

# Review of CIMS investigations and review framework

Final Report  
Cube Group  
June 2024



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# Overview

## Purpose of the review

Cube Group (Cube) was engaged by the Department of Families, Fairness and Housing (DFFH) to review and refine the Client Incident Management System (CIMS) investigation and review framework as part of the wider CIMS review. A revised investigation and review framework will ensure that client safety is prioritised when an investigation is conducted, as well as support better use of Departmental and service provider time and resources.

## Approach

This work was predominantly engagement-led, and used evidence gathered in stakeholder consults to inform recommendations.

An initial desktop analysis informed lines of enquiry that were used for both internal and external stakeholder engagement. Consults informed options for the refined CIMS investigations and a review framework. Two refinement sessions were then held with sector and Department stakeholders to refine and endorse guiding principles and recommendations.

## Document purpose

This report focusses on the design of the future-state investigation and review phases as part of a broader end-to-end CIMS review undertaken by the Department in 2024.

It presents recommendations based on the findings from engagement with internal and external stakeholders. Policy recommendations for a refined CIMS investigation and review framework as well as other long-term opportunities are included for Departmental consideration.

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# 1. Introduction

Executive summary

Background and methodology

# Executive summary

## About this report

This report presents findings from stakeholder consultations as well as proposed recommendations for a future-ready CIMS investigation and review framework:

1. Section one: Executive summary and background
2. Section two: What we heard from extensive engagement with internal and external stakeholders
3. Section three: What this means for a refined CIMS investigation and review framework
4. Section four: Our future-ready recommendations for refining the CIMS investigation and review framework, other impactful opportunities and broader CIMS system considerations
5. Section five: Considerations for implementing the proposed recommendations

## What we heard

Extensive engagement with internal and external stakeholders (including agencies, peak bodies and regulatory bodies) highlighted that the current CIMS investigation and review framework is complex, difficult to navigate, and does not always lead to positive outcomes for clients (in this report predominantly children and young people). Particular attention was drawn to:

- Scheme complexity and duplication with other safeguarding schemes, which causes confusion and delays
- Limited flexibility in the way investigations and reviews are conducted, despite the wide range of incidents that the scheme covers
- Limited system improvements following investigations and reviews, due to the sheer volume of them, and limited feedback mechanisms.

## Our recommendations

Recommendations are categorised into three groups, and seek to address the findings from stakeholder consults. The immediate priority recommendations look to improve CIMS policy, in particular by centering the client voice throughout CIMS investigation and review processes, and creating differentiated pathways depending on the type of incident.

It is recognised that recommendations will require time and effort to implement. With clear guidance and collaborative approaches for implementation, better outcomes for clients can be achieved.

# A complex safeguarding ecosystem

## Protecting vulnerable clients

The Client Incident Management System (CIMS) supports the safety and wellbeing of clients by providing timely and effective responses to incidents which harm them during service delivery.

CIMS investigations and reviews are the key mechanism for service providers and the department to determine if there has been abuse or neglect of a client by a staff member, volunteer or another client.

## Intersections with other safeguarding mechanisms

Other safeguarding investigation and review processes overlap with the CIMS requirements, including the Recordable Conduct Scheme (RCS) and the Worker Cover Exclusion Scheme (WCES). This can cause unnecessary duplication and significant negative impacts on the involved individuals.

Investigation and review processes for a single incident across the span of safeguards can take years and

participants (including the clients harmed by the incident) can be interviewed multiple times.

Other issues raised by stakeholders include difficulties in ensuring client voice is incorporated without re-traumatising individuals and ensuring Aboriginal cultural safety and self-determination in investigations and reviews.

## CIMS approach

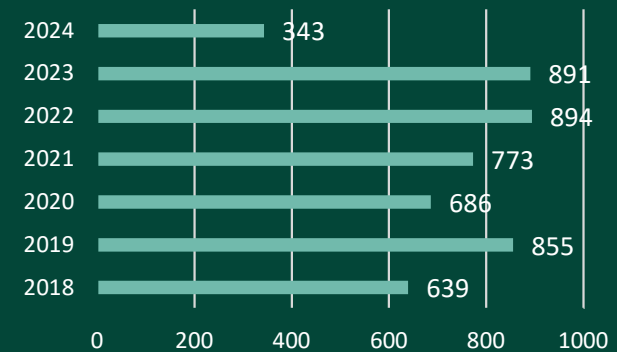
Management of a client incident within CIMS consistent of five phases:

1. Identification and response
2. Reporting
3. Incident investigation
4. Incident review
5. Analysis and Learning.
6. Only incidents assessed as 'major impact' are required to proceed through the investigation or review phases.

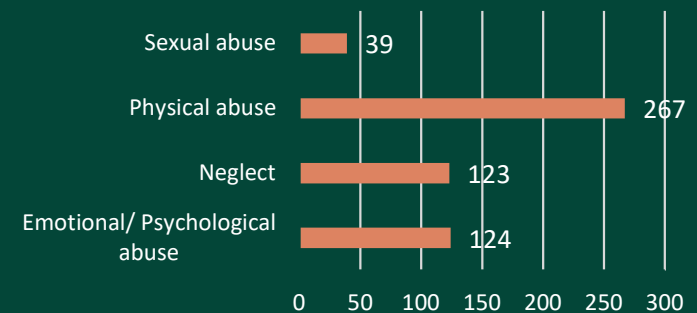
## A snapshot of CIMS investigations – in numbers

Figure 1 shows that between 2018 and 2023, the average number of investigations commenced per year has averaged 790 (noting that post-COVID this figure has risen to 893). 48% of substantiated investigation outcomes in 2023 were classified as 'physical abuse'.

### 1. Number of investigations commenced per year



### 2. Number of primary abuse outcomes substantiated in 2023



# Review methodology

The review of the CIMS investigation and review framework has been conducted in four steps. Evidence gathered in step 2 ‘Engaging for insight’ was refined and tested with internal and external stakeholders and has informed the recommendations in this report. A detailed list of who was engaged can be found in the [Appendix](#).

## Step 1: Rapid review and planning

Desktop review of internal and external documents

Informing lines of enquiry for Step 2 to build on previous Department-led stakeholder engagement

## Step 2: Engaging for insight

Consultations with:

DFFH

- CIMS Review Executive Oversight Group
- Social Services Regulation teams
- Human Services regulator
- Child Protection Directors
- Agency Performance and System Support Managers
- Safeguarding and Oversight team

External

- Service providers
- Peak bodies
- Commission for Children and Young

Informing stakeholder themes and insights for refining and testing

## Step 3: Refining and testing

Consultations with:

- CIMS Review project team
- Service providers and peak bodies
- CIMS Review EOG members and other department representatives

Refining recommendations and a future-ready CIMS investigation and review framework

## Step 4: Final report and roadmap

Synthesis of findings from consultations from step 2 and step 3 into the final report (this document), including a refined CIMS investigation and review framework and recommendations

Informing a refined CIMS investigation and review framework and guiding policy changes for the updated CIMS policy

## 2. What we heard

A summary of global themes and sub-themes from stakeholder consults

# A system that can do more to promote client safety and support providers

Sector and Department engagement surfaced wide ranging perspectives across five distinct themes (detailed below and overleaf).

## 1 Safeguarding mechanisms don't consistently promote system improvement and place client voice at the centre

- 1.1 There is a need to put the voice of the client and their experience and desired outcome at the centre of investigations.
- 1.2 Practice improvement and systems learning is not currently undertaken or implemented out of CIMS investigations and reviews.
- 1.3 CIMS case reviews is a valuable tool for informing practice and system improvement when done in a timely manner.
- 1.4 There has been a positive change in reporting behaviour, recognising its value to inform improvements.

## 3 Scheme complexity contributes to delays, confusion and duplication

- 3.1 There is misalignment between CIMS and other schemes, creating complexity and resulting in additional work and delays.
- 3.2 There are various factors making it difficult to align CIMS with other safeguarding schemes.
- 3.3 Greater alignment between schemes is possible if closer convergence between different thresholds and definitions could be achieved.
- 3.4 Information sharing practices can cause duplication of work and delays between schemes.

## 2 Investigations and reviews have limited flexibility for differentiated and proportionate responses

- 2.1 Inflexibility and the rigidity of CIMS policy application is impacting on the ability to conduct timely investigations.
- 2.2 Enhancing the use professional judgement and expertise in assessment risk and in deciding how to respond has the potential to improve investigations and reviews.
- 2.3 The current approach for client-to-client incidents could apply a considered approach to investigating and reviewing these incidents.
- 2.4 Kinship carers enter the safeguarding system differently to other carers and the investigation and review framework does not currently adjust for this.
- 2.5 The knowledge and expertise of Aboriginal leaders needs to be respected and trusted for investigations and reviews to have greater cultural safety.
- 2.6 Mature cultural safety practices are required to conduct investigations and reviews in a way that meet the needs of Aboriginal children, young people and carers and promote self-determination.
- 2.7 Participants feel the current language and labelling used in investigations and reviews leads with guilt and blame.



# A system that can do more to promote client safety and support providers

4

Current investigation and review processes and systems contribute to inconsistencies and confusion rather than clear direction

- 4.1 CIMS investigations are conducted well when they are independently conducted, there is a high level of thoroughness, and a consistent methodology is followed.
- 4.2 Inconsistent understanding of the purpose of CIMS investigations and reviews and application of the framework detracts focus from what can be learned or improved.
- 4.3 Current guidance material and information does not fully and clearly articulate the scope of and actions within investigations.
- 4.4 Investigations can be open for years, resulting in an administrative process that doesn't promote learning.
- 4.5 Investigations may lose their effectiveness when they focus excessively on minor details that do not influence the overall findings.
- 4.6 The CIMS system doesn't currently support action or steps to implement learning after an investigation or review.
- 4.7 There are inconsistency in information sharing and feedback loops to carers on CIMS progress and outcomes.
- 4.8 Process and system gaps are resulting in confusion and inconsistencies, creating potentially unnecessary work and avoidable delays.
- 4.9 Internal Department roles and responsibilities as they relate to CIMS investigations and reviews are at times unclear (i.e. Agency Performance and System Support, Safeguarding and Oversight, Child Protection).

5

The high level of capability and capacity is required for successful investigations is not consistently achieved

- 5.1 CIMS investigations can be complex and require a high level of capability to conduct adequately, which is not regularly met.
- 5.2 Insufficient resources and capacity to match the volume of investigations is resulting in lengthy processes and delays that pose significant challenges, especially for smaller organisations.
- 5.3 There is limited funding dedicated to support the investigation and reporting functions of CIMS.
- 5.4 The current level and frequency of training appears insufficient for the level of capability required to conduct high quality investigations.
- 5.5 Internal Department CIMS team's assessments and guidance on investigations is not always received with confidence by agencies.

### 3. What this means

What stakeholder findings mean for the CIMS investigation and review framework

# 1. Safeguarding mechanisms can be strengthened by promoting systems learning and placing the voice of the client at the centre.

What we've found	What this means
<p>1.2 There is a need to put the voice of the client, their experience and desired outcome at the centre of investigations. Client voice is not consistently well represented in investigations, resulting in investigations not reflecting person-centred approaches. Children or young people may disengage from the process, making it increasingly difficult to centre client voice.</p>	<p>There is an opportunity to return the focus of investigations and reviews to the experience of the client. Investigations can be strengthened by leading with a person-centred approach to reduce potential disengagement by children and young people during the process. This can create an avenue for clients experiencing better outcomes and feeling heard throughout the process.</p>
<p>1.2 Practice improvement and systems learning is not currently undertaken or implemented out of CIMS investigations and reviews. Currently opportunities for learning are not translated from experiences in service delivery to practice or system improvement. Continuous learning is an identified gap in investigations and reviews, resulting in missed opportunities to take whole of system learning approach for the out of home care system.</p>	<p>CIMS investigations and reviews can inform practice improvement and systems learning if learning opportunities are prioritised and implemented. The current investigations and reviews offer strong learning opportunities. Positive and negative experiences in service delivery and during investigation and review processes can inform continuous improvements initiatives, both for the Department and for agencies in the sector.</p>
<p>1.3 CIMS case reviews is a valuable tool for informing practice and system improvement when done in a timely manner. Case reviews currently fall short of what their intended purpose is. There is missed value in completing swift case reviews to surface opportunities for improvement.</p>	<p>There is potential to strengthen case reviews to promote practice and system improvement by minimising delays and tracking implementation of actions. CIMS case reviews presents rich learning opportunities. They provide a space to bring people together not only to discuss learnings and improvement opportunities but also their potential implementation.</p>
<p>1.4 There has been a positive change in reporting behaviour, recognising its value to inform improvements. Agencies have invested resources and significant effort into changing staff behaviours towards reporting. ACCOs in particular have reported that previous attitudes have not always been in favour of reporting Aboriginal data, but that time and effort devoted to shifting this attitude has resulting in positive movements.</p>	<p>Reporting is valued and a refined CIMS investigation and review framework that promotes learning has the potential to leverage this sentiment for continuous practice improvement. There is an opportunity to use the positive sentiment towards reporting and its ability to surface opportunities for improvement by embedding continuous learning in a refined investigations and review framework.</p>

## 2. The CIMS investigation and review framework can benefit from a differentiated, proportionate and flexible response to incidents

### What we've found

2.1 Inflexibility and the rigidity of CIMS policy application is impacting on the ability to conduct timely investigations.

The 'one size fits all' approach of the current investigation and review framework does not work and is causing significant backlogs. When there is no flexibility for agencies throughout the process, the purpose and intended benefit of investigations and reviews are questioned.

2.2 Enhancing the use professional judgement and expertise in assessing risk and in deciding how to respond has the potential to improve investigations and reviews.

The balance between the structure of rules and professional assessment and judgement is currently insufficient. There isn't opportunity to focus on therapeutic responses when allegations are raised by a young person.

2.3 The current approach for client-to-client incidents could apply a more considered approach to investigating and reviewing these incidents.

There are philosophically different views in how client-to-client incidents are interpreted and whether they require a full investigation or not. There are concerns that investigations further impact children and young people from trauma backgrounds and that the use of blaming language may contradict the discrimination framework. Currently there is no opportunity to provide a rationale for completing a case review in place of an investigation for client-to-client allegations. This can diminish the ability to focus on restorative justice approaches.

### What this means

There is an opportunity to refine the investigation and review framework to provide greater flexibility in the way investigations and reviews are conducted to promote timely action and completion.

There is a need for a proportionate response for different incidents and cohorts. Service providers are currently required to go through a full investigation due to an inflexible interpretation of the policy, where a smaller investigation or case review would be more appropriate.

Greater acceptance of professional judgement and expertise in assessing risk and responding to incidents can empower agencies in investigations and reviews. Professional judgement is used in considering patterns in a young person's behaviour, assessment of risk and the context in which a young person presents before forming a reasonable belief. It allows cultural factors and perspectives to be considered when responding to incident allegations.

There is an opportunity to shift the approach for responding to client-to-client incident allegations to a more therapeutic response.

The focus of client-to-client responses should shift from determining whether an allegation occurred to what can be done to mitigate or prevent it from happening again. A proportionate response to client-to-client allegations could include a shift from client-to-client incidents requiring an investigation (i.e. abuse incident categories) to alternative approaches where it may be more appropriate.

## 2. The CIMS investigation and review framework can benefit from a differentiated, proportionate and flexible response to incidents (cont.)

What we've found	What this means
<p>2.4 Kinship carers enter the safeguarding system differently to other carers and the investigation and review framework does not currently adjust for this. Kinship carers do not have the same training and skills of other carers yet face the same investigation thresholds. These carers are often called upon unexpectedly and are not given the support and consideration for transitioning from the role and obligations of a family member to that of a kinship carer.</p>	<p>There is an opportunity to adopt a differentiated response to investigating an allegation involving a kinship carer. The different nature of kinship care placements compared to other care arrangements signals the need for a different response to investigating allegations. For thorough consideration to be given, agencies need to have the ability to assess and write a rationale for the approach they determine is appropriate in response to allegations.</p>
<p>2.5 The knowledge and expertise of Aboriginal leaders needs to be respected and trusted for investigations and reviews to have greater cultural safety. Cultural safety is inconsistently applied in investigations and review practices, with the knowledge and expertise of Aboriginal leaders often undervalued. This results in professional judgement on culturally safe practices being questioned when used to assess and monitor risk for Aboriginal children and young people.</p>	<p>The investigations and review framework can embed Aboriginal cultural safety by amplifying Aboriginal knowledge and expertise. There is a need to place greater emphasis on Aboriginal knowledge and expertise when it comes to the outcomes of Aboriginal children and young people. An investigation and review framework that privileges Aboriginal knowledge and expertise can enable professional judgement on culturally safe practices to become a mechanism for greater self-determination.</p>
<p>2.6 Mature cultural safety practices are required to conduct investigations and reviews in a way that meet the needs of Aboriginal children, young people and carers and promote self-determination. Cultural safety practices consider the unique aspects of Aboriginal families and culture in approaches to engaging with an Aboriginal child, young person or carer. It is important that consistent cultural safety practices are applied, not only for Aboriginal people but for all cultures, to promote self-determination.</p>	<p>There is an opportunity to set a standard practice of cultural safety in the investigations and review framework that better meets needs and promotes self-determination. A refined investigation and review framework can set a standard for what best practice of embedding cultural safety should look like. This can promote consideration of the factors that are commonplace in Aboriginal families, to enhance self-determination in investigations and review. It can also promote a practice of cultural safety for other cultures that better meets the needs of clients.</p>
<p>2.7 Participants feel the current language and labelling used in investigations and reviews leads with guilt and blame. Current investigations and review language of “subject of allegation” and “victim” is problematic and fosters a sense of blame. This labelling can have lasting negative impacts on clients and carers, or staff accused of an allegation.</p>	<p>There is potential to shift language away from prejudicial labels and towards more neutral language promoting fairness and impartiality. There is a desire to move away from language that assumes guilt from the starting point and places potentially harmful labels on clients and carers or staff. The investigation and review framework could benefit from language (e.g., “participants”) that emphasises neutrality.</p>

### 3. Greater alignment of CIMS investigations with other investigation schemes has potential to minimise delays, provide great clarity and reduce duplication

#### What we've found

3.1 There is complexity between CIMS and other schemes due to different requirements, resulting in additional work and delays. CIMS investigation requirements are not fully aligned with requirements under other schemes (e.g. RCS and WCES). Each scheme has varying purposes, thresholds and definitions, increasing complexity and creating additional work and delays.

3.2 There are various factors making it difficult to align CIMS with other safeguarding schemes. Diverging purposes, thresholds, intended audiences and legislation underpinning various schemes make it difficult to bring them into closer alignment. There is also a perceived high level of investigation inherent quality that would need to be shared across schemes if closer alignment was sought.

3.3 Greater alignment between schemes is possible with closer convergence of different thresholds and definitions. The mechanics of an investigation is perceived to be largely similar across different schemes (i.e. fact finding), with the major point of difference being varying thresholds and definitions. When looking to complete one investigation in place of another, this is viewed as the most critical point of alignment.

3.4 Information sharing practices can cause duplication of work and delays between schemes. The current gap or inconsistency in sharing information between different agencies or investigators result in preventable duplication and can cause delays in progress when evidence needs to be recollected.

#### What this means

Closer alignment of CIMS with other schemes has the potential to simplify investigations. Alignment between CIMS and other schemes (RCS and WCES) require careful consideration of the overlapping and distinct factors involved in each scheme (e.g. purpose, definitions and thresholds). Consideration also needs to be given to the level of quality of investigations that is acceptable across schemes and how these may differ. Closer alignment of schemes pose significant potential benefit including, reducing the administrative burden on agencies completing duplicative processes, reducing confusion for participants involved in multiple investigations for the same allegation and increasing capacity for agencies to focus on implementing learning from investigations.

There is potential for RCS investigations to be conducted in place of CIMS investigations if definitions and thresholds are closer aligned. Closer alignment of CIMS and RCS definitions and thresholds provide an opportunity for CIMS to accept RCS investigations for incident allegations in scope under both schemes. This can reduce the burden on providers currently needing to complete a joint investigation or two separate investigations under each scheme.

There is an opportunity to review information sharing processes to allow for greater access that reduces duplicative efforts. Improved information sharing practices internally and with external agencies (e.g. between agencies and child protection), has the potential to reduce duplicative effort in collecting evidence and delays in investigation process.

## 4. Refining the CIMS investigation and review framework presents an opportunity to move towards clearer processes and a fit for purpose system

### What we've found

4.1 CIMS investigations are conducted well when they are conducted by an external investigator, there is a high level of thoroughness, and a consistent methodology is followed.

The quality of investigations are largely defined by their level of independence, thoroughness and the investigator's ability to follow a consistent methodology. There is a requirement for all investigation to have these elements but in practice this isn't well understood or achieved.

4.2 Inconsistent understanding of the purpose of CIMS investigations and reviews and application of the framework detracts focus from what can be learned or improved.

There is inconsistent understanding and application of the investigation and review framework purpose and as a result benefit. This leads to the process largely being viewed as administrative and opaques the intended outcome of identifying and implementing learning and improvement.

4.3 Current guidance material and information does not fully and clearly articulate the scope of and actions within investigations.

The current investigation and review framework is not explicit enough in providing clear guidance on scope and required actions, resulting in inconsistent subjective application.

### What this means

There is an opportunity to improve the quality of investigations by clarifying requirements and acceptable standards for investigations.

The CIMS investigation and review framework could benefit from guiding principles that provide clarity on elements that are required for investigations or that guide CIMS investigations. There is potential to review current investigation templates to ensure that they align with the elements that are required for well run investigations.

The CIMS investigation and review framework can be strengthened by shifting focus back to learning and improvement.

A refined framework promoting continuous learning opportunities can help to clarify perceived confusion around the benefit of investigations and reviews. This can enhance the quality and consistency of investigations and reviews, while creating a culture of learning.

There is a need to provide comprehensive and clear guidance material and information that specifies the scope and required actions of investigations.

The investigation and review framework can benefit from clear guidance materials that remove the subjective nature of some elements and fills in gaps currently missing from or not explicitly stated in current guidance material.

## 4. Refining the CIMS investigation and review framework presents an opportunity to move towards clearer processes and a fit for purpose system (cont.)

What we've found	What this means
<p>4.4 Investigations can be open for years, resulting in an administrative process that doesn't promote learning.</p> <p>Delays in conducting investigations can result in them being open for extended periods of time and being completed retroactively to when the allegation was made. This creates a sentiment of investigations being an administrative process rather than promoting learning.</p>	<p>Minimising delays in investigations can enable timely consideration of learning opportunities and implementation of options.</p> <p>When investigations are conducted swiftly, there is potential to take learnings and implement these in real-time when they are most relevant. This can create more opportunities to see benefits from investigations realised.</p>
<p>4.5 Investigations may lose their effectiveness when they focus excessively on minor details that do not influence the overall findings.</p> <p>Investigation reports can be withdrawn and returned to agencies multiple times throughout an investigation for small and trivial details or perceived errors. This creates delays and additional administrative burden on agencies.</p>	<p>The CIMS investigation and review framework can benefit from clarity of acceptable standards for endorsement.</p> <p>Providing clarity of acceptable standards for endorsement can support agencies to confidently complete investigation reports to meet requirements. It can provide transparency around why reports are withdrawn and prevent potential additional work.</p>
<p>4.6 The CIMS system doesn't currently support action or steps to implement learning after an investigation or review.</p> <p>There is a gap in the current CIMS system to support implementation of an action plan or steps to prevent future incidents. This creates a practice of investigations being viewed as the end point rather than the starting point that leads to learning opportunities.</p>	<p>There is an opportunity to include guidance and recommendation around actions to support steps post investigations and reviews.</p> <p>Guidance material related to action plans and how agencies can look to implement learnings arising from investigations and reviews can support practice improvement. There is potential for investigations and reviews to inform preventative measures.</p>



## 4. Refining the CIMS investigation and review framework presents an opportunity to move towards clearer processes and a fit-for-purpose system (cont.)

### What we've found

4.7 There is inconsistency in how and what information is shared with carers of progress and outcomes during investigations. Participants in investigations do not always feel information is clear or forthcoming during CIMS investigations. There is a gap in understanding of the CIMS investigation process and the potential impacts of it on carers and their ongoing employment opportunities.

4.8 Process and system gaps are resulting in confusion and inconsistencies, creating potentially unnecessary work and avoidable delays. The CIMS system is not very user friendly or fit for purpose. There are situations in which the system is the cause of delays or duplicative work. Current guidance material lack information on how to respond to certain situational events (e.g., retrospective investigations).

4.9 Internal Department roles and responsibilities as they relate to CIMS investigations and reviews are at times unclear (e.g. Agency Performance and System Support, Safeguarding and Oversight). It can be unclear for internal staff what their role is in relation to CIMS investigations and reviews, for example how Agency Performance and System Support and Safeguarding and Oversight should work together. At times there is overlap between team which creates confusion around who is responsible for different elements of investigations and reviews.

### What this means

CIMS investigations and reviews could benefit from clearer guidance on information-sharing expectations and support available to carers during an investigation or review. Clear and accessible information is required to ensure individuals feel informed on investigation processes and progress. This should include clarification on what support is available to participants involved and how it can be accessed. Additionally, guidance should be provided on information-sharing processes and expectations throughout an investigation or review.

CIMS investigations and reviews can benefit from a fit for purpose system and guidance that minimises ambiguity. There is an opportunity for the CIMS system to be reviewed and updated to enable rather than inhibit individuals conducting investigation.

Role clarity of internal Department staff as it relates to CIMS investigations and reviews can reduce potential overlap and confusion. Greater guidance on roles and responsibilities as they relate to investigations and reviews could help prevent confusion and overlap between Department teams. It is important to consider each team's role and purpose in various aspects of CIMS and the purpose of that involvement.

## 5. There is benefit to clarifying requirements of CIMS investigations to address current capability and capacity gaps

### What we've found

5.1 CIMS investigations can be complex and require a high level of capability to conduct adequately, a standard that is not regularly met. Investigations require a significant amount of experience and complex capability to be conducted well. Levels of capability and ability to staff appropriate staff vary by organisation.

5.2 Insufficient resources and capacity to match the volume of investigations is resulting in lengthy processes and delays that pose significant challenges, especially for smaller organisations. There is difficulty experienced by the sector to adequately resource the investigation function of their organisation. Limited capacity impacts on organisation's ability to assign impartial investigators and have adequate distribution of resources.

5.3 There is limited funding dedicated to support the investigation and reporting functions of CIMS. The sentiment is that the current funding is not sufficient to resource the capability and capacity required to support well run investigations. Sector stakeholders have expressed that funding be proportionate to the requirements that investigations impose on their organisations.

### What this means

There is an opportunity to clarify capability requirements and resourcing provided to meet these to improve investigation quality. The level of capability and capacity currently required for completing successful investigations is not always achieved by agencies. Clarity around the acceptable standard of investigation practice is needed to evaluate the capability and capacity required proportionately. In addition, there is benefit in reviewing current funding allocated to the reporting and investigation functions of agencies to see if it appropriately reflects the need.

## 5. There is benefit to clarifying requirements of CIMS investigations to address current capability and capacity gaps

### What we've found

5.4 The current level and frequency of training appears insufficient for the level of capability required to conduct high quality investigations. Training needs are not currently being met by sector stakeholders. This is particularly difficult when staff turnover is high and capacity to build capability internally is limited.

5.5 Internal Department CIMS team's assessments and guidance on investigations is not always received with confidence by agencies. There is sentiment that internal Department staff don't always have the on ground service delivery experience or risk expertise to provide appropriate and effective guidance to agencies.

### What this means

CIMS investigations and reviews can benefit from agencies and Department staff receiving regular training and upskilling to build capability. Regular and suitable training is required to support agencies to build capability and capacity to train staff within their own organisations. With the support of appropriate guidance material training can help tease out the nuances of investigations and reviews that may not necessarily be attained by reading information.

## 4. Recommendations

Recommendations for a future ready CIMS investigation and review framework

# Guiding principles for a future-ready CIMS investigation and review framework

The six principles below are designed to address the feedback received from stakeholders in step 2 'engaging for insight'. The future-ready CIMS investigation and review framework incorporates these principles to better address the needs of clients and other stakeholders.

- 1 Centering the client's voice and need for safety
- 2 Amplifying Aboriginal voices and supporting cultural safety
- 3 Applying proportionate and appropriate responses to incidents
- 4 Supporting carers through the process
- 5 Enabling timely investigations that promote real-time learning
- 6 Promoting system-wide learning and minimising harm

# Our recommendations for a future ready framework

Recommendations are grouped into three categories:

1. Policy changes
2. Other impactful opportunities
3. Broader CIMS systems considerations

## Policy changes

Seven recommendations for a revised CIMS policy, focussing on the investigation and review phases.

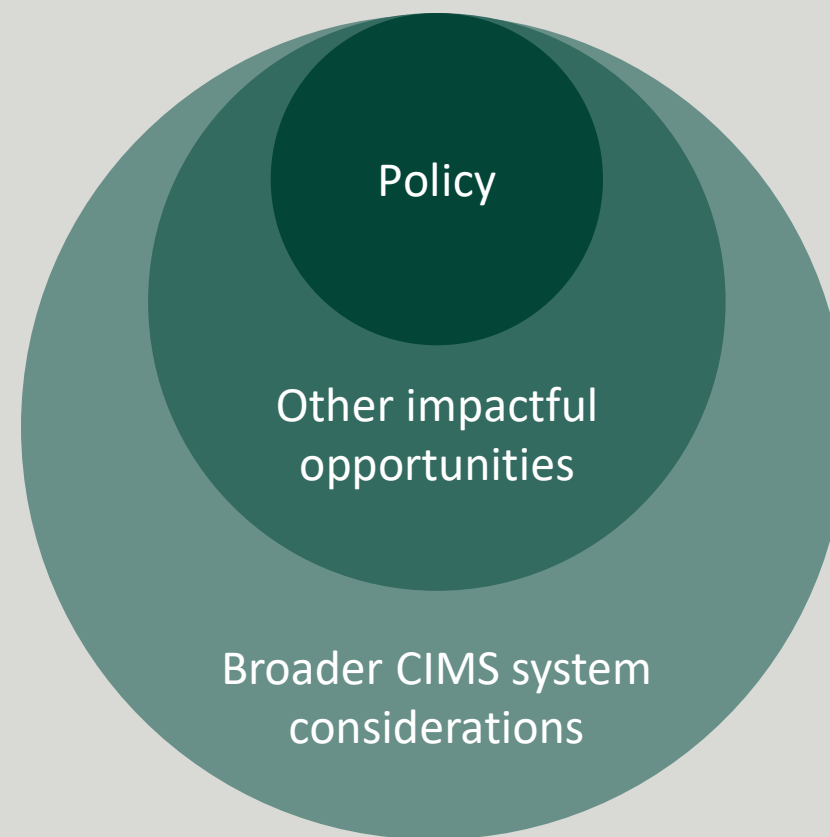
## Other impactful opportunities

Five recommendations that identify opportunities for longer-term positive outcomes that may require investment of time and resources.

## Broader CIMS system considerations

Three recommendations that fall outside the scope of this review, but important for the Department to consider in addressing gaps and improving practice.

Please note: Cube was unable to make recommendations relating to closer alignment between CIMS and the new Worker Cover Exclusion Scheme (WCES). This was primarily due to a lack of available information and WCES being developed throughout the duration of our review.



# CIMS investigations and reviews policy recommendations

Below are CIMS policy change recommendations for a future ready CIMS investigation and review framework (please see page 24 for the proposed framework).

Recommendation	Description	Anticipated benefit	Considerations and risks
<p><b>P1. Provide clearer policy guidance on incident categorisation and the application of professional judgment</b></p>	<p>Ambiguity in definitions of incident types and categorisation of major and non-major incidents has contributed to confusion and inconsistency. It is recommended that policy guidance is improved by providing clarity on incident categorisation, allowing for professional judgement in decision-making on how to respond to an allegation, as well as guidance on how the investigations framework should be applied.</p>	<ul style="list-style-type: none"> <li>• Reduce the number of incidents incorrectly categorised as major impact and unnecessarily investigated (including long and short-form investigations).</li> <li>• Empower agencies to use their professional judgement and experience when responding to incident allegations.</li> <li>• Promote greater balance between the structure of the rules and professional expertise.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider what support may be required following policy changes, including guidance for Department staff in recognising agencies' professional judgement in response to allegations.</li> <li>• Guidance should be presented in an easily digestible format to facilitate swift decision-making, ensuring a balance between clarity and the volume of information provided.</li> </ul>
<p><b>P2. Enable a proportionate and appropriate response for client-to-client incidents</b></p>	<p>It is recommended that alternative definitions are used for client-to-client incidents rather than the current criminalising language (e.g. 'subject of allegation'). It is also recommended that investigations are conducted in more therapeutic, rather than forensic approaches, wherever possible for client-to-client incidents.</p>	<ul style="list-style-type: none"> <li>• Streamline efforts in responding to client-to-client allegations.</li> <li>• Improve timeliness and experiences of clients on both sides of the allegation.</li> <li>• Support decriminalisation of clients, especially young people in out-of-home care.</li> <li>• Enable greater therapeutic response opportunities, as there is more time to consider various aspects and involve clients to uncover the root causes of incidents.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a risk that harm is downplayed or unacknowledged. Therefore, clear thresholds are required to inform when agencies need to investigate a client-to-client allegation.</li> <li>• Consideration needs to be given to what information CIMS requires if agencies conduct reviews within the current care team setting (e.g. a one-page template of the response and follow-up actions).</li> </ul>

# CIMS investigations and reviews policy recommendations (cont.)

Recommendation	Description	Anticipated benefit	Considerations and risks
<p><b>P3. Enable a proportionate and appropriate response for incidents involving kinship carers</b></p>	<p>Kinship care incidents and their investigation response were repeatedly discussed throughout stakeholder engagements. Kinship carers enter the system differently to other carers and are in care situations that were likely not planned and might have suddenly happened. It is recommended that policy changes are made to enable agencies to provide a rationale for completing a carer development plan rather than an investigation, after an assessment of the incident to determine the most appropriate approach.</p>	<ul style="list-style-type: none"> <li>• Promote preservation of the kinship arrangement within families where possible.</li> <li>• Empowers agencies to respond to allegations in a way that is proportionate to the incident.</li> <li>• Increase timeliness of responses.</li> <li>• Enables incidents to be looked at in the family’s context and for appropriate action to be taken to reduce the likelihood of incidents recurring.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a risk that harm is downplayed or unacknowledged. Therefore, clear thresholds are required to inform when agencies need to investigate an allegation involving a kinship carer.</li> </ul>
<p><b>P4. Enable RCS investigations to be accepted in place of CIMS for incidents in scope of both (please see section 5. ‘implementation considerations’ for further details on this recommendation)</b></p>	<p>The complex and overlapping nature of RCS and CIMS has contributed to increased administrative burden, duplication of efforts and adverse experiences by clients and other investigation participants. Consequently, for incidents that are in scope for both CIMS and RCS investigations, it is recommended that agencies have the option to conduct an RCS investigation only and have this accepted in place of a CIMS investigation.</p>	<ul style="list-style-type: none"> <li>• Reduce duplicative efforts, delays and administrative burden associated with conducting two separate investigations or a joint CIMS and RCS investigation, as only one investigation will need to be completed.</li> <li>• Promote timely investigations and outcomes that can reduce adverse experiences faced by participants of an investigation (e.g. not being subject to re-interviewing efforts to collect evidence for multiple investigations).</li> </ul>	<ul style="list-style-type: none"> <li>• Investigations under one scheme may be substantiated, whereas they may not be under the other (applies to both schemes).</li> <li>• Consideration needs to be given to the different purposes for both schemes and how that impacts the findings, i.e. RCS considers the conduct of the carer or staff member, whereas CIMS focuses on the impact to the child.</li> <li>• For the Department to accept RCS in place of CIMS, there will need to be consideration given to what information may be missed if a CIMS investigation was not done and if this would satisfy the requirements under CIMS.</li> </ul>



## CIMS investigations and reviews policy recommendations (cont.)

Recommendation	Description	Anticipated benefit	Considerations and risks
<p><b>P5. Clarify guidance on implementation of learnings after an investigation or review has been completed</b></p>	<p>Clear guidance on implementation of learnings from an investigation or review promotes a continuous learning culture and system learning opportunities for improvement and prevention. Quality improvement mechanisms already exist within many agencies, but the framework could be strengthened by providing clear guidance on what this should look like.</p>	<ul style="list-style-type: none"> <li>Clarity on implementation of learnings will provide greater opportunity to analyse trends in incidents and consequently identify improvements that can lead to fewer ‘major impact’ incidents. This benefit can be realised externally by agencies as well as internally by the SAO and APSS teams.</li> </ul>	<ul style="list-style-type: none"> <li>Consideration should be given to the extent to which learning implementation is monitored and the associated roles and responsibilities.</li> <li>There is a risk that agencies are demotivated and confused if learnings, in particular from case reviews, are not reviewed by the Department.</li> </ul>
<p><b>P6. Ensure greater consideration is given to Aboriginal knowledge and expertise for incidents involving an Aboriginal child, young person or carer</b></p>	<p>The CIMS investigation and review framework can be strengthened by privileging Aboriginal knowledge and expertise in decision-making, especially within ACCOs, in investigations and reviews. It is recommended that the updated investigations and reviews policy guidance include a section on cultural safety (of Aboriginal client and other cultures) under implementation guidance.</p>	<ul style="list-style-type: none"> <li>Increase culturally safe practices and set a standard for cultural safety in conducting investigations and reviews.</li> <li>Provide guidance for agencies who contract investigations externally to promote consistency in culturally safe approaches.</li> <li>Empower ACCOs in their experience with CIMS investigations and reviews.</li> </ul>	<ul style="list-style-type: none"> <li>There is a risk that in practice no change is experienced by ACCOs if internal Department staff don’t acknowledge Aboriginal knowledge and expertise in decision-making.</li> <li>Consideration will need to be given to how cultural safety can be reflected for all cultures.</li> </ul>

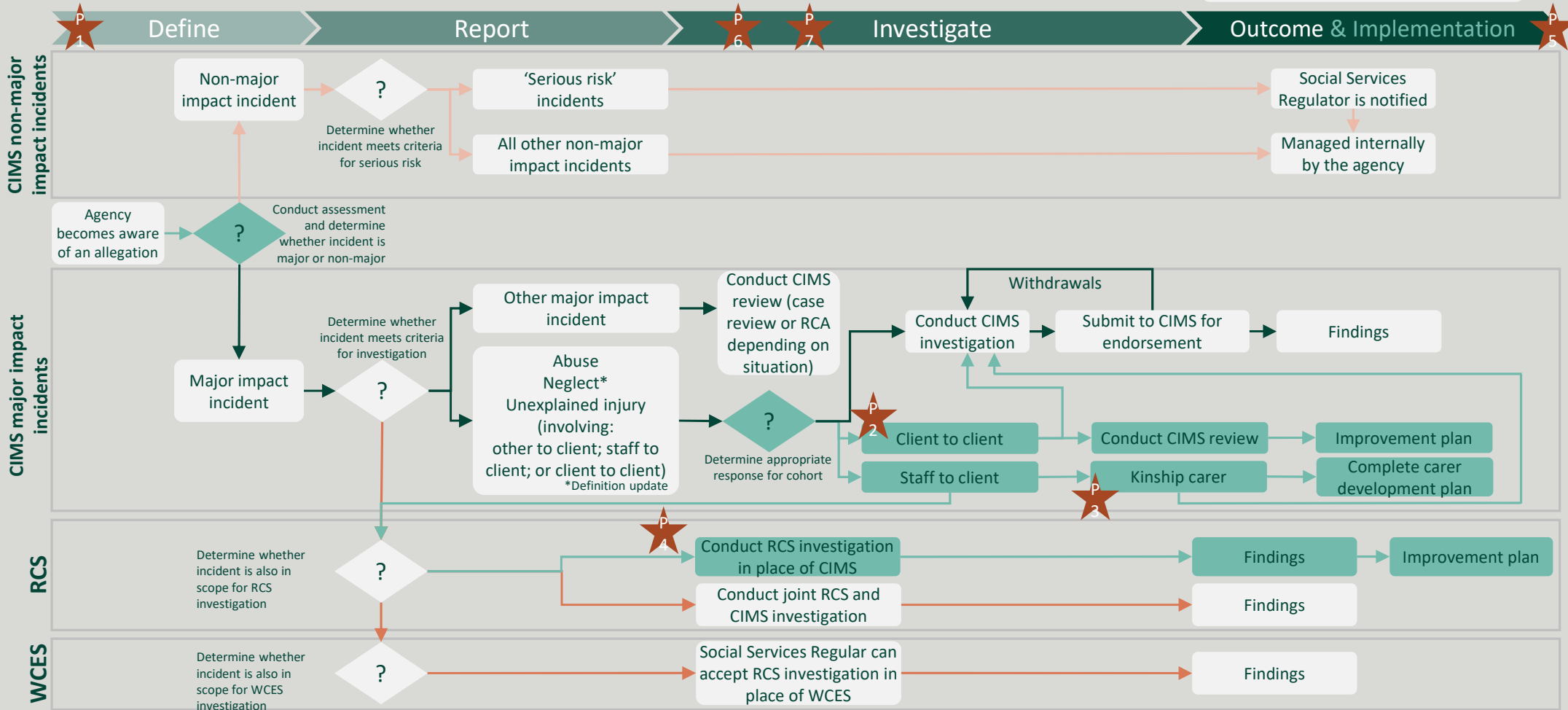
## CIMS investigations and reviews policy recommendations (cont.)

Recommendation	Description	Anticipated benefit	Considerations and risks
<p><b>P7. Amend the CIMS investigative language to move away from a presumption of guilt and blame</b></p>	<p>A common issue raised with investigations was the language used and the negative impact that labeling an individual a “subject of allegation” or a “victim” has on them, particularly for children and young people. It is recommended that investigative language be amended to something more neutral like “incident participants”, “reported individual” and “affected individual”.</p>	<ul style="list-style-type: none"> <li>• Contribute to reduction of the negative impact experienced by labels currently used and their long-term impact on clients when involved in an investigation at a young age.</li> <li>• Promote a felt sense of impartiality by investigation participants from commencement.</li> </ul>	<ul style="list-style-type: none"> <li>• There is a risk that neutral language can dilute the perceived seriousness of allegations. It is important that client voice is represented, and clients feel heard and supported through the investigation process.</li> </ul>

# A refined CIMS investigation and review framework that is proportionate to incidents and accounts for overlapping safeguarding schemes

**Key**

- Non-major impact (light blue arrow)
- Major impact (dark blue arrow)
- Other schemes (orange arrow)
- New practice (red star)
- Decision point (white diamond with question mark)



# Other impactful opportunities for CIMS investigations and reviews

Below are other impactful opportunities for CIMS investigations and reviews for consideration. These recommendations identify opportunities for long term positive outcomes and will likely require investment of time and resources.

Recommendation	Description	Anticipated benefits	Considerations and risks
<p><b>O1. Introduce regular thematic analysis of non-major impact incidents</b></p>	<p>Non-major impact incidents including the new ‘serious risk’ incident type, provide an opportunity to identify potential major impact incidents before they occur. It is recommended that developing an approach to thematic analysis of learnings from investigations and review outcomes is completed for these incidents types to identify emerging patterns and opportunities where early intervention can potentially prevent more serious, and major impact incidents from occurring.</p>	<ul style="list-style-type: none"> <li>• Reduction in preventable major impact incidents by analysis of trends in non-major incidents.</li> <li>• Support learning across different incident types and recurring incidents for individual clients, enabling targeted responses and care plans for clients.</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration should be given as to how capability across the system (i.e. both within service providers and within the Department) can be enhanced to conduct thematic analysis. This includes developing information resources and materials, as well as opportunities, where allowed, to share information between parties.</li> </ul>
<p><b>O2. Review current training needs develop a learning and development plan for capability uplift</b></p>	<p>The need for investigation capability uplift was repeatedly identified by internal and external stakeholders. It is recommended that training needs are reviewed to inform a learning and development plan, including regular training for agencies and internal staff to increase capability.</p>	<ul style="list-style-type: none"> <li>• Improve the overall quality of investigations conducted and reports written.</li> <li>• Empower agencies to train more staff internally on how to effectively conduct investigations and reviews, and in turn create greater capacity to undertake investigations and reviews.</li> </ul>	<ul style="list-style-type: none"> <li>• Current training mechanisms and materials should be reviewed, with consideration given to their ability to adequately train individuals on CIMS investigations and reviews.</li> <li>• Consideration should also be given to any additional training requirements for smaller community sector organisations that may not have the resources to fully train or upskill their staff.</li> </ul>

## Other impactful opportunities for CIMS investigations and reviews (cont.)

Recommendation	Description	Anticipated benefits	Considerations and risks
<p><b>O3. Develop fit for purpose information material on CIMS incident and findings definitions</b></p>	<p>Agencies expressed a need for greater clarity on CIMS incident and findings definitions, as current guidance is ambiguous and subject to interpretation. It is recommended that updated guidance provided in the CIMS investigation and review chapter clarifies ambiguity and that additional information material to support upcoming policy changes be developed to assist in implementation where needed.</p>	<ul style="list-style-type: none"> <li>• Reduce confusion and prevent misinterpretation of guidance material, resulting in rework and delays.</li> <li>• Assist in smoothing the transition to new policy guidance on CIMS investigations and reviews.</li> </ul>	<ul style="list-style-type: none"> <li>• There needs to be a balance between the volume of information and value it adds for agencies in terms of support and guidance for practice.</li> </ul>
<p><b>O4. Review information sharing practices across different safeguarding schemes to promote systems learning and improvement</b></p>	<p>The need for increased information sharing and the associated delays and duplication of effort that occurs when not in place was raised multiple times in consultations. It is recommended that information sharing practices are reviewed between child protection and agencies external to the Department to enable appropriate sharing of information supporting CIMS investigations.</p>	<ul style="list-style-type: none"> <li>• Reduce duplicative efforts by agencies when conducting a CIMS investigation after child protection has assessed the client's placement.</li> <li>• Promote positive working relationships between child protection and agencies, including ACCOs.</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration needs to be given to privacy requirements of individuals involved, and information sharing policies and procedures between the Department and external agencies.</li> </ul>

## Other impactful opportunities for CIMS investigations and reviews (cont.)

Recommendation	Description	Anticipated benefits	Considerations and risks
<p><b>O5. Review current funding allocation to conduct investigations to determine adequacy</b></p>	<p>External stakeholders expressed the need for greater financial support in conducting investigations and reviews. This is largely due to the cost associated with contracting external providers to complete investigations and the cost associated with redirecting internal resources to investigate an allegation. It is recommended that a funding review is undertaken to better understand the costs of service delivery, including impact of investigations.</p>	<ul style="list-style-type: none"> <li>• Identify if there are any gaps in the current funding allocation for CIMS investigations and provide consideration for adjustments where and if required.</li> <li>• Provide opportunities to enhance efficiency with potential for resources to be better aligned with the resource needs of investigations.</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration of the different operational environments of small and larger agencies and the implication on funding need.</li> <li>• Consideration of how often funding allocation is reviewed and adjusted to account for increasing costs and other impacting factors.</li> </ul>

# Broader CIMS system considerations that emerged from consultations

Below are recommendations that have been gathered from consultations that fall outside of the scope for this review but are important for the Department to consider in addressing gaps and improving practice.

Recommendation	Description	Anticipated benefits	Considerations and risks
<p><b>C1. Review current approach for investigations involving foster carers including information provided to potential carers and support provided during investigations</b></p>	<p>Consultations surfaced a gap in knowledge of foster carers in relation to CIMS investigations and reviews.</p> <p>There is a need for more information to be provided to foster carers when they are recruited, so they understand the CIMS process, and the potential impact investigations can have on their personal life (e.g. relationship with the foster child) and professional life (e.g. ability to work with children).</p> <p>Concerns were raised about the conflicting roles service providers play during foster carer investigations, i.e. conducting the investigation whilst also supporting the carer. Inconsistencies in the level of support provided to foster carers during investigations was also highlighted as key concern, for example the information provided during an investigation, as well as the investigation outcome, and the rationale for decisions.</p> <p>It is recommended that the Department reviews the current foster care approach to determine improvement opportunities.</p>	<ul style="list-style-type: none"> <li>Identify shortfalls in the foster care approach that when addressed can improve the experience of foster carers, whilst prioritising children and young people’s safety.</li> </ul>	<ul style="list-style-type: none"> <li>The Department will need to consider who is best placed to undertake this work.</li> <li>There needs to be a balance between the volume of information and value it adds for foster carers and agencies.</li> <li>Consideration needs to be given to the role that Foster Care Association of Victoria (FCAV) have in support carers through CIMS investigations when agencies conduct investigation internally.</li> </ul>

## Broader CIMS system considerations that emerged from consultations (cont.)

Recommendation	Description	Anticipated benefits	Considerations and risks
<p><b>C2. Strengthen the working partnership with Victoria Police to enhance investigative processes</b></p>	<p>Police investigations contributes significantly to delays in CIMS investigations. They also result in duplicative efforts and administrative burden when information is not shared with agencies in conducting their CIMS investigation. It is recommended that the Department strengthens its working partnership with Victoria Police to enhance investigative processes by developing information sharing practices and a consistent and structured referral pathway for a police investigation.</p>	<ul style="list-style-type: none"> <li>• Reduction in duplicative efforts and administrative burden of re-collecting evidence and information for CIMS investigations.</li> <li>• Improved working relationships between Victoria Police, the Department and agencies.</li> <li>• Increased consistency in referrals to Victoria Police, including information feedback loops and progress tracking.</li> </ul>	<ul style="list-style-type: none"> <li>• Consideration needs to be given to privacy requirements of individuals involved, and information sharing policies and procedures between the Department, Victoria Police and agencies.</li> <li>• Consideration should also be given to how this may evolve from adapted current practice, rather than adding more work to be completed.</li> </ul>
<p><b>C3. Review of the Department's current approach to kinship care</b></p>	<p>Kinship carers enter the system differently to other carers and are in care situations that was likely not planned and might have happen suddenly. The current system is not well set up to support kinship carers or promote proportionate responses to incident allegations. It is recommended that the Department reviews the current kinship care approach to determine improvement opportunities (in addition to recommendation P3).</p>	<ul style="list-style-type: none"> <li>• Promotes sustainability of this care placement as the preferred option for children and young people.</li> <li>• Identify gaps that when addressed can improve the experience of kinship carers in the system.</li> </ul>	<ul style="list-style-type: none"> <li>• Consider other work that is currently underway within the Department in relation to kinship care to streamline efforts and promote consistency.</li> </ul>



# 5. Implementation considerations

## Supporting effective implementation of the recommendations

# Implementation considerations

Implementation of the recommendations for a future-ready CIMS investigation and review framework will take careful planning, time and effort. The implementation considerations below should be considered to ensure that the future-ready investigation and review framework delivers the desired outcomes for clients.

## **Information sharing**

To further develop relationships with external stakeholders, identify where knowledge sharing can occur between parties so investigation and review learnings can be gathered and proactively shared.

## **Guidance material**

Guidance material for how policy changes will be applied in practice should be presented in an easily digestible format to facilitate swift decision-making, ensuring a balance between clarity and the volume of information. Guidance should include material on revised thresholds, as well as support around effective decision-making and impact assessment.

## **Scheme alignment**

The alignment of schemes will require development of supporting and consistent documents and templates and the use of existing IT systems to transition to the new ways of working. Clear guidance is required when schemes are being substituted, i.e. when RCS is being completed rather than CIMS.

## Accepting RCS investigations in place of CIMS – further considerations

Recommendation P4 states that the future-ready investigations and review framework ‘Enables RCS investigations to be accepted in place of CIMS for incidents in scope for both’ schemes.

This is recommended based on stakeholder insights and research into the two schemes that a single investigation could:

- reduce the risk of further traumatising the child
- enable witnesses to be interviewed on fewer occasions
- support procedural fairness through timely and effective investigations
- decrease the emotional toll on carers by streamlining the process
- Reduce the administrative burden on service providers.

### **Key considerations for implementation**

It is feasible that a single RCS investigation be conducted for incidents in scope for both schemes as the mechanics of an investigation are largely similar across the CIMS and RCS (e.g. plan the investigation; conduct a thorough and fair investigation, complete an investigation report; make findings).

Differences between the two schemes exist, and considerations for implementation are presented in the table overleaf. It is recommended that a review of the approach is held, e.g. after six months, to understand the impact of the change, and where refinements are required to improve practice and outcomes.

# Accepting RCS investigations in place of CIMS – further considerations

The table below highlights key features of CIMS and RCS Investigations, assesses the alignment between the two schemes and considers implementation considerations based on the degree alignment.

Criteria	CIMS Investigations	Reportable Conduct Scheme (RCS)	Alignment	Implementation considerations
<b>Purpose and scope</b>	<ul style="list-style-type: none"> <li>Determines if there has been abuse or neglect of a client by a staff member (including a carer or volunteer) or another client</li> <li>Investigations focus on client safety and wellbeing by outlining key actions and system-level responses to incidents</li> <li>Can include allegations of harm and abuse of all clients, regardless of age</li> </ul>	<ul style="list-style-type: none"> <li>Establishes facts and makes findings in relation to allegations of reportable conduct against a staff member including a foster or kinship carer or volunteer.</li> <li>Children or young person up to 18 years of age</li> </ul>	●	<ul style="list-style-type: none"> <li>Develop resources (e.g. information sheets, training material) on the difference between the two schemes, as well as when a single RCS investigation can occur in lieu of CIMS.</li> </ul>
<b>Definitions (CIMS) and thresholds (RCS)</b>	<ul style="list-style-type: none"> <li>Emotional or psychological abuse</li> <li>Poor quality of care</li> <li>Injury</li> <li>Physical abuse</li> <li>Sexual abuse</li> <li>Sexual exploitation</li> </ul>	<ul style="list-style-type: none"> <li>Behaviour that causes significant emotional or psychological harm to a child</li> <li>Significant neglect of a child</li> <li>Physical violence (against, with, or in the presence of a child)</li> <li>Sexual offences (against, with, or in the presence of a child)</li> <li>Sexual misconduct (against, with, or in the presence of a child)</li> </ul>	◐	<ul style="list-style-type: none"> <li>Move towards alignment of definitions/thresholds between the two schemes (underway)</li> </ul>
<b>Standard of proof</b>	<ul style="list-style-type: none"> <li>Balance of probabilities</li> </ul>	<ul style="list-style-type: none"> <li>Balance of probabilities</li> </ul>	●	<ul style="list-style-type: none"> <li>Alignment between the two schemes. Communicate alignment to service providers and investigators</li> </ul>

**Key**

● Strong alignment      ◐ Partial alignment      ○ Limited alignment

## Accepting RCS investigations in place of CIMS – further considerations (cont'd)

Criteria	CIMS Investigations	Reportable Conduct Scheme (RCS)	Alignment	Implementation considerations
<b>Findings</b>	<ul style="list-style-type: none"> <li>Substantiated</li> <li>not substantiated – no further action</li> <li>not substantiated – further action required.</li> </ul>	<ul style="list-style-type: none"> <li>Substantiated</li> <li>Unsubstantiated – insufficient evidence</li> <li>Unsubstantiated – lack of evidence of weight</li> <li>Unfounded</li> <li>Conduct outside the scheme</li> </ul>	<ul style="list-style-type: none"> <li>Alignment</li> </ul>	<p>Provide guidance to service providers on managing situations where findings differ under each scheme (noting that alignment of definitions will reduce the likelihood of this happening)</p>
<b>Information sharing</b>	<p>Service providers are responsible for sharing the outcome of a CIMS investigation with all relevant parties:</p> <ul style="list-style-type: none"> <li>the subject of allegation</li> <li>the alleged victim</li> <li>parents, carers or guardians of the alleged victim who is under the age of 18</li> <li>any additional service providers involved with the client or the subject of allegation</li> </ul>	<p>The RCS contains statutory restrictions on the sharing of information relating to a reportable allegation. The head of service:</p> <ul style="list-style-type: none"> <li>Can share information about the progress of an RCS investigation and findings and actions taken or not taken with the alleged victim and their parents or carers</li> <li>Should advise the subject of allegation of the outcome of the investigation</li> </ul>	<ul style="list-style-type: none"> <li>Alignment</li> </ul>	<p>CIMS reports are submitted by service providers to DFFH Divisional Offices for review and quality assurance. If an RCS report is completed in lieu of a CIMS report it is expected that:</p> <ul style="list-style-type: none"> <li>it will need to be submitted to DFFH for review and quality assurance</li> <li>It can be submitted to CCYP without waiting for quality assurance from DFFH</li> </ul> <p>Consider developing guidance for service providers e.g. information sheets, prompts in CIMS IT system on how report submission should be conducted.</p>
<b>Timeframes</b>	<ul style="list-style-type: none"> <li>Notify DFFHS via CIMS within 3 business days of the incident occurring or becoming aware of the incident</li> <li>Complete investigation and report within 28 business days of incident endorsement</li> </ul>	<ul style="list-style-type: none"> <li>Notify CCYP within 3 business days of becoming aware that any person has formed a reasonable belief of reportable misconduct</li> <li>Update the commission on progress within 30 calendar days</li> <li>Once the investigation has concluded advise the commission of the findings and actions taken, or not taken and reasons for each as soon as practicable</li> </ul>	<ul style="list-style-type: none"> <li>Alignment</li> </ul>	<p>Under CIMS, investigations should be completed within 28 business days. RCS investigations do not have a similar timeline.</p> <p>Departmental consideration is required on how the difference in timelines should be managed in practice. Accepting RCS timeframes will allow for consistency between the schemes, noting this may not allow the target of investigation and report completion within 28 business days.</p>

# 6. Appendix

## Consulted stakeholders



# Who we engaged with

Stakeholder		Representation areas
Internal	CIMS Review Executive Oversight Group	Community Operations and Practice Leadership; Fairer Victoria; Family Safety Victoria; Homes Victoria; Aboriginal Self-determination and Outcomes; Corporate Services; Disability, Complex Needs and Emergency Management Division; System Reform and Workforce
	Social Services Regulation Reform team	Human Services Regulator Office; Carer Investigations; Policy Reform; Regulatory Practice Improvement
	Child Protection Directors	Child Protection Directors
	Agency Performance and System Support Managers	Agency Performance and System Support Managers
	Safeguarding and Oversight team	Director; Manager; Senior Advisors
Service Provider	Anglicare	Quality and Outcomes; Client Services
	Berry Street	Quality and Risk; Child Safeguarding
	MacKillop	Systems and Data Reporting; Operational Performance
	Salvation Army	CIMS Manager
	Victorian Aboriginal Child Care Agency (VACCA)	Investigations and Review; Child Safeguarding
Peak Body	Victorian Aboriginal Children and Young People's Alliance	Senior Advisor; Executive Manager (Rumbalara Aboriginal Co-operative); Executive Director (Njernda Aboriginal Corporation); Quality (BDAC); Family Services (Wathaurong Aboriginal Cooperative Ltd.)
	The Centre for Excellence in Child and Family Welfare	Social Policy and Research
	Kinship Carers Victoria (KCV)	Director KCV
	Foster Care Association of Victoria (FCAV)	CEO; Care Support; Carer Advocate
Independent statutory authority	Commission for Children and Young People (CCYP)	Commissioner; Analysis and Strategy; Regulation

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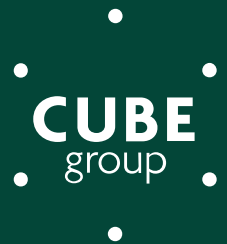
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