

## **Internal Investigation into Incidents and Complaints Policy**

Forge Clarity PTY LTD

Document: Internal Investigation into Incidents and Complaints Policy | Version: 1.0 |

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Organisation: Forge Clarity PTY LTD

Lead Therapist/Director: Tegan Elza Banks

Service Type: Telehealth Counselling and Therapeutic Supports

**Important: Do not begin investigation if police are involved until they complete their enquiries.**

## **1. Purpose**

This policy establishes how Forge Clarity investigates incidents and complaints to ensure client safety and meet NDIS and legal requirements.

## **2. Scope**

Applies to:

- All NDIS and general public clients receiving telehealth counselling
- Participants in the Thursday Zoom Grief Support Group
- Volunteers assisting with the grief support group
- The Lead Therapist/Director

## **3. When to Investigate**

An investigation is required when:

- A reportable incident occurs (death, serious injury, abuse, neglect, sexual/physical misconduct, unauthorised restrictive practices)
- A serious complaint is received about service quality or conduct
- Police are involved in an incident (investigation pauses until police complete their enquiries)
- A mandatory report is made (child protection, vulnerable adult abuse)
- An incident may lead to litigation
- An incident has affected client safety or service delivery

## **4. Roles**

Director:

- Receives all incident and complaint reports
- Conducts initial assessment within 24 hours
- Determines if investigation is needed
- Conducts all investigations
- Reports to NDIS Commission and ACA as required
- Implements recommendations

Volunteers:

- Report incidents/complaints to Director immediately
- Cooperate with investigations if required

- Maintain confidentiality

## **5. Investigation Process**

### Step 1: Immediate Actions (Within 24 Hours)

- Ensure safety of all affected parties
- Assess severity and immediate risks
- Notify NDIS Commission (reportable incidents - within 24 hours)
- Notify police if criminal activity suspected
- Make mandatory reports as required
- Document incident details

### Step 2: Initial Assessment

Determine:

- Is investigation needed?
- What are the investigation objectives?
- What evidence is required?
- Who needs to be interviewed?
- Investigation timeline (typically 30 days)

Important: Do not begin investigation if police are involved until they complete their enquiries.

### Step 3: Gather Evidence

- Review session notes and client records
- Review communication records (emails, Zoom recordings)
- Review volunteer notes (if grief group incident)
- Interview affected parties (with consent)
- Review relevant policies and procedures

### Step 4: Analyse and Document Findings

- What happened?
- What caused it?
- What contributed to it occurring?
- What was the impact on client safety?
- Were policies followed?

Step 5: Recommendations

- Actions to prevent recurrence
- Policy or procedure changes needed
- Training required
- Timeline for implementation

Step 6: Report and Follow-Up

- Document investigation using template (Appendix A)
- Report to NDIS Commission (final report within 90 days for reportable incidents)
- Inform affected parties of outcome (as appropriate)
- Implement recommendations
- Monitor effectiveness

**6. Communication**

During Investigation:

- Keep affected clients informed of progress
- Update NDIS Commission as required
- Maintain confidentiality

After Investigation:

- Share findings with affected parties (respecting privacy)
- Submit final report to NDIS Commission (if reportable incident)
- Brief volunteers on any practice changes

**7. Record Keeping**

Maintain secure records of:

- Incident/complaint details - (The Incident Register is completed)
- Initial assessment - (Incident Report Form is completed alongside the Incident Management Policy and Procedure Checklist and other relevant documents)
- Investigation Plan Template- (Investigation Plan Template is tailored and completed)
- Evidence collected
- Findings and recommendations
- Actions taken (Investigation Plan Template is tailored, completed and updated until the incident has come to a conclusion)

Retention: Keep records for 7 years minimum as law mandates.

## **8. Reporting to NDIS Commission**

For reportable incidents:

- Initial notification: Within 24 hours via NDIS Commission portal or another contact method such as phone or email.
- Updates: At 60 days if ongoing
- Final update to the Investigation Plan is the Final Report: Within 90 days including findings and prevention actions