

Good Housing Policy & Procedure Document

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1. Organisational Statement and Purpose

1.1 Organisational Statement

At Good Housing, we are committed to fostering a culture of transparency, accountability, and continuous improvement. We recognise that feedback, including complaints, is a valuable opportunity to listen, learn, and strengthen the services we provide. Our tenant-first approach ensures that every concern is treated with respect, fairness, and urgency, while upholding the rights and dignity of all individuals involved.

1.2 Purpose

The purpose of this document is to establish a consistent and structured framework for the management, reporting, and resolution of incidents at Good Housing. It ensures that:

- All incidents, including near misses, are reported, recorded, investigated, and resolved in a timely and transparent manner.
- The rights, safety, and wellbeing of tenants, staff, and stakeholders are protected and upheld.
- Good Housing complies with the NDIS Incident Management and Reportable Incidents Rules, the NDIS Practice Standards, and all relevant legislative and regulatory requirements.
- Staff are supported with clear guidance on incident response, escalation, documentation, and accountability.
- Incidents are systematically analysed within the incident management framework to identify risks, patterns, and emerging trends, ensuring that lessons are embedded into practice.
- Findings are used to drive continuous improvement, strengthen governance, and enhance the quality and safety of services provided to participants.

2. Scope

Both the Policy and Procedure components of this document apply to all Good Housing employees, contractors, volunteers, students, and host families who become aware of, or are involved in, an incident affecting tenants.

1.1.1 Scope of Awareness

This document applies to:

- All Good Housing staff (including management and board members).
- All Good Housing tenants and their families/guardians.
- Supported Independent Living (SIL) partners and support workers operating within Good Housing properties.
- Contractors, volunteers, and service providers engaged by Good Housing.
- External stakeholders where required by legislation, regulation, or contractual agreement (e.g. NDIS Quality and Safeguards Commission, auditors).



3. Responsibilities

- **Directors:** Final review and approval of this procedure.
- Managers/Supervisors: Maintain and implement the procedure, provide training, and oversee compliance.
- **Employees/Contractors:** Follow procedure requirements, respond to incidents, and complete mandatory training.

4. Definitions

Employee: For the purpose of this Policy, employee refers to paid employees, volunteers, contractors, students, and host families.

Incident: An event that has the potential to, or actually causes injury, harm or other adverse impacts to tenants and/or an event where a tenant contributes to the potential or actual injury, harm, or other adverse impacts to others.

Serious incident: Any incident that has the potential to, or results in, a serious outcome for tenants or where a tenant contributes to potential or actual serious outcomes to others. These include but are not limited to:

- Death
- Abuse and/or neglect including concern for a person's welfare and suspected abuse
- Serious physical injury
- Serious illness
- Attempted suicide of a tenant
- Near miss incident that could have resulted in a serious outcome
- Any incidents where emergency services are called
- Tenants' behaviours of concern that had the potential to, or resulted in, a serious outcome for another person or property damage.

Minor Incident: Any incident that threatens the health, safety and/or wellbeing of tenants or where a tenant contributes to a situation that threatens the health, safety and/or wellbeing of others. These include but are not limited to:

- Tenant behaviours of conference resulting in minimal impact on themselves or others
- Minor injury.

Reportable Incident: A reportable incident is an act or event that has occurred, or is alleged to have occurred, in connection with the delivery of NDIS supports or services.



5. Incident Response & Reporting

When an employee becomes aware of a tenant incident—whether at the time it occurs or after the event—they must immediately:

- **Protect the tenant from further harm:** Employees who fail to respond immediately and protect the tenant from further harm following an incident are in breach of duty of care and this procedure and may be subject to disciplinary action.
- Apply and seek first aid and contact emergency services: Apply and seek first aid if required and contact the Ambulance service on 000 in the event that a tenant sustains a serious injury requiring medical treatment or is in urgent need of medical help.
- The Police Service may be called immediately on 000 in any situation where life or serious injury is threatened; or where there is a threat of danger to people or property; when a serious crime is in progress, being witnessed or just committed (for example physical or sexual assault); or any other situation where urgent Police Service Assistance is needed.
- Work with the relevant SIL/Support provider to gather additional information about incidents that occur as there may be dual reporting requirements by the NDIS Quality & Safeguards Commission.
 This collaboration is aimed at safety of participants and staff involved.

In all other cases, the services supervisor must be contacted to authorise any contact with the Police Service.

- Implement immediate response requirements for suspected, observed or alleged abuse and neglect of tenants' incidents. Follow the additional steps required for the immediate response to suspected, observed, or alleged abuse and neglect of tenants as contained in the Responding to Abuse and Neglect Procedure.
- **Protect evidence**. Secure the scene of the incident if appropriate, for investigation purposes.
- Contact the service SIL/Care provider. Contact the service supervisor within 30 minutes if the incident is serious. See "Additional steps for serious incidents" below.
- Complete a Tenant Incident Report Form. The employee who identified the incident must, within two
 hours of the incident taking place or being identified, either complete the Tenant Incident Report
 Form and scan and email it to the nominated contact.

The following additional steps for serious incidents must be followed:

The employee who identified the incident must:

- Contact the service manager: After protecting the tenant from further harm, attending to the tenant's medical needs, and contacting the emergency services (if required), the employee who became aware of the serious incident must immediately make a verbal report to the service supervisor either in person or by telephone (or by telephone to the out of hours supervisor) within 30 minutes of becoming aware of the incident.
- Written or verbal messages for the care provider or service manager must not be left. Only employees
 who are not deaf or have a hearing impairment, which means that they do not communicate verbally
 may send a text message. Deaf or hearing-impaired employees must provide sufficient information
 in their message so that the nature of the incident can be understood. The service supervisor must



- arrange face-to-face meetings as soon as practicable with the employee to implement the requirements of this procedure.
- In the event that the employee who identified the incident cannot contact and speak with the service supervisor, they must telephone the service manager. Should the employee who identified the incident be unable to speak directly with the service manager, they must contact the tenant Services General Manager.
- **Implement any follow-up actions as directed by the service supervisor**: Implement any actions as directed by the service supervisor including communicating the tenant's emergency contact regarding the incident.

The service supervisor/out of hours supervisors must:

- Confirm with the employee reporting the incident that the incident is a "serious incident" in accordance with the definition contained in this procedure.
- Authorise any further contact with the Police Service on 000 if an emergency situation still exists and where the Police Service have not already been called or contact the Police Service for attendance in non-emergency situations where it is believed that a crime may have been committed.
- Agree further immediate action to be taken by the employee reporting the incident.
- Immediately following the conversation with the employee reporting the incident, telephone the service manager to advise them of the incident, the actions taken to date and the planned immediate actions to be taken, by when and by whom.

Provision of Support to Tenants

Depending on the nature of the incident, tenants, their families, their friends, or carers must be
provided with support where appropriate including referral to specialist organisations, counselling
services, or by providing information on advocacy services during the course of an investigation. A
Good Housing support person may be allocated to the tenant, their families, their friends, or carers
depending on the severity of the incident.

6. Incident Investigation

For Serious Incidents:

- Ensure that no internal investigations be conducted which may compromise or prejudice any Police Services or external agency involvement or investigations in progress
- Liaise with the Police Service if required to assist them in their investigations.
- If no conflict with external investigations exists (e.g., following the conclusion of an investigation conducted by the Police Service) work with the service supervisor and any relevant employees involved in the incident to complete the investigation and provide a written report on the outcome of the investigation to the tenant Services General Manager for their approval within five working days of the initial notification being made. The report must include the details of the initial incident report, what immediate response took place, the actions taken to date, the outcome of the investigation, and recommended actions required to resolve the incident. The report must also include an action



plan to support tenants and their families if appropriate. Internal investigations must result in recommendations to prevent the likelihood of the incident occurring in the future and to improve the response and management of incidents in the event that they reoccur.

- Provide a copy of the investigation report to the CEO for the purpose of reporting all serious tenant incidents to the Board
- Work with the service supervisor to implement any agreed follow up actions as approved.
- In the event that, as a result of the internal investigation an employee was found to have breached relevant Good Housing's policies and procedures or was found to be criminally responsible, liaise with the relevant executive to take any necessary HR processes as per the recommendations contained in the investigation report.

For Minor Incidents:

- The manager must review all minor incidents, identify any actions required to finalise the incident, and to minimise the chance of incidents reoccurring, within seven days of the incident being reported. Full records of incidents reoccurring, within seven days of the incident being reported. Full records of incidents, including details of reviews, actions, and outcomes must be recorded.
- The manager must provide a brief written report to the service manager that includes information on the nature of the incident, results of any investigations, action taken to finalise the incident, and actions implemented to reduce the risk of the incident reoccurring.

Whole of Service Review of Incidents:

- In addition to implementing strategies to prevent tenant incidents from reoccurring at the individual tenant level, managers must collectively conduct a review of all reported tenant incidents in their division every quarter to identify themes, trends, and factors contributing to tenant incidents. Following these reviews, appropriate improvements aiming to prevent tenant incidents, reduce their impact and improve service must be implemented. This may involve liaising with other Good Housing divisions.
- Managers must prepare a report that outlines the details and outcomes of the quarterly reviews and provide this report to the relevant executive monthly.



7. Reportable Incidents

This process outlines the steps Good Housing staff must follow when responding to and reporting incidents that meet the definition of a Reportable Incident under the NDIS Commission's requirements.

Step	What Happens	Who Is Responsible	Timing
1. Incident Awareness	An employee becomes aware of an incident or allegation connected with the delivery of NDIS supports or services.	Any staff who observe or receive information about the incident	Immediate
2. Immediate Response & Safety	Ensure the safety and wellbeing of the person(s) involved. Provide first aid or urgent care if needed, remove or reduce harm if possible.	Staff on the scene / Manager	Immediate
3. Internal Reporting	Report internally: record the incident in Good Housing's Incident Management Register, including what happened, who was involved, where, when, and any immediate actions taken.	The employee who became aware / their supervisor	Within a few hours of awareness
4. Determine if Incident is Reportable	Assess whether the incident meets the criteria for a Reportable Incident (e.g., death; serious injury; abuse or neglect; unlawful sexual or physical contact).	COO or Relevant Executive	As soon as possible after internal report
5. Notify the NDIS Commission	If reportable: submit an Immediate Notification Form via the NDIS Commission Portal. For unauthorised restrictive practices without harm, submit within 5 business days using the 5-Day Form.	COO or Relevant Executive	 Death, serious injury, abuse/neglect, unlawful contact: within 24 hours Unauthorised restrictive practices without harm: within 5 business days
6. Internal Investigation & Response	Carry out investigation: gather evidence, interview individuals, analyse root causes, take corrective actions.	COO or Relevant Executive	Begin immediately; aim to complete within 5-10 business days
7. Additional Reporting	Provide follow-up reports to NDIS Commission as required: actions taken, outcomes, any changes to systems or practices.	COO or Relevant Executive	As required (e.g., 5-Day Form)



8. Incident Reporting to the Good Housing Board

All serious incidents must be reported to the Good Housing Board including de-identified details of the tenant (initials only), the nature of the incident, de-identified details of employees involved (initials only), the date, time, and location of the incident, any action taken or planned, any outcomes and a plan to prevent the incident reoccurring either at an individual tenant level or for the whole of service.

9. Monitoring & Continuous Improvement

Good Housing is committed to continuous improvement in incident management. To ensure compliance and enhance service quality:

- **Quarterly Reviews**: All incidents are reviewed by management teams each quarter to identify themes, patterns, and systemic risks.
- **Board Oversight**: De-identified summaries of serious incidents are reported to the Board for governance oversight and strategic response.
- Audit & Compliance Checks: Incident records are regularly audited for accuracy, timeliness, and compliance with NDIS Commission requirements.
- **Feedback Loops**: Findings from investigations and reviews are fed back into staff training, policy updates, and risk management planning.
- Quality Improvement Actions: Lessons learned from incidents inform updates to procedures, tenant support strategies, and organisational practices.

10. Training & Awareness

All staff will receive regular training on incident reporting requirements, including recognising reportable incidents and using the Incident Management Register.

11. Legislation & Standards Compliance

- NDIS Quality & Safeguards 2018
- NSW Disability Inclusion Act 2014
- National Standards for Disability Services 2013
- ACT Disability Services Act (1991)
- NDIS Commission Reportable Incidents (Rules and Standards)