

Complaint Handling Policy

Applies to:	All Intereach employees, both paid and unpaid, and Family Day Care educators.				
Definitions:	Refer to Schedule of Definitions: <i>employees, explicitly expected, implicitly expected.</i>				
Version:	5	Date approved:	April 2017	Next review date:	February 2020

1. Policy Statement

Intereach is committed to:

- seeking and receiving feedback and complaints about our services, systems, practices and complaint handling processes;
- handling any concerns raised fairly, efficiently and effectively; and
- acknowledging that feedback and complaints are an important component of continuous improvement.

2. Objective

The objective of this policy is to:

- provide guidance to people who wish to make a complaint or provide feedback, and
- support employees and Family Day Care educators to handle complaints fairly.

Complaints made by employees or Family Day Care educators are covered by the *Resolving Workplace Conflict Policy*.

3. Responsibilities

It is the responsibility of the Chief Executive Officer to:

- promote a culture that values complaints and their effective resolution,
- provide adequate support and direction to key staff responsible for handling complaints,
- regularly review reports about complaint trends and issues arising from complaints, and
- support recommendations for improvements arising from analysis of complaint data.

It is the responsibility of executive directors to:

- handle all level 3 complaints and any others where the service or conduct of a senior manager is being complained about or where the complainant is dissatisfied with the complaint resolution; and
- ensure that regulatory authorities are notified of complaints in line with legislative and regulatory requirements.

It is the responsibility of the Quality Support team to:

- maintain and manage an effective complaint handling system, and
- provide regular reports to the CEO on issues arising from complaint handling work.

It is the responsibility of managers and nominated supervisors to:

- encourage all employees and Family Day Care educators to be alert to complaints,
- assist those responsible for handling complaints to resolve them promptly,

- ensure complaints and compliments are recorded appropriately,
- recognise and reward good complaint handling by employees and Family Day Care educators, and
- notify regulatory authorities of complaints in line with legislative and regulatory requirements.

It is the responsibility of employees and Family Day Care educators to:

- be alert to complaints and notify their line manager or nominated supervisor of a complaint as soon as possible,
- assist people to make a complaint, if needed,
- show commitment to fair, effective and efficient complaint handling, and
- treat all people with respect, including people who make complaints.

4. Guidelines

4.1. Definitions

Complaint - An expression of dissatisfaction made to or about Intereach, our services, partnering agencies, employees, Family Day Care educators or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

Feedback - Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Intereach, about our services, or complaint handling where a response is not explicitly nor implicitly expected or required.

4.2. Key qualities of our complaint handling process

When you make a complaint

A complaint can be made in any way, including in person, in writing, over the phone, via our website, by email or through an external agency.

- We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.
- Information about our how and where complaints can be made to or about us is publicly available through our website and printed material and is made known to all service users, where possible and appropriate.
- We support your right to have an advocate, such as another person or organisation, to assist or represent you in the making and/ or resolution of your complaint.

We will handle all complaints fairly and equitably

We address each complaint with integrity and in an equitable, objective and unbiased manner. Our employees and Family Day Care educators will listen, treat you with respect and actively involve you in the complaint process where this is possible and appropriate.

- The person handling the complaint will be different from any employee or Family Day Care educator whose service or conduct is being complained about. Conflicts of interest, whether actual or perceived, will be managed responsibly.
- We protect the identity of people making complaints where this is practical and appropriate and in accordance with the *Privacy and Confidentiality Policy*.
- We take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.
- Any new complaint will be treated on its merits, even if the complainant has made similar or multiple complaints previously.
- If the complaint relates to misconduct by an employee or Family Day Care educator, the resolution will be in accordance with the *Disciplinary and Dismissal Policy*.

- If the complaint is about the service or conduct of the CEO or Board director, the complaint will be handled by an external agency.

4.3. Responding to complaints

Where possible, complaints will be resolved at first contact with Intereach. We support employees and Family Day Care educators to resolve complaints promptly and with as little formality as possible.

There are three categories for complaint complexity and relevant handling:

- Level 1 – single issues that are straightforward and simple to resolve. These may be handled by front line staff.
- Level 2 – more complex and/or multiple issues where investigation may be required. These may be handled by a manager.
- Level 3 – complex, serious and sensitive issues (will be handled by executive), including a complaint that:
 - is initiated through or received from an Ombudsman, or a state or federal Minister or Member of Parliament.
 - is received by the CEO or a Board member,
 - involves multiple issues that require intensive investigation or involve other agencies,
 - is urgent or a potential high risk or a high profile issue that may adversely affect the reputation of the organisation,
 - alleges a breach of the Code of Conduct, which includes unauthorised access or disclosure of confidential information, conflicts of interest, serious misconduct and fraud,
 - is persistent and/or requires intensive management in order to progress or resolve it,
 - is required by contract, regulation and/or legislation to be reported or referred to an authorised third party, or
 - is an unresolved complaint at level 2.

What you can expect from us

When you make a complaint, we will acknowledge receipt as soon as we can and no more than five working days from notification.

We will ask you what outcome you are seeking and who you would like to be your key contact for the resolution process.

We will let you know what to expect from the complaints process and:

- the expected time frames for our actions,
- the progress of the complaint and reasons for any delay,
- your likely involvement in the process, and
- the possible or likely outcome of your complaint;

We will let you know as soon as possible if we are unable to meet the expected timeframes and the reason for the delay. If we can't deal with any part of your complaint, we will let you know and provide advice about alternative ways to resolve the issue, for example if the complaint is about another agency, we will support you to lodge your complaint with them.

As the complaint resolution progresses, we will keep you informed.

After investigation or resolution

After investigation, we will contact you to advise you of:

- the outcome of the complaint and any action we took,
- the reason/s for our decision,
- the remedy or resolution/s that we have proposed or put in place, and

- any options for review that may be available to you, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations or exemptions under the *Privacy Act 1988* before sharing our findings with you.

If you are unhappy with the resolution of your complaint, we can provide a further internal review or support you to refer the complaint to an external agency (see below).

4.4. Alternative avenues for dealing with complaints

At any time you can choose to have your complaint dealt with by an external agency, including:

- Aged Care Complaints Investigation Scheme – phone 1800 550 552 (National),
- Australian Human Rights Commission – phone 1800 620 241 (National),
- Community Services Commission – phone 1800 060 409 (NSW),
- Disability Services Commission – phone 1800 677 342 (VIC)
- NSW Ombudsman – phone 1800 451 524,
- Victorian Ombudsman – phone 1800 806 314,
- Commonwealth Ombudsman – phone 1300 362 072, or
- Complaints Resolution and Referral Service (CRRS) for services funded under the Commonwealth Disability Services Act – phone 1800 880 052
- National Disability Insurance Agency (NDIA) <https://www.ndis.gov.au/about-us/contact-us/feedback-complaints>

4.5. Recording complaints

We keep comprehensive records about:

- how we managed the complaint,
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations), and
- any outstanding actions that need to be followed up.

The *Complaint Handling Tool* can be used to record the complaint handling process. Any documentation relating to the management of a complaint is to be:

- stored electronically in a restricted access network folder or
- securely in accordance with contractual requirements, or
- forwarded to the Intereach Quality Support Team for secure filing.

After closure, all complaints must be de-identified and recorded in the *Complaints and Compliments Register*.

5. Policy context: this policy relates to:	
5.1. Standards or other external requirements	Education and Care Services National Regulation(2011)C176(2)(b) Human Services Standards (2015) VIC National Disability Service Standards (2013) Quality of Care Principles (2014) - Home Care Standards
5.2. Legislation or other requirements	Aged Care Act (1997) Cth Anti- Discrimination Act (1977) NSW Disability Inclusion Act (2014) NSW Disability Act (2006) VIC Disability Amendment Act (2012) VIC Disability Discrimination Act (1992) Cth Disability Inclusion Act (2014) Education and Care Services National Act (2010) C 174 (2)(b) Equal Opportunity Act (2010) VIC Ombudsman Act (1974) NSW Privacy Act 1988
5.3. Internal documents	Quality Management Framework Code of Conduct Policy Disciplinary and Dismissal Policy Privacy and Confidentiality Policy Rights and Responsibilities Policy Intereach Complaints Brochure Complaint Form Complaint Handling Tool Complaints and Compliments Register

6. Document control			
Version	Date approved	Approved by	Next review date
1	Aug 2010	Exec Team	Aug 2013
2	March 2013	CEO Exec Team	March 2016
3	Feb 2015	Leadership	Feb 2018
4	Feb 2017	Leadership	Feb 2020
5	April 2017	Leadership (minor review)	Feb 2020

Complaint Form



Your details (these are optional but needed if you would like to be contacted about this)			
Name:		Postcode:	
Contact email or phone:			
Details about your concern or complaint			
Date:		Have you raised this issue with us before?	YES NO
Program/service involved:			
Please tell us about your concern (attach extra pages if needed)			
<i>Who was involved, what happened, when it happened, where and how it occurred etc.</i>			
What outcome would you like?			
Please return to your nearest Intereach office or by the methods below:			
Fax: (03) 5881 5440 Email: complaints@intereach.com.au Post: PO Box 501 Deniliquin NSW 2710			

Office use only:			
Date received:		Date entered into Register	
Staff member handling complaint:			