

INCIDENT MANAGEMENT POLICY

Quality Areas: NQS 2 – Children’s Health and Safety

Policy Owner: Safety and Compliance

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Why this is
important

1.0 Introduction and Purpose

We are committed to providing a safe and healthy environment for children, families, team members and visitors, with the safety and wellbeing of children as the paramount consideration at all times. All educators share a duty of care to help prevent incidents and respond appropriately when they occur.

This Policy outlines the processes for identifying, responding to, recording and reviewing all incidents that occur within our centres, support offices and spaces we use. Incidents are to be assessed and classified according to their level of risk and severity, ensuring an appropriate and proportionate response. This includes immediate risk mitigation, escalation where required, and follow-up actions to prevent recurrence.

We manage incidents in a consistent, transparent and timely manner, with clear accountability for actions taken. It also supports effective communication, continuous improvement, and compliance with regulatory and legal obligations, ensuring that safety management is embedded in everyday practice across all centres, support offices and other spaces.

2.0 Who does this policy apply to:

All Team Members, Children, Families, Students, Volunteers and Contractors

3.0 What is our Policy:

3.1 Incident Reporting

All incidents will be recorded in BeSafe, our digital incident management system. BeSafe classifies incidents as minor, moderate, major or critical, which supports a consistent and proportionate response based on the level of risk and severity.

Depending on the classification, relevant managers and teams are automatically notified so that appropriate action can be taken. Incidents classified as moderate or above are escalated for review by subject matter experts, including Compliance and Recover@work, and may require further reporting to external agencies in line with regulatory requirements.

Where there are concerns relating to child harm, notifications are communicated to all levels of management, including senior leadership and the CEO, to ensure timely oversight and response.

3.2 Documenting incidents on Be Safe

All injuries, illness, hazards and any event that requires a response beyond minor routine care must be recorded on Be Safe. As a guide, an entry is required where an incident involves anything more than a very minor occurrence that is managed immediately and does not require ongoing action i.e. placing a band-aid on a child.

This includes, but is not limited to, situations where first aid is required beyond basic reassurance or minimal treatment where a child’s condition changes and requires monitoring, or where team members need to implement any form of incident response or escalation process.

BeSafe must also be used where an incident results in, or has the potential to result in, harm and requires a change to normal centre operations. This includes the implementation of “make-safe” actions such as closing or restricting access to an area, removing or isolating a hazard such as a space or room, or a significant change to supervision



practices i.e a child tries to climb the fence. Any incident that requires external notification, escalation to management, or reporting to a regulator or other authority must also be recorded in BeSafe.

The following types of events must be recorded in BeSafe (our incident management system):

- a. all injuries involving children, team members, students, contractors, family members or visitors; and
- b. all illnesses, including infectious diseases; allegations of child harm; unaccounted for children; and
- c. any concerning child behaviour, including sexualised behaviour; and
- d. child welfare concerns; and
- e. all complaints, where a complaint is defined as an objection to something considered unfair, unacceptable, or below expected standards; and
- f. service interruptions such as loss of power, water outages, non-functioning lifts or toilets, and any centre-related incidents including theft, property damage, fire, flood, data breaches or security events
- g. Where a hazard is identified but does not result in an incident or injury, it should be recorded through the appropriate risk or hazard management process rather than as a BeSafe incident, unless it has already resulted in harm or required immediate action to make the area safe.

3.3 Logging the event in BeSafe

Only Centre Managers and Responsible Persons are authorised to submit a BeSafe notification. However, the team member who witnessed the incident, responded to it, or received the disclosure is responsible for providing the initial details of what occurred.

If an incident was not directly witnessed, this should be clearly noted in the “witness” section as “not seen”, with the first responder instead recording how they became aware of the incident (for example, heard, was told, or responded). Be Safe reports must be completed in full with as much detail as possible. Be Safe reports must be accurate and factual.

This process helps ensure information is accurate, and that the Centre Manager or Responsible Person has first-hand understanding of the incident, enabling appropriate oversight and any immediate “make safe” actions to be implemented where required.

The Be Safe record must be completed within four hours (during business hours) of the incident occurring. If the incident occurs after 4 pm then it must be completed by 10 am the next morning. This timeframe helps ensure timely follow-up, including any required notifications to external authorities and the provision of appropriate support to children, families, and team members, in line with legislative and regulatory requirements.

Support Office team members who are present in a centre and witness an incident must promptly alert centre team members to ensure appropriate action is taken to manage the situation safely and effectively. The Support Office team member should also notify the Responsible Person or Centre Manager of their observation as soon as practicable.

A witness statement should be obtained from the Support Office team member, preferably before leaving and within two hours to support further enquiries and make assessment of reporting obligations. The Support Office team member may be recorded as a witness in Be Safe and may also be required to provide additional information for inclusion in the Be Safe report.

3.4 Incident Risk Management and Control

All incidents are managed using the organisation's Risk Management Framework and the BeSafe system. Following an incident, the Centre Manager or Responsible Person should review the classification of the incident and assess if incident is appropriately classified. If there are concerns that it may be incorrect reach out to Compliance. Incidents are classified as:

- **Minor** – Low impact incidents that are managed at a centre level. The centre may require some support from their Portfolio Manager.
- **Moderate** – Increased incident seriousness. These incidents will involve external reporting requirements. Generally, these incidents are supported by a centre and may involve portfolio support. In some instances, a centre may require a specific action or support by another department such as People and Culture for an employment related matter or facilities for property concerns.
- **Major** – High impact incidents requiring support from several subject matter experts. Given that multiple parties are required generally a Guardian Incident Report Team (GIRT) is called to identify issues and coordinate an approach.
- **Critical** – Most significant and critical incidents requiring urgent action that requires Leadership Team review and oversight. At times this may incident the establishment of a Critical Incident Team (CIT) that oversees actions and undertakings.

The incident classification determines the level of response, investigation, escalation, monitoring, and review required. If there is any uncertainty regarding the classification of an incident by BeSafe, or if a leader believes the assigned classification is incorrect, the Compliance Team must be contacted immediately via the Compliance Inbox for guidance and review.

3.5 Notifying a Regulatory Authority

Upon a Be Safe notification for a child being completed the Safety and Compliance Team will review the incident and determine if a notification is required. Similarly, the Recover@work team will oversee adult related incidents. This includes all required notifications to Education and Care Regulatory Authorities, Early Childhood Commissions, safety regulators, and any other relevant external bodies in line with legislative requirements in accordance with the *Regulatory Reporting Table*.

Incidents, complaints, and reportable matters are notified within required timeframes, including serious incidents, complaints and child protection matters (within 24 hours), circumstances posing a risk to health, safety or wellbeing (within 7 days), The Safety and Compliance support and advises on make-safe actions where a more complex issues requires attention.

Incidents involving adults, including team member injuries and workers compensation matters, are managed by the Recover@Work Team. This includes lodgement and management of workers compensation claims and coordination of injury management processes and adult related incidents to the safety regulator.

3.6 Incident Response

In response to any incident, the centre must take all reasonable steps to ensure the environment is safe and that the health, wellbeing and best interests of children and adults remain the priority in all decision-making.

This may include providing first aid, seeking medical assistance, implementing supervision adjustments, removing hazards, restricting access to an area, modifying routines or environments, or undertaking other "make-safe" actions to eliminate, reduce or manage identified risks. Where changes are made to the environment or operations as part of a make-safe response, these must be documented and supported by an appropriate risk assessment. Risk assessments should be uploaded to the BeSafe notification and be available for review at the centre.

The Centre Manager or Responsible Person is responsible for ensuring appropriate external agencies are contacted where required. This may include emergency services such as ambulance, police or fire services, and in some circumstances reporting concerns to Child Protection or other government authorities. Any contact with external agencies must be recorded on a Third-Party Contact Log and uploaded to the relevant BeSafe notification to ensure a complete record of actions taken.

Team members will be informed of any incident outcomes, make-safe arrangements or operational changes that may affect their work, supervision practices or the safety of children and others within the centre or support office. This ensures that appropriate controls are consistently implemented and maintained.



For guidance on responding to serious incidents, centres must follow the *Serious Incident Flowchart*. A current copy of the flowchart must be displayed within the centre and be readily accessible to all team members.

Major and Critical Incidents

For incidents classified as Major or Critical, Guardian recognises that these events present a higher level of risk and may result in more significant impacts or outcomes. Consistent with our risk-based approach, these incidents are subject to enhanced oversight, governance and response requirements.

Major Incidents

All Major incidents will be reviewed through a Guardian Incident Response Team (**GIRT**) process. These meetings may be convened to proactively prevent, or respond to, incident, risks, concerns or emerging issues that may impact safety, compliance or business performance

GIRT meetings may be convened in response to:

- Safety and compliance incidents; or
- Performance-related incidents.

The GIRT is chaired by the relevant General Manager, Head of Department, or other nominated leader responsible for managing the incident response who will plan the meeting and invite attendees. As part of the invite the chair will decide who should attend. Where an attendee believes that specific attendee should be at the GIRT, they should contact the chair and communicate why this person should be there. The chair will then make the final decision. If there is a misalignment about who should be at the meeting, this should be escalated to the chairs manager for final decision. Team members requested to attend a GIRT meeting are expected to participate or nominate an appropriate delegate where attendance is not possible.

A GIRT meeting will generally be convened within two to four hours of the incident being classified as Major. Meetings will be documented, including meeting records and transcripts where available. At the conclusion of each meeting, actions, accountabilities and timeframes will be agreed, assigned and monitored, and a subsequent review meeting scheduled as required.

Critical Incidents

Critical incidents represent Guardian's highest level of incident severity and may include events with significant operational, safety, legal, regulatory or reputational consequences, such as a pandemic or other major organisational crisis.

Critical incidents are overseen by one or more members of the Leadership Team. Where required, a Critical Incident Team (**CIT**) may be established to coordinate the response. Membership of the CIT will be determined based on the nature of the incident and the specialist expertise required.

The CIT is responsible for establishing response objectives, directing incident management activities, monitoring progress, and providing ongoing oversight until the incident is resolved and all required actions have been completed.

3.7 Emergency Management Plans

All centres and support offices must also maintain an *Emergency Management Plan* that outlines the procedures to be followed in the event of an emergency. Team members must be familiar with the plan and their responsibilities within it. Emergency and evacuation drills must be conducted and documented regularly in accordance with the *Emergency Management Policy* to ensure preparedness and an effective response during an emergency.

3.8 Risk Assessments

Risk assessments are used to identify hazards, assess risk, and document control measures to prevent or reduce the likelihood of incidents occurring or reoccurring. Centres must maintain current risk assessments in line with our policies, ensuring they reflect the environment, activities, and operational requirements.

Risk assessments must be reviewed and updated regularly, and following incidents, near misses, changes to practice, or identified hazards, to ensure control remains effective and the environment remains safe and prevents

future incidents.

4.0 Responsibilities

4.1 The Approved Provider will:

1. Ensure that there are systems and processes in place to ensure that incidents can be managed effectively and appropriately
2. Notify any reported incidents and complaints within regulatory timeframes
3. Ensure that incident, injury and trauma documentation is kept and stored securely until the child is 25 years old
4. Ensure there are systems in place to ensure that there is a minimum of one educator with a current approved first aid, CPR, emergency asthma and anaphylaxis qualification on the premises at all times
5. Ensure that children's enrolment forms provide authorisation for the centre to seek emergency medical treatment by a medical practitioner, hospital or ambulance service
6. Ensure that reports and documents are reviewed in line with reviews and changes to National Law and Regulations
7. Provide training and support in response to the review of incidents, injury and trauma events, if necessary
8. Ensure that all documents are updated and remain current to aid appropriate management of incident management

4.2 The Centre Manager / Nominated Supervisor (NS) will:

1. Ensure that the premises are kept clean and in good repair, to minimise the risk of any incident, injury and trauma
2. When a BeSafe notification is submitted in relation to a child, a parent or emergency contact must be informed of the incident as soon as practicable and within 24 hours of the occurrence.

It is recommended that the **Centre Manager / Nominated Supervisor (NS)** will:

1. Contact the family via phone (or if uncontactable via phone send email) before the end of the day to check on the wellbeing of child and family after an incident, injury or trauma and continue this contact until child returns to the centre. Document each interaction in BeSafe event record.
2. Ensure that The Centre Manager or a Responsible Person completes a Be Safe Record after an incident, complaint, illness, trauma or other incident. This should be undertaken with the person who witnessed the event
3. Follow the *Serious Incident Flow Chart*
4. Ensure all contact details for parents and emergency contacts for each child are current and accurate
5. Be aware of individual children's allergies and use this knowledge when attending or responding to any incident
6. Ensure that there is a system in place so that equipment in both indoor and outdoor areas is regularly checked for hazards and taking the appropriate action to ensure the safety of the children when a hazard is identified. This will include the daily checklists that are undertaken of the environment
7. Review the cause of any incident, injury or trauma and take appropriate actions to remove the cause if required
8. Ensure that current risk assessments are maintained that includes all identified risks and that these are understood and implemented by all team members
9. Ensure that the centre has a current *Emergency Management Plan* that is used to support emergency management practices and that is accessible and available to all team members

4.3 Team Members will:

1. Respond to a child or adult who sustains an injury, is ill or needs assistance
2. Ensure that effective hygiene and safety measures are in place when managing any incident
3. Understand individual children’s allergies when attending/ responding to any incident, injury or trauma
4. Alert the Nominated Supervisor or Responsible Person of any incident as soon as possible
5. Ensure that make safes, first aid or other appropriate incident responses are implemented following any incident
6. Notify families or emergency contacts promptly after any incident, injury or trauma and remind them to sign the Be Safe on collection
7. Support the documenting of Be Safe incident records by working with the Responsible Person or Centre Manager with information about what led to or occurred during any incident or illness and any action taken
8. Ensure that all incidents are managed sensitively and that confidentiality is maintained

4.4 Families will:

1. Ensure the emergency contact details on their child’s enrolment form is always accurate including emergency contacts and contact phone numbers
2. Ensure that I sign the Be Safe Record when where I am informed that there is an incident, illness or trauma incident related to my child

5.0 Definitions

Disaster: An incident or emergency affecting a whole community where the affected community is unable to cope using its own resources.

Emergency: An incident that poses an immediate risk which requires an urgent and coordinated response.

Incident: An event defined by something that happened in a moment in time but not triggered by a complaint. Incidents include but are not limited to injury (physical or psychological), infectious disease, complaint, event impacting the operation of the centre, emergency event, medical event, behavioural event

6.0 Tools and Resources

<p>The most important documents I need are: Injured at Work BeSafe Incident System First Aid Policy Notification to a Regulatory Authority Table Serious Incident Flowchart</p>	<p>Other supporting documents will include: Incidents and Emergencies Guardian Way page Incident Management Guardian Way page Emergency Management Guardian Way page First Aid Guardian Way page</p>
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7.0 Additional Information

- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2018
- Guide to the National Quality Framework 2018

8.0 Source



Section 174	Offence to fail to notify certain information to Regulatory Authority
Regulation 85	Incident, injury, trauma and illness policies and procedures
Regulation 86	Notification to parents of incident, injury, trauma and illness
Regulation 87	Incident, injury, trauma and illness record
Regulation 89	First aid kits
Regulation 97	Emergency and evacuation procedures
Regulation 161	Authorisations to be kept in enrolment record

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