

Incident and Reporting Management Policy

CPSN is dedicated to fostering a safe and secure environment by ensuring incidents are promptly reported and addressed with the utmost care and responsibility.

We recognise the importance of a transparent and supportive reporting framework, ensuring all individuals, particularly those in vulnerable situations, feel empowered to report incidents without fear of reprisal.

This policy promotes a holistic approach to safety, prioritising physical, emotional, and cultural wellbeing while fostering accountability and continuous improvement.

This policy and its associated procedure includes information about CPSN manages notifiable and/or reportable incidents, including client deaths.

Record of policy development

Version	Date approved	Date for review
4	February 2026	February 2028

Responsibilities and delegations

This policy applies to:	Board, members, clients, management, staff, volunteers, contractors
Policy approval:	CEO
Review of Policy Compliance	General Manager, Service Delivery
Specific responsibilities:	Board CEO General Manager, Service Delivery Human Resources Manager Employees with supervisory responsibilities CPSN Workers CPSN members, clients & stakeholders

Policy context

Service Standards	NDIS Practice Standards and Quality Indicators, November 2021 Version 4
Legislation	National Disability Insurance Scheme Act 2013 National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018 Occupational Health and Safety Act 2004 (Vic) Charter of Human Rights and Responsibilities Act 2006, Victoria Child Wellbeing and Safety Act 2005 (Vic) Disability Service Safeguards Act 2018 (Vic)
Contractual obligations	NDIS Practice Standards and Quality Indicators, November 2021, Version 4
Organisation policies	Human Rights Policy and Framework Practice and Governance Policy and Framework Quality Assurance Policy Workforce Policy Risk Management Policy and Framework

	Child Safe Policy NDIS Code of Conduct Complaints Management Policy Conflict of Interest Policy Emergency and Disaster Management Policy Financial and Fraud Risk Policy Privacy and Confidentiality Policy Work Health and Safety Policy Safeguarding Vulnerable Persons Policy Worker Screening Policy Bullying and Harassment Policy Handling Participants' Money Policy Drug and Alcohol Misuse Policy Underperformance and Misconduct Policy
Other Conventions	United Nations Convention on the Rights of People with Disabilities (CRPD), 2006

Definitions

Incidents: are acts, omissions, events or circumstances that occur or could occur during or in relation to the provision of supports, or the alteration or withdrawal of supports, that cause harm, either physically or emotionally, to a worker, client, or other stakeholder. Incidents also include acts, omissions, events or circumstances that have caused or could cause damage to property, the environment, material or cause public alarm.

Notifiable Conduct in relation to a Victorian Disability Worker must be reported to the Victorian Disability Worker Commission and means the disability worker:

- practiced as a disability worker while intoxicated by alcohol or drugs
- engaged in sexual misconduct while practising as a disability worker
- placed, or may place, the public at risk of harm because the disability worker has an impairment that detrimentally affects, or is likely to detrimentally affect, the disability worker's capacity to practice as a disability worker, or
- placed, or is placing, the public at risk of harm because the disability worker practiced, or is practicing, as a disability worker in a manner that constitutes a significant departure from accepted professional standards.

Reportable Incidents: refer to incidents, or alleged incidents, of severity that must be reported to NDIS Quality and Safeguards Commission. This includes but is not limited to:

- the death of a client
- serious injury
- abuse or neglect
- sexual misconduct
- unauthorised restrictive practices.

Reportable Conduct refers to conduct that must be reported by the CEO to the Victorian Commissioner for Children and Young People. There are five types of 'reportable conduct':

- sexual offences committed against, with or in the presence of a child
- sexual misconduct committed against, with or in the presence of a child
- physical violence against, with or in the presence of a child

- any behaviour that causes significant emotional or psychological harm to a child
- significant neglect of a child.

Employee means a person who is employed by CPSN with wages or salary.

Staff means all the people employed by CPSN or within a specific work area.

Worker means any person engaged by CPSN to perform a service, paid or unpaid, and may include but is not limited to employees, consultants, contractors, employees of a labour hire company, apprentices, trainees, students or volunteers.

Please note that CPSN also has responsibility to report “**Notifiable Incidents**” to WorkSafe Victoria or the applicable State/Territory regulator. This term is defined in the Work, Health and Safety Policy.

Policy statement

CPSN is committed to safeguarding its clients, members and stakeholders’ human rights.

CPSN promotes a culture of open reporting and ensures that all workers understand that they are supported to report any incident or alleged incident, and that CPSN views incident reporting as positive with a focus on learning and development, rather than punitive measures. It will handle all matters as discreetly and confidentially as is reasonably practicable in line with the CPSN Privacy and Confidentiality Policy, Complaints Management Policy, Diversity and Inclusion Policy, Safeguarding Vulnerable Persons Policy, Child Safe Policy and Work, Health and Safety Policy and reporting obligations.

CPSN collects and reviews data on incidents in order to inform improvement activities.

CPSN regularly reviews its incident management system and processes to ensure that they are:

- appropriate to the size of the organisation and the classes of supports it provides
- well documented
- readily accessible to all applicable workers employed or engaged by the organisation
- reflective and adaptive, with an intent to prevent incidents
- compliant with legislative requirements and meet CPSN’s external reporting obligations
- contributing to a culture of continuous improvement
- enabling CPSN to learn from incidents to improve practice and service delivery, and to inform planning, allocation of resources and policy review.

Principles

CPSN is committed to safety, honesty, integrity, accountability and best practice in all aspects of its operations. The following principles underpin these processes:

- ensuring clients are provided access to this policy upon commencement, if not prior to commencement
- ensuring employees understand their obligations in relation to incident reporting
- maintaining a pro-active and positive reporting culture, where employees are encouraged to report incidents without fear of retribution or negative impact
- responding to identified risks or hazards in a timely manner and in accordance with the Risk Management Policy and other applicable quality assurance processes.

Implementing this policy

Within CPSN the following roles communicate and operationalise this policy:

Roles and Responsibilities

The Board

The Board is responsible for delegating operational requirements and decisions to the CEO. The Board will be advised of reportable/notifiable incidents, including the death of any client supported by CPSN, and any subsequent risks identified as reportable to the Board by the CEO.

The CEO

The CEO is responsible for:

- creating and maintaining a culture of client, member, and stakeholder safeguarding and open reporting
- ensuring that incident reporting and risk management policies and associated procedures are effectively implemented
- ensuring that all workers understand that they are supported to report any incident or alleged incident, and that CPSN views incident reporting as positive with a focus on learning and development, rather than punitive measures
- ensuring CPSN has, and implements, processes for complying with CPSN's duties in relation to reporting of incidents to the NDIS Quality and Safeguards Commission, Victorian Disability Worker Commission, the Commission for Children and Young People, and other applicable State/Territory regulators where the service is being delivered
- creating and maintaining a culture of person-centred response to complaints management
- reporting high-level reportable incidents, including the death of any client receiving direct CPSN services, to the Board and;
- in consultation with the Chair, managing any responses to the media.

The CEO is responsible for delegating responsibility for financial, human resources, operations, record keeping, policy development and accountability to the CPSN Executive and Leadership Team members.

General Manager, Service Delivery

The General Manager, Service Delivery is responsible for:

- leading and prioritising safeguarding across the organisation
- ensuring employees understand their obligations in relation to incident reporting
- maintaining a pro-active and positive reporting culture, where employees are encouraged to report incidents without fear of retribution or negative impact
- responding to identified risks or hazards in a timely manner and in accordance with this policy and the Risk Management Policy
- working with the CEO, notifying the NDIS Quality and Safeguards Commission of reportable incidents within the requisite timeframes
- notifying the CEO of any reportable incident as soon as practicable after the incident
- supporting staff and liaising with external providers where the death of a client occurs, including ensuring access to Employee Assistance Programs is provided.

Human Resources Manager

The Human Resources Manager is responsible for:

- ensuring incidents pertaining to work health and safety are managed appropriately and in accordance with organisation policy and State/Territory legislation
- ensuring the effective provision of training related to incident reporting and management
- supporting employees through incident reporting and investigation processes, including by upholding policy and practice standards and ensuring access to the Employee Assistance Program
- working collaboratively with Service Delivery to re-deploy workers impacted by serious incidents
- leading any processes pertaining to employee wellbeing and counselling as a result of incidents.

CPSN Employees with supervisory responsibility

Supervising employees are responsible for the following:

- communicating and supporting staff in understanding their responsibilities under this policy

- ensuring procedures and work instructions are clear to staff
- investigating incidents in accordance with their role and work area responsibility
- monitoring implementation and contributing to review of policy.

CPSN Workers

CPSN Workers are responsible for:

- understanding this policy
- upholding their employee obligations
- maintaining appropriate skills, qualifications and screenings/checks as required by their role, CPSN and/or applicable legislation
- participating in CPSN directed training, development or supervision programs
- upholding client safeguarding practices
- upholding work health and safety practices
- engaging in pro-active continuous improvement processes
- reporting to their manager where they are unable to meet their obligations
- at all times acting in accordance with the NDIS Code of Conduct.

Maintaining appropriate records

Records will be kept for seven years.

CPSN records are maintained using cloud-based technology systems, covering HRIS, CRM and Operational documentation.

Forms and Procedures that apply to this policy:

- Risk Management Procedure
- Incident Reporting Procedure
- Complaints and Feedback Management Procedure
- Emergency and Disaster Management Procedure
- Incident Report forms
- Salesforce incident data
- Client Service Agreements
- Risk Register and Management Plan
- Complaint Forms
- Continuous Improvement Register
- Client Death Reporting *Checklist*

Document Revision History

This document is only valid on the day it was printed.

Who	Version	Date	Description of Review
CEO	V1,2	Unknown	Unknown
CEO	V3	Sept 2024	Scheduled Review
CEO	V4	Feb 2026	Scheduled Review and update roles following organisational restructure