




Documenting and Recording Incident Concern Reports Policy

STATEMENT

The Paraplegic & Quadriplegic Association of South Australia Ltd (PQSA) is committed to safeguarding the health and safety of its clients, workers and visitors. An important element in achieving this is reporting and investigating work related accidents, incidents, injuries, illnesses and concerns promptly and comprehensively.

This Policy should be read in conjunction with associated Documenting and Reporting Client/Worker Incidents and Client/Worker Concern Procedures.

Approved by:  Chief Executive Officer	Date: December 2022
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In this policy, 'us' 'we' or 'our' refers to The Paraplegic & Quadriplegic Association of South Australia Ltd ACN 644 670 977, which is a Company Limited by Guarantee and conducts its business through Lifestyle Support and HomeCare+ services.

Please note that printed copies are not able to be controlled and the Shared Drive should always be referred to for the most current version.

SCOPE

Compliance with this policy is a condition of appointment for all workers engaged to provide services on behalf of PQSA.

DEFINITIONS

Refer to the PQSA Policy and Procedure Definition Glossary

RESPONSIBILITIES

It is our responsibility to communicate our policies and procedures to all workers on a systematic basis. Senior Leadership, Managers and Supervisors are responsible for monitoring workers' understanding of their obligations and need for compliance with policies and procedures. Workers are responsible for complying with our policies and procedures.

Heads of Operations & People & Culture:

- the escalation point in the event that there is not consensus about the status of an incident and whether it is reportable to the Quality & Safeguards Commission
- final reviewers and approvers for reporting to external bodies (unless CEO specifically requests final approval)
- responsible for reporting incident trends, patterns of aggressive behaviours (by workers and clients), actioning urgent systemic issues and ensuring effective communication to the Quality Committee.

Directors:

- ultimately accountable for the investigation and resolution of incident management including being the lead and conduit between Operations and Quality team to enable effective reporting.

Quality Officer:

- analyses, reports and recommends reportable status and actions during incident triage process
- responsible for communicating with Responsible Director for any incident fitting the NDIS Quality & Safeguards Commission definition of being 'reportable'
- drafts reportable incident reports (including notification, investigation, post-investigation and remedial action requests) for final approval by delegated authorities
- reports incident and concern trends and emerging themes to the Head of Ops & P&C.

Client Service Coordinators/Team Leaders:

- investigate the incident/concern and follow up as necessary as per the Documenting and Recording Client-Worker Incident Procedures and the Documenting and Recording Client-Worker Concern Procedures
- Follow the PQSA Incident/Concern Investigation User Guide (FOUR WORK)
- document findings of all incident/concerns investigations within 30 days
- provide support to Directors with respect to risk control and injury management
- Ensure all documentation in relation to the incident/concern is filed appropriately in client personnel files.

Workers:

- report the incident or concern via the FOUR platform
- comply with legislative and statutory reporting requirements, such as mandatory reporting of child abuse (refer PQSA Child and Young Person Protection Policy and Procedures)
- document as directed in an appropriate manner.

Office-based workers receiving report via phone must:

- follow the Prevention of FOUR Duplication – Verbal/FOUR Reporting Work Instruction
- complete (if required) an Environmental Hazard Report
- notify other appropriate personnel and authorities.

All client/worker incidents, near misses or client/worker concerns will be handled in a sensitive, confidential and timely manner and discussed only with relevant persons, to protect the privacy of all concerned.

POLICY

PQSA will provide, maintain and monitor a system or systems (allowing for verbal, written and electronic reporting) for reporting incidents, accidents and concerns for the purpose of:

- minimising risk of injury and the re-occurrence of an incident
- providing critical feedback to stakeholders, including clients, workers and external bodies
- investigating incidents and concerns to determine the root cause with the objective of preventing a recurrence
- obtaining data and information to inform current and future practices
- meeting legislative requirements for reporting accidents and incidents.

In the event of a critical/reportable/notifiable incident, the relevant Head of function will ensure next of kin is notified. The Head of People & Culture will also ensure all relevant external bodies have been communicated with (where relevant), including the NDIS Quality & Safeguards Commission, PQSA's insurer, SafeWork and Return to Work SA.

Data regarding Client/Worker incidents or near misses, Client/Worker concerns (including the review of appropriate records and registers) will be reviewed at a divisional level and by the Leadership Team. Subsequent reports will be provided to the Board as part of PQSA's governance framework.

PQSA's Leadership Team will review all critical/reportable incidents as part of a quality improvement system. The Board of PQSA will be informed of all critical/reportable/notifiable incidents in a timely manner.

Training

Training in the investigation process and PQSA specific policies and forms will be determined by the Leadership Team.

The requirement to document and report client/worker incidents and concerns will be covered in all PQSA's worker's induction process, and again in biennial training.

Recordkeeping and privacy management

The People and Culture team, on behalf of PQSA, will maintain confidential records of client/worker incident and concern information in accordance with privacy legislation and policy.

RELATED LEGISLATION

- AS ISO 31000 - 2018 Risk Management - Guidelines
- [National Disability Insurance Scheme Act 2013](#)
- National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018
- National Standards for Disability Services - Standard 1: Rights
- National Standards for Disability Services - Standard 6: Service Management
- Privacy Act 1988
- Work, Health and Safety Act 2012
- Work, Health and Safety Regulations 2012

SUPPORTING PQSA DOCUMENTATION

- Child and Young Person Protection Policy and Procedures
- Document Retention, Archiving and Destruction Policy and Procedures
- Documenting and Recording Client/Worker Incident Procedures
- Documenting and Recording Client/Worker Concern Procedure
- HomeCare+ (Support Worker Related) Medication Incident Management Procedures
- Reportable Incident Reporting and Investigations – Work Instructions
- Reportable Incidents – Work Instructions
- Return to Work Management System Policy and Procedures
- Risk Management Statement
- Serious (Reportable) Incident Investigation & Risk Assessment Report Form
- Triage of Incident and Concern Reports in Four – Work Instruction
- Vulnerable Adult – Client Safeguarding Policy and Procedures
- Workplace, Health and Safety Management Policy

BREACHES OF THIS POLICY

A **breach** of this policy is grounds for disciplinary action, up to and including termination of employment. Ignorance of these procedures will not generally be accepted as an excuse for non-compliance. Only in extreme circumstances and where such ignorance can be demonstrated to have occurred through no fault of the individual concerned will PQSA accept such an argument.

DISTRIBUTION AND REVIEW

PQSA will ensure all persons engaged to provide services either paid or unpaid will be aware of this policy and will have easy access to it in an appropriate format. All policies are to be reviewed on a periodic basis or when legislation or government policy determines.