



Feedback & Complaints Policy & Procedure

Feedback & Complaints Procedure

Purpose

Definitions

1.0 PURPOSE AND SCOPE

This policy and procedure:

- outlines how people can provide feedback and make complaints about any aspect of Dwelcare's operations.
- documents the process of addressing or responding to feedback and complaints.
- applies to all staff, contractors and potential and existing participants.
- applies to other service providers, government agencies and members of the community.

2.0 DEFINITIONS

Compliment - an expression of praise, encouragement or gratitude about an individual staff member, a team or a service.

Complaint – is an expression of dissatisfaction with a service, including how a previous complaint was handled, for which a response or resolution is explicitly or implicitly expected. The form of expression can be any verbal or written complaint directly related to the service (including general and notifiable complaints).

Grievance – involves matters of a more serious nature that can not be addresses immediately and requires escalation and investigation.

COMPLIANCE REQUIREMENTS

Dwelcare's complaints management system has been developed, and is implemented, monitored and reviewed in accordance with the:

[National Disability Insurance Scheme Act 2013](#)

[National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#)

[Effective Complaint Handling Guidance for Providers](#)

[NDIS Procedural Fairness Guidelines 2018](#)

[Australian Privacy Principles of the Privacy Act](#)

[Australian Consumer Law](#)

Feedback and Complaints Policy

Dwelcare is committed to doing our best to resolve any issues raised by participants or interested parties in a responsive, fair and consultative manner.

We encourage people to provide feedback, raise concerns or complaints about any aspect of our service. We investigate and evaluate feedback and complaints to ensure we are continuing to improve the quality of our service.

We will support people to be fully involved through the complaint handling process, linking to external agencies such as Advocacy services and the NDIS Quality & Safeguards Commission, if applicable.

Dwelcare staff are trained on effective complaint handling processes and commit to abiding by the NDIS Code of Conduct and NDIS (Complaints Management and Resolution) Rules 2018.

Dwelcare is committed to providing people with accessible mechanisms to provide feedback, compliments and complaints. However, if you feel uncomfortable using Dwelcare's internal complaints process, complaints can be lodged directly with the NDIS Quality and Safeguards Commission via the dedicated complaints reporting line

Website: www.ndiscommission.gov.au

Email feedback@ndis.gov.au

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

NDIS participants purchasing products and services also have rights and protections under the Australian Consumer Law (ACL), including provisions on customer guarantees and unfair contract terms. Fair Trading offices are located in each jurisdiction to provide information and advice, and in some cases, dispute resolution services. Contact the National office on 13 28 46 to connect with your local office.



Feedback & Complaints Procedure

Rights

Responsibilities

4.0 PROCEDURE

Dwelcare has fostered an open and respectful culture that encourages and supports staff, clients and other stakeholders to provide feedback, make complaints and report grievance without fear of retribution.

Information about providing feedback and making complaints will be provided in a variety of formats, including the Service Agreement and Complaints & Incident Brochure.

Participants are verbally guided through the Service Agreement and *Feedback, Complaints & Incidents Brochure* to support a good understanding of the feedback and complaints handling process.

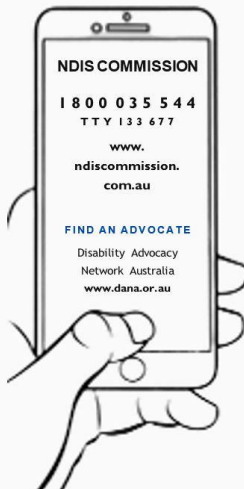
Feedback and complaints will be dealt with in a confidential manner and will only be discussed with the people directly involved. All information regarding feedback and complaints will be kept securely in accordance with Australian Privacy Principles.

Complaints and feedback can be provided in person, verbally, in writing or lodged anonymously or by a third party on behalf of another person, if their consent has been provided. Connections to interpreters and advocates will be facilitated.

All Dwelcare workers have been trained in this policy and procedure and commit to abide by this process and the NDIS Code of Conduct.

Feedback and complaints will be monitored to identify any ongoing issues and opportunities for service improvement as part of our commitment to continual improvement.

Quick view of the Feedback, Complaints & Incident Brochure



INCIDENTS

Your safety is very important. We are committed to work in a safe manner.

Sometimes accidents can happen.

Sometimes people don't behave appropriately or professionally.

If you don't feel safe, let one of our workers know right away.

You can also contact our National Helpline on: **1300 393 526**

We will always listen and act to find out what has gone wrong and do what we can to make it right.

If there is a serious incident, and you or someone else are in danger, call the Police immediately.

CONTACTS

NDIS COMMISSION

1 8 0 0 3 5 5 4 4
TTY 1 3 3 6 7 7

www.ndiscommission.com.au

FIND AN ADVOCATE

Disability Advocacy Network Australia
www.dana.or.au

FEEDBACK

WE WANT TO HEAR FROM YOU

We pride ourselves on providing the highest quality service and your feedback helps us to continually improve.

WHEN YOU TELL US

When you tell us what you like, or don't like, **we will listen.**

We will make sure you receive a reply and are informed about... **any** plans to rectify any issues as quickly as possible.

NEED HELP?

It can be hard to speak up. You don't have to talk to us. You can use our online Feedback Form @ www.dwelcom.com. If you have a serious complaint or an incident to report you can talk to an advocate or tell the NDIS Commission.

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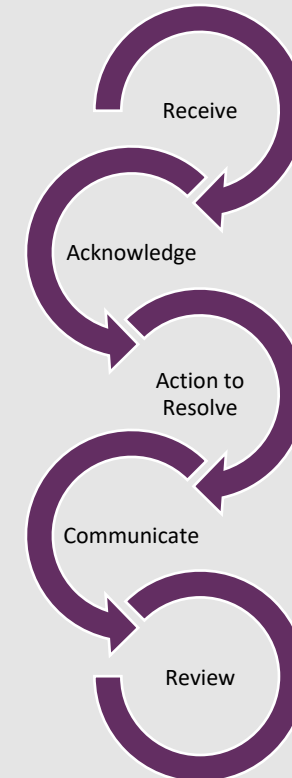
Process

Approach

4.0 FIVE-STEPS TO A CUSTOMER FOCUSED APPROACH

Dwelcare implements a five-step approach to customer focused feedback and complaints management:

1. Receive
2. Acknowledge
3. Action to Resolve
4. Communicate
5. Review



Feedback & Complaints Procedure

Step 1

Receive

Step 1 - Initial Risk Assessment of Issue

Dwelcare will be responsive to any concerns or complaints raised. We take a proportionate approach to ensure issues and complaints are resolved effectively to meet our client's desired outcomes.

When an issue is brought to our attention, an initial risk assessment is conducted by the staff member receiving the complaint to determine:

- Immediate and present hazards or risks to client safety, health and well-being;
- the seriousness of the issue in terms of service quality;
- the risk to client's confidentiality if the complainant, or their representative has indicated they wish to stay anonymous.

Immediate response

All complaints and grievances will be referred to the relevant supervisor and recorded in the Complaints Register.

The Supervisor and staff will resolve minor issues immediately, where possible, without neglecting to fulfil reporting requirements.

The Supervisor will assess the likely degree of difficulty in reaching a satisfactory and timely resolution. If the complaint cannot be resolved promptly or within 24 hours, the supervisor will treat it as a grievance.

The Supervisor (or delegate) will investigate more serious complaints and will report appropriately.

Anonymous Complaints

Clients may approach a staff member and express their concerns about lodging complaints through Dwelcare's internal complaint process.

The staff member should support the client to:
lodge the complaint anonymously;
lodge the complaint with the NDIS Commission; and/or
engage an advocate to assist them lodge the complaint.

Feedback & Complaints Procedure

Step 1

Receive

Notifiable Complaints

If a complaint alleges actual or possible criminal activity or abuse or neglect, it will be referred to Senior Management immediately.

Senior Management will follow the *Incident Management Policy and Procedure*, reporting the complaint and working with the relevant authority to investigate the allegation.

All clients making a complaint or grievance will be encouraged to use an advocate of their choice to act on their behalf if they wish. The advocate may be a family member or friend, or sourced (with the assistance of a staff member if required) through the National Disability Advocacy Program.

Staff will take all reasonable steps to ensure a complainant is not adversely affected because a complaint has been made by them or on their behalf.



Feedback & Complaints Procedure

Step 2

Acknowledge

Step 2 - Acknowledge

The Supervisor will

- Acknowledge – receipt of the grievance within 2 working days.
- Consult with the complainant to understand desired outcomes.
- Provide realistic expectations
- Refer the matter to other agencies or organisations, where identified as being more suitable to handle.
- Avoid conflict of interest by appointing a person unrelated to the matter to undertake an investigation, if necessary.
- Provide anonymity where a person requests to remain anonymous in their lodgement. Contact may not be possible or expected but the issue will still be addressed.

All information that is relevant to the feedback or complaint, will be recorded in the Complaints Register

The Complaints Register will record:

- the subject of the complaint,
- investigation progress and outcomes,
- how the outcomes have been communicated to stakeholders.

Dwelcare will respect client and staff privacy in managing complaints and grievances.

Details documented in the complaint handling system are de-identified, where possible. Stored complaint records are protected from unauthorised access.

Feedback & Complaints Procedure

Step 3

Action to Resolve

Step 3 – Action to Resolve

Dwelcare will respond to all complaints and grievances as soon as possible and within 28 days from acknowledgement.

Investigation of complaints will not be conducted by a person about whom a complaint has been made. If required, the Management Team will determine the appropriate person to undertake the investigation.

In resolving a complaint or grievance, the Supervisor (or nominated delegate) will:

- Involve the complainant to keep them informed of the progress of the complaint and discuss any disparities identified in the information held;
- Request additional information when required;
- Communicate any additional time requirements to the complainant with an explanation of the need;
- Record all decisions or actions of the complaint investigation in the Complaints Register.

If a complaint or grievance cannot be responded to in full within 28 days of acknowledgement, an update will be issued to the complainant. The update will provide the date by which a full response can be expected. The update should be provided verbally in the first instance then confirmed in writing.

Actioning resolutions

Appropriate actions to effectively respond to a complaint will be in response to the nature of the complaint. Appropriate actions could include:

- explaining processes;
- rectifying an issue;
- providing an apology;
- ongoing monitoring of issues; and
- training or education of staff.

The Supervisor (or delegate), in consultation with the complainant, will develop and document an action plan for all actionable resolutions using the Feedback & Complaint Form. The following items should be covered:

- what will be done
- who will do it
- when it will be done by
- how the progress of the complaint and outcomes will be communicated; and
- how the progress of any actions and implementation will be oversighted.

Feedback & Complaints Procedure

Step 4

Communicate

Step 4 - Communicate

The Supervisor (or delegate) will:

- Discuss the outcome – where possible, verbally with the complainant before providing written advice and allowing them the opportunity to make further contact following receipt of the written advice.
- Include information on recourse – further action available to the complainant at the conclusion of the complaint investigation. An action of recourse may be to escalate the matter further with an external agency or for a further review within the organisation.
- Provide a further review – to enable the first investigation to be reviewed for soundness and allow additional information not available in the first complaint to be included.
- Identify opportunities – relay complaint outcomes to the appropriate area within the organisation for action to improve service delivery.
- Seek Feedback – from the complainant regarding their experience of the complaints process.

Support will be provided to assist complainants understand correspondence regarding complaints and grievances where required (e.g. interpreters, referral to advocates, etc.)



Feedback & Complaints Procedure

Step 4

Grievances

GRIEVANCES

If a complainant remains dissatisfied with the outcome of their complaint or grievance they will be provided with the details of other agencies they can use to assist them to achieve a resolution.

A Feedback and Complaints Form will be made available to the individual to lodge their grievance, however it is not mandatory that they use the form. The Feedback and Complaints Form can be used to make anonymous complaints.

Escalated complaints will be tracked in the Complaints Register in the same manner as other complaints and the same communication processes as outlined in earlier stages will be applied.



Feedback & Complaints Procedure

Step 4

Reporting Requirements

REPORTING REQUIREMENTS

Where complaints allege abuse, neglect or exploitation they will be managed as a reportable incident.

Where complaints allege criminal conduct they will be referred to the Police and managed as a reportable incident.

For all reporting processes, see the Incident Management Policy and Procedure.

Record Management

Dwelcare will keep and maintain appropriate records of all complaints received by the provider. This will include, where appropriate:

- information about the complaint
- any action taken to remediate or resolve complaints, and
- the outcome of any action taken.

Records must be kept for 7 years from the date the record was made.

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Step 5

Review

Step 5 - Review

All complaints will be reviewed.

Feedback will be sought from the complainant about the resolution of all complaints, and their response to any follow up or implementation of actions.

Feedback and complaints will be discussed at management meetings as a standing agenda item, with consideration to protecting the client's privacy.

The Complaints Register will be reviewed annually, as per the Internal Audit Schedule, in order to:

- identify and resolve systemic issues;
- identify problems within the complaints management process; and
- inform the continuous improvement process.

Dwelcare will provide statistical and other information about complaints to the NDIS Commissioner, on request.

The Supervisor (or Delegate) will ensure the complaints handling system is fully implemented, including verifying the status of the item has been effectively resolved and can be recorded as closed in the Continual Improvement Register.

Things to consider in reviewing complaints:

- What was the experience for the person who made the complaint? Were the issues resolved for them?
- What information did the complaint provide that will allow you to identify and improve those services, policies and procedures and your organisation as a whole?
- How effective was the communication with the complainant, any affected participants, affected staff and other stakeholders?
- Do people using your services, their families, carers and friends require more or improved information about their rights and the complaints process?
- Does the person who made the complaint feel more comfortable about speaking up in the future?
- Do staff require further training?