

# CS2.4 Feedback and Complaints

## Purpose

1. To recognise and promote the rights of participants and stakeholders to give feedback (including compliments, complaints and suggestions) on SAVVY services
2. To establish good practice for responding to and managing feedback including resolving complaints in a timely, courteous and fair manner
3. To set out procedures for using feedback to improve service delivery to participants

## Alignment with Practice Standards

1. Module 1: Rights and Responsibilities
2. Module 2: Provider Governance and Operational Management

## Legislative Alignment

1. Disability Discrimination Act 1992
2. National Disability Insurance Scheme Act 2013
3. National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
4. Privacy Act 1998
5. Community Services (Complaints, Reviews and Monitoring) Act 1993
6. Ombudsman Act 1974

## Key Responsible Executive

Chief Executive Officer

## For More Support

Your People Manager

## Policy Statement

1. SAVVY recognises the value of participant and stakeholder feedback (compliments, complaints and suggestions) and clear communication as an important tool in continuously improving service delivery with a view to exceeding participants' expectations and acknowledging the quality of services provided.

2. The feedback system provides opportunities to identify what is working well and areas for improvement, to assist in planning and allocating resources, to strengthen public support and to address the concerns of dissatisfied participants.
3. Feedback may be about access to SAVVY services, particular staff or programs, the type of service provided or the way it is delivered.
4. SAVVY acknowledges the importance of creating a culture that is open, accepting and responsive to feedback, complaints and incident notifications.
5. Any reports of abuse, neglect, violence or violence will be treated seriously and will be responded to with sufficient urgency given the severity of the situations.
6. Procedures are well-publicised and accessible. Staff members foster an environment in which participants and their families, carers and advocates can confidently give feedback with any worker in a confidential interview at any time without fear of adverse consequences. Neither SAVVY management nor workers take or threaten to take adverse or hostile action in response to complaints lodged with SAVVY or the NDIS Commission about the provision of supports or services.
7. Feedback is responded to in a timely manner. In particular, complaints are objectively assessed and resolved quickly. Wherever possible this resolution is done at the most immediate level with appropriate support offered to those involved.
8. On receipt of a complaint SAVVY will have 5 working days to resolve the situation
9. If the complaint is about a staff member, he/she has the right to be informed of the nature of the complaint. However, confidentiality is a prime consideration during complaint processes for both the participant(s) and any staff members involved.
10. The supports and/or delivery of services to participants will not be influenced by their actions relative to reporting and/or providing feedback.
11. Participants are advised to approach the NDIS Quality and Safeguarding Commission (NSW) if they are not comfortable with any part of the SAVVY complaints process, or not satisfied with the proposed solutions or strategies

## Definitions

1. Complaint - any written or verbal statement outlining a problem or concern involving the organisation including its staff, the service they provide, or the terms of engagement or contract with the organisation.
2. Feedback - information given by a service user, stakeholder or community member in relation to the organisation and may be in the form of a compliment, suggestion or complaint.
3. Compliment - an explicit expression of satisfaction or praise in relation to the organisation or a staff member working on behalf of the organisation.

4. Suggestion - a comment that indicates how the organisation could improve its service delivery. It may be part of a compliment or complaint but may also be offered as standalone information.
5. Complaint resolution - a complaint is resolved when both parties reach an agreement. The parties will be informed, in writing, of the complaint agreement.
6. Vexatious grievances - where complainants use the complaint/grievance resolution process without reasonable cause, the processes as outlined above will still be adhered to. If complaints are malicious or vexatious and therefore not made in good faith, the complainant may be referred to undertake counselling and/or other actions if appropriate.
7. Corrective action - addressing an ongoing systemic issue to eliminate the root cause of the problem to prevent recurrence.
8. Confidentiality - only people directly involved in the complaint as part of the nature of the complaint or the resolution of it will have access to the information about the complaint.

## Delegations

Roles	Responsibilities
Board of Directors	<ul style="list-style-type: none"> <li>● Review and monitor reports on all complaints to ensure issues impacting service user satisfaction and service outcomes are being managed effectively</li> <li>● Ensure organisational reputation is not placed at risk</li> <li>● Respond to complaints relating to the CEO and/or Board members and to high level or escalated complaints from service users, staff or stakeholders, as required</li> </ul>
CEO	<ul style="list-style-type: none"> <li>● Ensure complaints where relevant are tabled at the Board</li> <li>● Receive feedback and complaints and ensure the appropriate person resolves the complaint in a timely manner and feedback is monitored and reviewed</li> <li>● Ensure all staff are equipped to handle complaints in a professional manner and adhere to the complaint management process</li> </ul>
Management	<ul style="list-style-type: none"> <li>● Receive feedback and complaints and ensure the appropriate person resolves the complaint in a timely manner and feedback is monitored and reviewed</li> <li>● Ensure all staff are equipped to handle complaints in a professional manner and adhere to the complaint management process</li> </ul>
Staff, volunteers, contractors and students	<ul style="list-style-type: none"> <li>● Ensure all service users have the opportunity to provide feedback and to treat all complaints seriously and as an opportunity for improvement</li> <li>● Will assist service users to resolve complaints to the best of their ability</li> </ul>

## Procedures

1. Strategies for Obtaining Feedback: participants are advised of the SAVVY feedback system at the time of intake both verbally and in writing.
  - a. They are encouraged to use the participant Feedback Form.
  - b. If this is not convenient, feedback may also be made via the SAVVY website, a telephone call, personal interview, email or letter.
  - c. For these cases, the staff member receiving the feedback will ensure it is recorded on the participant Feedback Form.
2. SAVVY will ensure that the participant Feedback Form is readily available and may be obtained on request from any staff member.
3. Assistance for participants who wish to give feedback: Generally, participants may approach any staff member at any time. If the matter cannot be addressed immediately the staff member ensures it is referred to the most appropriate person as soon as practicable, noting the timeframe outlined below.
  - a. SAVVY makes arrangements for an interpreter to assist a participant in giving feedback, if required.
  - b. participants may have an advocate or support person present when giving feedback. If requested, SAVVY assists the participant in obtaining an advocate.
  - c. The identity of anyone making a complaint is known only to those staff directly involved in its resolution. There is no adverse-effect on service delivery to any complainant.
4. Responding to Compliments and Suggestions: If a compliment or suggestion is made verbally, then the participant or stakeholder is thanked immediately and advised how the feedback is followed up.
  - a. The feedback and the response are recorded on the participant Feedback Form and passed to the CEO.
  - b. If the compliment or suggestion is made in writing a similar response is given in writing within one week of receipt.
  - c. This is usually done by the person receiving the correspondence but in consultation with the CEO.
5. Resolving Complaints: Employees do not handle complaints in which they have a conflict of interest. This conflict of interest may apply to investigating, managing, decision making and reviewing decisions. Employees acknowledge the conflict of interest and refer the matter to an appropriate person.
6. Minor Complaints: participants are encouraged to discuss the complaint with the staff member(s) directly involved in the matter and/or, if appropriate, the staff member with the responsibility for rectifying the situation or making improvements.
  - a. If this is considered inappropriate or the participant does not wish to speak to those directly involved, he/she is invited to discuss the complaint with the Co-ordinator or Service Manager.
  - b. The staff member/manager asks the participant to complete the participant Feedback Form or, alternatively, the staff member completes the participant Feedback Form on the

- participant's behalf and reads it back to the participant for a mutually agreed sign-off by the participant.
- c. Particular attention is given to what the participant would like to happen to resolve the matter; ensuring relevant suggestions are recorded for future use and follow up.
7. If possible, the staff member / manager gathers the information, determines appropriate courses of action and negotiates an acceptable resolution at this immediate level as quickly as practicable.
  8. Major Complaints: A major complaint may involve:
    - a. a significant breach of policy and procedures
    - b. repeated, less serious breaches of policy and procedures
    - c. breaches of ethical and professional conduct standards
    - d. ongoing poor work practices and performance
    - e. recurrence of similar minor complaints/disputes
    - f. minor complaints which have the potential to escalate
    - g. conduct or behaviour that may bring the agency's reputation into disrepute
    - h. the use of a restrictive practice, other than where the use is in accordance with the participants authorised behaviour support plan
  9. A major complaint is reported immediately to the CEO; and actioned using the Grievance Resolution procedures or Incident Management procedures depending on the nature of the complaint. Allegations of abuse or neglect are covered in the abuse and neglect Policy and are dealt with through the Incident management procedure.
  10. Monitoring and Reporting Information about Complaints: Information regarding complaints is collated and provided to the Board of Directors at each regular Board meeting unless the CEO considers that it is to be communicated to the Board urgently.
    - a. The Board should include a standing agenda item on complaint handling at all Board meetings.
    - b. The CEO analyses complaints for trends and provides recommendations for action to be taken. Recommendations are discussed at Board and/or staff meetings.
  11. Provision of Staff Training in Complaints Handling: SAVVY will provide and ensure all staff, management and volunteers receive information and training as part of their induction on complaints handling. Refresher training will be provided every three years.

### References to other SAVVY policies and external sources

1. CS1.1 Human Rights
2. CS1.5 Abuse and Neglect
3. Org2.7 NDIS Reportable Incident and Response Management
4. HR4.4 Grievances Resolution
5. HR4.5 Discipline and Termination

### Summary of attachments

1. Nil



## Version Control

1. 1 April 2023 - New Policy Creation