



CRITICAL CLIENT INCIDENTS POLICY

Department of Human Services (DHS)

Summary

This policy is in place to ensure that critical incidents affecting clients of the Department of Human Services (the Department) are effectively and consistently identified, reported, responded to, managed, and monitored. The policy ensures the Minister is notified of any critical client incidents as they are declared.

Table 1: Document Details

Policy Number	N/A
Applies to	All DHS Divisions that are involved in any way with the provision of direct client services or service providers and contractors who provide services on behalf of the Department or to the Department
Issued by	DHS
Delegated Authority	Chief Executive, Department of Human Services
Policy Custodian	Director, Incident Management Unit, People and Performance.
Content author (position & phone no)	Director Incident Management Unit
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Review Date	March 2023
Classification	Official

Table 2 – Revision Record

Date	Version	Revision description
June 2014	1.0	Implementation of Policy
March 2015	2.0	Policy reviewed following implementation
April 2016	3.0	Policy updated to include ICAC reporting requirements
December 2016	4.0	Policy updated to include Incident Management Unit
January 2019	4.1	Policy updated to include new monthly reporting timeframes, Department and Division name changes
December 2020	5.0	Policy reviewed following increased reporting requirements and implementation of lower threshold for reporting
March 2021	6	Policy redrafted following PWC Review. Reporting procedures separated into Critical Client Incident Reporting Procedures.

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1. Policy Title

Critical Client Incidents (CCI) Policy

2. Purpose

This policy documents the Departments requirements in the identification and management of Critical Client Incidents. This policy:

- Supports the health and safety of clients.
- Ensures that critical incidents affecting clients of the Department of Human Services (the Department) are effectively and consistently identified, reported, responded to, managed, and monitored.
- Ensure consistent and considered reporting of critical client incidents to the Minister.

3. Context

The Department delivers and funds programs and services to children, young people and adults in a range of settings. The vulnerability of many of these clients, and the nature of the services provided, heightens the responsibilities and duty of care associated with service delivery.

Government and the community expect a high degree of accountability in the delivery of services, particularly to those who are vulnerable due to age, disability or life circumstances. In recent years, there have been several enquiries and reports focusing on safeguarding vulnerable people and the reporting and management of critical incidents. There are clear expectations, by government and the community, that clients are protected, and critical incidents are consistently and properly identified, reported, responded to, managed, and monitored. Timely notification to the Minister is a critical component of this policy.

This policy contains specific provisions relating to client incidents which are deemed to be critical; all existing and future operational documents across the Department in relation to client incident management must be consistent with this policy.

4. Scope

This policy applies to all DHS Divisions that are involved in any way with the provision of direct client services or service providers or contractors who provide services on behalf of the Department or to the Department. Organisations to whom DHS has provided grant funding (but who do not provide services on behalf of or to the Department) are not within the scope of this policy.

5. Policy Detail

5.1 Guiding Principles

The following principles must guide the management of all critical client incidents.

- **Commitment to clients:** The Department is committed to providing safe, high quality and person-centred services.
- **Responsive and coordinated:** Critical client incidents will be responded to and managed in a timely, consistent, responsive, coordinated, and effective manner. The Minister will be notified of critical client incidents as they are declared.

5.2 Definitions

Client: is a person who receives, relies on, or benefits from, services delivered by the Department or its service providers. Interchangeable terms used are consumer and customer. Some areas utilise specific descriptions for clients depending on the service setting (e.g., resident or service recipient). Clients of organisations to whom DHS has provided grant funding are excluded.

Worker: a worker includes anyone who works for the Department as an employee, employee of a labour hire company placed within the Department, contractor, sub-contractor, trainee, work experience student or volunteer. A worker includes anyone employed or engaged in voluntary capacity by a Department service provider.

Critical Client Incident: is an event (or alleged event) that occurs as a result of, or during the delivery of services directly provided by the Department or a service provider and has caused or is likely to cause significant negative impact to the health and or safety of a client. Critical client incidents will usually require a crisis response, incident management, coordination, and consideration of a range of risks and sensitivities. Critical client incidents may include (but are not limited to):

- The unexpected death, serious injury (including any injury that requires emergency medical attention or hospitalisation or medical treatment within 48 hours of an incident¹) or alleged assault (including physical, sexual abuse, sexual assault, and indecent assault) of a client, that occurs as a result, or during the delivery, of services. Dependent upon the circumstances, this could include client pregnancy.
- Allegations of unlawful or criminal activity or conduct involving an employee, a subcontractor or volunteer that has caused, or has the potential to cause, injury or impact on the health and or safety of a client.
- The seriousness of the allegation results in reporting to SAPOL, OPI, CARL, the Training Centre Visitor, the Coroner, Health and Community Services Complaints Commission or SafeWork SA or other external bodies. In this instance a matter is automatically declared a CCI.

¹ Aligned to Part 3 of the Work Health and Safety Act 2012

- Any event that has a negative impact on the health and or safety of a client that may attract media attention.
- Any event declared a CCI by the Chief Executive.

5.3 Procedure

The following outlines the high-level process that must be followed in relation to all (apparent) critical client incidents:

1. **Immediate Response - Safety:** The safety of clients, workers and others is of the highest priority. Following any client incident, workers must respond immediately and appropriately to ensure the health and safety of client(s) and/or others. This may involve calling an ambulance or administering first aid.
2. **Report to SAPOL:** If the incident may be a criminal offence or if police attendance is necessary to ensure the safety of those involved in the incident or restore order, the incident must immediately be reported to SAPOL. In the event of such reporting, workers must seek to preserve physical evidence (e.g., medical or scene examination, seizure of clothing).
3. **Report to Office for Public Integrity (OPI):** If the incident involves a reasonable suspicion of corruption, serious and/or systemic misconduct or maladministration, the matter must be reported to OPI. The Incident Management Unit can assist with this if required.
4. **Report from Service Providers:** If a critical client incident is reported by a service provider to a DHS worker, the worker must respond immediately to ensure the service provider has:
 - Provided for the safety of clients, workers and others involved in the incident.
 - Reported the incident to SAPOL, if the incident constituted a criminal offence or if SAPOL attendance is necessary to ensure the safety of those involved in the incident, to restore order or preserve evidence.
 - Reported the incident to OPI, if the incident involved a reasonable suspicion of corruption, serious and/or systemic misconduct or maladministration.
 - Advised the client's family member(s) and/or guardian(s) of the incident.
5. **Notifying:** Department workers must immediately advise their line manager and/or Director of an apparent critical client incident, either in person or by phone. The Manager and/or Director must then immediately then contact the Director, IMU and relevant Executive Director.

All incidents must be recorded in the incident management system, MySafety (or C3MS for youth justice clients).

6. **Assessment:** The Director, IMU will assess and determine if the incident is to be classified as a critical client incident. If the Director IMU deems an incident to be a critical client incident, the incident will be managed in accordance with the Critical Client Incident Reporting Procedure, which includes briefing the Minister within 24 hours.

6. Reference Documents


Critical Client Incident Reporting Procedure

Critical Client Incident Disclosure Policy

7. Aboriginal Impact Statement Declaration

The needs and interests of Aboriginal people have been considered in the development of this policy, and there is no specific or indirect impact on Aboriginal people.

8 Policy Approval

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<p>Comments:</p>	<p style="text-align: center;">APPROVED</p> <p style="text-align: center;"></p> <p style="text-align: center;">Lois Boswell Chief Executive 6 / 4 / 2021</p>	