

Policy: Participant/Client Feedback and Complaints

Document record

Approved & signed by
CEO
Next review due 6/2/22

POLICY STATEMENT

Intent

The Customer Feedback and Complaints Policy:

- Guides Help at Home in decision making and action relating to the best practice management of customer feedback (compliments, comments/suggestions) and complaints in accordance with National Standards and State Government requirements;
- Ensures that Help at Home manages customer feedback and complaints in a fair, efficient, systematic, consistent and accountable manner;
- Ensures staff are supported and aware of their responsibilities with regards to participants/clients' feedback and complaints;
- Ensures effective and timely identification of and response to trends; and
- Provides a foundation for Help at Home mandated incident reporting and feedback system, relevant procedures, guidelines and any other related documentation.

Context

On 27 July 2015, Cabinet approved a new instruction on Complaint Management (PC039). This requires agencies to handle complaints in a manner consistent with the principles in the Australian/New Zealand Standard: AS/NZ 10002:2014. It supports participants/clients to receive the services and/or products that Help at Home is funded to deliver.

- Informs participants/clients about their right to provide feedback or complain about a service and what to expect in response to that feedback, including possible outcomes, actions and/or resolutions.
- Ensures all feedback is handled in a fair, transparent and timely manner.
- Monitors and evaluates the handling of complaints to inform service improvements.

The NDIS Practice Standards and Quality indicators specify requirements for providers in relation to feedback and complaints management. Help At Home shall comply with these requirements as per this policy and practice relevant guidance as published by the NDIS Quality and Safeguards Commission <https://www.ndiscommission.gov.au/3cnolink3e/complaints-management>.

Risk

By not adhering to the consistent, timely and effective management of customer feedback and complaints, Help at Home risks causing or compounding participant/client dissatisfaction, litigation, loss of reputation and community and staff confidence and/or financial loss.

Scope

The Customer Feedback and Complaints Management Policy applies to all feedback received from participants/clients and the public about decisions, omissions and actions undertaken in the provision of services by Help at Home. This policy applies to all staff involved in responding to feedback and complaints.

Included:

All participant/client feedback, including comments, suggestions, compliments and complaints, are included within the scope of this policy.

Excluded:

Employee disputes, grievances, misconduct matters, contracted service provider disputes or grievances and appeals against decisions (e.g.: screening assessments).

Definitions

Carer - Family members, guardians or friends who have an interest in, or are responsible for, the care of a DHS or NDIS client.

Participant/Client - Someone who has received one or more of DHS or NDIS services or programs.

Complainant - Any person or organisation who is providing feedback or making a complaint.

Complaint - Includes expressions of dissatisfaction or concerns about a DHS or NDIS service made by participants/clients, their carers or others.

Feedback – Opinions, comment/suggestion, compliment or complaint, or concern, by a client about Help at Home staff or the organisation itself.

HCSCC - Health and Community Services Complaints Commissioner

NDIS – Complaints Commission

Policy Detail

Policy

Help at Home will maintain effective customer feedback and complaint management processes and systems to support consistent and high quality management of feedback and complaints.

Help at Home is open and responsive to feedback from participants/clients, families, carers and members of the community and uses that feedback to support continuous service improvement.

Where Help at Home are unable to resolve feedback or complaints internally, complainants will be provided with information about avenues for seeking resolution and/or external appeal.

Principles

Help at Home will **enable** feedback by ensuring:

- information about how and where feedback may be made is accessible and transparent;
- individuals who are vulnerable or have special needs are assisted to provide feedback when requested;
- people's rights to provide feedback or make a complaint is acknowledged, and complainants are treated with respect; and
- complainants are not adversely affected because they have made a complaint.

Help at Home will **manage** feedback by ensuring:

- feedback is promptly acknowledged, assessed and prioritised in accordance with the urgency of the issue;
- the management and resolution of feedback occurs at a local level wherever possible, and is only escalated where local resolution has been unsuccessful;
- complainants are advised if their matter is out of the scope of the Policy. Complainants are redirected in a timely manner to appropriate avenues where possible;
- complainants are advised of the complaint process, expected timeframes, possible outcomes and avenues of review and appeal;

- unless resolved at the first point of contact, complaints will be documented (including information about the issues raised, any supporting documentation provided, the enquiries undertaken, and the outcomes achieved);
- immediately report to the Office for Public Integrity any complaints or feedback that potentially relate to issues of corruption, misconduct and maladministration as required under the Independent Commissioner Against Corruption Act, 2012;
- immediately report to NDIS Quality Commission;
- key performance indicators for the complaints management system are established, implemented and monitored and improvements implemented, as required;
- personal information is treated confidentially and is only used and disclosed in accordance with the South Australian Department of the Premier and Cabinet Circular PCO12 - Information Privacy Principles Instruction, and other legal and policy obligations regarding privacy;
- complainants are advised of the process by a brochure given with their agreement of how to send an official complaint to the NDIS Commissioner; and
- the legal, policy, procedural and factual basis for decisions are provided in communications with complainants, staff and others.

Help at Home will **support** parties involved in complaint resolution by ensuring:

- the roles, responsibilities and expected behavior of complainants and staff are communicated;
- practices are established to ensure the health and safety of staff involved in feedback management;
- practices are established to manage unreasonable complainant conduct; and
- consultation and advice is provided to staff managing complex and difficult disputes.

Help at Home will use a complaints system to ensure **continuous improvement** and accountability by:

- identifying opportunities for improvement as a result of complaints;
- analysing feedback data to monitor service performance and evaluate trends, and identify and action opportunities for improvement; and
- providing internal and external reporting on key performance indicators.

Governance and Roles

The following governance arrangements support Help at Home client feedback and complaints management:

The Chief Executive is responsible for:

- ensuring Help at Home maintains an effective complaints management system; and
- promoting the rights of participants/clients to provide feedback, including complaints.

The Executive Leadership Team is responsible for:

- reviewing and evaluating the implementation and effectiveness of this policy;
- reviewing reports on participant/client feedback, data and trends; and
- identifying and/or endorsing opportunities for service improvements.

The HR/Quality Manager is responsible for:

- ensuring participant/client feedback is handled seriously and thoroughly in their services;

- ensuring feedback is responded to in a fair and consistent manner, in accordance with the policy and guidelines;
- ensuring their department has systems and processes in place which are consistent with this Policy;
- informing the Chief Executive of significant complaints;
- reporting high-risk complaints to the Health and Community Services Complaints Commissioner (HCSCC) and/ or Aged Care Complaints Commissioner (if the complaint falls within either of these jurisdictions) and providing a summary of actions taken to resolve the matter;
- reporting high-risk complaints to the NDIS commission &/or advising/assisting participants/clients to contact the commission;
- ensuring all feedback is recorded on the mandated incident reporting and feedback system;
- ensuring divisional staff understand this policy and related procedures and promote participant/client feedback processes to participants/clients;
- monitoring and reviewing the Participant/Client Feedback and Complaint Policy to ensure relevance and compliance with the Australian & NDIS Standards;
- ensuring that information about the mandated incident reporting and feedback system is communicated and easily accessible to staff, participants/clients and members of the public, particularly vulnerable populations (including Aboriginal people, people from CALD background, people with disabilities);
- reporting to staff and other internal stakeholders about issues of concern identified through the complaint management system;
- supporting the complaint management system, including staff training, provision of guidelines, trend analysis and monitoring of the efficacy of improvement actions; and
- providing advice and consultation on complex complaint management policy and processes.

Managers, supervisors and senior staff are responsible for:

- ensuring that information about the mandated incident reporting and feedback system (is communicated and easily accessible to staff, participants/clients and members of the public, particularly vulnerable populations (including Aboriginal people, people from CALD backgrounds, people with disabilities);
- ensuring feedback is responded to in a fair and consistent manner, in accordance with this policy and guidelines;
- ensuring the feedback and complaint management system is implemented in their department, with any relevant local procedures;
- ensuring appropriate records and documentation are retained in accordance with the *State Records Act 1997*, departmental policy and business unit procedures; and
- ensuring that feedback information is kept available for review by senior management and others.

All Help at Home staff are responsible for:

- ensuring they are familiar with the Help at Home feedback and complaints management policy and procedures, the mandated incident reporting and feedback system and local procedures, guidelines and processes;
- ensuring that feedback and complaints are acknowledged and responded to in a timely, fair and consistent manner, or referred to the appropriate party; and
- enabling participants/clients and community members to give feedback or make complaints through the provision of information and advice.

Aboriginal Impact Statement Declaration

The needs and interests of Aboriginal people have been considered in the development of this policy and have been appropriately addressed. It is noted that additional considerations may be required to support, enable and respond to feedback and complaints from Aboriginal participants/clients. These specific factors may include, for example, the provision of information to family, kin and community, seeking specific cultural advice, and developing specific resources.

Related documents

Document type	Document name	Location
Gov legislation	AS/NZ 10002:2014 Guidelines for Complaint	https://infostore.saiglobal.com/en-us/standards/as-nzs-10002-2014-1764518/
	Department of the Premier and Cabinet, Circular (27/7/15) on Complaint Management	https://dpc.sa.gov.au/documents/rendition/B17780
	Independent Commissioner against Corruption Act 2012	https://icac.sa.gov.au/content/about-us-0
	Independent Commissioner Against Corruption SA (ICAC) – Directions and Guidelines for Inquiry Agencies, Public Authorities and Public Officers.	https://icac.sa.gov.au/directions-guidelines
	Health and Community Services Complaints Act 2004	http://www.hcscs.sa.gov.au/hcscs-and-the-law/
	Public Sector Act 2009	https://publicsector.sa.gov.au/policies-standards/public-sector-act-2009/
	Ombudsman Act 1972	https://www.legislation.sa.gov.au/LZ/C/A/OMBUDSMAN%20ACT%201972.aspx
	SA Department of the Premier and Cabinet circular PC012- Information Privacy Principles Instruction	https://dpc.sa.gov.au/what-we-do/services-for-government/premier-and-cabinet-circulars
	State Records Act 1997	https://publicsector.sa.gov.au/policies-standards/code-of-ethics/
	Code of Ethics for SA Public Sector, Office for the Public Sector	https://publicsector.sa.gov.au/policies-standards/code-of-ethics/
	HCSCC Aboriginal and Torrens Strait Islander Outreach Project: Ever felt like complaining; leaflet	http://www.hcscs.sa.gov.au/wp-content/uploads/2013/08/hsc0003_info_flyer_revised_web.pdf
	NDIS Commission pamphlet & website information	https://www.ndiscommission.gov.au/providers/complaints-management
Policy	Code of Ethics	..\Current Policies\Code of Ethics.docx
Forms	Complaints forms	..\..\Forms\CLIENT FORMS\Complaints form.doc
Register	Help at Home Complaints register.	..\..\REGISTERS\6. Registers Complaint Incident Compliment (2).lnk