



# Incident Management Policy

---

## Contents


|                                       |   |
|---------------------------------------|---|
| Overview .....                        | 1 |
| Definitions .....                     | 2 |
| Policy Statement.....                 | 3 |
| General Principles.....               | 3 |
| Incident Management Principles .....  | 3 |
| Incident Management Framework .....   | 4 |
| Roles and Responsibilities.....       | 5 |
| Accountability.....                   | 6 |
| Location .....                        | 6 |
| Feedback.....                         | 6 |
| Related Documents and References..... | 6 |
| Document Control Information.....     | 8 |

## Overview

|                                |   |
|--------------------------------|---|
| <b>Purpose</b>                 | To provide the principles and framework for the effective management of all incidents (including critical incidents) and the reduction of preventable incidents, across The Salvation Army (TSA). |
| <b>Who does this apply to?</b> | This policy applies to: <ul style="list-style-type: none"> <li>▪ All TSA personnel</li> <li>▪ Anyone who engages with TSA</li> </ul>  |
| <b>Effective date</b>          | 07/08/2020  |

## Definitions

Definitions are located in the [Glossary of Terms and Definitions](#).

| Term                                 | Definition   |
|--------------------------------------|--|
| <b>Child</b>                         | Refers to and includes all persons under the age of 18 years.  |
| <b>Control/Safeguard</b>             | A system, process, activity, device or practice that is implemented to prevent and/or detect an incident.  |
| <b>Incident Investigation</b>        | A structured process which involves the gathering and examination of information and evidence in order to prevent or minimise the reoccurrence of the incident.  |
| <b>Incident Investigation Report</b> | A comprehensive file that documents all details of an incident investigation.  |
| <b>Incident Management Report</b>    | Frequent reporting to management of incident trends and status of incidents being managed.   |
| <b>Incident Management System</b>    | The policies, processes, documents and tools (including online register) which together, allows the management of incidents within TSA.  |
| <b>Incident Owner</b>                | The person assigned ownership of the incident and who is responsible for ensuring all policy and procedural activities are completed for the assigned incident.  |
| <b>Investigation Review</b>          | A structured activity that can take place at the end of or whilst an incident investigation is underway, with the purpose of: <ul style="list-style-type: none"> <li>▪ Reconfirming the facts and evidence</li> <li>▪ Confirming that the correct investigation process was undertaken</li> <li>▪ Confirming the appropriate remediation and recompense was provided</li> <li>▪ Identifying additional causes that have contributed to the incident occurring (including external factors)</li> </ul>  |
| <b>Near Miss</b>                     | A near miss is where an incident has occurred and a fortunate break in the chain of events has prevented a negative consequence.   |
| <b>Natural Justice</b>               | Also referred to as 'procedural fairness', natural justice is afforded when the incident management process is accessible, fair, transparent and consistent and all participants receive: <ul style="list-style-type: none"> <li>▪ Equitable treatment</li> <li>▪ Written notice of the incident and details of the incident process are provided</li> <li>▪ The right to be heard and to respond to complaints</li> <li>▪ The right to make submissions and present material and information</li> <li>▪ Decisions made on the balance of probabilities</li> </ul> |
| <b>Notification</b>                  | The action of communicating the incident to management and subsequent parties according to the notification schedule and to external bodies, where mandated contractually or as required in our compliance obligations.<br> This terminology may differ with some existing processes e.g. privacy notifiable breaches.  |
| <b>Remediation</b>                   | To correct something that is wrong or to address a deficiency.   |
| <b>Recompense</b>                    | To make amends to (someone) for loss or harm suffered; to compensate.  |
| <b>Root Cause Analysis (RCA)</b>     | A method of investigation used for identifying causes of the incident in order to detect the appropriate remedial solutions.   |

# Policy Statement

## General Principles

|  |   |
|--|---|
| <b>Our commitment</b>                        | <p>The Salvation Army is committed to the effective and timely management of all incidents, including critical incidents, across the organisation to ensure:</p> <ul style="list-style-type: none"><li>▪ The safety and care of all people engaged with TSA</li><li>▪ Compliance with all legislative and regulatory obligations including privacy and confidentiality</li><li>▪ Accountability and transparency in the management of all incidents</li><li>▪ Responsive and open communication</li><li>▪ The delivery of a fair outcome to all parties</li><li>▪ Continuous improvement of service delivery through the reduction in preventable incidents</li></ul> |
| <b>Legislative and regulatory obligation</b> | <p>TSA is committed to compliance with all applicable legislation, government regulation and/or mandatory reporting requirements associated with the management of incidents and must be in addition to TSA's own internal incident notification requirements.</p>  |
| <b>Contractual obligation</b>                | <p>All incident notification obligations required as part of a contractual arrangement must be in addition to TSA's own internal incident notification requirements.</p>  |
| <b>Safety and wellbeing of children</b>      | <p>TSA is a child safe organisation and provides an environment which is safe and inclusive for all children.</p> <p>Reporting of all alleged, suspected or actual incidents of abuse, neglect, harm or risk of harm involving children is a mandatory requirement within TSA and by statutory authorities as required by law.</p>  |

## Incident Management Principles

|                              |   |
|------------------------------|---|
| <b>Transparency</b>          | <p>TSA commits to open disclosure and managing incidents in a transparent and open way.</p>   |
| <b>Privacy</b>               | <p>All personal information collected as part of the incident or the investigation will be managed in line with the Privacy Act Compliance Policy (GO_LR_POL_TPAC).</p>   |
| <b>Confidentiality</b>       | <p>Wherever possible TSA must maintain confidentiality throughout the incident management process unless all the parties involved have indicated that confidentiality is not required.</p> <p>TSA is required to disclose information:</p> <ul style="list-style-type: none"><li>▪ That is necessary for the safety of any person or to prevent harm</li><li>▪ Where the sharing of the information is compelled by law</li></ul> |
| <b>Communication</b>         | <p>All parties involved or impacted must be provided timely updates on the status of the incident in a format and language they understand.</p>   |
| <b>Diverse and inclusive</b> | <p>TSA commits to incorporating the principles of diversity and inclusion in all interactions with parties involved or impacted by an incident and treating all with respect and fairness.</p>  |
| <b>Management Reporting</b>  | <p>Regular management reporting of critical incidents must be provided to the Executive Mission Council, Quality and Safety Committee and the Board.</p> <p>Ad hoc reports will be provided to identified stakeholders.</p> <p>Refer to the incident management reporting section included in Incident Management Procedure (GO_QA_PRO-01_TCIM).</p>  |
| <b>Shared accountability</b> | <p>TSA is committed to a culture of accountability and transparency in the reporting and management of incidents.</p> <p>Ownership and subsequent management of incidents must be clearly identified.</p>   |

## Incident Management Framework

---

### Incident management principles

The principles underpinning TSA's incident management are:

- All incidents must be recorded, categorised, notified and managed based on pre-defined criteria
- Any incident that relates to the suspected or actual abuse, neglect, harm or risk of harm to a child, children or young person/s, must be reported to the relevant external statutory authority (e.g. state/territory or federal police, statutory child protection agency or funding body) without delay.
- All information must be compliant with confidentiality and privacy legislation
- Incident data must be collated, analysed and reported based on pre-defined criteria



Incidents are recorded in a TSA incident register.

---

### Approach

The Incident Management System must provide TSA with:

- A consistent approach
  - A consistent language and categorisation
  - A means to manage critical incidents in a timely and effective manner
  - A means to support the continuous improvement of all TSA services and operations
- 

### Incident investigation

Incidents must be investigated in accordance with the Incident Management Procedure (GO\_QA\_PRO-01\_TCIM) and in line with any state/territory statutory requirements as required by law/



Where an investigation is required it may be conducted by internal or external parties to ensure:

- The appropriate skill set is applied based on the type of incident
  - They are investigated in an impartial way, without any real or perceived conflict of interest
  - Compliance with relevant state/territory legislation and regulations
  - For safeguarding related incidents, refer to the Investigations Roles Matrix in Safeguarding Investigation Procedure (GO\_LR\_PRO-03\_TPOI)
  - Where an incident has been reported to a statutory or regulatory body (i.e. police, child protection authority), any TSA investigation can only proceed with the explicit written approval and authority of that relevant statutory or regulatory body
- 

### Local (operational) incident forms

Service stream incident processes and forms may sometimes be required in addition to the recording in a TSA incident register.

---

### Local incident management

Mission stream specific processes and work instructions required to meet state/territory regulations must align with this policy.



State/territory specific timeframes may be less than but not longer than the timeframes specified in the Incident Management Procedure (GO\_QA\_PRO-01\_TCIM).

---

### Continuous improvement

TSA is committed to reducing the risk and impact of all incidents and the number of preventable incidents.

All actions (remedial, recompense, interim and long-term solutions) will be tracked and reported.

---

## Roles and Responsibilities

The roles and responsibilities associated with execution of this policy are indicated in the table below.

|   |  |
|---|--|
| <b>Australia Territory Board</b>                    | The Board, through its Committees, provides oversight of management actions in response to critical incidents.   |
| <b>Executive Manager Compliance</b>                 | Ensure all regulatory breaches and reporting to the Audit and Risk Committee are in line with the Compliance Management System.  |
| <b>Executive Manager Continuous Improvement</b>     | Ensure that the practice of incident management process adheres with this policy across TSA and, identify improvements within this policy as well as of service delivery through the reduction in preventable incidents.<br>Monitor and evaluate trends in incident type, categorisation and prevalence. |
| <b>Executive Manager Risk</b>                       | Monitor incident trends and report to the Audit and Risk Committee in line with the Risk Management Framework.   |
| <b>General Counsel</b>                              | Provide guidance and consultation where there are actual or potential court or legal proceedings.  |
| <b>Head of Department; Governance and Risk</b>      | Ensure transparent critical incident management communication is provided to the Board.  |
| <b>Head of Department; Quality and Safeguarding</b> | Oversight of the incident management process in order to ensure compliance with this policy across TSA.  |
| <b>Head of Internal Audit</b>                       | Provide guidance and consultation for all Audit matters.   |
| <b>Head of Media</b>                                | Provide guidance and consultation for all media matters.   |
| <b>Line Manager and Mission Expression Leader</b>   | Ensure: <ul style="list-style-type: none"> <li>▪ All immediate actions are taken</li> <li>▪ All personnel are compliant with the incident management process</li> <li>▪ All notifications are completed in line with the incident management process</li> </ul>  |
| <b>Personnel (HR and Officer)</b>                   | Provide guidance and consultation for all personnel matters.   |
| <b>Q&amp;S (Safeguarding)</b>                       | Provide guidance and consultation for all child safety matters.  |
| <b>Senior TSA Representative</b>                    | Ensure: <ul style="list-style-type: none"> <li>▪ All personnel are compliant with the incident management process</li> <li>▪ All personnel understand their obligations under this policy and comply with this policy</li> </ul>   |
| <b>TSA Personnel</b>                                | Take appropriate action when aware of or impacted by an incident.<br>Undertake required training.  |

## Accountability

---

|                                       |  |
|---------------------------------------|--|
| <b>Obligation</b>                     | All personnel under the terms of their service, employment, engagement or contract must comply with all TSA policies, procedures and supporting documents. |
| <b>Consequences of non-compliance</b> | Failure to comply with this policy may result in disciplinary action and, in serious cases, termination of employment or engagement with TSA.              |

---

## Location

---

|                   |                        |
|-------------------|------------------------|
| <b>Repository</b> | Territorial Policy Hub |
|-------------------|------------------------|

---

## Feedback

---

|                                     |  |
|-------------------------------------|--|
| <b>Feedback is encouraged</b>       | Feedback is used to improve and enhance the impact of this policy and will be considered when reviewing and updating the document. |
| <b>Who is feedback provided to?</b> | All feedback is to be forwarded to <a href="mailto:CI_Central@salvationarmy.org.au">CI_Central@salvationarmy.org.au</a> .          |

---

## Related Documents and References

---

|                         |  |
|-------------------------|--|
| <b>Policy Documents</b> | Incident Management Policy (GO_QA_POL_TCIM)                              |
|                         | <u>Procedures</u>  |
|                         | Incident Management Procedure (GO_QA_PRO-01_TCIM)                        |
|                         | <u>Charts</u>  |
|                         | Incident Management Process Chart (GO_QA_CHA-02_TCIM)                    |
|                         | Salvos Stores Incident Categorisation Table (GO_QA_CHA-03_TCIM)          |
|                         | Employment Plus Incident Categorisation Table (GO_QA_CHA-04_TCIM)        |
|                         | Social Mission Incident Categorisation Table (GO_QA_CHA-05_TCIM)         |
|                         | Community Engagement Incident Categorisation Table (GO_QA_CHA-06_TCIM)   |
|                         | Salvation Army Housing Incident Categorisation Table (GO_QA_CHA-07_TCIM) |
|                         | SAID Incident Categorisation Table (GO_QA_CHA-08_TCIM)                   |
|                         | Corps Incident Categorisation Table (GO_QA_CHA-09_TCIM)                  |
|                         | Salvos Funerals Incident Categorisation Table (GO_QA_CHA-10_TCIM)        |
|                         | <u>Guides</u>  |
|                         | SolvSafety User Guide - Report an Incident (GO_QA_GUI-01_TCIM)           |
|                         | SolvSafety User Guide - Manage an Incident (GO_QA_GUI-02_TCIM)           |
|                         | Incident Investigation Guidelines (GO_QA_GUI-03_TCIM) to be developed    |
|                         | <u>Forms</u>   |
|                         | Incident Report Form (GO_QA_FOR-01_TCIM)                                 |
|                         | Investigation Action Plan Template (GO_QA_FOR_02_TCIM)                   |
|                         | RCA Tool - Cause and Effect Diagram Template (GO_QA_FOR_03_TCIM)         |
|                         | RCA Tool - Five Why Diagram Template (GO_QA_FOR_04_TCIM)                 |
|                         | Root Cause Analysis Action Plan Template (GO_QA_FOR_05_TCIM)             |
|                         | Root Cause Analysis Review Template (GO_QA_FOR_06_TCIM)                  |
|                         | Case Review Action Plan Template (GO_QA_FOR_07_TCIM)                     |
|                         | Case Review Template (GO_QA_FOR_08_TCIM)                                 |

---

---

**Related Policy Documents**

Code of Conduct Policy (GO\_LR\_POL\_TCOC)  
Compliance Policy (GO\_LR\_POL\_TCOM)  
Diversity and Inclusion Policy (GO\_LR\_POL\_TDAI)  
Enterprise Risk Management Policy (GO\_LR\_POL\_TERM)  
Client Feedback and Complaints Policy (GO\_QA\_POL\_TFBK)  
Fraud Policy (GO\_LR\_POL\_TFRC)  
Governance Policy (GO\_LR\_POL\_TGOV)  
Knowledge, Information and Data Management Policy (GO\_LR\_POL\_TKID)  
Managing a Person of Concern Procedure (GO\_LR\_PRO-02\_TPOI)  
Lived Experience and Participation Policy (GO\_SR\_POL\_TCSP)  
Media Relations Policy (GO\_PR\_POL\_TMED)  
Person of Interest (Safeguarding) Policy (GO\_LR\_POL\_TPOI)  
Privacy Act Compliance Policy (GO\_LR\_POL\_TPAC)  
Quality Management Policy (GO\_QA\_POL\_TQCI)  
Responding to Safeguarding Concerns Procedure (GO\_LR\_PRO-01\_TPOI)  
Safeguarding Investigations Procedure (GO\_LR\_PRO-03\_TPOI)  
Safety and Wellbeing of Children and Young People Policy (GO\_LR\_POL\_TSWC)  
Whistleblower Protections Policy (GO\_LR\_POL\_TWBP)  
Work Health and Safety Policy (GO\_WH\_POL\_TWHS)

---

**Related Legislation**

Care and Protection of Children Act 2007 (NT)  
Children and Young People Act 2008 (ACT)  
Children and Young Persons (Care and Protection) Act 1998 (NSW)  
Children, Young Persons and their Families Act 1997 (Tas)  
Children, Youth and Families Act 2005 (Vic)  
Children Legislation Amendment (Reportable Conduct) Act 2017  
Children and Community Services Act 2004 (WA)  
Children's Protection Law Reform (Transitional Arrangement and Related Amendments) Act 2017 (SA)  
Children's Protection Act 1993 (SA)  
Child Wellbeing and Safety Amendment (Child Safe Standards) Act (Vic) 2015  
Child Safety (Prohibited Persons) Act 2016 (SA)  
Child Safety (Prohibited Persons) Regulations 2016 (SA)  
Child Protection Act 1999 (Qld)  
Commissioner for Children and Young People Act 2006  
Criminal Records Act 1991 (NSW)  
Crimes Act 1914 (Cth)  
Domestic and Family Violence Act 2007 (NT)  
Ombudsman Act 1974 Part 3A (NSW)  
Reportable Conduct and Information Sharing Legislation Amendment Act 2016  
Victorian Crimes Act 1958 (Vic) (Section 49B, 49C, 327)

---

**Funding Agreement Requirements**

N/A

---

**Governance/ Accreditation/ Certification Standards**

N/A

---

**Audit Report Findings**

N/A

---

## Document Control Information

| <b>Document ID</b>        | GO_QA_POL_TCIM   |   |               |                    |     |            |                   |     |            |   |     |           |   |
|---------------------------|--|---|---------------|--------------------|-----|------------|-------------------|-----|------------|---|-----|-----------|---|
| <b>Theme</b>              | Governance   |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Category</b>           | Quality Assurance  |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Policy Owner</b>       | Assistant to the Chief Secretary – Governance Portfolio  |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Policy Implementer</b> | Head of Quality and Safeguarding   |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Approval Authority</b> | Australia Territory Board  |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Review Date</b>        | February 2022  |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Next Review Date</b>   | October 2023   |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Previous Documents</b> | <b>AUE</b><br>Incident Policy (May 2017)<br>Critical Incident Policy (DS.SP.40)<br><b>AUS</b><br>Critical Incident Management Policy (GO_QI_POL_CIM)   |   |               |                    |     |            |                   |     |            |   |     |           |   |
| <b>Document History</b>   | <table><thead><tr><th>Version</th><th>Date Approved</th><th>Summary of Changes</th></tr></thead><tbody><tr><td>1-0</td><td>07/08/2020</td><td>Inaugural version</td></tr><tr><td>1-1</td><td>17/08/2021</td><td>Update to Related Documents and References – added categorisation table links</td></tr><tr><td>1-2</td><td>4/04/2022</td><td>Updates to meet SA Dept of Human Services safeguarding requirements</td></tr></tbody></table> | Version   | Date Approved | Summary of Changes | 1-0 | 07/08/2020 | Inaugural version | 1-1 | 17/08/2021 | Update to Related Documents and References – added categorisation table links | 1-2 | 4/04/2022 | Updates to meet SA Dept of Human Services safeguarding requirements |
| Version                   | Date Approved  | Summary of Changes  |               |                    |     |            |                   |     |            |   |     |           |   |
| 1-0                       | 07/08/2020   | Inaugural version   |               |                    |     |            |                   |     |            |   |     |           |   |
| 1-1                       | 17/08/2021   | Update to Related Documents and References – added categorisation table links |               |                    |     |            |                   |     |            |   |     |           |   |
| 1-2                       | 4/04/2022  | Updates to meet SA Dept of Human Services safeguarding requirements           |               |                    |     |            |                   |     |            |   |     |           |   |