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| Client Incident Management System (CIMS)  |
| Notable changes to CIMS policy requirements, effective 9 December 2024  |
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# General

The Client Incident Management System (CIMS) is the Department of Families, Fairness and Housing’s system to safeguard clients by providing timely and effective responses to incidents which harm them during service delivery, which in turn enables service providers to enhance service delivery by learning from incidents.

CIMS was introduced in 2018. A staged review has been conducted to address some of the barriers which prevented CIMS from working as well as it can. The review has covered both the IT platform and the incident reporting system itself. This includes the CIMS policy, implementation and supports and oversight and learning.

The CIMS review concludes in December 2024. On 9 December 2024 the new CIMS policy will come into effect and the CIMS IT platform will be updated to implement the outcomes of the CIMS review.

The below table provides a high-level overview of notable changes in the new CIMS policy. This list is not exhaustive, and all programs and staff who are in scope of and use CIMS should familiarise themselves with the new CIMS policy document, available on the [CIMS webpage](https://providers.dffh.vic.gov.au/cims) providers.dffh.vic.gov.au/cims.

# High level overview of changes in new CIMS policy

## General

| Topic  | Brief description  |
| --- | --- |
| Easy to read format  | Policy requirements clearly separated from implementation guidance. |
| Integration of existing CIMS guide documents  | Collation of the existing CIMS guidance documents into one policy document. |
| Removal of dangerous actions and poor quality of care incident types | Service providers to document these issues in their case note systems and integrate into their care planning.  |
| New incident type: sexual exploitation - suspected | Introduction of a new incident type sexual exploitation – suspected in response to significant stakeholder feedback to strengthen identification and response to children and young people who are at risk of child sexual exploitation.  |
| Renamed incident types: sexual exploitation and emotional and psychological trauma. | Incident type sexual exploitation renamed to sexual exploitation – grooming to strengthen identification and response.Incident type emotional and psychological trauma renamed to emotional and psychological harm in response to stakeholder feedback that ‘trauma’ is unable to be assessed at the time of incident reporting.  |
| Separated incident types: injury and attempted suicide/self-harm | Incident types have been split into two distinct categories to strengthen the responses and follow up to these incidents:* Injury separated into explained injury and unexplained injury
* Self-harm/attempted suicide separate into two distinct categories: self-harm and attempted suicide.
 |

## Chapter 1

| Topic  | Brief description  |
| --- | --- |
| Updated CIMS Principles  | Two new principles introduced to elevate client voice and Aboriginal voice and cultural safety. * Prioritising client voice to ensure that clients are listened to throughout the CIMS process. This principle is embedded throughout the policy through language use and linkage back to the principle.
* Aboriginal self-determination, voice and cultural safety by understanding, respecting and supporting Aboriginal culture, diversity and lore during the CIMS process.
 |
| Updated services in scope   | The Services in scope definition has been updated to reflect the prescribed services in scope of the Social Services Regulator. All services previously in scope of CIMS will continue to be in scope of CIMS.  * Child Protection Services in scope of CIMS has been clarified to reduce confusion and strengthen the consistent application of CIMS policy.
* Only disability services funded or delivered by the department are in scope for CIMS. Disability support services funded by the Transport Accident Commission or the Victorian WorkCover Authority and Supported residential services are prescribed service under the Social Services Regulations but not in-scope of CIMS
* Public housing and health services previously in scope of CIMS will continue to be in scope.
* Victorian Health Incident Management System (VHIMS) reporting health organisations are not required to report incidents through CIMS.
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## Chapter 2

| Topic  | Brief description  |
| --- | --- |
| Strengthened approach to Aboriginal cultural safety  | Improved clarification of requirements for key consultation stages with ACSASS and ACAC providers. Service providers will need to ensure they are aware of their local service.  |
| Carer wellbeing  | New policy section requiring carer support planning following a client incident.    |

## Chapter 3

| Topic  | Brief description  |
| --- | --- |
| Strengthened Aboriginal cultural safety  | Improved clarification of requirements for key consultation stages with ACSASS and ACAC providers. Service providers will need to ensure they are aware of their local service.   |
| Lawful use of force  | Explicitly removes arrests by Victoria Police from CIMS. Explicitly removes authorised restrictive practices from CIMS when they are applied in the manner that has been authorised.  Service providers will need to document these issues in the case note system instead.  |
| Common clients  | Clarification of policy requirements for incident reporting and response, where a client discloses harm experienced while receiving care or support from another provider. Providers will need to ensure practitioners are aware of this requirement.  |
| Historical incidents  | Ensures incident reports are consistently made when the client discloses harm. Providers will need to ensure practitioners are aware of this requirement.  |

## Chapter 4

| Topic  | Brief description  |
| --- | --- |
| Clear investigation minimum requirements  | Clarification of minimum requirements for investigations, investigation planning and investigation reports to reduce ambiguity and support service providers to meet CIMS requirements the first time, reducing duplication of effort and rework.  |
| Reportable conduct scheme investigations  | Service providers will have the choice to submit an RCS in lieu of a CIMS. This will reduce duplication of effort arising from multiple, parallel investigation requirements.  |
| Strengthened Aboriginal cultural safety  | New policy requirement to explicitly consider the needs of Aboriginal clients. Implementation guidance strengthens the requirement to consult with ACSASS/ACCO’s/ACAC to facilitate culturally safe investigations. Guidance prioritises the views of Aboriginal leaders in responding to an incident and conducting the investigation.  |
| Strengthening responses to clients and carers  | New policy requirement to explicitly consider the needs of kinship carers and clients who are the subject of an allegation. Implementation guidance provides a framework to apply to investigations involving these cohorts to ensure a considered and proportionate response.   |
| Strengthened procedural fairness in investigations  | CIMS investigation minimum requirements strengthens procedural fairness being applied to CIMS investigations. CIMS policy upholds the principle of procedural fairness by: * Requiring the subject of allegation to receive the allegations in writing
* Timeframe for completing the investigation is 28 days from incident report
* Investigations must be conducted by an independent person
* Investigation requirements ensure that all reasonable lines of enquiry are followed
* Investigation outcomes can be reviewed when issues of procedural fairness are raised
 |
| Reducing the re-interviewing of clients due to parallel investigation processes  | Enables child protection interviews or investigation information to satisfy information gathering requirements in CIMS information. Clarifies CIMS minimum requirements to enable a substantiation decision to be made when significant, verifiable and reliable evidence is obtained which can inform an investigation outcome without further information gathering being required. For example, CCTV footage.  |
| Clarified guidance for investigation outcome reviews  | Review of investigation outcomes can be made when there are issues of procedural fairness or adherence to minimum requirements raised. Inclusion of minimum requirements for who can conduct a decision review. Clarification that outcome reviews can be requested by a client (or their guardian) or the individual subject to allegation.  |
| Revised policy for incidents when sufficient evidence is available to make a decision without further investigation (previously ‘short form’ investigations).  | The previous short-form investigation policy has been revised.  Short-form investigation policy related to incidents where sufficient evidence is available to make a substantiation decision from the outset (where no further information gathering is required, such as when CCTV footage is available).  Revised policy enables service providers to provide a rationale for why no further information gathering is required in the investigation report and complete the investigation outcome and response plan without the requirement of an additional case review.    |
| Investigation response plan policy moved to Chapter 6  | Investigation response planning and guidance has been moved to chapter 6 to locate all analysis and learning policy within the one chapter. Response planning will be locally managed and integrated into case and care planning. |

## Chapter 5

| Topic  | Brief description  |
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| Clear incident review minimum requirements  | Clarified minimum requirements for an incident review and incident review report. Major impact incidents will now require either an incident investigation or an incident review.  |
| Timeframes | Extended review timeframe to 28 days (from 21 days) to align with investigations timeframe requirements  |
| Strengthened incident review guidance  | Implementation guidance on information sources that should be considered to obtain an understanding of what happened and why, including identifying contributing process or system factors to the incident. |
| Removal of Root Cause Analysis  | Root cause analysis removed as an incident review option. |
| Case reviews now referred to as Incident Reviews  | Case reviews now referred to as incident reviews to locate the focus of the review on circumstances surrounding an incident and evaluate opportunities to enhance client safety and service delivery. |

## Chapter 6

| Topic  | Brief description  |
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| System wide sharing and learning implementation guidance  | Embedded the importance and responsibility of the entire system to learn from incidents.  |
| Strengthened roles and responsibilities for analysis and learning from incidents  | Service provider to embed approaches to sharing learnings from investigations and reviews within the organisation to promote a continuous learning culture and engage sector wide learning. Operations support to support sector learning and provide aggregated data on incident outcome responses. Contract Manager to use the learnings to inform contract management performance in accordance with the Agency Management Framework.  System steward to apply system learnings to inform policy and program development.  |
| Strengthened responses to incidents  | Strengthened policy and guidance to embed learnings from investigations and reviews into client care and case planning.  Clarified minimum considerations for when a carer development plan may be an appropriate form of response to an investigation.   |
| Located CIMS within the safeguarding framework of the department and sector  | Clarified the informing and complementary systems/processes in place to safeguard clients.  Included links to the Social Services Regulator, Victims of Crime Commissioner, Commission for Children and Young People and Disability Services Commissioner.   |
| Transparent sharing of CIMS information  | Clarified who the department shares CIMS incident information with and for what purpose. Including the enabling mechanism to ensure this action upholds privacy requirements.  |

To receive this document in another format email CIMS Review <CIMS.Review@dffh.vic.gov.au>

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In this document, ‘Aboriginal’ refers to both Aboriginal and Torres Strait Islander people. ‘Indigenous’ or ‘Koori/Koorie’ is retained when part of the title of a report, program or quotation.

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Available at the [CIMS webpage](https://providers.dffh.vic.gov.au/cims) <providers.dffh.vic.gov.au/cims>