

Policy category	BC - Best Care		
Best care goals	<input checked="" type="checkbox"/> Safe <input type="checkbox"/> Personal <input checked="" type="checkbox"/> Connected <input type="checkbox"/> Effective		
Applies to	National		
Version	Approval authority	Effective from	'Review by' date
8	Executive Director, People and Care Governance	16/10/2025	16/10/2027

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1. Purpose

Silverchain Group (SCG) is committed to providing Best Care, every person, every time, delivering a high-quality client experience that is safe, personal, connected, and effective. This policy communicates the requirements for best practice client incident management system (CIMS) within Silverchain.

2. Policy statement

This policy provides the principles to deliver a best practice approach for client incident management to prevent or reduce further harm to clients in keeping with state-based health care legislation and national regulatory authorities. The policy supports and ensures learnings and improvements are taken from client incidents and near misses to prevent recurrence.

This policy applies to all employees regardless of whether they are client facing or corporate support employees. This policy applies to all activities related to provision of health and aged care services, administration activities performed, travelling between locations for work purposes, and to any service providers/contractors that are engaged on behalf of Silverchain.

3. Policy principles

Client incidents and near misses are to be formally reported and investigated. Incident reporting and investigation aims to prevent further harm and to identify risks and allow for continuous improvement opportunities to be explored and implemented.

Incident reporting and investigation

- All Silverchain employees in a direct care role are required to complete training on the recognition of client incidents and near misses through mandatory completion of the online module '*Incident Reporting and Open Disclosure*' available through the Learning Centre. This module provides education to facilitate the identification of all client incidents and near misses as well as those incidents that have mandatory reporting requirements as outlined in the Mandatory reporting procedure.
- Silverchain has an established and documented process for identifying, managing, and reporting any client incident that results in actual or potential client harm, with consideration to the identification and management of client risks.
- Client Incident Management includes specific roles and responsibilities for recording all client incidents and near misses into the electronic incident management system (Datix or Salesforce) as soon as practicable and in any event, **within four (4) hours** after an incident has occurred, has been identified or reported.
- All serious incidents are brought to a national Client Incident Verification Team (CIVT) meeting at the earliest opportunity to confirm the severity rating, implement any immediate actions that are required to be taken and determine the members of the investigation panel
 - Severity Assessment Code 1 (SAC 1) incidents may require additional reporting (eg relevant state health department) and all client incidents should be considered for regulatory reporting requirements (eg, Serious Incident Response Scheme, Child Safety).

- Client incident management takes a systems view and supports both employees and clients to raise issues or report errors without the fear of blame or retribution.

Connected

Open disclosure

- Timely open disclosure is provided to clients and/or their family/carer; open and honest communication with an apology or expression of regret after a client incident following discussion with relevant stakeholders. Refer to Open Disclosure Procedure BC-PRO-0217.
- Lessons learned from client incidents are shared across the organisation for wider learning.

4. Roles and responsibilities

This policy applies to:	<ul style="list-style-type: none">● All Silverchain employees, volunteers, students, contractors, and consultants (together, Employees).
All staff	<ul style="list-style-type: none">● All staff are responsible for maintaining their knowledge of incident reporting.● All staff are expected to report incidents within 4 hours of occurrence or, or report of an incident or near miss.● All staff are responsible for ensuring clients immediate safety following an incident.
Managers	<ul style="list-style-type: none">● Managers are responsible for ensuring ongoing safety of clients and staff following incidents.● Managers are responsible for a comprehensive investigation into reported incidents.● Managers are responsible for appropriate referrals and documentation updates following incidents.
Clients	<ul style="list-style-type: none">● Are responsible for ensuring a safe environment is maintained for staff to complete care and services.● Reporting incidents that occur outside of visits that may impact care- such as falls or hospital admissions.

5. Escalation and reporting

- 5.1 All incidents are to be reported in line with the Client Incident Management Policy BC-POL-0036 and Client Incident Management Procedure BC-PRO-0143.
- 5.2 All complaints are to be reported in line with the Client Feedback Policy BC-POL-0035 and Client Feedback Procedure BC-PRO-0141.

6. Definitions

The following definitions are for the purpose of this policy.

Child safety: Each Australian state and territory has its own mandatory reporting law for the mandatory reporting of child abuse and neglect (Australian Institute of Family Studies 2023). Refer to the Mandatory Reporting Procedure BC-PRO-0185 and Child Safe Environment Policy ALL-POL-0004 for guidance.

Employees: Means employees, contractors, volunteers and sub-contractors working for Silverchain.

Client incident: An event or circumstance that resulted or could have resulted in unintended or unnecessary harm to a patient or a client, or a complaint, loss or damage. An incident may also be a near miss (Australian Commission on Safety and Quality in Health Care definition).

An act, omission, or event or circumstance that occurs in connection with the provision of care or services that: has (or could reasonably be expected to have) caused harm to a client; is suspected or alleged to have (or could reasonably be expected to have) caused harm to a client or another person; or the provider becomes aware of and that has caused harm to a client (Aged Care Quality and Safety Commission definition).

Incident analysis (also known as review or investigation): The various actions and processes required to conduct the immediate and ongoing activities following an incident. Incident analysis is a part of incident management. Review of what happened and why to determine how a similar Incident can be prevented.

Open disclosure: An open discussion or conversation with a client about an incident that resulted in harm while they were receiving care.

Reportable incident: An incident described in section 54-3 of the Aged Care Act (and section 15NA of the Quality-of-Care Principles). The SAC rating is determined by actual harm to the client not by incident meeting reportable criteria.

Severity assessment code (SAC): Severity assessment code is the rating applied to an incident to communicate the degree of harm to a client that is attributed to the care and service provision (through act or omission) by Silverchain rather than the client's underlying condition or illness and is based on the Silverchain SAC matrices within the Client Incident Management Procedure BC-PRO-0143.

Silverchain: Means collectively, Silver Chain Group Ltd (ACN 077 082 825) and each entity controlled by that entity.

SIRS reportable incidents: Acts, omissions, events or circumstances that occur, are alleged to have occurred or are suspected of having occurred in connection with the provision of care and services to a consumer that have, or could reasonably have been expected to have, caused harm to a consumer or another person. Reportable incident types include (ACSQHC definition):

- Unreasonable use of force
- Unlawful sexual contact or inappropriate sexual contact
- Psychological or emotional abuse
- Unexpected death
- Stealing or financial coercion
- Neglect
- Inappropriate use of restrictive practices
- Missing consumers.

Systems approach/thinking: Systems thinking is an approach to problem solving that views problems as part of a wider dynamic system. It recognises and prioritises the understanding of linkages, relationships, interactions and interdependencies among the components of a system that give rise to the system's observer behaviour (WHO definition).

7. Relevant standards

- Australian Commission on Safety and Quality in Health Care 2017, National Safety and Quality Health Service Standards (2nd ed), Sydney. Australia.

8. Relevant legislation

- Federal: *Aged Care Act 2024*.
- New South Wales: *Health Administration Act 1982*: Part 2A, Division 2, 3, 4, and 5.
- Queensland: *Hospital and Health Boards Act 2011*: Part 6, Division 2, 3. *Hospital and Health Boards Regulation 2012*: Division 6, Part 6. and Health Service Directive Patient Safety
- South Australia: *Health Care Act and Regulations 2008*: Part 8 , SA Government Gazette 11 July 2019, *National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018*: Parts 1, 2, 3.
- Victoria: *Health Services Act 1988*: Part 5A, Division 1, 3.
- Western Australia: *Health Services Act 2016*: part 3, Division 1, section 20.

9. Related information

Policies	
Observation and Escalation Policy (BC-POL-0073)	Child Safe Environment Policy (ALL-POL-0004)
Client Incident Management Policy (BC-POL-0036)	Client Feedback Policy (BC-POL-0035)
Procedures	
Mandatory Reporting Procedure (BC-PRO-0185)	Open Disclosure Procedure (BC-PRO-0217)
Client Incident Management Procedure (BC-PRO-0143)	Client Alerts Management Procedure (BC-PRO-0133)
Client Incident Management Procedure (BC-PRO-0143)	Client Feedback Procedure (BC-PRO-0141)
Work Instructions	
Nil.	

Forms
Nil.
Other
Aged Care Quality and Safety Commission (ACQSC) 2022, Effective Incident management Systems: best practice guidance, Commonwealth of Australia, Australia.
Aged Care Quality and Safety Commission (ACQSC) 2023, Guidance and resources for providers to support the Aged Care Quality Standards, Commonwealth of Australia. Australia.
Aged Care Quality and Safety Commission (ACQSC) 2023, Serious Incident Response Scheme: guidelines for providers of home services, Commonwealth of Australia, Australia.
Aged Care Quality and Safety Commission (ACQSC) 2022, Open Disclosure Framework and Guidance, Australian Government, Australia.
Australian Commission on Safety and Quality in Health Care (ACSQHC) 2013, Australian Open Disclosure Framework, Commonwealth of Australia, Australia.
Australian Commission on Safety and Quality in Health Care (ACSQHC) 2021, Incident Management Guide, Commonwealth of Australia, Australia.
National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission (NDISQSC) 2019, Incident Management Systems, NDISQSC, Australia.

10. Document details

Document owner	Client Incident Co-ordinator
Consumer Participation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> Not Applicable
Document Type	POL - Policy
Functional Area	Quality and Safety
Risk Rating	High
Periodic Review	24 months

Silverchain Group policies align with relevant legislation and standards and are based on providing a fair, inclusive, and safe working environment free from bullying and discrimination and one that enables equal opportunity for all Silverchain Group staff.

Our policies embody our values of integrity, respect, trust, and compassion.