



Incident Management System (V 1.0 Policy Document)

Purpose of Policy:

This policy provides procedures and guidelines for the Incident Management System for Rainbow Fun workers, all customers and other interested parties who become aware of an incident either through observation or disclosure relating to the supports and services we provide. The purpose of this policy is to demonstrate that:

- Rainbow Fun always attempts to prevent and mitigate incidents;
- Customers and other interested parties can easily, safely, and quickly disclose any incident relating to the supports and services we provide with understanding and knowledge about timeframes, the ways they will be supported and pathways to resolution;
- Should an incident be observed or disclosed, Rainbow Fun workers are trained to respectfully and appropriately respond to any incident to ensure the health, safety and wellbeing of all people involved, and if required, involve relevant safety personnel (police or ambulance);
- Rainbow Fun Workers are aware that should any incident be observed or disclosed they have a responsibility to ensure that the accurate details of the incident are recorded and report immediately to the owner of Rainbow Fun;
- The owner of Rainbow Fun is responsible for reporting and managing incidents/reportable incidents in a timely manner, offering appropriate support(s) to any affected parties and analysing the incident to reduce or eliminate the reoccurrence of such an incident; and
- The owner of Rainbow Fun has a responsibility to report all reportable incidents (as defined in the NDIS Quality and Safeguards Commission Reportable Incidents Guidance) within the designated and appropriate timeframes to the NDIS Quality and Safeguards Commission.



Types of Incidents this Incident management system covers:

The Rainbow Fun Incident Management system covers incidents as outlined in the National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018, including:

- Acts, omissions, events or circumstances that occur in connection with providing NDIS supports or services to a person with disability and have, or could have, caused harm to the person with disability;
- Acts by a person with disability that occur in connection with providing NDIS supports or services to the person with disability and which have caused serious harm, or a risk of serious harm, to another person; and
- Reportable incidents that have or are alleged to have occurred in connection with providing NDIS supports or services to a person with disability.

Definitions:

Worker: Rainbow Fun owner, employee, contractor, consultants or people otherwise engaged as volunteers.

Incident: Where harm, or potential harm, neglect or abuse is caused to or by any person while they are receiving NDIS supports or services.

Reportable Incidents: Include allegations or incidents arising in the content of NDIS supports or services that must be reported to the NDIS Commission. As outlined in the National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018, these include:

- Death of an NDIS participant;
- Serious injury of a NDIS participant, abuse or neglect of a NDIS participant;
- Unlawful sexual or physical contact with or assault of, a participant;
- Sexual misconduct committed against, or in the presence of, a participant, including grooming of the participant for sexual activity; and
- The use of a restrictive practice in relation to a participant, other than where the practice is authorised and used in accordance with the participants approved behaviour support plan.



Preventing and mitigating incidents that could occur in connection with providing supports and services:

Rainbow Fun understands that certain incidents can impact the health, safety and wellbeing of all people. Rainbow Fun has a responsibility to provide supports and services to all people in a safe manner and takes reasonable steps to prevent and mitigate all forms of harm to all customers. In order to reduce preventable deaths, serious injuries and other serious incidents that could impact the health, safety and wellbeing of all people, Rainbow Fun has effective preventative and mitigative incident management practices which include:

- All products (supports) are described on the Rainbow Fun website with information about age appropriateness;
- When a customer receives the product (supports), the packaging is correctly labelled for age appropriateness;
- All products (supports) are described on our website with specific information about the product, including images allowing parents, care takers, support coordinators, guardians, plan managers or families to quantify any potential hazards (i.e. loud sounds, sharp points, small pieces);
- When a customer receives a product (supports) the packaging is correctly labelled for any potential hazards (i.e. choking, strangulation, poisoning);
- All products (supports) sold are fully product tested to international toy safety standards and/or Australian standards for toys;
- Rainbow Fun works closely with suppliers in relation to product (supports) recalls and should a product be recalled it would immediately be removed from stock and all customers who purchased said product would be contacted;
- If any products are deemed defective in store/warehouse, Rainbow Fun contacts the supplier and reports said defect to the manufacturer;
- Rainbow Fun customers are reminded to view the Kidsafe Child Accident Prevention Foundation of Australia Toy Safety information sheet <https://www.kidsafensw.org/imagesDB/wysiwyg/ToySafety2013.pdf> which is linked to the Rainbow Fun webpage;
- Rainbow Fun workers continually review updates placed on the Australian Competition and Consumer Commission Product Safety Australia website <https://www.productsafety.gov.au> to stay up to date with product (supports), recalls and product safety laws;
- Rainbow Fun workers continually review updates and information from the Australian Toy Association <https://austoy.com.au/toy-safety/international-toy-safety> related to Australian toy safety, International toy safety and labelling of toys;
- Rainbow Fun undertakes worker training on products (supports) to provide the best information to customers regarding the products (supports) they select, to reduce and prevent risks to all people; and
- Rainbow Fun workers have completed the interactive online NDIS Quality and Safeguards Commission 'Worker Orientation Module Quality, Safety and You' assisting them to identify, reduce and prevent risks. If said workers are unsure how to identify a risk and/or incidents they seek advice from the owner of Rainbow Fun.



However, even when Rainbow Fun adhere to preventative and mitigative incident management practices, incidents may still occur, which is why it is imperative that Rainbow Fun has an Incident Management System to record, investigate and manage all incidents in connection with providing supports and services.

Rainbow Fun training requirements for workers:

In addition, to completing the interactive online NDIS Quality and Safeguards Commission 'Worker Orientation Module Quality, Safety and You', further training systems are in place to educate workers of their role in incident management. Workers are aware of all types of incidents/reportable incidents and are encouraged to identify these through the course of their work. In the event that a Rainbow Fun worker identifies or observes an incident and/or an incident is disclosed to them, they have received training from the owner of Rainbow Fun to help them identify their role in our incident management policies and procedures. This includes:

- Their role and responsibility to immediately ensure the health, safety and wellbeing of the people involved in the incident, and if required immediately contact appropriate emergency services (i.e. ambulance or police);
- Where they can find additional resources on how to respond to incidents;
- Their role and responsibility to immediately contact the owner of Rainbow Fun should they become aware of any risks of potential harm to people;
- Their role and responsibility to immediately report incidents to the owner of Rainbow Fun for further reporting, support and management; and
- Where they can find additional resources relating to incident management (Appendix 1), and on the Incident Management System.

Identifying incidents that occur in connection with providing supports and services:

Rainbow Fun workers may become aware of an incident in varying ways, including but not limited to:

- By witnessing the incident;
- Disclosure of an incident by a customer; and/or



- Receiving information provided by another person.

Disclosure of incidents Rainbow Fun takes all reasonable steps to allow all people to feel comfortable and safe reporting incidents to Rainbow Fun workers. Rainbow Fun provides all customers with several ways in which to easily and quickly report any incidents that occur in connection with supports or services we provide.

From our easy to navigate web pages any person can access our:

1. Dedicated NDIS web page (<https://www.rainbowfun.com.au/NDIS-provider>) directing participants to a dedicated NDIS email address and phone number;
2. Contact Us Page (<https://www.rainbowfun.com.au/contact-us>);
3. Company email addresses (i.e. ndis@rainbowfun.com.au, hello@rainbowfun.com.au);
4. Phone number; and
5. Postal address (allowing for ANONYMOUS contact).

In addition, people can speak directly to our friendly workers face to face in the store.

Offering customers a variety of channels to easily and quickly inform us of incidents that occur in connection with supports or services allows the customers to feel supported and comfortable to report incidents. It gives them choice and control, and the ability to explain the incident themselves to us, and feel safe doing so. Rainbow Fun workers check all points of potential customer contact multiple times a day. This ensures no incidents remain unanswered for more than 24 hours.

When an incident has been observed or disclosed, Rainbow Fun workers are trained to:

1. Ensure the immediate health, safety and wellbeing of all persons and to contact emergency services support if deemed necessary (Figure 1); and
2. Follow the Steps in Incident Management flow chart (Appendix 2).

Incident response: Is everyone safe?

It is everyone's responsibility to ensure the safety and wellbeing of people with disability.



Call '000'	Call '000' if someone needs urgent medical care or there is an immediate risk of harm to you or the people around you.
Is everyone safe?	Make sure you and the people around you are safe from harm. Implement your workplace incident response plan.
Tell someone	Tell your manager or supervisor about the incident. If required, they will notify the NDIS Commission.

Call '000'

You may become aware of an incident by witnessing signs of possible abuse, being told about an incident by a person with disability, or directly witnessing the incident.

When an incident occurs, you must take action to ensure the safety and wellbeing of yourself and the people around you.

Call emergency services on '000' if:

- a person suffers a serious injury and requires medical treatment
- there has been an alleged or suspected criminal offence
- there is ongoing danger
- any other situation you believe may require emergency services.

Is everyone safe?

When an incident occurs, take action to make sure you and the people involved are safe. This may include people with disability, workers, or other people who are there when an incident happens.

Example: If a person with disability suffers a serious injury and needs medical treatment, contact emergency services on '000' immediately.

Tell someone

Your workplace incident management system includes procedures about how to identify, manage and report incidents, and a response plan. Follow the steps in your incident management system and response plan.



Contact Us | Call: 1800 035 544 (free call from landlines).

To report an incident, or to make a complaint if you have a concern about the NDIS supports and services being delivered, contact the NDIS Quality and Safeguards Commission (NDIS Commission).

Email: reportableincidents@ndiscommission.gov.au | Website: www.ndiscommission.gov.au

Figure 1: Incident Response: Is everyone safe? Rainbow Fun workers are trained to ensure the health, safety and wellbeing of all people.

Source: *NDIS Quality and Safeguards Commission*.

3. Work through the relevant stages of Steps 1 to 3 of the 'Identifying and responding to incidents: 6 Step Guide for Workers' put out by the NDIS Quality and Safeguards Commission (Figure 2). Once the Rainbow Fun workers have taken the necessary step to ensure the health, safety and wellbeing of all people they will immediately, protect any evidence, record the facts that have been told or observed and contact the owner of Rainbow Fun. The owner of Rainbow Fun will then continue with the Rainbow Fun Incident Management System procedures which includes those outlined in the 'Identifying and responding to incidents: 6 Step Guide for Workers' put out by the NDIS Quality and Safeguards Commission (Figure 2). During this process the Rainbow Fun worker will provide the owner with any notes taken in relation to an incident – unless there is a potential conflict of interest.

Identifying and responding to incidents: 6 step guide for workers

It is your responsibility to prevent, respond to, and report incidents that may occur when providing supports or services to people with disability.

1 Identify, prevent and mitigate

- You must take all reasonable steps to prevent all forms of harm.
- If you identify any risks of harm to people with disability talk to your employer.
- Ask your manager or supervisor if you are unsure about how to identify, reduce, and prevent risks to people with disability

When an incident does occur

2 Ensure immediate safety

- Call '000' if someone needs urgent medical care and/or if there is an immediate and serious risk of harm to you or others.
- Make sure you and the people around you are safe from harm.
- Notify your manager or supervisor.
- Follow your incident management procedures.

3 Respond to a disclosure

Sometimes you will not see an incident, but a person with disability will tell you ('make a disclosure') about it. In these circumstances:

- record and report this information as per your incident management procedures and tell your supervisor or manager as soon as possible
- reassure and support the person with disability by staying calm and explaining what will happen next
- listen to the person, writing down the details using their exact words. If you need more information to form a general understanding of the allegation, ask open questions, and avoid leading questions
- tell the person with disability that you have to report the incident.

4 Protect evidence

If it is your job to gather the initial information about a reportable incident, you must protect any evidence. For example, depending on the incident:

- do not disturb any evidence that may be required for an investigation
- if there is an alleged sexual assault, try to delay the victim bathing or showering until police arrive
- do not wash the person's clothing or bedlinen, but keep these things safe.

5 Record and report

If you become aware of a reportable incident you must notify your manager or supervisor as soon as possible. Do not rely on someone else to do this. Follow your workplace incident management procedures, including:

- record what you have seen and heard, including the details of any witnesses
- give your manager or supervisor any notes you have taken
- do not interview the person who is allegedly responsible for the incident.

6 Report to Police

Any allegation of a criminal offence against a person with disability must be reported to the police. Follow your incident management procedures, and:

- if appropriate, report the alleged offence as soon as possible
- tell the police that the impacted person is a vulnerable person and let them know if they will need communication aides or other supports
- support the person with disability when they are dealing with the police so that their wishes are made known.

NDIS providers must notify the NDIS Commission about a reportable incident that occurs, or is alleged to have occurred, in connection with the NDIS supports or services you deliver.

Reportable incidents are:

- The death of a person with disability
- Serious injury of a person with disability
- Abuse or neglect of a person with disability
- Unlawful sexual or physical contact with, or assault of, a person with disability
- Sexual misconduct, committed against, or in the presence of, a person with disability, including grooming of the person with disability for sexual activity
- Unauthorised use of restrictive practices in relation to a person with disability.

Contact Us | Call: 1800 035 544 (free call from landlines).
Our contact centre is open 9.00am to 4.30pm in the NT, 9.00am to 5.00pm in the ACT, NSW, QLD, SA, TAS and VIC Monday to Friday, excluding public holidays.
Email: reportableincidents@ndiscommission.gov.au | Website: www.ndiscommission.gov.au

Responding to incidents at your service (who to contact, etc):

Figure 2: Identify and responding to incidents: 6 Step Guide for Workers. Rainbow Fun workers are trained to work through steps 1, 2 and the start of 3. During the Step 2, Rainbow Fun workers have a duty to immediately contact the owner of Rainbow Fun for support. The owner of Rainbow Fun will then continue through the remaining steps, in conjunction with the Rainbow Fun Incident Management System policies and procedures.

Source: NDIS Quality and Safeguards Commission.

Recording, responding and managing incidents that occur in connection with providing supports and services:

The owner of Rainbow Fun records, responds to and manages incidents that occur in connection with providing supports and services to all customers, using our Incident Management System Spreadsheet (Table 1: Please note, it only displays headings) and proceeds through Steps 3-6 in the 'Identifying and responding to incidents: 6 Step Guide for Workers' put out by the NDIS Quality and Safeguards Commission (Figure 2). The Rainbow Fun Incident Management System Spreadsheet sets out the requirements for reporting, managing and resolving incidents.

Table 1: Incident Management System Spreadsheet (Headings only) that is completed by the owner of Rainbow Fun to record, manage and report (where necessary) incidents and reportable incidents that occur in connection with providing supports and services to all customers. Any reportable incidents are to be immediately reported to the NDIS Quality and Safeguards Commission by the owner of Rainbow Fun.

Description of incident	Details of incident	Contact details	Response	Support provided	Management & Resolution	Affected person provided with report or findings Y/N explain	Reportable incident to NDIS Commission Y/N and why	Reportable to other bodies (Y/N) and why	Investigation details	Risk assessment & future prevention	Case closed Y/N report written Y/N

Description of required information in the Incident Management System Spreadsheet (Table 1):

- Description of incident must be as complete and detailed as possible, ensuring details of what the affected person (or other person) has reported, in their exact words if possible, including details of any witnesses, and/or what the relevant person has seen or heard and any actions taken. It will not include anything that the relevant person did not directly hear or see, or their opinions or interpretations.
- Details of incident need to be as complete and as detailed as possible including date/time/ location/ how reporter became aware of incident.
- Contact details of person reporting the incident, involved in the incident and any witnesses. Please note: the owner of Rainbow Fun, will always be the person responsible for completing this spreadsheet along side the reporting worker.
- Response: Description of action taken in response to incident includes activities undertaken to ensure the health, safety and wellbeing of all people and workers, protecting any evidence and any information recorded prior to the owner being present/informed.
- Support provided to and ongoing consultation with the affected person, and or their guardian, carer or family member must be described.
- Management and resolution of incident including what has been done and how the owner of Rainbow Fun worked with persons involved in the incident.



- Person affected by the incident has or has not been provided with a report or finding about incident, with explanations as to why or why not.
- Reportable incident lodged with NDIS Commissioner (Yes or No) and all appropriate steps taken.
- Report of incidents provided to others (Yes or No) and if so, which other bodies. (i.e. police, child safety authorities).
- Investigation details if one was required (internal, independent expert or NDIS Commission) and timeframe of the investigation.
- Risk assessment and future preventative measures described.
- Case closed (Yes or No) and report written by the owner of Rainbow Fun.

Closure of an incident case:

Prior to an incident case being closed in the system, the owner of Rainbow Fun will write a brief report that will be accessible to those involved in the incident. This report will contain information regarding four key areas:

1. Could this incident have been prevented? If so, what actions will be taken to prevent similar incidents the future;
2. How well was the incident managed and resolved;
3. Did any other parties need to be informed about this incident before closure; and
4. Does the affected person(s) have any feedback to provide about the Incident Management System? For example, was the affected person treated respectfully, provided with appropriate support and assistance throughout the process and provided with appropriate feedback regarding the investigations, proposed recommendations and actions take to resolve the incident?

Reviewing and Improving our Incidents Management System Spreadsheet:

Records are maintained of all incidents, and subsequent resolution. This allows for easy review of incidents to address any reoccurring incidents that customers may have had. In addition, it highlights if any products need to be removed from stock and/or if Rainbow Fun workers require additional training. Incident data are reviewed annually by the owner of Rainbow Fun. As a registered NDIS Provider clear records of incidents are kept for seven (7) years. All details of incidents will be kept on client file in our Administrative Outlook and NETO. The information will be confidential and access is restricted to the owner of Rainbow Fun.



PLEASE NOTE: As far as Rainbow Fun is aware, to date, no incidents have occurred in connection with providing supports and services to any customer. Therefore our Incident Management System has not had any testing for adequate review and/or modifications.

Notifying the NDIS Quality and Safe Guards Commission of all reportable incidents:

The Owner of Rainbow Fun will notify the NDIS Commission of all reportable incidents (including alleged reportable incidents) that occur in connection with the NDIS supports or services that we deliver via the NDIS Commission Portal. Rainbow Fun will follow the set processes and provide the required information as set out on the 'My Reportable Incidents' page on the NDIS Commission Portal, within the specified timeframes.

If NDIS participants, their support coordinators, caretakers, guardians, plan managers or families do not want to discuss an incident directly with Rainbow Fun, or if they are not satisfied with the management of the incident, Rainbow Fun suggests, they are directed to contact the NDIS Quality Safeguards and Commission on 1800 035 544 Monday - Friday 9am to 5pm or to visit www.ndiscommission.gov.au to fill out a Complaint Contact Form.

NDIS Code of Conduct:

As an NDIS provider Rainbow Fun has taken every step to ensure that delivery of safe, quality supports and services to people with a disability. Rainbow Fun complies with the NDIS Code of Conduct <https://www.ndiscommission.gov.au/sites/default/files/documents/2018-07/NDIS%20Commission%20-%20Conduct.pdf> Registered NDIS providers are also subject to the NDIS Practice Standards. Rainbow Fun has developed the Incident Management system based on guidelines produced by the NDIS Quality and Safeguards Commission and the National Disability Insurance Scheme (Incident and Reportable Incidents) Rules 2018.

Privacy Policy regarding complaints:

As a NDIS provider, Rainbow Fun is bound by privacy legislation and must manage all incidents in a way that respects the confidentiality and privacy of the person(s) affected by the incident. The owner of Rainbow Fun informs all workers about their responsibilities in this regard. Further details about the Rainbow Fun Privacy Policy, are accessible by all customers at https://www.rainbowfun.com.au/privacy_policy



Access to the Rainbow Fun Incident Management System:

The Rainbow Fun Incident Management system is accessible by all Rainbow Fun workers and NDIS customers via our NDIS web page.

Appendix 1: Additional resources accessible to Rainbow Fun workers:

- Posters in store and warehouse providing to new staff members via one drive This poster contains important information for workers about how to identify incidents that occur in their workplace, and what to do if an incident occurs. <https://www.ndiscommission.gov.au/sites/default/files/documents/2020-08/poster-incident-response.pdf>
- This reference card which is a quick guide for workers on what to do if they become aware of an incident or directly witness an incident. <https://www.ndiscommission.gov.au/sites/default/files/documents/2020-08/reference-card-everyone-safe.pdf> It is everyone's responsibility to ensure the safety and wellbeing of people with disability.
- This document providing guidance on the expectations of workers providing services in incident management and reporting incidents. <https://www.ndiscommission.gov.au/sites/default/files/documents/2019-06/detailed-guidance-expectations-workers-providing-services-incident.pdf>
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.
- National Disability Insurance Scheme Act 2013 (the Act).
- Effective Complaint Handling Guidelines for NDIS Providers.
- NDIS Code on Conduct.
- Fact sheet: How to make a complaint (NDIS).
- NDIS (Incident Management and Reportable Incidents) Rules 2018.

Appendix 2: Flow chart accessible to Rainbow Fun workers (Source: NDIS Quality and Safeguards Commission):

