



Feedback and Complaints Policy and Procedure

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Policy Statement

Interchange Illawarra welcomes feedback, complaints and comments because they help us to provide participants a better service. All complaints are treated in the strictest confidence.

This policy is in line with The National Disability Services act and Standards and the NDIS quality and Safeguarding Framework.

Policy Aim

This policy is aimed to assist Interchange Illawarra participants to understand their rights and what they should expect of Interchange Illawarra, giving them and their support networks the confidence to give feedback or raise areas of concern, when needed to assist Interchange Illawarra to improve the services and supports provided and to address any areas of concern in relation to Interchange Illawarra its services, supports, people or processes. Feedback and complaints enable the identification of systemic issues and to inform and direct continuous improvement across the organisation.

Scope and Responsibilities

This policy relates to all activities of Interchange Illawarra and applies to all employees of Interchange Illawarra including Volunteers, administrative staff and its Board.

The CEO is responsible to ensure the content of this document and the external documents it references are accurate, current and reflect Interchange Illawarra and industry best practice.

The CEO will report all complaints monthly to the Board of Directors and will ensure all feedback and complaints are handled in line with this policy.

Policy Details

Interchange Illawarra respect that our participants, their family and support networks will decide how, when and where they wish to make a complaint and they can choose a key contact person at Interchange Illawarra to work through the process with them

We will provide our participants with ongoing information about our feedback and complaints policy and processes that is accessible and easily understood

When making a complaint or giving feedback we will ensure we will provide participants and their support network the information, support and a safe environment at a place determined by them, in which to raise a complaint about any of the supports or the service provided by Interchange Illawarra.

We commit to resolve a participant complaint in a private, confidential, fair, and timely manner and their views and those of their support network will be respected

Interchange Illawarra will assist our participants to find a support person or advocate to assist or represent them if they want one.

Interchange Illawarra will also support them with their right to take their complaint to external agencies if they wish to do so by ensuring they are aware of their right to make a complaint to an external regulatory body i.e. the NDIS quality and Safeguarding Commission, if they are unsatisfied with how Interchange Illawarra has responded to their complaint or concern.

Throughout the complaint handling process Interchange Illawarra will support a participant's participation, identify their anticipated outcome, and keep them and their supporters informed of all decisions and the reasons for those decisions.

Ensure that there are no negative consequences or disadvantage to any participant or their supporters because they have complained or expressed their view.

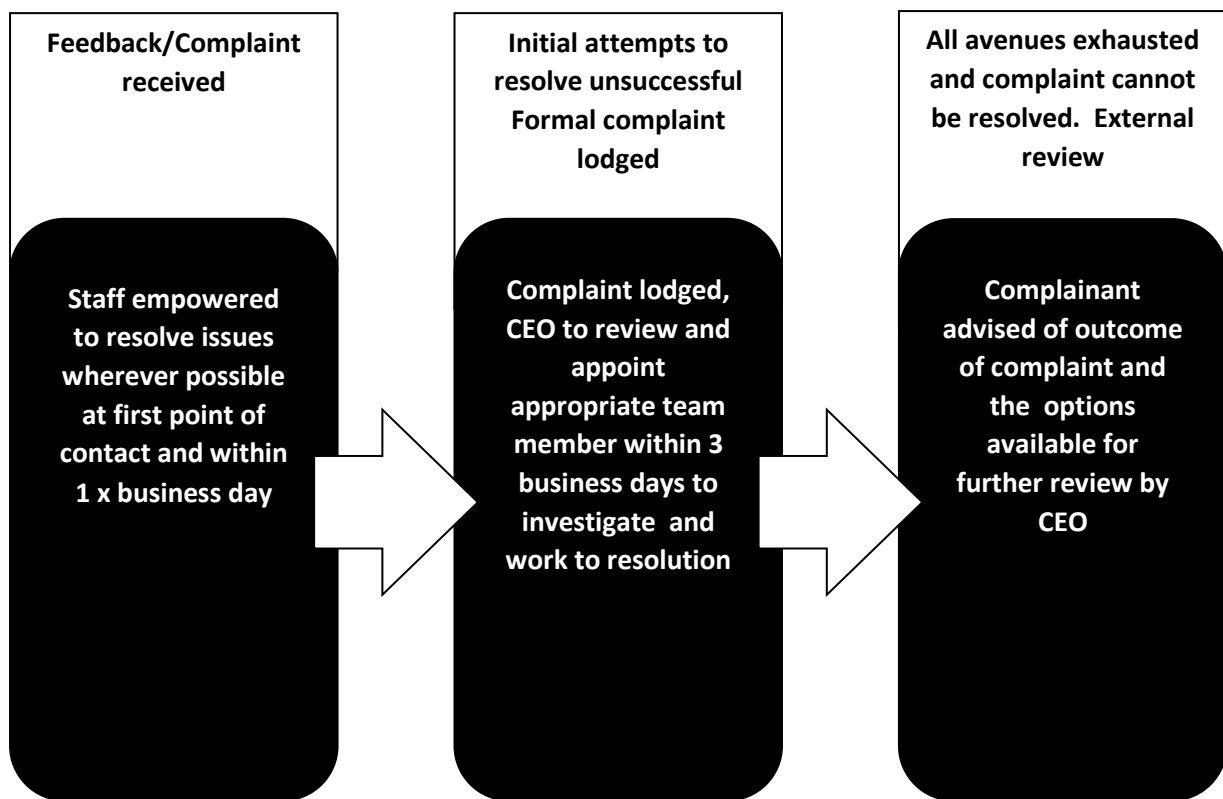
We will make available in multiple formats including Easy-English and pictorial posters for people who have different communication needs our written complaints policy and procedure taking into account the diverse backgrounds of our participant and the individual, cultural and language/ communication approaches that are required to assist our participant be aware of and understand the complaint handling process. Where information is not accessible to a participant due to a specific communication barrier, assistance will be provided as required.

Interchange Illawarra will also communicate with participants about changes in staff and or organisational structure so our participant, their family and support network are always up to date on who they can report to and the person to whom they can escalate their complaint or concern to if they are not satisfied with the local response.

Compliments

Interchange Illawarra hope there will be times when we exceed participant expectations and participants want to share the positive experience they have had with us. Positive feedback also assists us to know what we are doing well and what we can promote as good practice throughout our organisation and give credit to our people where credit is due.

Procedure :



1. Initial Feedback received

Participant, family or support network raises feedback or concern with support staff. Interchange Illawarra encourages staff to try and resolve the concern or address the feedback wherever possible.

Some examples of these types of complaints might be:

- lack of information
- a misunderstanding
- a response to correspondence or telephone call
- errors in records.

Interchange Illawarra Staff members are empowered to resolve these issues wherever possible. As such, they have authority to:

- obtain necessary information to assess the validity of the complaint
- resolve issues or concerns, wherever possible
- reject issues or concerns (while informing the complainant of the entitlement to lodge a formal complaint).

If the matter is dealt with to the satisfaction of the participant at this stage, the issues or concerns do not need to be recorded as a complaint under these procedures.

This should be recorded by way of Client notes recorded in the CMS

2. Formal complaints resolution

Where step one has been unsuccessful in resolving an issue or concern to the satisfaction of the participant, the participant, their family or support network should be supported to raise a formal complaint for internal investigation.

There are four steps to lodging, acknowledging, investigating and reporting on a formal complaint at Interchange Illawarra.

Step 1 – Lodging a complaint

Who can make a complaint?

Any participant, family, support network, member of the public or any other concerned party may lodge a complaint about the services, supports, actions or decisions provided by Interchange Illawarra.

All complaints will be treated in the strictest confidence.

Complaints can be received either verbally or in writing. Wherever possible, complaints should be submitted in writing so that all aspects of the complaint can be accurately investigated. The complaint form provides an outline of the type of information that is required when lodging a complaint.

In circumstances where the complainant:

- cannot lodge their complaint in writing, the receiving staff member will record all particulars of the complaint
- is unable to speak or write in English, they can access the Translating and Interpreting Services :

Free Interpreting Service (enquiries about free services)

Phone: 1300 575 847

Email: tis.freeinterpreting@homeaffairs.gov.au

As indicated in the complaint form, reports of verbal complaints should include, where possible:

- the complainant's name and contact details
- full details of the events, dates and places concerning the complaint
- the names of others who may have witnessed or have information about the complaint
- any other evidence that supports the complaint
- the desired outcome.

When creating a record of the complaint, the receiving staff member should:

- work through the complaint form with the complainant, listening carefully to document the complaint as dictated
- provide further information about the complaint management process
- have the complainant sign the complaint form (where possible) or acknowledge the complaint details
- provide the complainant with a copy of the form
- refer the record of complaint to the Chief Executive Officer.

Anonymous complaints

While anonymous complaints are not encouraged, they are accepted. They may be lodged either in writing or accepted by an employee as an oral statement. Complainants are encouraged to provide as much information as possible which may be of assistance when investigating the complaint. It should, however, be noted that an anonymous complaint might be more difficult to investigate as, for example, further details of the circumstances relating to the complaint might be difficult to obtain.

3. Registration, allocation and acknowledgment of complaint

Once a complaint is lodged, it will immediately be acknowledged and forwarded to the CEO who has overall responsibility for the review, allocation and ultimately the resolution of complaints.

If the complaint meets the criteria of a reportable incident under the NDIS quality and safeguarding framework the CEO will immediately report as per the framework requirements with the initial notification being lodged within 24 hours

(refer to Incident reporting policy)

Complaints register

All complaints accepted by Interchange Illawarra must be recorded in the complaints register held by the CEO. A summarised complaints register is to be forwarded to the board of Directors monthly for review.

The register must contain the following minimum information:

- name of complainant
- type of complaint
- name of investigating staff member
- time taken to investigate complaint
- outcome of complaint
- action recommended to address systemic issues (if any)
- Complainant satisfaction with the outcome.

To maintain confidentiality, access to the complaints register and all associated documents (both electronic and paper based) will be restricted to the CEO and the board of directors and/or their delegates.

Allocation of complaint

The Chief Executive will undertake an initial review of the complaint. The CEO will within three business days if appropriate assign a senior staff member to investigate and resolve the complaint.

The designated staff member will be responsible for ensuring a complaint is managed fairly, reasonably and within an appropriate timeframe. Ideally complaints should be resolved within 30 days.

Generally, a formal complaint will be managed by the delegated senior staff unless it is inappropriate to do so, for example:

- the matter is outside the area of expertise or delegation

- the complainant requests it
- if there may be a potential conflict of interest
- if the complaint relates to the staff member.

In these circumstances, the complaint will be allocated to another senior staff member or the CEO, as appropriate.

Acknowledgement of complaint

Wherever possible, complaints must be acknowledged by the investigating staff member within five working days of receipt of the complaint.

The acknowledgment should:

- reassure the complainant that the complaint is valued
- request any further information that is considered necessary to investigate the complaint
- outline how the complaint will be managed, including an estimated timeframe for resolution
- establish how progress will be provided, if necessary
- provide contact details for the investigating staff member.

4. Investigation of complaint

Timeframes

Complaints will be investigated as promptly as possible. Complaints that relate to a simple matter should be finalised within a maximum of 30 working days.

However, Interchange Illawarra recognises that complaints can be sensitive and complex and may require detailed investigation. It should therefore be recognised that the complexity of, and the resources available for, and/or the involvement of other agency's an investigation into a more complex issue will result in more time being taken to finalise a complaint. Where a complaint may take longer to resolve this will always be communicated to the complainant.

Record keeping

The investigating staff member will be responsible for ensuring complete and accurate recording of all information and records relating to an investigation into a complaint.

A file should be created in the secure H Drive. This file should contain all correspondence, file notes of telephone conversations, interviews and findings from investigations, recommendations and internal approvals. The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

Conducting an investigation

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities.

Investigating a complaint may include:

- clarifying the details provided in a complaint

- identifying actions taken to resolve the issue before the complaint was raised formally
- gathering and analysing information from relevant file notes, correspondence and/or other sources
- reviewing documentation submitted by the complainant
- reviewing previous decisions or actions
- interviewing complainants, employees and/or other individuals involved in the complaint
- reviewing relevant policies, procedures and/or legislation
- reviewing previous complaints about the same issue.

Outcome of an investigation

At the conclusion of the investigation, the investigating staff member will provide the CEO with a written report, detailing the findings and making recommendations regarding appropriate action and/or system improvements, as appropriate.

Outcomes that may result from an investigation may include, but are not limited to:

- amending a decision
- a written/verbal apology
- an explanation
- changes to a service provided
- a review of policies/procedures and changes to those policies/procedures
- staff training
- disciplinary action.

In some circumstances, no further action on a complaint may be recommended. The rationale for this course of action may include:

- the matter has been investigated and it is considered that all action to address the original complaint has been satisfactorily completed
- the matter is currently being managed by an external agency, court or tribunal
- after assessment, the complaint is determined to be frivolous or vexatious.

5. Advising the complainant

At the conclusion of the investigation, a written response must be provided to the complainant outlining the key findings and/or recommendations made concerning the complaint. The response must be approved by the CEO before forwarding to the complainant.

The written response should:

- fully examine the issues raised in the complaint
- identify the actions taken by Interchange Illawarra to resolve the complaint (if possible)
- identify how and why this action has been taken
- identify the options available to the complainant for an external review of the investigation.

6. Conciliation

Conciliation can be used to try to resolve the complaint that could not be resolved through other processes. The most common form of conciliation is a meeting between the person making the complaint and the Interchange Illawarra. Advocates or other support people may also be involved. Participation in a conciliation is an open and voluntary process.

The purpose of a conciliation meeting is to help people understand the concerns being raised and to reach agreement on how a complaint can be resolved.

Conciliation can help to clarify the issues and encourage discussions between people at the conciliation meeting. An independent person can facilitate the conciliation meeting.

Each person is given the opportunity to put forward his or her views. Because of this, conciliation may be preferable for some people as this person-centered approach allows the person making the complaint to have their views heard directly by Interchange Illawarra and be involved in finding solutions.

7. External review

If a complainant is not satisfied with the outcome of the investigation by Interchange Illawarra they will be encouraged to seek support from family, friend or an independent advocate to support them in making a further complaint or to raise the complaint with the NDIS Quality and Safeguarding Commission

Contact details for the Commission are as follows:

Phoning: 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.

National Relay Service and ask for 1800 035 544.

Completing a complaint contact form

<https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=PRD00-OCF>

Withdrawal of a complaint

A complainant may withdraw his or her complaint at any time by advising the Interchange Illawarra in writing or by any other means which is appropriate in the circumstances.

Interchange Illawarra must acknowledge, in writing, receipt of the withdrawal of the complaint.

Despite the withdrawal of a complaint, Interchange Illawarra may deal, or continue to deal, with the complaint.

In deciding whether to continue to investigate a withdrawn complaint Interchange Illawarra will consider the following : the wishes of the person or persons with disability affected by an issue raised in the complaint; the health, safety or welfare of any person with disability affected by an issue raised in the complaint

Related legislation and documents

Community Services Complaints and Appeals Monitoring Act (NSW) 1993

Disability Services Act (Commonwealth) 1986 and

Disability Services Act (NSW) 1993 and NSW Disability Services Standards

Disability Inclusion Act 2014

National Disability Insurance Scheme Amendment (Quality and Safeguards Commission and Other Measures) Act 2017

Human Rights and Equal Opportunity Commission Act (Commonwealth) 1986

Disability Discrimination Act (Commonwealth) 1992

Australian Consumer Law

Anti-Discrimination Act (NSW) 1977

Australian Privacy Principles (Privacy Act 1988)

International:

UN Convention on the Rights of People with Disability

Disability Service Standards

DSS Std 1: Rights

DSS Std 2: Participation and Inclusion

DSS Std 3: Individual Outcomes

DSS Std 4: Feedback and Complaints

DSS Std 5: Service Access

DSS Std 6: Service Management

Related Interchange Policies, Procedures and documents

Incident reporting and response Policy

Intake and Referral Policy

How to make complaints poster easy read

Complaints form Easy read

Interchange Illawarra Complaints form

Interchange Illawarra Feedback and complaints Facts sheet

Document Control

Version	Date	Author (who wrote it)	Reason	Sections changed
1	20/07/18	J Kernot	New policy	1 st edition