



Organisational Management

C.13 Incident Management Policy

REVIEWED:29 November 2022

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This policy outlines Mercy Services' (Mercy) organisational approach to incident management across its services in aged care, disability support, community transport, and alcohol and other drug services. It documents the framework and procedures in place to identify, record and report incidents that occur within services.

POLICY PRINCIPLES

The following principles guide the expectations and practices of Mercy's Incident Management Policy:

- All clients, residents, staff and volunteers are afforded **procedural fairness** in dealing with an incident, including appropriate investigation free from conflict of interest;
- Clients or residents are supported in resolving incidents, with **transparency and engagement** over the process including feedback;
- Incidents are monitored and reviewed to identify areas for **continuous improvement** in practices;
- **Maintaining accurate records** of incidents to enable effective reporting to committees and the Board to provide oversight and identify trends.

Record of policy development

Version	Date approved	Policy Changes
1.0	15/11/2020	Policy created
2.0	02/03/2021	Updated policy approved by RCI Committee via poll
3.0	29/11/2022	Updated with SIRS inclusion into Home Services

Responsibilities and delegations

This policy applies to	Staff and Volunteers
Specific responsibilities	Governance Committees, Head of Risk & Compliance, Quality, Clinical & Safety Advisor
Policy approval	Risk & Continuous Improvement Committee

Policy context – this policy relates to:

Standards	NDIS Practice Standards Aged Care Quality & Safety Standards
Legislation	N/A
Contractual obligations	N/A
Organisation policies	Safeguarding, Risk Management, Complaints, Incidents, Health & Safety
Forms, record keeping, other documents	Quality reviews, Continuous Improvement Register

Scope and Responsibilities

All staff and volunteers have a responsibility to notify or report any incident(s) to their supervisor/manager that arises within the course of their work at Mercy. A reportable incident (as outlined in the next section) must be escalated immediately to a supervisor or manager.

Incidents and Reportable Incidents

What is an Incident

An incident includes:

- Any event that has or could have, caused harm to a client/resident receiving supports or services;
- Any event that has or could have, caused harm to Mercy staff or volunteers whilst performing their role; and
- Acts by a client/resident that occur in connection with the provision of supports or services and that have caused harm or a risk of harm to another person.

All incidents must be recorded and reported as per the process outlined in this policy.

What are Reportable Incidents

Reportable incidents are alleged, suspected or actual incidents which have occurred in connection with service delivery, where the person affected by the incident is a consumer, of severity that must be reported as specified to an appropriate authority or agency based on the service received. This includes but is not limited to meeting the reportable incident requirements of:

- Aged Care Quality & Safety Commission;
- Transport for NSW;
- NDIS Quality & Safeguards Commission and
- Local Health District or funding NGO.

Mercy has established processes for identifying and reporting such incidents via the relevant authority. An incident reporting framework for each of the services provided (as outlined in the appendix), specifies the flowchart for reporting an incident in each service, along with the internal governance processes in place to provide oversight of incidents.

Incident Management System (Process)

Mercy has developed an incident management system to help identify, manage and resolve incidents. A flowchart outlining the process for each service is available in the appendix. Incidents are identified through errors in staff practice, accidents, complaints or client/resident issues. Mercy Services collects and reviews data on incidents in order to inform continuous improvement activities.

An incident can be reported by either the person involved, a witness to the incident or if staff are advised of an incident occurring. Once an incident is identified, the reporting person should complete an incident form, as available on Mercy's [website](#) and discuss the situation with their supervisor/manager. The manager will then identify any potential corrective actions to address

the incident and report the matter via the incident mailbox (incidents@mercyservices.org.au). Clients or residents, and where appropriate their designated representative, are to be kept informed of how incidents they are involved in have been managed and resolved, where possible.

All incidents that are reported via the incidents mailbox and client management database systems are reviewed by the Risk and Compliance Team. They will review incidents to ensure appropriate corrective actions have been undertaken and report incidents to respective committees/councils. Management of incidents will vary, depending on the seriousness of the incident, however all incidents are assessed in relation to:

- Whether they could have been prevented;
- How successfully the incident was managed or resolved;
- If there is a scope or need for a formal investigation
- If any further remedial or continuous improvement action is required to prevent similar incidents or minimise their impact; and
- Whether statutory agencies or individuals are required to be notified.

All investigations will be undertaken and conducted in accordance with principles of natural justice and procedural fairness.

Incidents involving criminal allegations will be reported to law enforcement, who will receive full support of the organisation in their investigations.

Serious Incident Response Scheme

The management of serious or reportable incidents will be undertaken by the Risk and Compliance Team in conjunction with the Head of the service area. The service area supervisors are responsible for ensuring the Risk and Compliance Team and Head of service are notified as soon as possible of an alleged, suspected or actual reportable incident. As outlined in the Incident Management Flowcharts in the appendices, the Risk and Compliance Team will be in contact with the manager of the service area and ensure the incident is reported to the required authority within the directed timeframes.

A risk assessment will be conducted as part of reviewing serious incidents to immediately mitigate the potential for any ongoing or further harm. An internal investigation on the incident will be undertaken and depending on the seriousness of allegations this could involve engagement with an independent expert to investigate the incident and ensure impartiality.

If Mercy Services becomes aware of a Reportable Incident of a serious nature, it will be reported to police. This includes in cases:

- In which a Reportable Incident is only suspected or alleged to have occurred;
- Where there are reasonable grounds to notify police; or
- Where the Reportable Incident is criminal in nature.

Any serious incident requiring notification to the police will also be notified by the CEO to the Chair of the Board. The Board also receives a summary of any serious incidents at each Board meeting which require the CEO to outline corrective action or any investigation undertaken.

Supporting and Engaging Consumers in Resolving Incidents

Throughout the incident management process, from initial response through to review, consumers and others affected by an incident will be supported by the organisation through means of:

- Reassurance if the consumer reported the incident;
- Trauma and counselling services where required;
- Changes to regular care and services if necessary;
- Consistent engagement with consumers and others affected by an incident, in line with the principles of open disclosure and Mercy Services' Open Disclosure Policy; and
- Clear, ongoing communication regarding the progress and outcomes of the investigation.

Consumers and others affected by an incident will be involved in the management and resolution of the incident where appropriate. The process for investigating and supporting clients/residents and their families for issues of trauma and abuse is outlined in Mercy's Safeguarding Policy.

Clients/residents and their representative, will be offered access to relevant advocacy groups as outlined in the table below:

Service:	Organisation:	Contact No:
Aged Care	Older Persons Network – OPAN Senior Rights Service	1800 700 600 1800 424 079
NDIS	Family Advocacy Disability Advocacy NSW	1800 620 588 1300 365 085

Documenting and Reporting

Once an incident has been reported via incident@mercyservices.org.au or entered via a client management system (Telstra Health/Sandwai, etc), the matter will be reviewed by the Risk and Compliance Team. If further information or actions are required, they will be in contact with the reporting manager to clarify circumstances and corrective actions taken. All incidents are documented in a central incident register and reported monthly to the Risk and Continuous Improvement committee for review. This provides awareness of issues across services to identify if other services could be impacted by similar issues. Clinical incidents are also reported monthly to the Clinical Advisory Council and matters concerning work, health & safety incidents involving employees are reported to the Health and Safety Committee.

The Board and Service Delivery sub-committee receive a summary of incidents by service area each meeting, with commentary on any significant movements, trends or serious incidents reported, including actions taken for continuous improvement.

Continuous Improvement

As outlined above, incidents reported across Mercy Services are collated and reported to various committees for review, monitoring any trends for identifying opportunities for continuous improvement in practices or procedures. This provides management staff with the opportunity to track incidents and the implementation of corrective actions to minimise the occurrence of further incidents. If an incident highlights the need for improvement in practices, these would be logged on Mercy's Continuous Improvement Register.

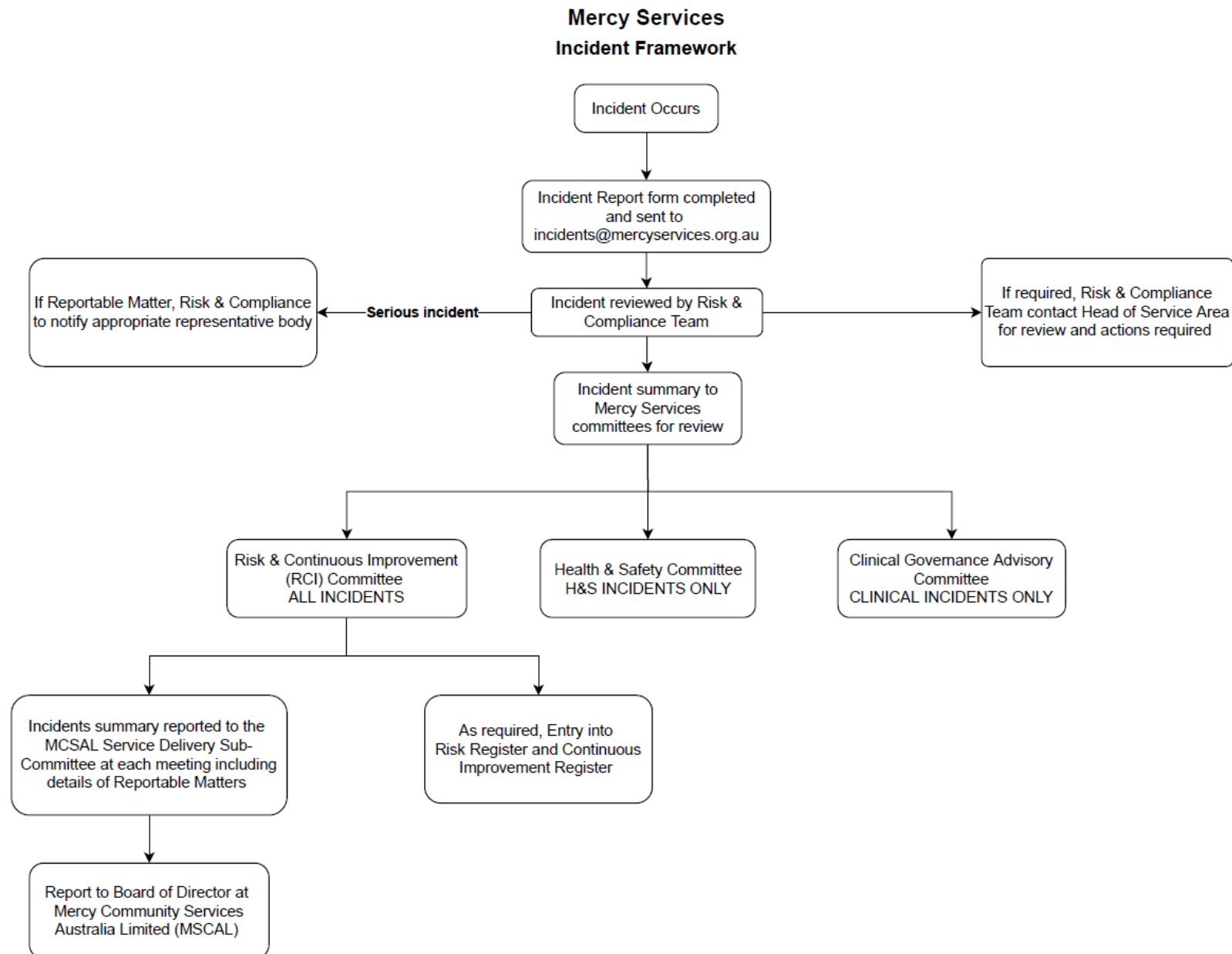
A review of the incident management system will also be undertaken periodically to ensure its effectiveness in capturing incidents and reporting them in a meaningful way to committees and the Board.

Publication and Policy Awareness

This policy will be made freely available to staff, volunteers, residents, clients and their representatives via [Mercy's public website](#). This policy will also be advised to new staff as part of the employee induction process.

Incident Management Framework

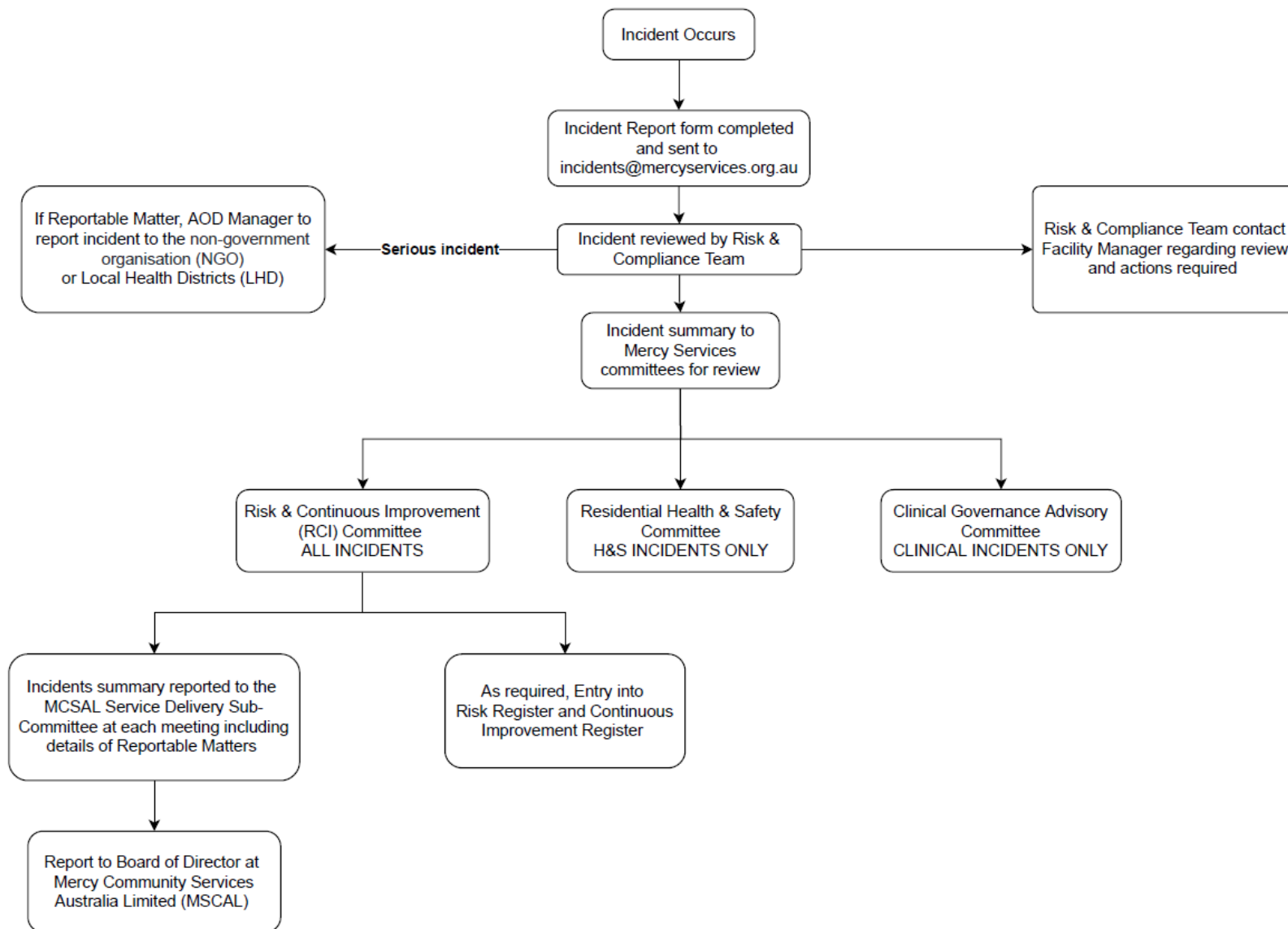
APPENDIX 1



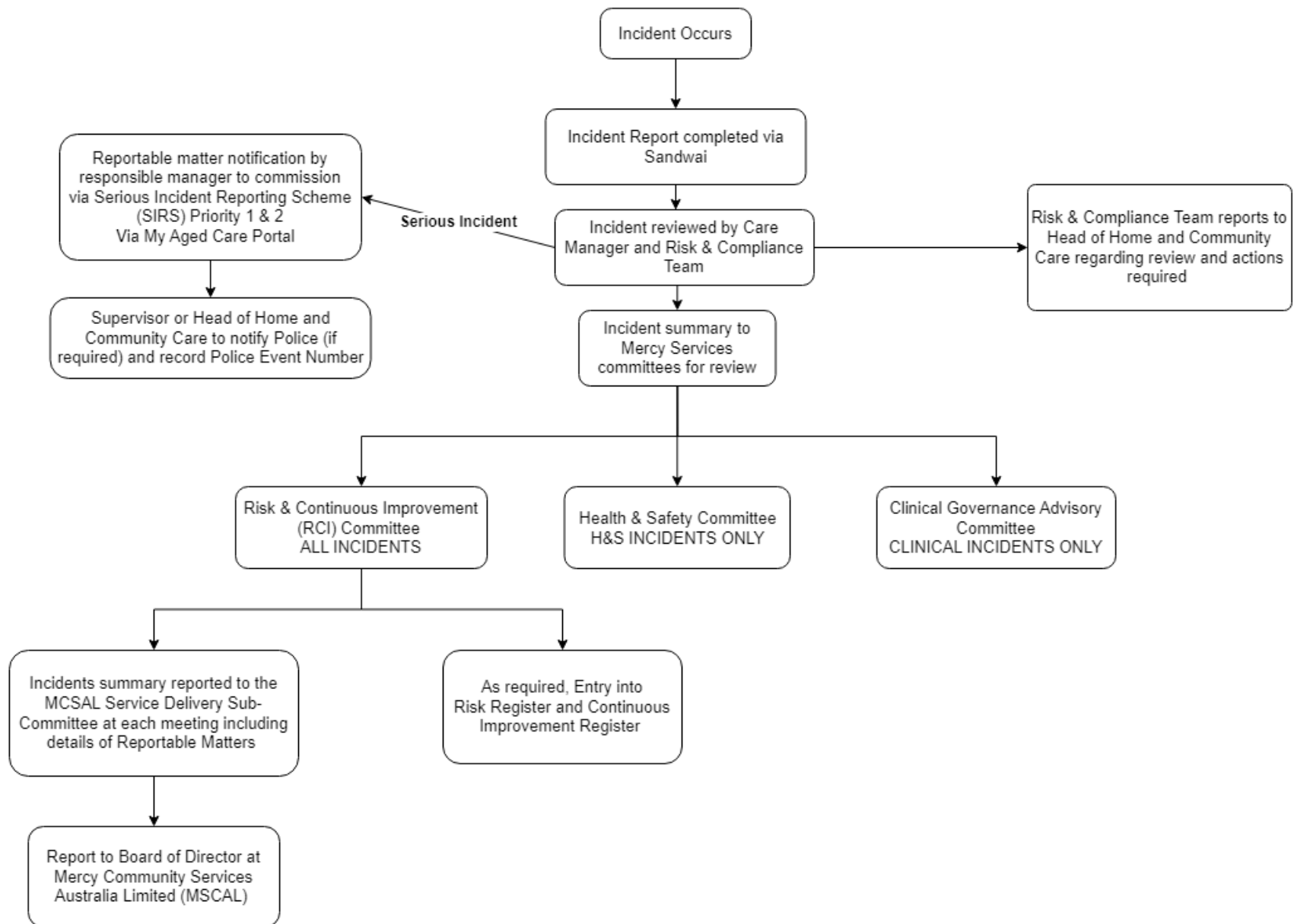
Incident Management Frameworks by Service

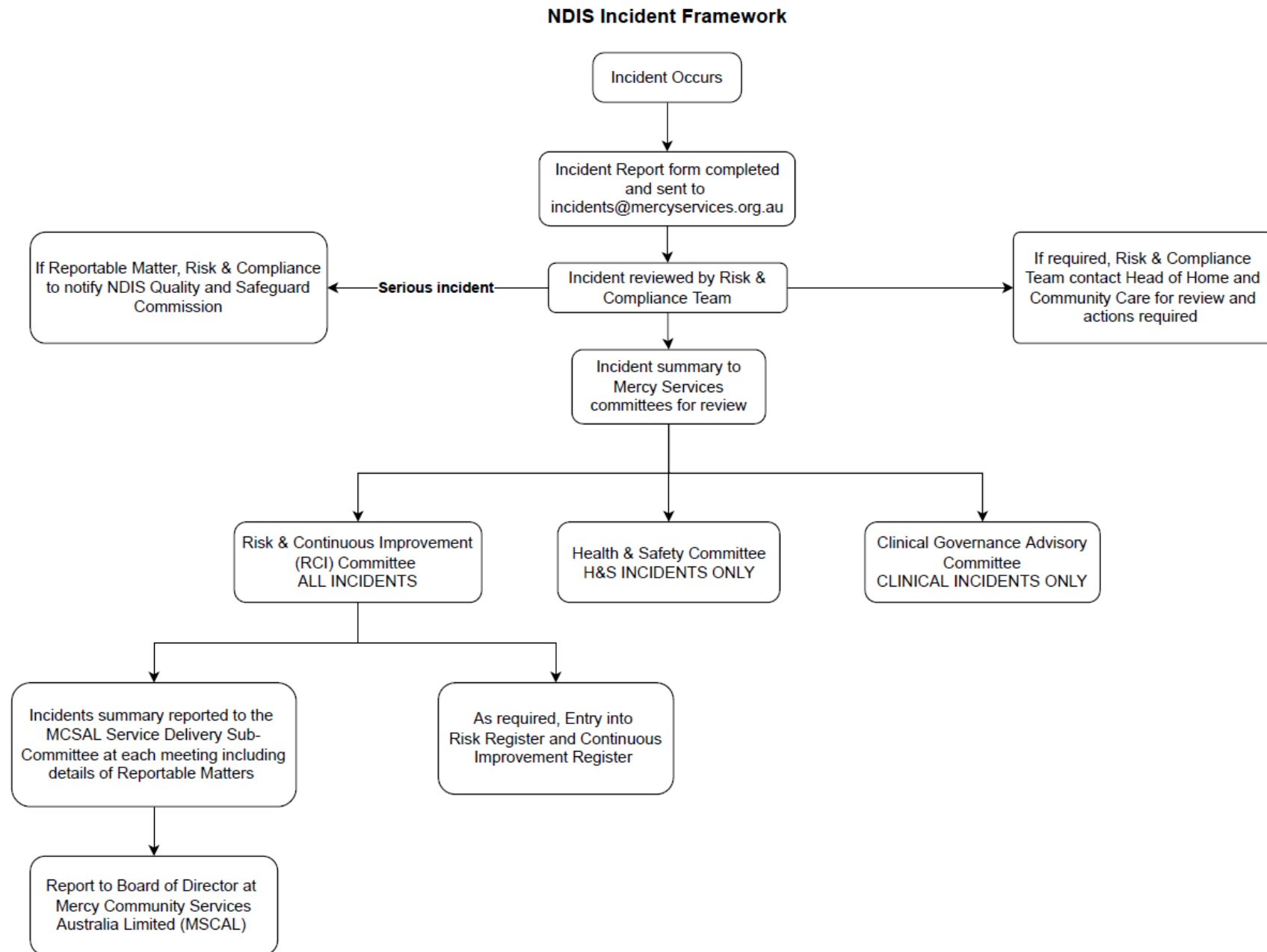
APPENDIX 2

Alcohol & Other Drug (AOD) Services Incident Framework

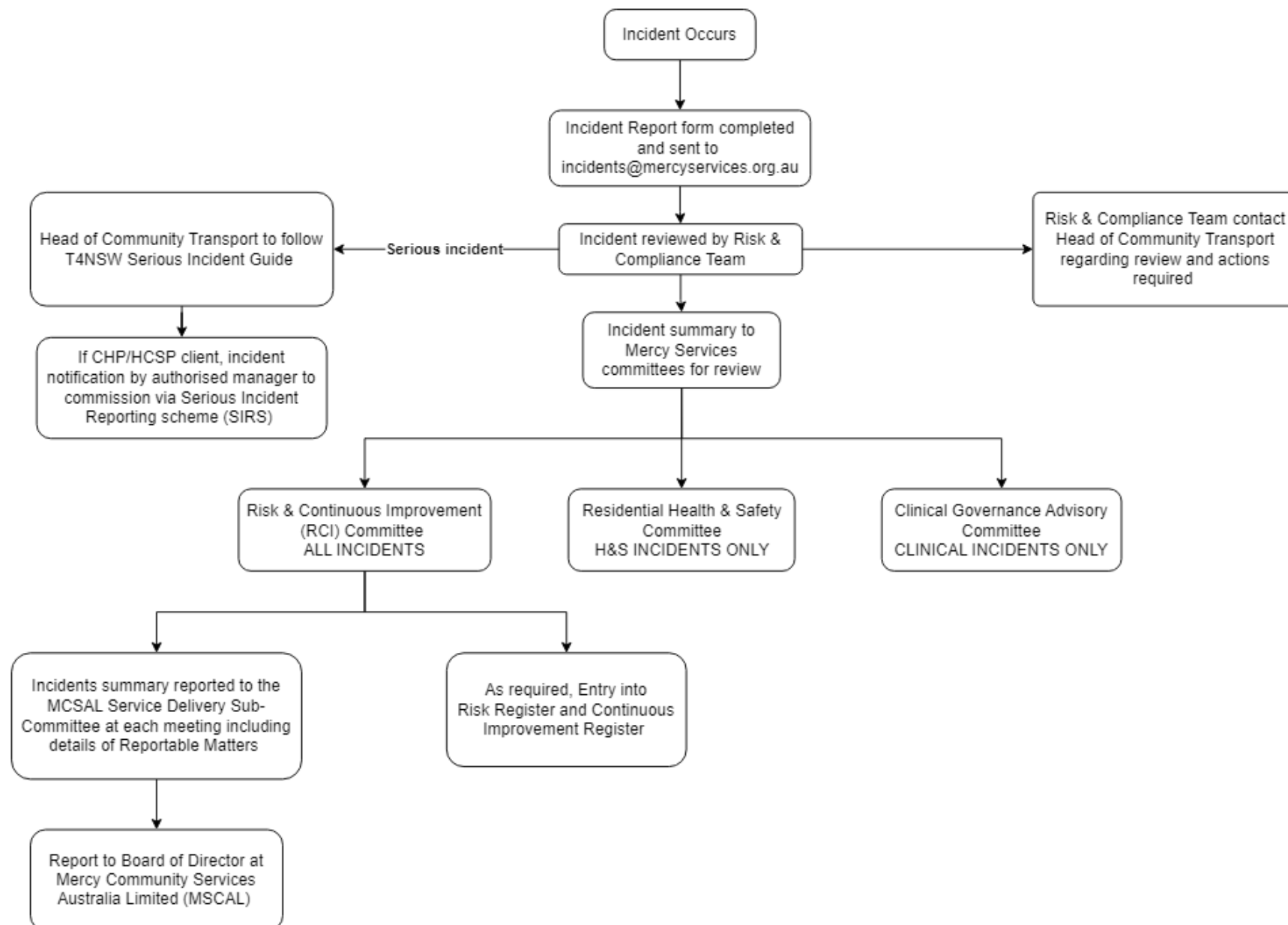


Home and Community Care Incident Framework





Community Transport Incident Framework



Residential Incident Framework

