INCIDENT INVESTIGATION AND REPORTING POLICY

1. Scope

Sight For All is committed to providing a safe working environment for Board Directors, staff, Visionaries and non-medical volunteers. Sight For All staff located in Adelaide, Cambodia, Myanmar, Laos and Mongolia work a combination of time in their home offices and the hospitals where workspaces are provided on a pro-bono basis. When working out of hospital environments, it is important that staff adhere to the work health safety requirements implemented by those institutions.
Sight For All acknowledges the important role of incident reporting and investigation in ensuring the health and safety of all persons within the workplace. It is therefore the intention of Sight For All to ensure that all incidents, regardless of severity, are reported and investigated for the specific purpose of identifying the causes of the incident and to allow the taking of corrective actions.
In addition to incident reporting, Sight For All representatives have a responsibility to report concerns or allegations of fraud, child and young person protection and sexual exploitation, abuse and harassment.
This procedure outlines the steps required and documentation to be used in reporting and investigating incidents, concerns and allegations.
This procedure applies to all Sight For All Board Directors, staff, Visionaries, Fellows, project participants and non-medical volunteers.
For the purposes of this policy, "Organisational Leader" refers to the most senior employed officer of the organisation (e.g. Chief Executive Officer or General Manager), as appointed by the Board of Directors.

2. Purpose of the Reporting and Investigating Incidents, Concerns and Allegations Procedure

The purpose of this procedure is to provide a framework to report and document incidents, allegations and concerns to ensure the safety of Board Directors, staff, Visionaries, Fellows, project participants at all times.
The reporting of incidents (actual and near miss) will ensure areas of concern are identified and allows for corrective strategies to be implemented to prevent incidents of a similar nature.
Reporting of incidents relating to fraud, child and young person protection, sexual exploitation, abuse and harassment are required to be undertaken as part of Sight For All's compliance requirements, including to the Department of Foreign Affairs and Trade.

3. Definitions

Sight For All's head office of operations and business registration is in Adelaide, South Australia. As such Sight For All main office staff and Board Directors must abide by the Government of South Australia's Work Health & Safety Regulations Act 2012.

Work Health Safety Incidents

Notifiable Incident is defined in the current South Australian Work Health and Safety Act as:

- the death of a person;
- a serious injury or illness of a person; or
- a dangerous incident.

Notifiable incidents must be reported to SafeWork SA immediately after becoming aware, by the fastest means possible (e.g. phone). The incident site must be preserved and not disturbed until an inspector arrives or directs otherwise, except to assist an injured person or make the site safe.

Notifiable dangerous occurrence is defined in the current South Australian Work Health and Safety Act as any incident or event which arises from operations carried on at a workplace and which causes an immediate and significant risk to a person. The specific dangerous occurrences which must be reported are:

- an uncontrolled escape, spillage or leakage of a substance;

- an uncontrolled implosion, explosion or fire;
- an uncontrolled escape of gas or steam;
- an uncontrolled escape of a pressurised substance;
- electric shock;
- the fall or release from a height of any plant, substance or thing;
- the collapse, overturning, failure or malfunction of, or damage to, any plant that is required to be authorised for use in accordance with the regulations.

Psychosocial Hazards and Psychological Injury

In accordance with the Work Health and Safety Act 2012 (SA) and recent amendments, all psychosocial hazards – including bullying, harassment, work-related stress, exposure to traumatic events, and violence – must be reported and investigated. Notifiable incidents now include serious psychological injuries and violent incidents (including sexual assault and attempted suicide). Sight For All is committed to providing a psychologically safe workplace and will ensure all such incidents are managed in line with legal requirements.

4. Instructions for Reporting Incidents

The following steps are to be followed when reporting incidents:

- Ensure that you and any other person involved is safe and that appropriate treatment and support has been provided.
- All incidents, regardless of their severity (including near misses), must be reported as soon as possible and within 24 hours of the incident occurring.
- Report the incident to the Sight For All Organisational Leader. In the absence of the Organisational Leader, or in the case that the incident involved the Organisational Leader, the incident should be reported to another Sight For All staff member immediately. This staff member should then contact the Organisational Leader, Chair or Vice Chair.
- The Chair, Vice Chair or Organisational Leader will be responsible for determining if the incident meets the criteria of a 'notifiable dangerous occurrence' or if an 'immediately notifiable work-related injury' has occurred and if so will notify Safe Work SA as soon as possible.
- The responsible person at the incident site is to ensure immediate short-term measures are taken to prevent recurrence of the incident and, if necessary, isolate the area to preserve evidence in the event of investigation by regulatory authorities.
- The focus of the investigation must be on the circumstances of the incident, the identification of hazards and the measures to be taken to prevent recurrence through the elimination of or minimisation of risk.
- Incidents must be investigated using the Sight For All Incident Report Form. Where possible, this form should be completed within 24 hours of the incident occurring.
- The Organisational Leader (or in the case that it is the Organisational Leader involved in the incident, the Chair) will arrange a follow up meeting with those involved in the incident (approximately 1 week following) to assess how all parties are feeling.
- Additional support or counselling is able to be arranged if required.
- A report outlining details of the incident will be provided to the Board of Directors.
- The Organisational Leader maintains the Master Register of incidents.

5. Prevention of Workplace Incidents

The Sight For All Board of Directors and Organisational Leader have responsibility for managing the prevention of incidents, to ensure:

- Potential risks are identified in terms of the likelihood of its occurrence and what could potentially happen;
- That appropriate controls are in place to reduce the likelihood of incidents/adverse events occurring;
- That risk management is incorporated into the strategic and operational planning processes within Sight For All.

Site For All will regularly review incident data and trends, conduct root cause analyses, and implement corrective actions to prevent recurrence. Lessons learned from investigations will be shared with relevant stakeholders and incorporated into training and risk management processes.

6. Incidents In-Country

Incidents that occur in-country are required to be reported to the Organisational Leader, Chair or Vice Chair as soon as possible after the incident has occurred. Depending on the nature of the incident, Sight For All can make arrangements for the representative to travel home as soon as possible. Representatives are required to complete the Sight For All Incident Report Form as soon as possible. A report of the incident will be undertaken by the Organisational Leader and shared with the Board of Directors.

7. Reporting Concerns or Allegations of Child Abuse or Exploitation

All concerns or allegations of child abuse or exploitation must be reported immediately. The Sight For All Child and Young Person Protection Policy outlines the process for reporting a concern or allegation of child abuse or exploitation. Any allegation from a child, young person, adult or Sight For All representative regarding harm, abuse or exploitation of a child or young person, any observation of concerning behaviour or breaches of Sight For All's Child and Young Person Protection Policy, DFAT Child Protection Policy, Sight For All Vulnerable Person Code of Conduct or the ACFID Code of Conduct are required to be reported. Reports and/or concerns are to be made immediately and within a **24 hour period** of becoming aware of an alleged incident. Reports are to be made using the Sight For All Reporting Form For Suspected Cases of Child Abuse or Mistreatment.
It is the responsibility of the Sight For All Organisational Leader to report allegations or incidents to DFAT via childwelfare@dfat.gov.au.
A flow chart of the Child Protection Reporting Process is contained as Addendum A of this Policy, as is a copy of the Reporting Form for Suspected Cases or Child Abuse or Mistreatment or Policy Breach.

8. Reporting Concerns or Allegations of Sexual Exploitation, Abuse or Harassment

All concerns or allegations of sexual exploitation, abuse or harassment must be reported immediately. The Sight For All Prevention of Sexual Exploitation, Abuse or Harassment (PSEAH) Policy outlines the process for reporting a concern or allegation of sexual exploitation, abuse or harassment. Any allegation from an individual or Sight For All representative regarding sexual exploitation, abuse or harassment, any observation of concerning behaviour or breaches of Sight For All's Prevention of Sexual Exploitation, Abuse or Harassment Policy, DFAT Prevention of Sexual Exploitation, Abuse or Harassment Policy, Sight For All Vulnerable Persons Code of Conduct or the ACFID Code of Conduct are required to be reported.

There are two types of reporting required for DFAT funded projects:

MANDATORY AND IMMEDIATE

Any alleged incident of sexual exploitation, abuse or harassment related to the delivery of DFAT business must be made within **two working days** of becoming aware of an alleged incident. Such an incident poses a significant reputational risk to DFAT. An example of **MANDATORY AND IMMEDIATE** reporting is an allegation against a senior staff member of a partner organisation.

MANDATORY

An alleged policy non-compliance is to be reported by staff and DFAT partners within **five working days**. An example of mandatory reporting is a failure to adhere to DFAT's PSEAH Policy Minimum Standards or Principles.
It is the responsibility of the Sight For All Organisational Leader to report incidents to DFAT using the DFAT Sexual Exploitation, Abuse and Harassment Incident Notification Form and emailed to seah.reports@dfat.gov.au.
A flow chart of the PSEAH Reporting Process is contained as Addendum B of this Policy, as are copies of the Mandatory and Immediate and Mandatory Reporting Forms.

9. Reporting Concerns or Allegations of Fraud and Corruption

All concerns or allegations of fraud must be reported immediately. The Sight For All Anti-Fraud and Corruption Policy outlines the process for reporting a concern or allegation of fraud or corruption. Individuals wishing to report an incident of fraud or corruption involving Sight For All can do so confidentially in writing or verbally to the Organisational Leader or Chair of the Board within 24 hours. Sight For All has a responsibility to notify DFAT of any suspected cases of fraud and corruption within 5 business days. The Sight For All Reporting Form for Suspected Incidents of Fraud or Terrorism Form is to be used.

The flowchart at Addendum C of this Policy outlines the process in further detail. A copy of the reporting form is also included.

10. Responsibilities

Sight For All is responsible for ensuring the Incident Investigation and Reporting Policy is implemented and that all representatives are aware of how to access it as well as the associated reporting forms.

Board Directors, staff, Visionaries, Fellows, project participants and non-medical volunteers are responsible for adhering to the Incident Investigation and Reporting Policy at all times. A breach of the policy may result in disciplinary action, restriction of duties or termination of services.

All incident investigations will be conducted confidentially, and support will be offered to affected staff and volunteers.

11. Reporting Forms

Sight For All has the following reporting forms to be used and that are accessible below:

Reporting Form for Suspected Cases of Child Abuse and Mistreatment
Reporting Form for Suspected Cases of Sexual Exploitation, Abuse and Harassment – Immediate and Mandatory
Reporting Form for Suspected Cases of Sexual Exploitation, Abuse and Harassment – Mandatory
Reporting Form for Suspected Incidents of Fraud
Incident Report Form

12. Review

The Sight For All Incident Investigation and Reporting Policy is reviewed biennially.

13. Related Documents

- Sight For All Anti-Fraud and Corruption Policy
- Sight For All Child and Young Person Protection Policy
- Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Sight For All Volunteer Policy
- Sight For All Work Health Safety Policy
- Sight For All Reporting Form for Suspected Incidents of Fraud Form
- Sight For All Reporting Form For Suspected Cases of Sexual Exploitation, Abuse or Harassment MANDATORY AND IMMEDIATE
- Sight For All Reporting Form For Suspected Cases of Sexual Exploitation, Abuse or Harassment MANDATORY
- Sight For All Reporting Form For Suspected Cases of Child Abuse or Mistreatment.

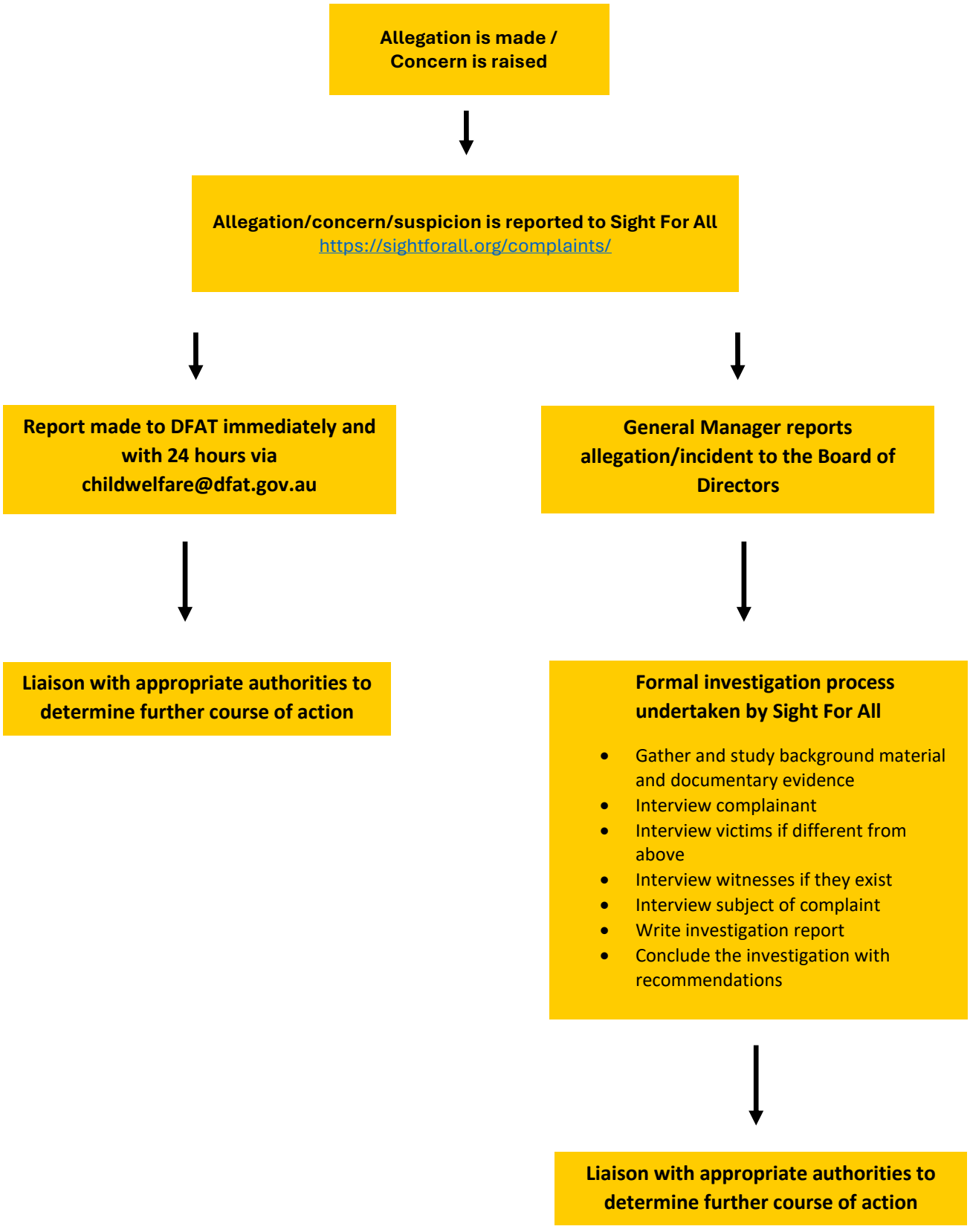
Sight For All Incident Investigation and Reporting Policy
Approved by the Board of Directors
Version 8

Document Revision History		
Document Name	**Version #**	**Date Approved**
Incident Investigation and Reporting Policy	1	17 November 2015
Incident Investigation and Reporting Policy	2	15 November 2016

Incident Investigation and Reporting Policy	3	7 February 2017
Incident Investigation and Reporting Policy	4	12 May 2020
Incident Investigation and Reporting Policy	5	14 September 2021
Incident Investigation and Reporting Policy	6	16 November 2021
Incident Investigation and Reporting Policy	7	2 September 2022
Incident Investigation and Reporting Policy	8	11 November 2025

ADDENDUM A

Child Protection Reporting Process
The following process is to be followed in responding to a report of concern:



SIGHT FOR ALL
REPORTING FORM FOR SUSPECTED CASES OF CHILD ABUSE OR MISTREATMENT OR POLICY BREACH

This reporting form is to be used to report violations to Sight For All's Child and Young Person Protection Policy, Vulnerable Persons Code of Conduct or any child safeguarding concerns. The form is to be completed immediately and within 24 hours of an incident, allegation or concern occurring.

In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'. It is to be returned to the General Manager, Dr Cesar Carrillo via email ccarrillo@sightforall.org or another Sight For All contact person as outlined in Addendum A of the Child Protection Policy.

Name of person completing report: _____ Date: _____
Position at Sight For All: _____
Email address:_____ Phone number: _____

Please **tick** which situation you are reporting on:

- Witnessing an incident of child abuse ☐
- Suspected child abuse ☐
- Has there been an accusation of child abuse ☐
- Has a report of child abuse been made against you ☐
- You are aware that a child has been sexually abused ☐
- You are aware that a child has been emotionally abused ☐
- You are aware that a child has been physically abused ☐
- You are aware that a child has been neglected ☐
- There has been a breach of the Sight For All Child and Young Person Protection Policy ☐
- There has been a breach of the Sight For All Vulnerable Persons Code of Conduct ☐

Details of incident
Date of incident: _____ Time of incident: _____
Location of incident: _____
Name(s) of witnesses: _____

Description of incident (please describe the sequence of events):

_____

_____

_____

_____

Information about the child
Name of child involved: _____
Child's address: _____
DOB: _____ Male ☐ Female ☐

Parent's name: _____ Parent's phone number: _____

Do you believe the child is currently safe: Yes ☐ No ☐

Please describe what has been implemented to ensure the child's safety:

_____

_____

_____

Does the child have a disability: Yes ☐ No ☐

If **yes**, please provide details of the disability:

_____

_____

Do you believe the child is:

- Particularly vulnerable Yes ☐ No ☐
- Is traumatised Yes ☐ No ☐
- Has been repeatedly abused Yes ☐ No ☐

Is an interpreter required to communicate with the child and/or their guardian: Yes ☐ No ☐

Are there specific cultural factors to be considered: Yes ☐ No ☐

If **yes**, what are they:_____

_____

Have other organisations been informed of this allegation: Yes ☐ No ☐

If **yes**, list the organisations, names and contact details of who you liaised with:

_____

_____

Information about the person against whom the allegation has been made (if known)

Name: _____ Male ☐ Female ☐

Relationship to the child: _____

Relationship to Sight For All: _____

Contact details: _____ Employer: _____

Are you aware of the person against whom the allegation has been made, has been confronted with the allegations:

Yes ☐ No ☐ If **yes**, detail the conversation:

_____

_____

_____

Please detail any further information you would like to provide:

_____

_____

_____

Signature of person completing the report: _____ Date:_____

Signature of Organisational Leader/Chairman/Country Officer: _____ Date: _____

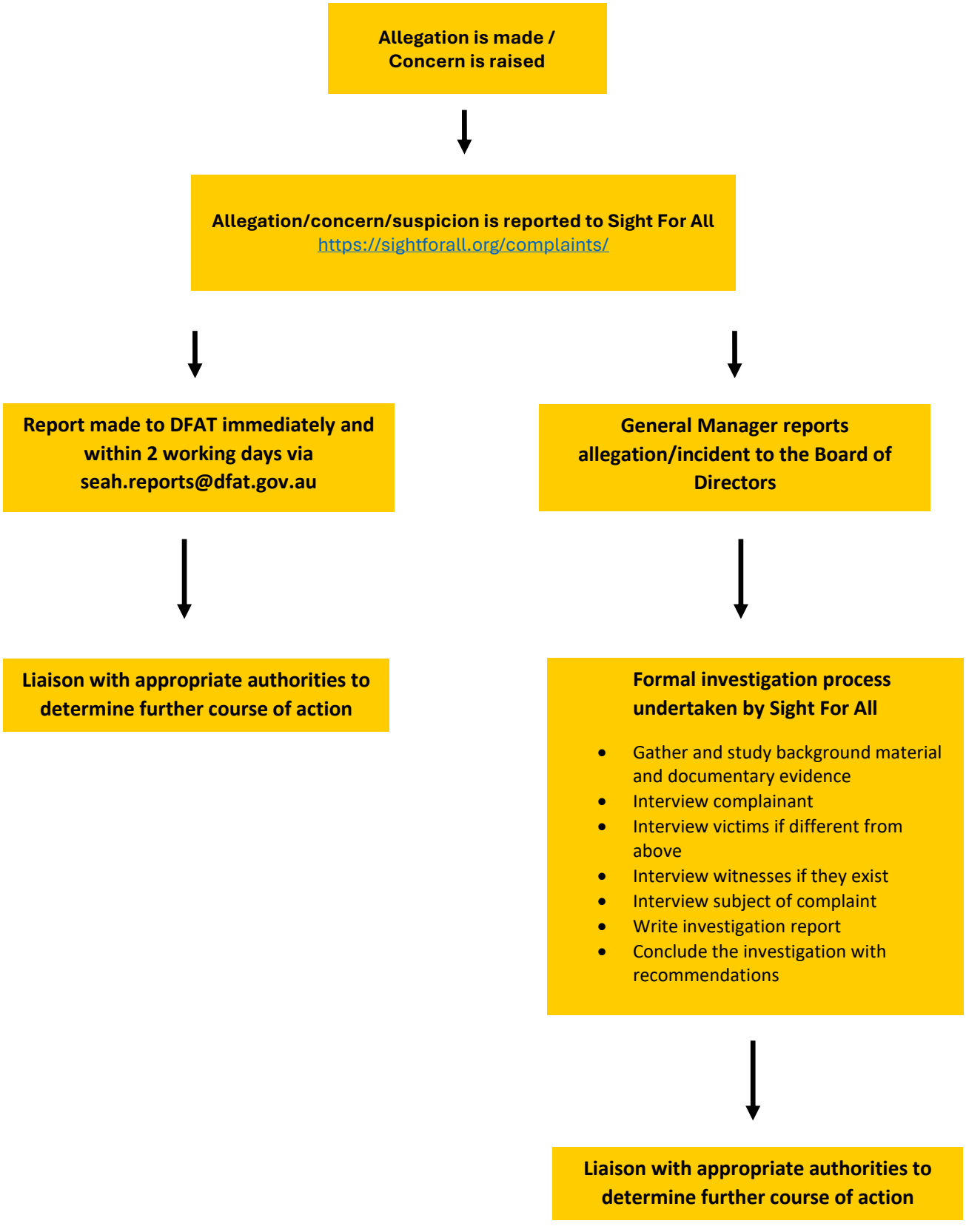
Date received by Sight For All Office: _____

Name of Sight For All Representative conducting the investigation: _____

ADDENDUM B

PSEAH Reporting Process

The following process is to be followed in responding to **MANDATORY AND IMMEDIATE** reporting. Such reporting is to be made within 2 working days of the alleged incident occurring. Reporting is required within this period for DFAT funded activities. Sight For All employs the same process for all projects. An example of such reporting includes an allegation against a Sight For All Visionary teaching in-country as part of an ANCP funded project.



SIGHT FOR ALL
REPORTING FORM FOR SUSPECTED CASES OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT
MANDATORY AND IMMEDIATE REPORTING

This reporting form is to be used in responding to MANDATORY and IMMEDIATE reports of sexual exploitation, abuse and harassment. The form is to be completed and sent to Sight For All within 2 working days of the incident occurring.

In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'.

Name of person completing report: _____ Date: _____
Email address:_____ Phone number:_____

Information about the individual
Name of individual involved: _____
Phone number: _____
Individual's address:

_____
DOB: _____ Male ☐ Female ☐

Details of incident
Date of incident: _____ Time of incident: _____
Location of incident: _____
Name(s) of witnesses: _____

Description of incident (please describe the sequence of events):

_____

_____

_____

_____

_____

Please **tick** which situation you are reporting on:

- Witnessing an incident of sexual, exploitation, abuse or harassment ☐
- Suspected sexual, exploitation, abuse or harassment ☐
- An accusation of sexual, exploitation, abuse or harassment ☐
- A report of sexual, exploitation, abuse or harassment been made against you ☐
- You are aware that an individual has been sexually exploited, abused or harassed ☐

Is the individual a Sight For All Board Director, employee, Visionary or non-medical volunteer
Yes ☐ No ☐

Do you believe the individual is currently safe: Yes ☐ No ☐

Please describe what has been implemented to ensure the individual's safety:

_____

_____

_____

_____

_____

Does the individual have a disability: Yes ☐ No ☐
If **yes**, please provide details of the disability:

_____

_____

Do you believe the individual is:

- Particularly vulnerable Yes ☐ No ☐
- Is traumatised Yes ☐ No ☐
- Has been repeatedly abused Yes ☐ No ☐

Is an interpreter required to communicate with the individual: Yes ☐ No ☐

Are there specific cultural factors to be considered: Yes ☐ No ☐
If **yes**, what are they:_____

_____

_____

Have other organisations been informed of this abuse: Yes ☐ No ☐
If **yes**, list the organisations, names and contact details of who you liaised with:

_____

_____

Information about the potential perpetrator

Name: _____ Male ☐ Female ☐
Relationship to the individual: _____
Relationship to Sight For All: _____
Contact details: _____ Employer: _____

Has the potential perpetrator been confronted with the allegations: Yes ☐ No ☐

If **yes**, detail the conversation:

_____

_____

_____

Is there any further information you would like to provide: Yes ☐ No ☐

If **yes**, please list below:

_____

_____

_____

_____

Signature of person completing the report: _____ Date:_____

Signature of Organisational Leader/Chairman: _____ Date: _____

Date received by Sight For All Office: _____

Name of Sight For All Representative conducting the investigation: _____

PSEAH Reporting Process

The following process is to be followed in responding to **MANDATORY** reporting.
Such reporting is to be made within 5 working days of becoming aware of policy minimum standard or principles not being met or of non-compliance. An example of such reporting includes non-compliance of the Sight For All PSEAH Policy, DFAT PSEAH Policy or DFAT minimum standards or principles not being met.

Allegation is made / Concern is raised

↓

Allegation/concern/suspicion is reported to Sight For All
https://sightforall.org/complaints/

↓ ↓

Report made to DFAT immediately and with 5 working days via seah.reports@dfat.gov.au

↓

Liaison with appropriate authorities to determine further course of action

General Manager reports allegation/incident to the Board of Directors

↓

Formal investigation process undertaken by Sight For All

- Gather and study background material and documentary evidence
- Interview complainant
- Interview victims if different from above
- Interview witnesses if they exist
- Interview subject of complaint
- Write investigation report
- Conclude the investigation with recommendations

↓

Liaison with appropriate authorities to determine further course of action

SIGHT FOR ALL
REPORTING FORM FOR SUSPECTED CASES OF SEXUAL EXPLOITATION, ABUSE & HARASSMENT
MANDATORY REPORTING

This reporting form is to be used in responding to MANDATORY reports of sexual exploitation, abuse and harassment. The form is to be completed and sent to Sight For All within 5 working days of the incident occurring.

In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'.

Name of person completing report: _____ Date: _____
Email address:_____ Phone number:_____

Information about the individual
Name of individual involved: _____
Phone number: _____
Individual's address:
_____
DOB: _____ Male ☐ Female ☐

Details of incident
Date of incident: _____ Time of incident: _____
Location of incident: _____
Name(s) of witnesses: _____

Description of incident (please describe the sequence of events):
_____
_____
_____
_____
_____

Please **tick** which situation you are reporting on:

- Witnessing an incident of sexual, exploitation, abuse or harassment ☐
- Suspected sexual, exploitation, abuse or harassment ☐
- An accusation of sexual, exploitation, abuse or harassment ☐
- A report of sexual, exploitation, abuse or harassment been made against you ☐
- You are aware that an individual has been sexually exploited, abused or harassed ☐

Is the individual a Sight For All Board Director, employee, Visionary or non-medical volunteer
Yes ☐ No ☐

Do you believe the individual is currently safe: Yes ☐ No ☐

Please describe what has been implemented to ensure the individual's safety:

_____

_____

_____

_____

_____

Does the individual have a disability: Yes ☐ No ☐

If **yes**, please provide details of the disability:

_____

_____

Do you believe the individual is:

- Particularly vulnerable Yes ☐ No ☐
- Is traumatised Yes ☐ No ☐
- Has been repeatedly abused Yes ☐ No ☐

Is an interpreter required to communicate with the individual: Yes ☐ No ☐

Are there specific cultural factors to be considered: Yes ☐ No ☐

If **yes**, what are they:_____

_____

_____

Have other organisations been informed of this abuse: Yes ☐ No ☐

If **yes**, list the organisations, names and contact details of who you liaised with:

_____

_____

Information about the potential perpetrator

Name: _____ Male ☐ Female ☐

Relationship to the individual: _____

Relationship to Sight For All: _____

Contact details: _____ Employer: _____

Has the potential perpetrator been confronted with the allegations: Yes ☐ No ☐

If **yes**, detail the conversation:

_____

_____

_____

Is there any further information you would like to provide: Yes ☐ No ☐
If **yes**, please list below:

_____

_____

_____

_____

Signature of person completing the report: _____ Date:_____

Signature of Organisational Leader/Chairman: _____ Date: _____

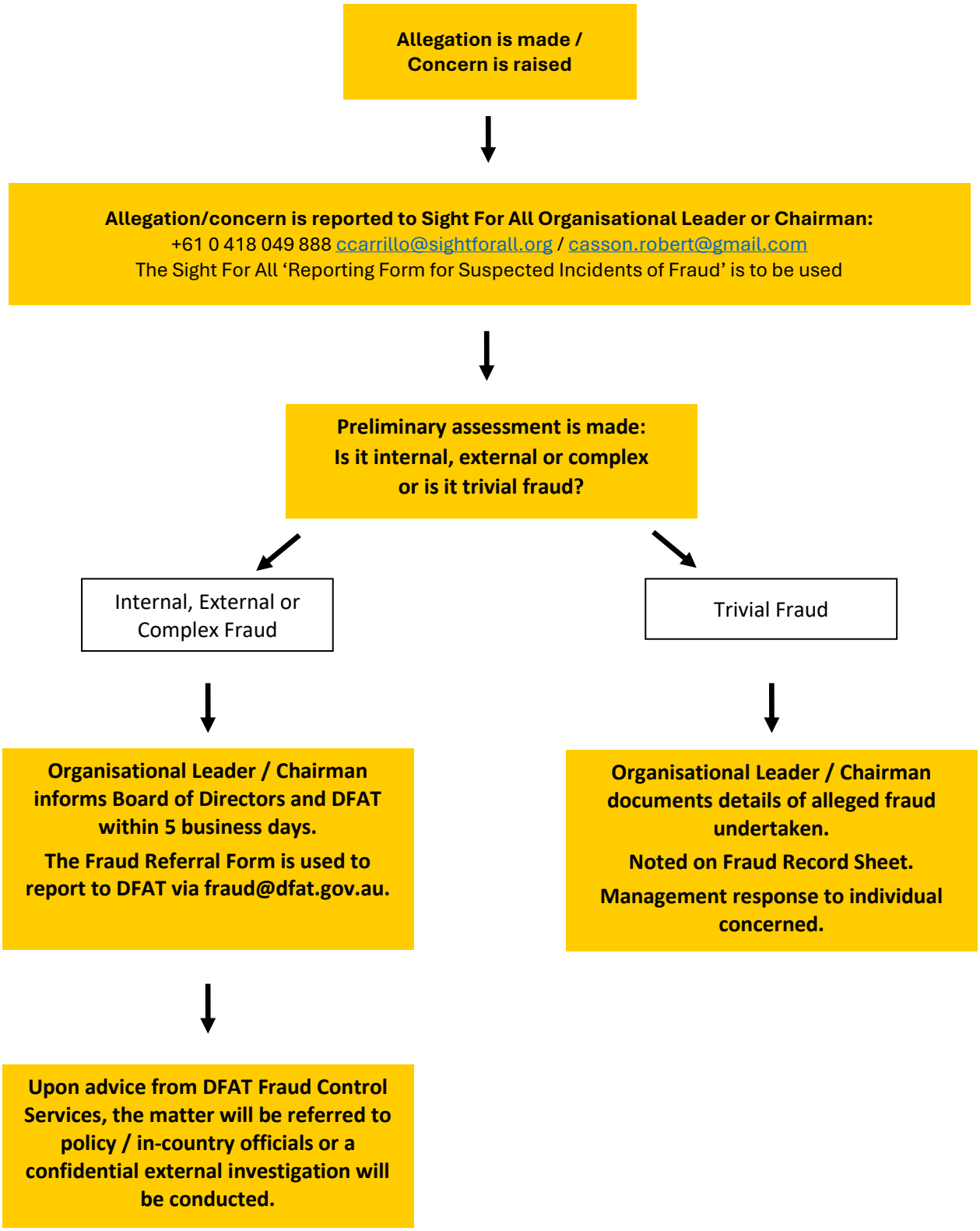
Date received by Sight For All Office: _____

Name of Sight For All Representative conducting the investigation: _____

ADDENDUM C

Fraud Reporting Process

The following process is to be followed in responding to a report or concern or fraud.



SIGHT FOR ALL

REPORTING FORM FOR SUSPECTED CASES OF FRAUD OR TERRORISM

The Report Form is to be used to report suspicions or allegations of fraud, corruption or terrorism. The form is to be completed within 24 hours of the incident occurring and be returned to the Organisational Leader or Chairman.

In emailing this form the subject line should read 'CONFIDENTIAL URGENT EMAIL'.

Name of person completing report: _____ Date: _____

Email address:_____ Phone number: _____

Information about the allegation

Name of individual involved in allegation: _____

Name of individual making allegation: _____

Details of allegation (please describe the sequence of events):

_____

_____

_____

_____

_____

_____

_____

_____

_____

Name(s) of any witnesses: _____

Is there any further information you would like to provide: Yes ☐ No ☐

If **yes**, please list below:

_____

_____

_____

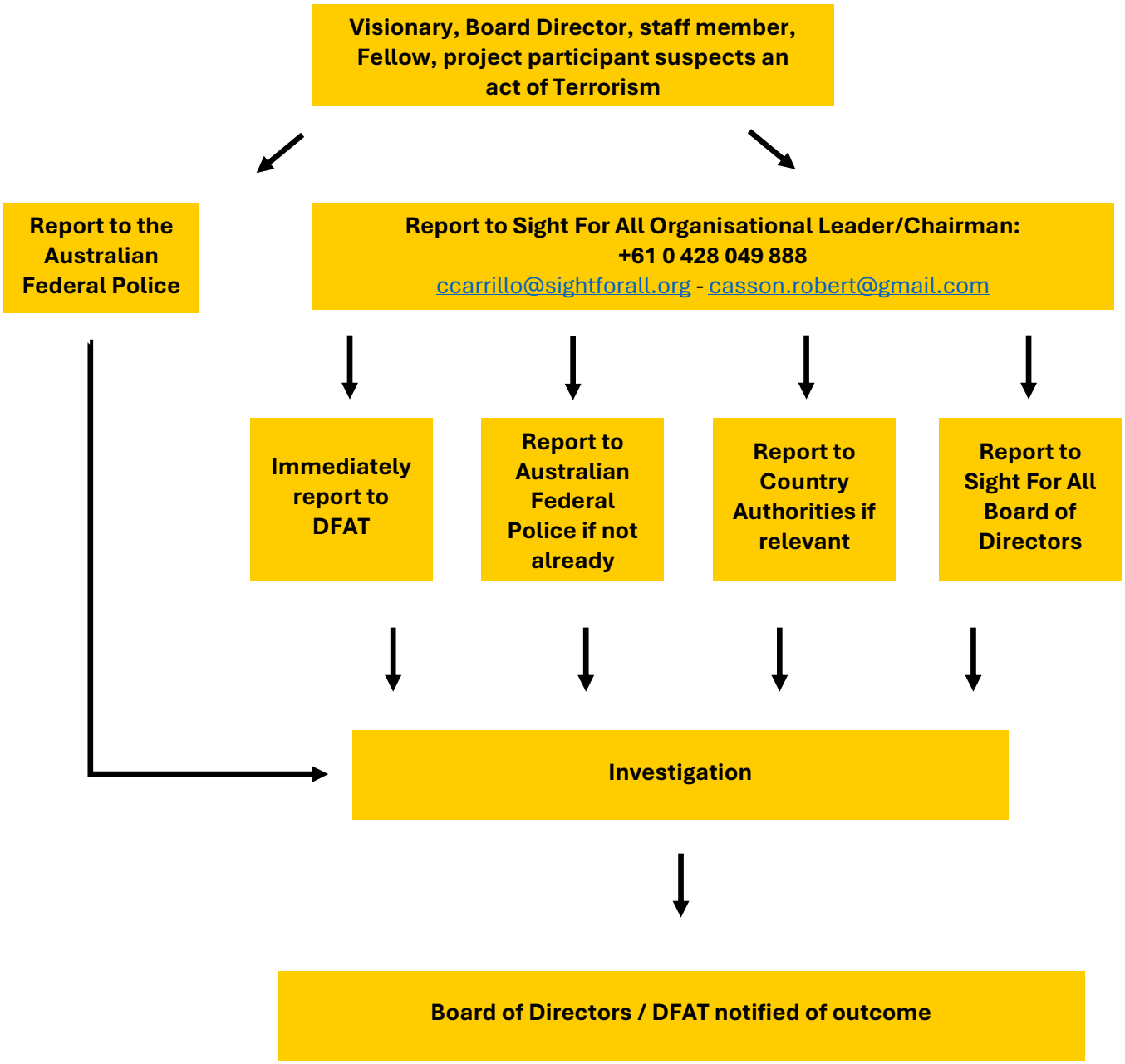
_____

Signature of person completing the report: _____ Date:_____

Signature of Executive Officer/Chairman: _____ Date: _____

Date received by Sight For All Office: _____

Name of Sight For All Representative conducting the investigation: _____

ADDENDUM D

Counter-Terrorism Reporting Process
The following process is to be followed in responding to a report of Terrorism