

Incident Management



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System: Workplace Health and Safety

Responsible Person/s:

Directors

CEO

Team Leaders

All Footsteps Community Services (FCS) Employees, Contractors, and Volunteers

Purpose:

This policy seeks to define clear guidelines for managing incidents, including reporting, addressing, and implementing strategies to mitigate risks. Additionally, this policy aims to provide further details to ensure that critical incidents involving FCS's clients, employees, volunteers, and services are addressed appropriately in accordance with contractual and legal requirements. This policy should be understood within the broader context of FCS's risk management.

Scope:

This policy applies to all FCS employees, including subcontractors, consultants, volunteers, and clients.

Statement:

FCS is committed to ensuring that all employees, volunteers, clients, carers, and visitors are well-informed and sufficiently protected from the risks of illness, accidents, or injuries within the workplace by promoting sound occupational health and safety practices that adhere to legislative requirements.

FCS is also committed to ensuring the timely and comprehensive notification of incidents to the relevant agencies and departments it collaborates with. As a provider of services to people with disabilities, children, and older Australians, FCS is required to ensure that all incidents of a critical nature are reported to the relevant agencies in accordance with FCS's service agreements with the applicable funding bodies (*i.e. Department of Communities, Disability Services and Seniors, Department of Child Safety, Youth and Women (the Department) and the National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission (the Commission)*).

Definition

An incident is defined as an unplanned accident, event, or unusual occurrence that may affect the safety or health of a client, carer, volunteer, and/or employees of FCS while participating in a service, visiting FCS, or while at work. These incidents include, but are not limited to:

- Unnecessary harm to a person, or loss or damage to property, including the use of Restrictive Practices (RP).
- Identification and allegation of abuse and neglect cases.

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- A near miss that did not cause any harm but had the potential to do so.
- Medicinal error.
- Anything unlawful (e.g., assault, sexual misconduct, fraud).

Principles:

- The prompt and thorough notification of incidents leads to:
 - Immediate, appropriate advice and management of incidents, including the provision of support for employees and clients.
 - Effective delivery of incident information, data requests, and briefings.
 - Informed, accurate, and timely responses to external agencies, departments, and potential media enquiries.
- Proper documentation and reporting.

General

- FCS will ensure it has suitable systems in place to effectively manage incidents.
- FCS will maintain its Information Technology (IT) systems to ensure that incidents related to service delivery are managed seamlessly.

1. Identifying and reporting

It is mandatory for all individuals identifying an incident to first act upon it to ensure the safety of the workplace and its occupants. This can be achieved by directly addressing the cause when possible or by ensuring it has been reported to the appropriate person. At a minimum, the individual identifying the incident is responsible for ensuring the environment is safe for clients, employees, and potential visitors to the location. FCS may have specific reporting obligations stemming from the law or its registrations/funding received.

FCS maintains an Incident Register to ensure that incidents are logged, acted upon appropriately, and that potential improvements are captured in FCS's Continuous Improvement Plan (CIP) (see FCS' *Continuous Improvement and Service Quality Policy*).

2. Types of incidents

The organisation considers two types of incidents based on their seriousness and associated reporting, namely:

- A general or minor incident can be readily resolved or addressed.
- A major or critical incident, whether intentional or accidental, that is more serious and/or complex in nature.

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Please note that FCS employs a traffic light system to further categorise and address incidents, ensuring granularity in reporting as follows:

Categories	Description	Examples
	A minor incident where danger is very low	Abrasions, water spills, minor altercations
	A minor incident where risks are higher to individuals	Incident resulting in use of first aid, Use of registered RP, Medication errors, Complex behaviors, suicide ideations seizures.
	All Major incidents	See Major Incidents, harm to staff other than needing first aid.

Examples of “general or minor incidents” include, but are not limited to:

- Minor injuries that may result in short-term pain or discomfort, such as a scratch or bruise.
- Minor accidents such as slipping, tripping, or falling.
- The recurrence or worsening of any pre-existing injury or illness.
- Near misses or dangerous occurrences that could have, but did not, injure any person(s).
- Complex behaviours.
- Seizures.
- Use of Restrictive Practices (registered).
- Circumstances in which first aid and/or medical attention or advice is necessary.

Examples of critical incidents include, but are not limited to:

- Situations in which first aid is inadequate.
- Use of unregistered Restrictive Practice (RP).
- Any suggestion or claim of abuse, assault, or negligence.
- Any complaints or allegations made by clients themselves.
- Any signs of potential sexual interference.
- Any injury that is deemed suspicious.
- Any injury that could not have been self-inflicted, such as a hand imprint or rope mark.
- Any client injury that occurred simultaneously with a staff injury.
- Any injury suffered by a client while staff had to intervene to protect the client, themselves, or others.
- Suspected or confirmed abuse (this can encompass physical, sexual, psychological, emotional, financial, or legal abuse).

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- Sexual assault occurring both on and off the organisational premises.
- Allegations of assault against employees and clients.
- Major accidents.
- Death while in service.
- Serious self-harm issues.
- Abandonment or the risk of a client's abandonment.
- A missing client.
- Unexpected or abnormal seizure.
- Suicide /attempted suicide.
- Altercations involving weapons.
- Allegations of unlawful drug use or distribution within the service.
- Vandalism on premises or significant break-ins.
- Critical illness.
- Criminal conduct.
- Negative community and/or media attention regarding FCS.
- Significant threats to employees, volunteers, clients, and/or facilities.
- Fire or natural calamity.
- Overall, any matters that in the short or medium term are likely to create liabilities for the organisation.

Note that

- **Any incident that causes harm to employees will be regarded as major or critical.**
- **Suicidal ideations are treated as category orange and will be reclassified by the Team Leader depending on the clients' risk assessment.**

FCS has built below a non-exhaustive list of critical incidents and their reportable obligations as follow:

Immediate verbal notification to the Chief Executive Officer followed by an Incident Report submitted within four (4) business hours of the employee becoming aware of the incident. CEO to immediately notify the relevant agency or Department upon becoming aware of the incident as per FCS procedure	
Death of a person (Reportable police/coroner and to Department/NDIS Commission)	Who was a child or young person known to Child Safety in the previous 12 months; or With a disability which is defined as a 'death in care' under the <i>Coroners Act 2003</i> ; or Where another client, foster or kinship carer or employees member is allegedly involved in the death; or While attending or using a department provided or funded services, facilities or activities.
Life threatening injury to a person (Reportable to Department/ NDIS)	Where another client, foster or kinship carer or employees member is allegedly involved in the injury; or

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Commission)	While attending or using departmental provided or funded services, facilities or activities.
Serious injury to a child that results in hospitalisation (Reportable to Department/Child Safety/ NDIS Commission)	When a child or young person, currently known to Child Safety or known to Child Safety within the previous 12 months is believed to have an injury that meets the definition of a serious physical injury under the <i>Child Protection Act 1999</i> .
Abduction (reportable to Department/Child Safety)	Abduction of a child or young person subject to departmental intervention from their carer/service provider.
Major security incident (Reportable to police, work cover as applicable)	A major security incident involving an emergency response to a hostage situation, fire, power failure, bomb threat or discovery of a bomb.
Alleged rape, sexual assault, or serious assault of a child under 14 years of age (Reportable to Department/ NDIS Commission /Child Safety)	With a disability while attending or using departmentally provided or funded services, facilities or activities; or Of or by a child or young person subject to departmental intervention; or While attending or using department provided or funded services, facilities or activities.
Serious injury to a person that results in hospitalisation (Reportable to Department/NDIS Commission/Child Safety)	Where another client, foster or kinship carer or employees is allegedly involved in the injury; or While attending or using department provided or funded services, facilities or activities.
Alleged rape, sexual assault or serious assault reportable to Department/NDIS Commission/Child Safety/Work cover)	Of a person with a disability while attending or using department provided or funded services, facilities or activities; or Of or by a child or young person subject to departmental intervention; or Of or by a person while attending or using department provided or funded services, facilities or activities; or Of an employee whilst performing their duties.
Attempted Suicide (reportable to Department/NDIA/Child Safety)	Of a person in a departmental facility; or Of a person who is a client of accommodation support provided or funded by the department; or Of a child or young person in care.
Missing Child (reportable to Police/Department/ Child Safety)	Any child whose location is unknown and there are fears for the safety or concern for the welfare of that child.
Missing person (reportable to police/Department/Child safety)	Clients are missing from their place of residence where there are serious concerns for their safety or wellbeing due to their vulnerability
Alleged abuse, neglect or exploitation of a person with a disability (reportable to the Department/NDIS Commission)	At all time Where another client, employees or direct carer is allegedly involved; or Who is a client of accommodation support provided by the department.
Major Data/IT/privacy breach (reportable to OAIC)	When those happen and have strong impact on individual privacy and when the type of data exposed might pose a risk to individuals.
Involvement of an employee in a critical incident involving a child (reportable to Child Safety, NDIS and QFCS)	When the incident relates to an allegation of abuse

Roles and Responsibilities

1. The role of the Directors is to:

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- Overview incidents within the organisation by monitoring the incident register. This occurs through the CEO reporting all incidents in a de-identified manner. It is crucial that critical incidents are fully reported in a de-identified fashion, while minor incidents are documented in a quantitative format.
- Staying mindful of legal reporting obligations and, when applicable, understanding how to report critical incidents.
- Assume ultimate responsibility for FCS to fulfil its legal requirements.

2. All employees must:

- Ensure a consistently safe working environment.
- Always adhere to FCS policies and procedures.
- Always strive to avert incidents:
 - Report all incidents to the Line Manager (i.e. Team Leader/Chief Executive Officer) as soon as practicable following an incident.
 - Seek guidance on how to respond to the incidents and adhere to the given instructions.
- Only offer assistance that they are qualified to give following an incident.
- Engage in incident investigations.
- Seek and/or engage in debriefings following an incident.
- Ensure they have read and understood a client's Support Plan and implement it fully.
- Ensure they communicate with the Team Leader(s) and/or officers any suggestions for changes or adaptations to the Client's Support Plan.
- Ensure they do not make any comments to the media and direct any enquiries to the Chief Executive Officer.

3. Team Leaders and delegates

Alongside employees' requirements, Team Leaders and delegates are to:

- Ensure they respond swiftly to incidents and requests for advice, support, and training.
- Notify the Chief Executive Officer or delegate at the earliest opportunity when a critical incident occurs.
- Inform the FCS delegate of the incident report for entry in the incident register.
- Carry out all necessary work and close the incident as appropriate.
- Formulate comprehensive plans with clients, carers, and employees.
- Make sure employees are informed of any plans created for the clients and put these into action.
- Notify the Chief Executive Officer or delegate of any training needs or areas that require enhancement to prevent incidents and manage risk.

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- Ensure that information is shared with all relevant employees when amendments to the Incident Management Policy and/or reporting systems and processes are issued.

4. Chief Executive Officer (CEO) and/or delegate

Furthermore, the CEO and their delegates are to:

- Ensure that relevant policies and procedures are established.
- Ensure that employees are aware of and properly follow procedures.
- Ensure that preventative strategies are identified and implemented. These strategies aim to minimise the occurrence of incidents while respecting individuals' rights to take risks and make informed decisions.
- Ensure employees receive adequate training and support to maintain their health and safety and respond to incidents. Training should be provided during the employees' orientation and at regular intervals thereafter.
- Ensure that the Incident Register is kept up to date.
- Address significant incidents as necessary.
- Report major incidents to the Board by notifying the Chair of critical incidents as soon as practicable and providing a comprehensive account of these incidents at the next Board Meeting, including informing Management.
- Ensure that all critical incidents, as defined in this document, are reported to the relevant external agencies and departments within the timeframes indicated in this policy (for example, the relevant departments, Work Cover, etc.).
- Ensure that incidents are responded to promptly.

In accordance with FCS's Organisational Authority and Delegation Policy, when the CEO is not in a position to address the incident, the General Manager or identified individuals will act as the delegate.

5. Clients, Carers and Visitors

Are asked to:

- Inform FCS of any needs that may impact the individualised services that FCS provides.
- Allow FCS to conduct necessary assessments (e.g. in-home risk assessments).
- Adhere to employees' instructions and FCS procedures to ensure their health and safety.
- Ensure that employees are aware of their arrival and departure from the office or activity.
- Avoid attending a service if you are unwell or have an infectious illness.
- Not to put themselves or others at risk; and

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- Ensure that incident investigations are a collaborative process and that post-incident strategies are implemented.

Reporting an incident

Overall, incidents need to be reported to the appropriate Team Leaders or Manager on the same day they occur, and incident reports must be formally submitted within 24 hours. Incidents should be submitted electronically when feasible (see Incident Management procedures).

1. Reporting to external agencies, including the NDIS Commission.

FCS has a wide array of agencies to which it needs to report. These are detailed in the associated procedure.

Under the NDIS Act, the following incidents must be reported directly to the commission within 24 hours:

- The death of a disabled person.
- A serious injury to a person with a disability that results in hospitalisation.
- Abuse or neglect of a person with a disability, or allegations of the same.
- Unlawful sexual or physical contact with, or assault of, a person with a disability.
- Sexual misconduct perpetrated against, or in the presence of, a person with a disability, including grooming that person for sexual activity.
- The use of a restrictive practice concerning a person with a disability that is either an unauthorised use or not in line with a behaviour support plan.

All incidents mentioned above should be reported within 24 hours of becoming aware of their occurrence. This task is carried out by the FCS delegate(s).

Reporting is carried out via the Commission Portal by FCS delegates or by emailing reportableincidents@ndiscommission.gov.au using form 661 <https://www.ndiscommission.gov.au/document/661>

All other information linked to the reported matter must be submitted within 5 days from the organisation becoming aware of the incident.

Note: Please refer to the “STA, RP and Positive Behavior procedures” for specific guidelines regarding those incidents.

2. Reporting to other stakeholders

FCS will strive to contact relevant stakeholders promptly (e.g.: next of kin, family, guardian) when deemed appropriate.

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Prevention and Continuous Improvement

FCS will ensure it has a clear process to prevent incidents, mitigate risks, and raise awareness.

This will be accomplished through the rigorous training of employees and the integration of lessons learnt from incident reports into the FCS *Continuous Improvement Plan*.

Alternatively, FCS will review its incident register at least annually to identify trends and areas for improvement.

Related Documents:

Incident Management Procedure.

Organisational Authority and Delegation Policy

[NDIS \(Incident Management and Reportable Incidents\) Rules 2018 \(Cth\)](#)

Incident Register

Risk Register

Continuous Improvement Plan

Continuous Improvement and Service Quality Policy

Child Safe Organisations Act 2024

Scheduled Review Date:

This policy will be reviewed as necessary, or no later than five (5) years from the date of authorisation.

Authorisation:

Initially approved by directors on 4 May 2023

[Reviewed and approved by Directors as per schedule below]

Changes History

Date	Summary of changes	Responsible individual
13/01/2023	Draft	Mickael Blanc (GM)
04/05/2023	Reviewed and approved	Jay Harrison (CEO)
16/05/2023	Review by GM to clarify suicidal ideations categorization	Mickael Blanc (GM)
28/05/2025	Review and addition considering the Child Safe Organisations Act 2024 QLD	Mickael Blanc (GM)
30/05/2025	Reviewed and approved	Jay Harrison (CEO)

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