



# Feedback, Compliments and Complaints Management

## Policy and Procedure

### Purpose

This policy and procedure is to ensure that feedback, compliments and complaints are handled fairly, efficiently and effectively. The resolution process will be consistent with a rights-based principle fundamental to the *United Nations Convention on the Rights of Persons with Disabilities*.

The feedback, compliments and complaints management system intends to:

- provide a well-handled system that takes all feedback seriously, with the intent to improve the relationship between our organisation and our clients
- support all stakeholders to feel free to voice their feedback
- allow us to respond to issues raised by individuals in a timely and cost-effective way
- boost client confidence in our administrative processes
- seek a resolution that meets all parties' expectations, where possible
- provide Focal Community Services (Focal) with information to help us deliver quality continuous improvements in our services, supports, roles, and complaints handling process

### Scope

This policy and procedure applies to all Focal Community Services (Focal) employees, volunteers, clients, stakeholders and contractors. For the purpose of this document, the terms employee and Support Worker refers to paid employees and volunteers.

### Statement

Focal will create an environment where feedback, compliments, complaints, concerns and suggestions are welcomed and viewed as an opportunity for acknowledgement and continuous improvement. This process ensures that individuals have the right to make complaints and are encouraged to exercise their right in a blame-free and resolution-focused culture, respecting an individual's right to privacy and confidentiality.

The Senior Manager Quality and Compliance has been appointed as the designated Complaints Manager. The Complaints Manager is responsible for coordinating and handling complaints, ensuring a complaint is properly managed.

It is acknowledged that Focal views all feedback, compliments and complaints as a vital contribution to our internal review of performance and processes, which assists in developing the continuous improvement of our services as we work towards achieving our quality-of-service commitment.

A person does not necessarily have to expressly state that they wish to make a complaint to have the issue or concern dealt with as a complaint. Regardless of whether an issue is big or small, it will be treated seriously, and Focal will ensure the person is advised on how valuable their feedback is to our organisation. We will use such information to improve our service delivery continuously.

Clients, families, advocates, other stakeholders and employees may submit feedback, compliments and complaints regarding Focal's supports, services, employees or contractors by reporting in person, by phone, by email, or by submitting feedback on the Focal website.

It is our policy to follow the principles of procedural fairness and natural justice and also comply with the requirements under the *NDIS (Complaints Management and Resolution) Rules 2018* and *NDIS (Procedural Fairness) Guidelines 2018*, including:

- informing a person if their rights or interests may be adversely or detrimentally affected in a direct and specific way
- putting forward information and submissions in support of an outcome that is favourable to their interests
- ensuring that the decision to take adverse action is soundly based on the facts and issues that were raised during that process, and this should be apparent in the record of the decision
- ensuring that the decision maker be unbiased and maintain an unbiased appearance

Focal ensures that feedback, compliments, and complaints are managed effectively through:

- implementing an open and transparent feedback, compliments, and complaints management system
- observing the principles of natural justice and compliance with relevant mandatory reporting under Australian law

Focal will ensure that positive feedback and compliments received are communicated onto all relevant parties as positive reinforcement.

## Procedure

### Feedback, Compliments, and Complaints Process

Feedback, compliments, and complaints can be made by:

- contacting the Senior Manager Quality and Compliance, verbally or in writing
- contacting any Focal employee, to refer the matter to the Senior Manager Quality and Compliance on your behalf
- responding to questionnaires and surveys
- sending an email
- attending meetings
- contacting external agencies, e.g. *NDIS Quality and Safeguards Commission*

Contacts for feedback, compliments and complaints are as follows:

<b>Contact:</b>	Senior Manager Quality and Compliance
<b>Email address:</b>	<a href="mailto:feedback@focal.org.au">feedback@focal.org.au</a>
<b>Phone Number:</b>	07 3812 2014
<b>Mobile:</b>	0424 045 224
<b>Postal Address:</b>	7 Canning Street, North Ipswich, Qld, 4305

Feedback, compliments, and complaints can be lodged by any individual or organisation including anonymously although this may limit the extent to which the matter can be investigated and responded to. Feedback, compliments, and complaints are recorded on the *Feedback, Compliments and Complaints Register*, allowing input into our continuous improvement process. The *Continuous Improvement Plan Register* will be updated with any required improvements established during the process.

If the feedback is negative or defined as a complaint, Senior Manager Quality and Compliance will act as the Complaint Manager and initiate the complaints process. The Complaint Manager will link in with the:

- relevant Client Services team member if the complaint relates to supports or services
- Senior Manager People and Culture and/or CEO, depending on seriousness, if the complaint relates to an employee
- CEO if the complaint relates to a manager
- Focal Board if the complaint relates to the CEO

If the feedback is positive or a compliment, the Senior Manager Quality and Compliance will ensure that the relevant person or team is notified and recorded on the *Feedback, Compliments and Complaints Register* with the details.

Employees, clients, family, and advocates, visiting health professionals, and visitors are informed of our feedback and complaints process via:

- Newsletters and Focal website
- Initial intake to supports
- Employee orientation, induction, and training
- Meetings, reviews, and assessments
- *Service Agreements*
- *Contractor Agreements*

### Complaint Management Process

The complaint investigation must adhere to impartiality, privacy, confidentiality, transparency, and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. Focal must consider any cultural and communication needs of a complainant and provide the relevant support mechanism, such as an interpreter or similar.

The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

- Acknowledgement
- Answers
- Actions
- Apology

## Complaint Investigation Process

### Step 1. Assess

The Complaints Manager will assess the complexity of the complaint recognising that where possible complaints will be managed directly and at the point of service. If appropriate the complaint will be delegated to the relevant Client Services Manager or Senior Manager People and Culture to discuss the issues raised and seek satisfactory resolution. The Complaints Manager is provided with the outcome of the complaint and the *Feedback, Compliments and Complaints Register* is updated.

Where resolution is not achieved, or the complaint is more complex or serious the following steps are taken.

### Step 2. Acknowledge

1. The Complaints Manager will acknowledge all complaints quickly, within one working day, where possible.

### Step 3. Review of the Complaint

1. Determine the type of outcome that the complainant seeks (i.e. acknowledgement, answers, actions, or apology). Information will be used to ensure that the complainant's feedback and requirements are at the core of the complaint investigation and management process.
2. Inform the complainant of:
  - the stages of the complaint management and decision-making process
  - mechanisms implemented to protect the complainant's privacy
  - their right to complain to the NDIS Quality and Safeguards Commission at anytime
  - and outcomes of the investigation
3. Determine the type of complaint (i.e. service, support, or process).
4. If a consultative meeting is required, it will be held in a safe environment determined by the complainant and at a time of their choosing.

### Step 4. Assessing the Complaint

1. When assessing a complaint, the Complaints Manager must prioritise the complaint and determine a resolution pathway (where required).
2. After the pathway is established, the complaint will be investigated.
3. Feedback from the complainant or their advocate must be used as part of this process.

### Step 4. Investigation and Decision Making

1. When the complaint is lodged, the Complaints Manager should determine if it is practicable to find an immediate resolution.
2. During the investigation and decision-making process, the Complaints Manager will:
  - update and complete the *Feedback, Compliments and Complaints Register*
  - consult with the complainant to gather information about the underlying issue/s
  - analyse the background of the complaint and underlying issues when determining a decision
  - respond to the complainant with a clear decision and any next actions (if any)

### Step 5. After the Decision

1. After investigation and a satisfactory response has been documented, the Complaints Manager will:
  - inform the complainant and/or their advocate of the decision, including the reason for the decision
  - ensure that the complaint investigation is satisfactorily completed
  - determine if the complainant is satisfied with the outcome
  - follow-up and consult with the complainant/s about any concerns
  - close out the complaint

## Review and Improvement

Focal takes a systematic approach to incorporate a review of all issues raised by a complaint to identify and address any possible systemic issues and determine any continuous improvement actions identified during the complaints process.

The review and improvement process include:

- ascertaining preventative actions and continuous improvement
- considering if any systemic issues require addressing
- recording the details of the improvement stemming from a complaint in the *Continuous Improvement Plan Register*

- training employees in any new systems or actions
- adjusting policies and procedures as required
- providing feedback to the complainant personally to inform them of the outcomes and influences their issue raised within our organisation

## Documentation

Documentation of the complaint process is as follows:

- all complaints will be recorded in the *Feedback, Compliments and Complaints Register*, and information in the register will include the following:
  - complaint details
  - identified issues
  - actions are undertaken to resolve the complaint
  - the outcome of the complaint
- relevant information is stored electronically in the Compliance Complaints SharePoint file
- all information is kept confidential, and access is only delegated to relevant employees, the Complaints Manager and the CEO will determine who is relevant
- relevant information will be retained in the file for seven years from the record date, if the information relates to a client under 18 years of age, it will be retained until the client turns 25
- this policy and procedure will be reviewed and updated if there are legislative changes or when determined by an internal audit review

## Unresolved Complaints

Where a complaint is unresolved the complainant will be offered referral to the CEO. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be referred to the following:

### NDIS Quality and Safeguards Commission

Phone: 1800 035 544 (free call from landlines) or TTY 133 677 National Relay Service and ask for 1800 035 544

Interpreters can be arranged

## Employee Orientation and Training

The employee orientation process includes training for all employees on the *Feedback, Compliments and Complaints Management Policy and Procedure*, including the NDIS Commission requirements.

## Related Documents

- Continuous Improvement Plan Register
- Client Handbook
- Service Agreements
- Contractor Agreements
- Feedback, Compliments and Complaints Register
- Employee Handbook

## References

- United Nations Convention on the Rights of Persons with Disabilities
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS (Procedural Fairness) Guidelines 2018
- NDIS Quality and Safeguards Commission

## Document History

Date:	Version:	Details:
19/05/2024	3.0	Review and updated to align with process changes
12/01/2021	2.1	Review and updated by CEO
31/10/2018	2.0	Review and updated by CEO
14/09/2016	1.1	Review and updated by CEO
12/10/2009	1.0	Created by CEO