GREENWAY
PLAN MANAGEMENT

Incident Management

Policy and Procedure

Policy Name	Date Created	Last Reviewed	Approved By
Incident Management	21.09.2025	18.03.2026	Nicholas Lyle

1. Purpose

This policy outlines how Greenway Plan Management Pty Ltd manages incidents that occur in connection with our supports and services, in compliance with the National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018.

The purpose of this process is to:

- Ensure all incidents are acknowledged, recorded, managed, and resolved in a timely manner.
- Protect the rights, safety, and wellbeing of participants.
- Fulfil our obligations to notify and report to the NDIS Commission where required.

2. Scope

This policy applies to:

- All staff, contractors, and advisors engaged by Greenway Plan Management.
- All incidents related to our Plan Management services, including but not limited to:
  - Financial mismanagement or errors in payments.
  - Fraud or suspected fraud.
  - Breach of privacy or confidentiality.
  - Inappropriate conduct by staff.
  - Participant complaints relating to our services.

3. Definitions

Term	Definition
Incident	Any event that has, or could have, an adverse impact on a participant, staff member, or the organisation.
Reportable Incident	Incidents defined under the NDIS Rules that must be reported to the NDIS Commission. This includes: death of a participant; serious injury of a participant; abuse or neglect of a participant; unlawful sexual or physical contact with a participant; sexual misconduct involving a participant; and use of restrictive practices.
NDIS Commission	The NDIS Quality and Safeguards Commission — the regulator responsible for registering providers and handling complaints and reportable incidents.

4. Responsibilities

- All staff must report incidents immediately to management upon becoming aware of them.

The Provider/Director is responsible for:

- Ensuring incidents are documented, investigated, and resolved promptly.
- Reporting reportable incidents to the NDIS Commission within required timeframes.

    - Maintaining secure and confidential records of all incidents.
- Participants will be supported to raise concerns and access available complaint mechanisms at any time.

5. Procedure

Step 1: Identification and Immediate Action

- Any staff member who becomes aware of an incident must take immediate steps to ensure safety where relevant.
- Notify the Provider/Director as soon as possible.

Step 2: Recording the Incident

- Complete an Incident Report Form (see Appendix A) including: date, time and location; people involved; description of what occurred; immediate actions taken; and potential impact on participant(s).
- Store the completed form securely in the Incident Register.

Step 3: Response and Investigation

- The Provider/Director investigates promptly, proportionate to the severity of the incident.
- Determine root cause and corrective actions required.
- Provide outcome and resolution information to the participant where relevant.

Step 4: Reporting to the NDIS Commission

For reportable incidents, the following timeframes apply under the NDIS (Incident Management and Reportable Incidents) Rules 2018:

Incident Type	Notification Timeframe
Death of a participant, serious injury, abuse or neglect	**Within 24 hours**
Sexual misconduct or unlawful physical contact involving a participant	**Within 24 hours**
Use of restrictive practices	**Within 24 hours**
All other reportable incidents	**Within 5 business days**
Follow-up report (if requested by the Commission)	**As directed by the Commission**

Step 5: Resolution and Continuous Improvement

- Implement corrective actions to prevent recurrence of the incident.
- Review policies, training, or processes if systemic issues are identified.
- Update the Incident Register with full resolution details and closure date.

6. Participant Information

Participants will be provided with:

- A plain-English summary of this process in their Welcome Pack.
- Information on how to raise concerns, including contacting Greenway Plan Management directly, and independent options such as the NDIS Commission and the Commonwealth Ombudsman.
- Assurance that reporting an incident or complaint will not affect their access to services.

7. Record Keeping

- All incident records are stored securely for a minimum of 7 years.
- Access to records is limited to authorised staff only.

- Records will be made available for NDIS audit or Commission review upon request.
- Records containing personal information are managed in accordance with the Privacy Act 1988 and the Australian Privacy Principles.

8. Review

This policy and process will be reviewed annually, or sooner if legislative requirements or organisational changes occur. The review date and approving officer will be recorded on the cover page.

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Appendix A

Incident Report Form

Complete this form as soon as possible after an incident is identified. Store securely in the Incident Register.

Incident Reference #	
Date & Time of Incident	
Location	
Reported By	
People Involved	
Description of Incident	
Immediate Actions Taken	
Was the participant informed?	☐ Yes ☐ No
Is this a Reportable Incident under the NDIS Rules?	☐ Yes ☐ No
Has the NDIS Commission been notified?	☐ Yes ☐ No
Date/Time of Commission Notification	
Resolution / Corrective Action	
Date Resolved / Closed	
Signature of Reporter	
Signature of Director	