



Compliments, Complaints and Feedback

The purpose of this policy and procedure is to set out how any person can provide feedback and make complaints about any aspect of All Walks of Life's operations, as well as the process that All Walks of Life will take to address or respond to feedback and complaints.

This policy and procedure applies to all stakeholders of the organisation, including participants, families, carers, advocates, workers, students, volunteers, contractors, other service providers, government agencies and members of the community. All of the All Walks of Life workers must be trained in and comply with the requirements of this Policy and Procedure.

All Walks of Life also has obligations in relation to incident management systems and reportable incidents that may apply to a complaint. See All Walks of Life's *Participant Incident Management Policy and Procedure* for more detail.

This policy and procedure meets relevant legislation, regulations and standards as set out in Schedule 1, Legislative References.

Failure to comply with the complaints management requirements of the NDIS legislation and rules may lead to the NDIS Commissioner taking compliance and enforcement action against All Walks of Life.

Documents relevant to this policy and procedure include:

- *Compliments, Complaints & Feedback Register*
- *Compliments, Complaints and Feedback Form*
- *Easy English Compliments Booklet*
- *Easy English Complaints Booklet*
- *Easy English Feedback Booklet*

Policy Scope

All Walks of Life's complaints management and resolution system ensures people can easily make a complaint and have it dealt with fairly and quickly.

All Walks of Life makes information available to participants and other stakeholders about how to make a complaint to us and to the NDIS Commissioner. This information is contained in the Service Agreement

generated at the commencement of supports and reviewed regularly as part of our ongoing service provision.

Records are kept about complaints that are received, how they are managed and feedback provided via the Compliments, Complaints and Feedback register.

General

All Walks of Life must promote best practice, continuous improvement and an open, respectful culture that encourages and supports workers, participants and other stakeholders to make complaints without fear of retribution.

Upon commencement, all workers must undergo an Induction that includes information on All Walks of Life's compliments, complaints and feedback processes. Additional on-the-job and formal training will be provided where required.

The Managing Director will maintain up-to-date knowledge and awareness of compliments, complaints and feedback requirements, undertaking additional on-the-job and formal training where required.

All Walks of Life will provide participants, families and carers with information about this policy and procedure when they first access the service, as outlined in their Service Agreement and in our 'Welcome Pack'. Throughout service delivery, where relevant, participants and their support people should be reminded of their right to make a complaint without fear of affecting their service. Any person wishing to lodge feedback or a complaint must also be provided with this information.

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.

Privacy & Records Management

All personal information All Walks of Life collects to manage feedback and complaints will be handled in accordance with relevant privacy legislation.

Employees, Supervisors and the Managing Director must keep information about complaints confidential. They may only disclose necessary detail if they are required to do so by law, or if not disclosing is likely to place the safety, health or wellbeing of any person at risk. They must take all reasonable steps to notify the complainant before deciding not to keep information confidential. Copies of any feedback, complaints and further actions must also be recorded in the electronic case file e.g. Nookal and provided to the participant.

All Walks of Life's *Feedback & Complaints Register* must be used to record information about feedback and complaints. All records regarding complaints will be retained for at least 7 years from the date they were created.

Compliments

Compliments can be provided to All Walks of Life at any time, in any way, by any stakeholder, directly to an employee or the Managing Director or by email, mail or phone.

Providing compliments to All Walks of Life is voluntary.

Complaints

All Walks of Life's complaints management process can be simplified into five steps:

1. **Lodge**

All complaints must be referred to the Managing Director for resolution. The Managing Director will discuss minor complaints directly with the party involved as a first step towards resolution.

If the complaint cannot be resolved promptly or within 24 hours, the Managing Director 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. A copy of the Feedback & Complaints form will also be provided to support this.

Formal complaints can be lodged directly to a worker or the Managing Director or by email, mail or phone.

At any time, people can make a complaint about NDIS service providers or the support they provide to the NDIS Quality & Safeguards Commission. Complaints to the NDIS Commission can be lodged:

- online at www.ndiscommission.gov.au; and
- by phone on: 1800 035 544.

People making a complaint or affected by a complaint must be assisted to contact the NDIS Commission, where this is required.

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. State consumer protection agencies provide information, advice and, in some cases, dispute resolution services for customer disputes under the ACL.

People with disability making a complaint or impacted by a complaint must 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 through the National Disability Advocacy Program.

If a complaint alleges actual or possible criminal activity or abuse or neglect, the Managing Director must report the complaint as per All Walks of Life's Participant Incident Management policy and work with the relevant authorities to investigate the allegation.

All Walks of Life must 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.

Complaints made to All Walks of Life and the NDIS Commission can be withdrawn at any time.

Complaints about the National Disability Insurance Agency (NDIA) should be directed to the Agency itself or the Commonwealth Ombudsman.

Complaints to the NDIA can be lodged:

- by phone on 1800 800 110; and
- by email to feedback@ndis.gov.au.

Complaints to the Commonwealth Ombudsman about the NDIA can be lodged:

- by phone on 1300 362 072
- online at www.ombudsman.gov.au.

All Walks of Life must support people making a complaint about the NDIA to contact the Agency or Commonwealth Ombudsman, where this is required.

2. Record

The Managing Director must record all information relevant to complaints, in its original and simplest form, in All Walks of Life's *Compliments, Complaints and Feedback Register* which must be stored in a secure file e.g. Happy HR. Relevant information including copies of the Compliments, Complaints and Feedback form, and any further actions taken must also be recorded in the relevant electronic case file e.g. Nookal and a copy provided to participants and any agreed stakeholders.

3. Acknowledge

The Managing Director must acknowledge receipt of complaints within 2 working days. However, where a person has requested to remain anonymous, contact may not be possible or expected.

In their acknowledgement, the Managing Director must set realistic expectations regarding complaint resolution and refer the matter to other organisations where they are identified as being more suitable to handle it. Acknowledgements must provide timeframes for resolution where possible.

4. Resolve

In resolving a complaint, the Managing Director must involve the complainant and keep them informed of the progress of the complaint. They must discuss any disparities identified with the complainant and may request additional information when required. A timeframe within which further information is to be provided should be clearly communicated with the complainant. The Managing Director should consider granting extensions where necessary and always communicate any additional time requirements to the complainant.

Complaint investigation must focus on the identified complaint matters only and be undertaken in a way that provides procedural fairness to all parties involved.

All decisions, feedback or actions regarding complaint investigation must be recorded by the Managing Director in All Walks of Life's *Compliments, Complaints and Feedback Register* and a copy of this information is to be stored in the Electronic Case file e.g. Nookal. A copy of this information is to be provided to the participant and any agreed stakeholders.

5. Communicate Resolution

All Walks of Life will respond to all complaints as soon as possible and within 28 days from acknowledgement.

If a complaint 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.

The Managing Director should discuss the outcome of a complaint investigation verbally with the complainant, where possible. This must be followed by written advice that provides the complainant an opportunity to make further contact with the Managing Director if required.

The written advice must also include information on what further action may be available to the complainant at the conclusion of the complaint investigation and any feedback provided by the participant in the course of the investigation. This may include escalating the matter to an external complaints agency or seeking a further review within All Walks of Life. Written advice should also seek feedback from the complainant regarding their experience of the complaints process, to be recorded in the electronic case file.

Support must be provided to assist complainants' understanding of correspondence regarding complaints where required (e.g. interpreters, referral to advocates, etc.).

Options for resolving complaints include:

- explaining processes;
- rectifying an issue;

- providing an apology;
- ongoing monitoring; and
- training or education of workers

Once resolved, complaint outcomes must be relayed to the appropriate area within All Walks of Life in order to improve service delivery.

All Walks of Life's *Compliments, Complaints and Feedback Register* will be used by the Managing Director to record every complaint, track investigation progress and outcomes and note how outcomes have been communicated to stakeholders. A copy of this information is also to be stored in the electronic case file e.g. Nookal

The *Compliments, Complaints and Feedback Register* will be reviewed on at least a quarterly basis by the Managing Director in order to analyse and report on trends and identify and address any systemic underlying issues.

Complaints Escalation

Where a complaint about All Walks of Life is made to the NDIS Commission, it must:

- comply with any orders or requests made by the NDIS Commission;
- assist in any resolution process or inquiry undertaken by the NDIS Commission; and
- ensure the complainant or a person with disability affected by the complaint are not adversely affected or fear retribution because a complaint has been made by them or on their behalf.

Feedback

Feedback can be provided to All Walks of Life at any time, in any way, by any stakeholder, directly to an employee or the Managing Director or by email, mail or phone.

Providing Feedback to All Walks of Life is voluntary.

Definitions

Compliment - an expression of praise, encouragement or gratitude.[1]

Complainant - a person who makes a complaint or has a complaint made on their behalf.

Complaint - an expression of dissatisfaction made to or about a business, where a response or resolution is explicitly or implicitly expected.

Feedback - information about reactions to a product, a person's performance of a task, etc., which is used as a basis for improvement.

Procedural Fairness - a principle that requires a fair and proper procedure to be used when making decisions.

[1] FACS Community Complaints Policy for Ageing and Disability Direct Services

Monitoring and Review

This Policy and Procedure will be reviewed at least annually and incorporate feedback from workers, participants and other stakeholders where relevant. This policy is currently scheduled for review on 12th July 2024 unless indicated prior.