



## CANCELLATION POLICY

### 1. Objectives and Background

Diverse and Thriving is committed to providing the best service in a timely manner. We aim to accommodate your needs.

Unfortunately, when a client cancels without giving adequate notice, it prevents another client from being served. This cancellation policy is used as a way of respecting the time commitment of all involved. It explains the process for requesting a cancellation and the fees applicable. This policy is used in fairness to both our business and the clients who would otherwise have wanted an appointment.

We are implementing a straightforward cancellation policy for our NDIS-funded services and private services to be upfront about all the costs you may face when engaging our services.

### 2. Compliance with NDIS Regulations

Diverse and Thriving's Cancellation Policy is compliant with the regulations and definitions set out by the National Disability Insurance Agency (NDIA) in the National Disability Insurance Scheme (NDIS) Terms of Business for Registered Providers and the NDIS Pricing Arrangements.

### 3. Definitions

#### 3.1. Adequate Notice Cancellation

Cancellation with more than two (2) clear business days' notice.

#### 3.2. Short Notice Cancellation

A cancellation is a short notice cancellation if the participant:

- (a) does not show up for a scheduled session within a reasonable time, or is not present at the agreed place and within a reasonable time when the provider is travelling to deliver the support; or
- (b) has given less than two (2) clear business days' notice for a session.

#### 3.3. No-Show

Non-attendance for scheduled delivery of session without notice. This includes services delivered through digital means.

#### 3.4. Business Day

9am - 5pm Monday - Friday



## **4. Cancellation Process**

### **4.1. Cancellations**

- (a) To cancel an appointment, clients can contact the office of the appropriate Diverse and Thriving centre within business hours. You may cancel an appointment by contacting us by:
  - (i) phone 03 7035 8773; or
  - (ii) email [admin@diverseandthriving.com.au](mailto:admin@diverseandthriving.com.au).
- (b) Where Diverse and Thriving cancels as the service provider, no charge is made to either the client.
- (c) Where a client is unable to participate in a virtual session due to technical difficulties on their end, they must email the therapist that they are meeting with to notify them of the issues so that they can assist them in resolving the issue.

### **4.2. Providing Notice**

- (a) Where the participant cancels with adequate notice, no charge applies.
- (b) Where the participant cancels with short notice or no-shows, Diverse and Thriving is able to charge 100% of the scheduled fee, pursuant to the NDIS Pricing Arrangements or agreed rate for Private Clients.
- (c) Wherever possible, Diverse and Thriving will charge the relevant funding body directly. If the funding body rejects the cancellation payment for any reason, the client will be charged directly as above.

### **4.3. NDIS-Funded Services**

- (a) Pursuant to the NDIS Pricing Arrangements, Diverse and Thriving can charge 100% of the agreed session fee to the client's NDIS plan for each booking in the event of a short notice cancellation or a no-show.
- (b) Where the NDIA does not permit charges against the NDIS plan, the customer will be personally invoiced in accordance with clause 4.2.

### **4.4. Exceptional Circumstances**

We understand that plans may change due to uncontrollable and external circumstances. Missed appointments can be unintentional or may stem from an emergency, etc. Therefore, cancellation due to such circumstances will not incur a cancellation fee. Having cancellation fees waived require approval from Diverse and Thriving.

### **4.5. No-Show Procedure**

In the event of a no-show, the employee scheduled to support the client will make every reasonable attempt to contact the client to determine if there are any special circumstances



affecting that client.

## **5. Questions**

Our business firmly believes that a good client and business relationship is based upon mutual understanding. Questions about our cancellation policy should be directed to [admin@diverseandthriving.com.au](mailto:admin@diverseandthriving.com.au) or 03 7035 8773.

## **6. Agreement**

Please sign that you have read, understood and consented to this Cancellation Policy. By signing, you understand that you are holding a spot and you may be charged a cancellation fee if an appointment is cancelled without providing at least 5 business days' notice or if the appointment is missed.



## Privacy Policy

### Background

- (A) Diverse and Thriving's policy is to respect and protect the privacy of all people connected with the National Disability Insurance Scheme (NDIS) inclusive of participants, providers, employees and contractors. In dealing with personal information, Diverse and Thriving abides by the obligations imposed under federal law, inclusive of the Privacy Act 1988 (Cth) and the National Disability Insurance Scheme Act 2013 (Cth).
- (B) The Privacy Act 1988 (Cth) authorises the collection of personal information where this is required to facilitate access to services provided under the NDIS and perform the other functions required for service provision. The National Disability Insurance Scheme Act 2013 (Cth) sets the provisions for confidentiality and secrecy which limit how Diverse and Thriving collect and use personal information and when and to whom this information can be disclosed.

### 1. Information collected and stored

- (a) Diverse and Thriving will collect information which is considered reasonably necessary to carry out our role as service providers. The kinds of information we collect and store includes, but is not limited to, personal information (as defined under the Privacy Act 1988 (Cth)) about the participants and other users of our services, and about our employees, contractors and providers.
- (b) We may collect the following types of personal information:
  - (i) identity information, such as your full name and date of birth;
  - (ii) contact details, such as your email and phone number;
  - (iii) government identifiers, such as your participant number under the National Disability Insurance Scheme (NDIS) if applicable;
  - (iv) the relevant NDIS Plan information when provided;
  - (v) any information or documents which you upload to the Diverse and Thriving platform;
  - (vi) information about your interactions with us on or via the Diverse and Thriving platform;
  - (vii) information you provide via free text inputs on or via the Diverse and Thriving platform;
  - (viii) your occupation;
  - (ix) your preferences;



- (x) your relationship to other users of Diverse and Thriving;
  - (xi) information about you, which is held by third parties, where you have provided your separate consent to such collection, such as information that is or was held by the National Disability Insurance Agency;
  - (xii) other personal information that may be required in order to facilitate your dealings with us
- (c) Diverse and Thriving may also collect 'health information' as defined under the Privacy Act 1998 (Cth), such as information about your health or disability, doctors or other health professionals you have seen or health services you have received.

## **2. Sensitive information**

- (a) Sensitive information is defined under the Privacy Act 1988 (Cth) as "Information or an opinion about an individual's: racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; criminal record; or health information".
- (b) Without your consent, we will not collect information sensitive information. Sensitive information will only be collected if it is specifically required for operational purposes. This is subject to certain exceptions such as when collection is required by law, or when the information is necessary for the establishment, exercise or defense of a legal claim.

## **3. Purposes of information collection and storage**

- (a) Where an individual has provided consent, Diverse and Thriving will use and disclose the personal information we collect to:
  - (i) provide and improve our services to our clients and their family members;
  - (ii) process donations and communicate with our donors and supporters, including sending them information (which may be by phone, email or other electronic means);
  - (iii) communicating with our clients and their family members, donors and supporters, and volunteers (including responding to queries and complaints) and distributing our publications, conducting events and raising awareness about our services; and
  - (iv) our general business activities, including interacting with contractors and service providers, billing and administration including measuring and assessing the level of support we receive and the effectiveness of our fundraising activities and assessing applicants for positions with us.
- (b) We will not share any of your personal information with third parties without your consent except:



- (i) if we are required by law or we believe in good faith that such action is necessary in order to comply with law, cooperate with law enforcement or other government agencies, or comply with a legal process served on the company (including other service providers or insurers) or court order;
  - (ii) the disclosure of the information will prevent or lessen a serious and imminent threat to somebody's life or health;
  - (iii) to our contractors, service providers and volunteers only to the extent necessary for them to perform their duties to us.
- (c) We are obliged to report to the Australian government and other bodies on the services they fund us to provide. Reports cover demographic and service use information only.

#### **4. Processes for collecting and storing information**

- (a) Diverse and Thriving has systems and procedures in place to protect personal information from misuse and loss, as well as from unauthorised access, modification or disclosure. These steps include:
- (i) paper-based records which are held securely;
  - (ii) access to personal information is on a need-to-know basis, by authorised personnel;
  - (iii) storage and data systems are regularly updated and audited; and
  - (iv) Digital records will be stored in a secure practice management software called Power Diary.
- (b) When no longer required, personal information is either archived or destroyed in accordance with federal law.

#### **5. Accessing and correcting your personal information**

- (a) Diverse and Thriving aims to ensure that all personal information held about a person is accurate, up to date, complete and relevant before acting on it. If a person learns that the personal information that Diverse and Thriving holds about them is inaccurate, outdated, incomplete, irrelevant or misleading that person can contact Diverse and Thriving through the methods detailed in Section 8 so that the information can be updated accordingly.
- (b) Where a person requests Diverse and Thriving to correct the personal information we hold about them, we will action this request promptly. A person can request that we notify this change to any other agencies or organisations that we have previously disclosed the personal information too.
- (c) If we do not agree to correct our records as requested, we will give written notice of the decision, setting out our reasons for refusing this request and how the person can lodge a complaint about our decision.



## 6. Links to Third Party Websites

Our website [www.diverseandthriving.com.au](http://www.diverseandthriving.com.au) contains external links and widgets operated by certain third parties such as Facebook, Twitter, Instagram and Google. These third parties may not be subject to the Privacy Act 1988 (Cth). Diverse and Thriving is not responsible for the privacy practices of these third parties, or the accuracy, content and security of their websites. You should review the Privacy Policies of these individual websites and use your discretion regarding the use of their site.

## 7. Making a complaint

- (a) You may make a complaint about our handling of your personal information, including if you think we have breached the Privacy Act, by contacting Diverse and Thriving in writing, by email, mail or fax to the contact information set out at the end of this privacy policy.
- (b) Diverse and Thriving will aim to resolve your complaint within fourteen (14) days from when your request was made. If we are not able to resolve your complaint, you may wish to contact the Office of the Australian Information Commissioner at the details set out below.

## 8. Contact information

If you would like to leave feedback or complain about the service you have received from us or you feel that we have breached your privacy obligations, please contact us through any of the following methods.

Phone: 03 7035 8773

Email: [admin@diverseandthriving.com.au](mailto:admin@diverseandthriving.com.au)

If you want to obtain additional information on your privacy rights and how you can enforce them, you can visit the website of the Office of the Australian Information Commissioner at:  
<http://www.privacy.gov.au> or <http://www.oaic.gov.au/>



## COMPLAINT POLICY

### Background

- (A) Diverse and Thriving values complaints from people with disability, families, carers, service providers and regulators to ensure people are treated fairly when they use our services.
- (B) There may be times where Diverse and Thriving does not meet your expectations. In these circumstances we encourage you to let us know. We are committed to learning from your experiences as it will help us to continually improve the service we deliver.
- (C) Diverse and Thriving's complaint management and resolution system complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 and National Disability Insurance Scheme (Code of Conduct) Rules 2018.
- (D) All Diverse and Thriving employees are aware of, trained in, and comply with the required procedures in relation to complaints handling.

### 1. Policy

- (a) Compliments, complaints and other feedback provide Diverse and Thriving with valuable information about participant satisfaction and an opportunity to improve upon all aspects of our service.
- (b) Diverse and Thriving ensures you can easily make a complaint and have it dealt with fairly and quickly.
- (c) Diverse and Thriving makes information available to you and other stakeholders about how to make a complaint to it, the NDIS Commissioner and any other relevant body. Diverse and Thriving keeps adequate records about complaints received.

### 2. Procedure for lodging complaints

Diverse and Thriving has a structured approach to resolving complaints.

#### 2.1. Speak with a member of the Diverse and Thriving team

To lodge a complaint, you are encouraged to speak directly to a staff member first, in an attempt to resolve the matter without recourse to Diverse and Thriving's complaints procedures.

Staff will:

- (a) listen openly to the concerns being raised by you;





- (b) ask you what outcome you are seeking;
- (c) inform you of the complaint process and how to formally make a complaint to Diverse and Thriving, the NDIS Commissioner or other complaints body and the time the process takes.

If your complaint cannot be resolved within 24 hours, it will be referred to Diverse and Thriving's Clinic Owner. The Clinic Owner will advise the person of their right to lodge a formal complaint if they have not already done so, with the assistance of a support person or advocate if they wish.

## **2.2. Lodge a formal complaint**

- (a) If you are dissatisfied with the service provided by Diverse and Thriving, you can lodge a complaint with us.
- (b) Please include in your complaint the following details:
  - (i) your name and contact details;
  - (ii) the nature of the complaint;
  - (iii) details of any steps you have already taken to resolve the complaint;
  - (iv) details of conversations you may have had with us that may be relevant to your complaint and;
  - (v) copies of any documentation which may be relevant.
- (c) Formal complaints can be lodged through the following channels:
  - (i) verbally, with a staff member;
  - (ii) by email to [admin@diverseandthriving.com.au](mailto:admin@diverseandthriving.com.au);
  - (iii) by phone on 03 7035 8773;
  - (iv) Complaints about the NDIA should be directed to the Agency itself or the
- (d) Commonwealth Ombudsman.
- (e) Complaints made to Diverse and Thriving, the NDIS Commission and other complaints bodies can be withdrawn at any time.

## **3. Support provided by Diverse and Thriving**

- (a) Despite 2.2(b)(i), you nonetheless have the option of lodging their complaint anonymously using any of the above channels.
- (b) Complaints and feedback can be lodged by a third party on behalf of another person, if their consent or the consent of their legal representative has been provided.
- (c) At any time, you can make a complaint about Diverse and Thriving or the support we provide to the NDIS Commission or other external complaints bodies.
- (d) Staff will assist complainants or people with disability affected by complaints to contact the NDIS Commission or other complaints body, where this is required.



- (e) You will be encouraged to use an advocate of your choice to act on your behalf if you so wish. The advocate may be a family member or friend, or sourced (with assistance from staff if required) through the National Disability Advocacy Program.
- (f) Staff will take all reasonable steps to ensure complainants or people with disability affected by complaints are not adversely affected or fear retribution because a complaint has been made by them or on their behalf.
- (g) Where a complaint about Diverse and Thriving is made to the NDIS Commission, all staff will:
  - (i) comply with any orders or requests made by the NDIS Commission; and
  - (ii) assist in any resolution process or inquiry undertaken by the NDIS Commission.

#### **4. Evaluation of complaints**

- (a) We will take note of what information you provide to us. This information will be passed on to the appropriate department of Diverse and Thriving to deal with the complaint.
- (b) Investigation of complaints will not be conducted by a person about whom a complaint has been made, or a person who has a conflict of interest in the matter.
- (c) All parties involved in a complaint will be provided with procedural fairness and with the support and information necessary to participate in the complaints process.

#### **5. Response**

- (a) Diverse and Thriving will respond to all complaints as soon as possible and within 14 days from acknowledgement.
- (b) Once we have finalised your complaint, we will advise you of our findings and any action we have taken.

#### **6. Further Action**

If you are unhappy with Diverse and Thriving's response to your complaint. You may lodge a complaint with the Australian Association of Social Workers

Australian Association of Social Workers, Level 7, 14-20 Blackwood St NORTH MELBOURNE 3051  
Or Phone: 03 9320 1000



## INCIDENT MANAGEMENT POLICY AND PROCEDURE

### 1. Policy

Diverse and Thriving will promote the health, safety, welfare and well-being of its clients and meet its professional and legal responsibilities by ensuring any incidents are appropriately:

- (a) identified and recorded;
- (b) assessed to determine corrective and harm minimisation strategies;
- (c) investigated where necessary;
- (d) followed up in a timely manner and to ensure satisfactory outcomes are achieved;
- (e) considered against legislative and funding body requirements and guidelines (including the NDIS Quality and Safeguards Commission: Incident Management Systems) and acted upon as required; and
- (f) shared where appropriate to assist with quality improvement.

### 2. Outcomes

- (a) Risks will be identified and managed to eliminate or minimise any adverse event.
- (b) The impact of any incident will be minimised.
- (c) Clients and other stakeholders will be satisfied with the outcome of the management of risks and incidents.
- (d) Involved workers are aware and accepting of the outcome of the management of risks and incidents.
- (e) There will be minimal reoccurrence of incidents.
- (f) Diverse and Thriving's Clinic Owner will be aware of risks and incidents and the actions taken to manage these events.

### 3. Definitions

- (a) **Accident:** event or situation that actually resulted in harm to an individual or damage to equipment.
- (b) **Incident:** event or situation that could have resulted in harm to an individual or to the business. This includes, but is not limited to:
  - (i) injury and/or near-miss to Participant;
  - (ii) injury and/or near-miss to workers;
  - (iii) acts by a person with disability that did or may have caused serious harm;
  - (iv) complaint or negative feedback about the service;
  - (v) actual or suspected abuse of Participant or others;
  - (vi) breach of privacy/other Participant rights such as through restrictive practice;



- (vii) less than expected therapeutic outcome;
  - (viii) damage to equipment/goods; and
  - (ix) breach of statutory obligations.
- (c) **Participant:** the party receiving the NDIS-funded services (i.e., the client).
- (d) **Risk:** something that could potentially lead to an incident or accident.

For the purpose of this policy, incidents and accidents will be referred to as “incident” for ease of reading.

## 4. Procedures

### 4.1. Identifying Incidents

While some incidents are obvious (eg a client fall) it is also important to understand that not all incidents may be so readily identified. Section 3.1 of the NDIS Commission Incident Management Systems: Detailed Guidance for Registered NDIS Providers June 2019 provides guidance to Diverse and Thriving and its staff to consider potential indicators and signs associated with particular types of incidents. While it is acknowledged that this is not an exhaustive list, staff will be educated to assist them with better identifying incidents or potential incidents.

### 4.2. For all incidents

- (a) Clinic Owner is to be notified of all incidents.
- (b) An Incident and Complaint Form is to be completed within 24 hours of the incident. The report must include all necessary factual details, immediate actions that have been taken, any identified follow-up actions, any reports made to other bodies.
- (c) The incident is recorded in Diverse and Thriving's Incident and Accident Register by the Clinic Owner. Access to the register and any completed forms must be limited to senior staff only.
- (d) Actions are to include as a minimum:
  - (i) providing support to the affected person/s;
  - (ii) consideration by the Clinic Owner if the incident is reportable and if police/other agencies should be involved, and actions then taken as appropriate;
  - (iii) when, how and with whom follow-up will occur;
  - (iv) risk assessment of the incident, including seeking feedback from involved parties;
  - (v) evaluation at the conclusion of the incident to ensure involved parties are satisfied with the outcome; and
  - (vi) consideration of what people, process, or policy changes could be made to improve Diverse and Thriving's systems (see Section 4.4 below).



#### **4.3. Incident Investigations**

- (a) If required, a formal incident investigation will be conducted to explore in more detail why an incident occurred and if any steps are required to prevent it occurring again. As a minimum, incidents requiring investigation include:
  - (i) any 'Notifiable' incident, as required by the NDIS;
  - (ii) any mandatory report made (see Section 5 below); and
  - (iii) any incident that could lead to potential litigation.
- (b) If police are involved in the incident, no internal investigation is to commence until the police investigations are complete.
- (c) The Governing body is to be informed as soon as practicable of any incident investigations and their outcomes.

#### **4.4. Outcomes**

Outcomes of formal or informal investigation could include:

- (a) further training of staff/others involved;
- (b) reviewing and enhancing policies and/or procedures;
- (c) changes to the environment/delivery mode for support services; or
- (d) Participant (and/or their family) and Diverse and Thriving agree to accept the risks inherent in support delivery to achieve goals.

#### **4.5. Follow-Up**

- (a) Actions will be monitored by the Clinic Owner and updates on progress will be added to the register until the incident is satisfactorily concluded.
- (b) The Governing body will review the management of all incidents.
- (c) Incident reports and all related documents are to be kept for 7 years.

#### **4.6. When a Participant incident occurs**

- (a) Respond to immediate needs and re-establish a safe environment. Make sure Participant, workers and any others present are safe.
- (b) If required, call emergency services to assist, seek medical attention, commence first aid.
- (c) Contact the appropriate emergency contact or 'significant other' (e.g., parent, spouse, son or guardian) as soon as practicable.
- (d) Determine what support Participant and/or their family require and how this can be best delivered. This is to include asking them if they want the support of an advocate.
- (e) Consult with Participant and/or their family on how to satisfactorily resolve the issue and what could have been done to prevent it occurring.
- (f) Keep Participant informed of progress on the incident.



- (g) If Participant is involved and receives funding from a government body (e.g. NDIS, Medicare or DVA), the Clinic Owner will review the requirements and complete the required reporting, as required by the NDIS.
- (h) If the incident could lead to any potential litigation, Diverse and Thriving's professional liability insurer must be informed.

## **5. Mandatory reporting of suspected incidents of risk of harm to a participant/client**

### **5.1. Policy**

Diverse and Thriving will promote the health, safety, welfare and well-being of its participants and meet its professional and legal responsibilities by ensuring any suspected abuse is appropriately assessed and considered against set guidelines and reported as required.

### **5.2. Outcome**

- (a) Diverse and Thriving fulfils its statutory obligations under the relevant Victoria legislation.
- (b) Diverse and Thriving will feel assured participants identified as "at risk" will receive assistance through the authorities responsible.
- (c) Diverse and Thriving staff will feel supported by management through the mandatory reporting process. Diverse and Thriving

### **5.3. Procedures**

- (a) For all suspected incidents of risk of harm the following steps are to be taken. Any specific requirements for children, adults or aged clients are listed below these, as are the documentation requirements.
- (b) Staff member who suspects a person (child, adult or aged person) may be at significant risk of harm is to determine if a report may have been made by other members of the support team (e.g. their Case Manager or NDIS Support Coordinator). If written evidence of the report having been made is provided, there is no further requirement for a report to be made. If no report has been made the following steps are to be followed:
  - (i) Allied Health Professional (AHP) is to make observations regarding the participant to collect as much information as possible about the situation - if safe to do so.
  - (ii) Record information in the participant notes.
  - (iii) As soon as practicably possible, but within at least 24 hours
    - (A) review the situation against the appropriate legislation/guides (as per the Participant Categories below).



(B) complete Diverse and Thriving's Incident and Complaint Form.

Where possible, this is to include additional details.

- (iv) The AHP is to assess the situation using the appropriate guidance material (as per the Participant Categories below) and/or seeking assistance from the relevant authority or Victoria Police.
- (v) If a decision is made that mandatory reporting is required, the Clinic Owner must be contacted. They will assist with the reporting process.
- (vi) If after reference to the relevant guide/policy the matter is considered urgent it will be reported to the appropriate service by the required method.
- (vii) If the risk is considered non-imminent, an online report will be completed.
- (viii) Diverse and Thriving will assist with any investigation or action undertaken by the department or other authorised bodies as a result of the report.
- (ix) Diverse and Thriving will monitor progress and add actions to the completed incident form until the matter is resolved or closed. Reporting and monitoring shall be as per the Incidents and Complaints management system.

Diverse and Thriving has identified the following Participant Categories where various requirements will need to be met.

#### **5.4. Participant Category: Participants being funded by NDIS**

Reportable incidents are serious incidents or alleged incidents which result in harm to an NDIS participant and occur in connection with NDIS supports and services. Specific types of reportable incidents include:

- (a) The death of a person with disability.
- (b) Serious injury of a person with disability.
- (c) Abuse or neglect of a person with disability.
- (d) Unlawful sexual or physical contact with, or assault of, a person with disability (excluding, in the case of unlawful physical assault, contact with, and impact on, the person that is negligible).
- (e) Sexual misconduct committed against, or in the presence of, a person with disability, including grooming of the person for sexual activity.
- (f) The use of a restrictive practice in relation to a person with disability, other than where the use is in accordance with an authorisation (however described) of a State or Territory in relation to the person or a behaviour support plan for the person.

#### **5.5. Participant Category: All children aged from birth to 18 years regardless of funding source**

Specific requirements for children:



- (a) If there are concerns the child's health or life is at imminent risk, contact the police by calling 000.

In other situations the following steps are to be taken:

- (a) Assess the situation using the Mandatory reporting to child protection in Victoria - generic factsheet.
- (b) If the matter is considered urgent (using the Mandatory Reporting Guide) submit a report by phone to the Child Protection Helpline on 132 111.
- (c) If the risk is considered non-imminent an electronic report is to be completed using the eReporting System.

#### **5.6. Participant Category: Disability clients aged 16 to 65 not being funded under NDIS**

For non-government funded clients with a disability aged 16-65, advice is to be sought from:

- (a) the National Disability Abuse and Neglect Hotline;
- (b) the Victoria Police Force; and
- (c) the Victoria Ombudsman.

Assistance for the participant to access an advocate as required can also be by referral to appropriate service such as Victorian Disability Advocacy Program.

#### **5.7. Workers**

If a worker is harmed Diverse and Thriving will need to report to Victoria SafeWork.

### **6. Training Workers on Incident Management**

All staff will receive initial and refresher training on Incident Management, including mandatory reporting.