

Internal Investigation into Incidents and Complaints Policy

Forge Clarity PTY LTD

Organisation: Forge Clarity PTY LTD

Lead Therapist/Director: Tegan Elza Banks

Service Type: Telehealth Counselling and Behavioural Support

Internal Investigation Effective Date: 19/11/2025

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