



GOVERNANCE - INCIDENT MANGEMENT POLICY

Policy Number	Incident Management
Aged Care Quality Standard	8. Governance
Ratified by Board (date)	27/10/2022
Signed	
Name	Karen Silvester
Position	Chairperson Board of Directors
Review date	27/10/2023

Background

All Commonwealth funded providers of aged care have a responsibility to provide safe and quality care to support consumers to live the best life they can.

8(3)(d)(iv) of the Aged Care Quality Standards specifically requires Aged Care Providers to have effective risk management systems and practices for preventing and managing incidents including the use of an effective incident management system.

An Effective Incident Management System is a feature of safe and high-quality care and services, and an important element of quality improvement and consumer centred approach to aged care.

Home Assist Community Services is committed to the health, safety and well-being of its consumers, employees, volunteers, contractors and consultants whether employed or not, and, to the continual improvement of Home Assist Community Services governing and operating systems.

Home Assist Community Services endeavours to create and implement effective systems that support the day to day needs of our consumers, employees, volunteers and contractors and consultants.

Home Assist Community Services aims to ensure we are compliant with legal, regulatory and contractual requirements.

Home Assist Community Service also aims to ensure that we meet the expectations of our consumers and their families who trust us to provide them with services.

The purpose of this policy is to provide the foundation for a transparent and coordinated approach to our overall Incident Management System.

For the purpose of this policy, an incident is

- An act, omission, event or circumstance that has caused harm, that could have caused harm, or that has the potential to cause harm (near miss) and
- Has occurred in connection with the provision of services or throughout the course of employment or throughout the course of business operations and includes incidents



where there are reasonable grounds to suspect that there may be a connection between the incident and the provision of services, employment or business operations.

Home Assist Community Services Statement

Home Assist Community Services is committed to maintaining a documented Incident Management System that contains procedures for identifying, assessing, managing, resolving and reporting incidents.

All incidents, accidents and near misses are to be recorded on Home Assist Community Services Incident Form.

Legislation relating to responsibilities of approved providers regarding Incident Management.

1. The Charter of Aged Care Rights

Under the charter consumers have the right to safe and high-quality care and services, the right to be treated with dignity and respect, and the right to live without abuse and neglect. Home Assist Community Services as a provider of Commonwealth funded aged care is required to uphold these rights and ensure that consumers in their care understand their rights under the Charter.

2. The Aged Care Quality Standards

All providers must meet the requirements of the Quality Standards which detail the standard of care all aged care consumers can expect.

The Quality Standards require providers to maintain effective organisation-wide governance and risk management systems and practices to prevent and manage incidents and to identify and respond to abuse and neglect of consumers

Providers are also required to regularly review the care and services provided for effectiveness, including when incidents impact on the needs, goals or preferences of consumers, and to effectively manage high impact and high prevalence risks associated with the care of each consumer to ensure that each consumer gets safe and effective personal and clinical care.

Other requirements in the Quality Standards are also relevant to how providers prevent, assess and manage risks of and actual incidents. This includes requirements to provide consumers with choice, control and independence, to enable consumers to take risks to live the life they want, and to support consumers to maintain relationships of choice.

3. Open Disclosure Requirements

As outlined in the Aged Care Quality Standards, providers must use an open disclosure process when things go wrong. This means providers should facilitate an open discussion with consumers and/or their representatives when something goes wrong that has harmed or had the potential to cause harm to a consumer.

Providers are expected to practice open disclosure in the prevention and management of any incidents impacting consumers.

4. Clinical Governance

The Aged Care Quality Standards require providers that provide Clinical Care to demonstrate the use of a clinical governance framework (Standard 8(3)(e)).

Clinical governance is an integrated set of leadership behaviours, policies, procedures, responsibilities, relationships, planning, monitoring and improvement mechanisms that are implemented to support safe, quality clinical care and good clinical outcomes for

each consumer. An incident management system is an essential component of an effective clinical governance framework.

5. The Serious Incident Response Scheme

The SIRS aims to prevent and reduce incidents of abuse and neglect in Commonwealth funded aged care services. The SIRS requires providers to have effective incident management system in place to identify, record, manage and resolve all incidents and to notify all reportable incidents that occur, or are alleged or suspected to have occurred to the Aged Care Quality and Safety Commission (and the police where there are reasonable grounds).

Home Assist Community Services Incident Management System

Our incident management system includes avenues to identify, assess, respond to and record all incidents and near misses regardless of whether they are known to have occurred or are alleged or suspected to have occurred. It follows the guidelines from the Aged Care Quality and Safety Commission relating to the principles of effective incident management.

1. Consumer Centred

Our approach to managing incidents and near misses will be based on consumer dignity and choice. When managing incidents and near misses we will be respectful of and responsive to each consumer's individual identity, needs and preferences while supporting their safety and wellbeing. We will engage the consumer in the resolution of incidents and ensure they are partnered with when any remedial actions are put in place to prevent incidents from recurring.

2. Outcomes Focused

Our approach will focus on the health, safety and wellbeing of consumers, staff and others focusing on and understanding risk and preventing incidents from occurring, minimising harm if incidents do occur and taking action to prevent the recurrence.

3. Open Disclosure

When things go wrong Home Assist Community Services will apologise to and ensure that an open discussion occurs between those affected by the incident to address their immediate needs and determine the steps we will take to prevent any similar incidents from occurring again.

4. Accountable

Home Assist Community Services is accountable for the effective management of an incident. Any person involved in the management of an incident must understand their role and responsibilities and be held accountable for decisions or actions taken in responding to an incident.

5. Clear, Simple and Consistent

Our incident management system will be documented, readily accessible to staff and consistently applied.

6. Timely

Home Assist Community Services commits to timely investigation and resolution of incidents and the provision of regular updates to the people affected.



7. Continual Improvement

Our incident management system will ensure we are able to identify trends, issues and areas for improvement. This will allow for Home Assist Community Services to continually improve the quality of care and services we provide.

Key Elements of an Incident Management System

1. Ensure leadership and a safety culture.

- Prepare for incidents by ensuring leadership around risk mitigation and incident management and creating a safety culture. Embed critical enablers through effective governance systems, with end-to-end policies and procedures that support staff to understand and use the incident management system.
- The Board of Directors and Chief Executive Officers show their support and commitment to effective incident management.
- The Chief Executive Officer ensures that all staff are aware of our incident management system and this is conveyed to all staff and consumers.
- Our consumers are placed at the centre of their care and are treated with openness, honesty, fairness and accountability.
- Home Assist Community Services requires and encourages the reporting of incidents and near misses.
- Should staff or consumers identify an incident they are encouraged and supported to document the incident.
- All staff are educated in our incident management system when they commence employment with Home Assist Community Services and at regular intervals during their period of employment.
- All staff receive diversity education at orientation and during their time with us. They are provided with information and skills on how to support persons to make a complaint or report an incident via the use of support networks or an advocate.
- Home Assist Community Services ensures that all staff, volunteers, contractors, consumers and/or their representatives are aware that we appreciate being informed when things go wrong as this will give us an opportunity to reduce the risk of it recurring and use information gained from the experience to continually improve the care and services we provide.
- The Board of Directors reviews incidents and near miss information at their monthly Board Meeting. They are provided with a report on all incidents, near misses, trends, investigation outcomes and actions taken.

2. Respond to incident

- An incident or near miss may be identified in a number of ways, including where a staff member or another consumer observes the incident, a consumer makes a disclosure about the incident or another person informs a staff member that an incident occurred (or may have occurred)
- Respond to the immediate needs of those affected by the incident to ensure their health, safety and wellbeing.

- Assess the level of harm and mitigate any ongoing risk – what actions can be taken to reduce this harm and ensure each person’s health, safety and physical psychological wellbeing.
- Notifying consumer representatives of an incident as soon as possible after it has occurred or was notified to Home Assist Community Services
- Facilitate and assist the consumer to access advocates – OPAN or other services
- Facilitate meetings and discussions with those affected by an incident (and their representatives if appropriate) using open disclosure, to apologise and determine an appropriate response to the incident
- Providing ongoing updates to those affected by an incident, including in relation to the reason for/cause of the incident, what is being done to address it and what is being done to prevent or mitigate the risk of such incidents in the future
- Ensure we assist consumers and others who have witnessed an incident are provided with support and reassurance.
- Notifying the relevant authorities – Aged Care Quality and Safety Commission, Police, coroner or AHPRA
- Undertaking internal investigation of Serious Incidents to determine cause and the events that led up to the incidents occurring.

3. Record and report the incident

- Report and record the incident to understand what occurred and the appropriate next steps (including any required notifications).
- If the incident has a high potential for harm verbal reporting should be undertaken as part of the immediate response with follow up paper work (incident report form) completed as soon as possible following the incident.
- Reporting assists in understanding the next steps i.e. further investigation or analysis if needed and whether additional resources and other actions are required.
- All incident reports are reviewed and analysis of the facts undertaken, any additional information required to gain understanding of the incident should be gathered.
- Open disclosure, expressions of compassion and offering an apology are all important elements of communication, helping both consumers and staff in healing and restoring trusting relationships
- Reporting is the trigger for a chain of notifications that, depending on the nature of the incident, may involve
 - Consumers – speak with the consumer and/or their representatives as soon as possible. Disclosure is an ongoing process in which multiple conversations may occur over time. Practical support should be provided to the persons affected by the incident so that those who may have suffered emotionally and/or physically can receive early assistance.
 - Notifying the Aged Care Quality and Safety Commission - if the incident is a reportable incident under the Serious Incident Response



- Scheme. The commission must be notified within the relevant time frames – Priority 1 – 24 hours and Priority 2 – within 30 days.
- Reporting to the coroner – deaths may be referred to the coroner for a range of reasons including if a person dies unexpectedly, or from an accident or injury, if the death is unnatural or violent, or a doctor has not been able to sign a death certificate because the cause of death is unknown.
 - Reporting to the Police – where there are reasonable grounds to report an incident to police (where there is ongoing danger), you should contact police and other relevant emergency services within 24 hours of becoming aware of the incident (or within 24 hours of becoming aware of the incident).
 - Notification to others – there may be circumstances where Home Assist Community Services will be required to make further notifications depending on the nature of the incident e.g. Safe Work Australia regarding a workplace incident/accident, AHPRA where the incident has been caused by the professional conduct of a registered health practitioner, local public health units where the incident triggers a requirement to report a notifiable disease or condition or the NDIS Quality and Safeguards Commission where an incident relates to a NDIS participant.
- Recording incidents – Home Assist Community Services Incident Form will document both incidents and near misses. It will record all information as below

Details of the Incident or Allegation

- Name and contact details of the person recording the incident or near miss
- The name and contact details of a person making the accusation
- The time and date the incident or near miss was identified/reported
- The time, date and place at which the incident or near miss occurred (or was alleged or suspected to have occurred)
- Whether a death has occurred as a result of the incident
- Whether the incident is a reportable incident and if so, the type of incident (this will assist in identifying patterns or common occurrences)
- A description of the incident or near miss, including harm caused (or that could reasonably be expected to have caused) to each person affected by the incident and the consequences of that harm (if known)

People involved in the incident

- Details of the person directly involved, including names, contact details and cognitive status
- Whether the subject of the allegation is an aged care recipient or if not their relationship to Home Assist Community Services
- Whether the affected care recipient or subject of the allegation have been involved in any prior incidents

- Whether the affected care recipient or subject of the allegation have suffered psychological or physical impact and if so the level of the impact.
- The names and contact details of any witnesses

Response to the incident

Details of the actions undertaken in response to the incident, including:

- Whether the incident has been reported to the police and if so, when and how the police were contacted
- The action taken by the police, including whether a person has been arrested or charged.
- Whether the affected care recipient or subject of the allegation's next of kin or representative has been notified
- Whether the persons next of kin or enduring power of attorney has ongoing concerns about the management of the incident
- The actions (support or assistance) taken to ensure the health, safety and wellbeing of the care recipients involved
- Details of any actions undertaken to prevent further similar incidents from occurring or to minimise their harm
- Any consultation with those affected by the incident (and/or their representatives) in the management and resolution of the issue and any findings/outcomes they have been provided.
- Any notifications made to the Aged Care Quality and Safety Commission, police and other relevant organisations.

Investigation and Analysis

- Details of the investigation/analysis undertaken to identify the cause or source of the incident
- Outcomes of any investigation or analysis undertaken (including whether the incident could have been prevented)
- Recurring incidents will be identified to enable us to address issues and support Home Assist Community Services to notify reportable incidents to the Aged Care Quality and Safety Commission

4. Investigate and Analyse the incident – how and why it happened.

- Understand underlying causes and how systems and practices could be improved to reduce the risk of similar incidents occurring in the future.
- The nature of the incident will inform the extent and type of analysis (or investigation, where warranted).
- The extent and type of analysis will depend on
 - Severity of the incident
 - Impact of the incident on the consumer (and family/representative) confidence and safety
 - Probability of recurrence
 - Whether the same or similar incident has occurred in the past
 - Whether the incident involves a similar underlying cause to an incident that has occurred in the past

- Whether it involves people who have been involved in other incidents in the past
 - Is the incident reportable under Serious Incident Response Scheme
 - The views of the affected people
 - Whether the incident warrants an external or internal investigation
 - An external investigation may be appropriate where the facts of the incident are being disputed, where it involves an allegation that a staff member has behaved in an inappropriate manner or if requested by the consumer or their representative.
 - The investigation should consider
 - Underlying causes of the incident
 - Additional actions required to address an incident that occurred
 - Additional actions that reduce the occurrence of a similar incident in the future, including any systemic changes.
- 5. Implement changes to reduce the risk of recurrence and to make care and services safer.**

Implement remedial actions that help prevent future risk and improve incident response.

When an incident occurs, we should consider whether

- The incident have been prevented or the severity of the impact lessened by an action taken by Home Assist Community Services or a staff member
- There is ongoing risk to consumers, visitors, staff or others following the incident
- There are actions Home Assist Community Services or a staff member could undertake or cease to prevent or minimise the risk of a recurrence

Remedial Actions may include

- Staff education and training
- Making changes to organisational or clinical governance frameworks
- Reviewing and updating service practices and procedures or developing new procedures to support staff to managing emerging issues
- Making changes to the service environment or equipment used to provide care and services
- Taking actions to promote a safe culture
- Making additional staff available to assist consumers with certain activities
- Seeking specialist assistance and or implementing alternate strategies to manage consumer behaviours
- Updating care planning documentation to address the cause or impact of incidents
- Take disciplinary action with respect to staff (including performance management, implementing a probationary period, standing down a staff member pending the outcomes of any investigation or terminating a staff member's employment)

Home Assist Community Services is responsible for ensuring remedial actions are taken and for updating those affected on the outcomes or progress of these actions. Home Assist Community Services will ensure that any organisational changes made



are communicated to consumers, their representatives, staff and other service providers who are contracted as appropriate.

Monitor actions for effectiveness.

6. Close the loop

Share lessons learned with management and leaders, staff, consumers and families. Continuously improve the quality and safety of aged care. Analyse incident trends and data and regularly review the incident management system.

Home Assist Community Services incident management system allows us to collect data and other information relating to incidents enabling us to

- Identify and address systemic issues in the quality of care and services we provide
- Identify repeated occurrences (including alleged/suspected occurrences) of similar incidents or near misses
- Analyse trends and identify patterns of incidents
- Provide feedback and training to staff about preventing and managing incidents
- Provide information to the Aged Care Quality and Safety Commission as requested.

Home Assist Community Services Procedure.

Incident Forms are to be forwarded to the Quality team leader who will enter, investigate and analyse them in Home Assist Incident Management Register

When investigating incidents Home Assist Community Services will follow the procedure for Complaint Handling, Work, Health and Safety Guidelines and Risk Management Policies of Home Assist Community Services.

Throughout the investigation Home Assist Community Services is committed to the process of procedural fairness.

Home Assist Community Services requires that the views of the person impacted by the incident be considered when assessing the following

- Whether the incident could have been prevented
- How well the incident was managed
- What, if any, remedial action needs to be undertaken to prevent further similar incidents from occurring, or to minimise their impact
- Whether other persons or bodies need to be notified of the incident.

Home Assist Community Services is committed to communicating to all relevant parties, information about how the system operates and who will be responsible for actions and processes.

To promote transparency, Home Assist Community Services ensures that its' Incident Management System is accessible to all stakeholders by providing a summary of our system in our Client Information Handbook and our Staff Handbook. We will provide a full copy of our Incident Management System on request and in a format that is accessible to the individual requesting it.

Home Assist Community Services Incident Management System provides for the collection of statistical and other information relating to incidents to enable Home Assist Community Services to



- Review issues raised by the occurrences of incidents
- Identify and address systemic issues
- Report information relating to incidents

Applicability

This policy applies to

- Consumers
- Board of Directors
- Employees
- Volunteers
- Contractors and Consultant whether employed or not

Roles and Responsibilities

All incidents must be recorded and reported within 12 hours to the Quality team leader and the CEO. Responsibilities include undertaking a review when a client has made a complaint or has reported an incident.

If the Quality team leader or the Chief Executive Officer are the ones suspected, then the Chairperson of the Board must be informed immediately.

The Chief Executive Officer, or delegated Officer, including the most senior worker to witness the incident, or the senior worker to whom the incident is reported, is responsible for collecting information regarding the circumstances of an incident.

Staff delivering services have a key role in responding to incident disclosures made by clients, reporting incidents to relevant personnel and protecting evidence.

The following positions will be responsible for:

- Reporting to the Aged Care Quality and Safety Commission - SIRS – Chief Executive Officer
- Recording incidents – Chief Executive Officer, Quality Coordinator, Coordinator Modifications, Coordinator My Aged Care, Coordinator Minor Modifications, Coordinator Home Care
- Conducting internal investigations – Quality Coordinator and Chief Executive Officer
- Undertaking remedial action related to incidents and review of the Home Assist Community Services Incident Management System - The Board and Chief Executive Officer
- Engaging an independent expert to investigate and report on incidents, when required - The Board and Chief Executive Officer
- Reviewing the incident and Home Assist Community Services' response – the Chief Executive Officer and the Quality and Clinical Governance Committee.
- Reporting to the Police – Chief Executive Officer
- Reporting to Worksafe Qld – Chief Executive Officer
- Reporting to AHPRA – Chief Executive Officer



Continual Improvement

Home Assist Community Services is committed to fostering a culture that promotes continual improvement in all that it does, see Home Assist's Quality Management Policy, including incident management.

Sharing what was learned within the organisation and the consumer, their family or representatives, those involved in the incident and others as needed) and outside Home Assist Community Services is key to preventing additional harm and making aged care safer.

Learning from incidents and near misses and articulating what can be done to prevent them from occurring and building trust are key aims of our Incident Management Process

Investigation and analyses of incidents will be reported to the Board of Directors on a monthly basis. The Risk, Finance and Audit Committee of the Board of Directors will conduct an analysis of our risk management and determine any actions that may need to be undertaken to ensure our ongoing commitment to deliver safe and effective aged care that meets the needs of consumers in line with their needs, goals and preferences. They will consider

- Timeliness of completing the analysis
- Implementation of remedial actions – were the actions implemented
- Effectiveness of remedial actions implemented in reducing the occurrence of harm
- Feedback from those affected by an incident
- Sharing what was learned

Home Assist provides information to all consumers on how incidents will be managed. Included in Home Assist's Consumer Welcome Guide is:

- An outline of Home Assist's incident management system and contact persons
- An outline of Home Assist's Quality Management and Continuous Improvement Systems
- Advice that participants will be supported to report incidents and that they will be involved in, and supported through, the incident process and provided with opportunities to provide feedback

Staff Education

All employees will receive education on Incident Reporting and Management during Induction. Thereafter it will occur annually during Mandatory Education.



Legislation

Aged Care Act
 Aged Care Quality and Safety Commission Act
 Queensland Workplace Health and Safety Act
 Queensland Workplace Codes of Practice updated 2021
 Commonwealth Human Rights and Equal Opportunity Commission Act 1986 -
 Queensland Anti-Discrimination Act 1991
 Commonwealth Disability Discrimination Act 1992
 Powers of Attorney Act 1998
 Guardianship and Administration Act 2000
 Aged Care Act
 Aged Care Quality and Safety Commission Act
 Queensland Workplace Health and Safety Act
 Queensland Workplace Codes of Practice updated 2021

References

Name	Source
Identify, Assess and Control Hazards	SafeWork Australia
Effective Incident Management Systems – Best Practice Guidance	Australian Government Aged Care Quality and Safety Commission
Home Services – Incident Management System	Australian Government Aged Care Quality and Safety Commission
Incident Reporting Instruction	Victoria Health
Serious Incident Response Scheme for Commonwealth funded in-home aged care services	Australian Government Department of Health
Recording Incidents in an Incident Management System	Australian Government Aged Care Quality and Safety Commission