

Feedback and Complaints Management Policy & Procedures

1. Policy

Everyone (participants and their families, workers and other providers) at Doctoroo is encouraged to provide feedback or make a complaint through multiple mechanisms including conversations with Allied Health Professionals (AHP), phone calls, emails, websites and third parties such as funding bodies.

In line with the focus on participant rights and person-centred care, Doctoroo informs and encourages participants to provide feedback or make a complaint through the Service Agreement and conversations with their provider.

Information on how to make a complaint is provided to participants before services commence and reinforced during support delivery.

The participants and their families are provided with the opportunity to provide feedback or make a complaint at the time of their reviews but also at any time during service delivery.

Workers are informed of this policy.

Other providers and external stakeholders are informed on how to make a complaint via engagement letters and contracts.

All feedback, both positive and negative, is used by Doctoroo to evaluate services and to make changes to ensure everyone is safe and satisfied.

Complaints will be managed as per the [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#), [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#) and the [NDIS Effective Complaint Handling Guidelines for NDIS Providers](#).

2. Outcome

Everyone is aware of how they can provide feedback or make a complaint.

Everyone has their concerns satisfactorily addressed, feels supported through the feedback and complaints process and is kept informed of progress with their own issue and of any changes made.

All feedback and complaints are documented and changes made, as required, to improve service delivery and procedures to improve participant satisfaction.

3. Definitions

Complaint Is a statement that something is unsatisfactory.
NDIS Commission “A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of

a complaint, where a response or resolution is explicitly or implicitly expected or legally required.”

[NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019 p8](#)

Feedback Information about reactions to a service, a person's performance of a task, a product etc. which is used as a basis for improvement.
Feedback can be positive or negative.

Note: As per the definitions in the Incident Management Policy, a complaint or negative feedback about the service is also a type of **incident**.

4. Related Policies / Documents

Internal

- Incident Management Policy and Procedures
- Risk Management Policy and Procedures
- Risk Management Register
- Service Delivery Model
- Incident and Complaint Report form
- Incident and Complaint Register
- Incident Investigation Form
- Human Resource Management Policy and Procedures /Grievance

External

- [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#)
- NDIS *Effective Complaint Handling Guidelines for NDIS Providers* – includes a valuable approach to managing complaints extracted from [Victorian Disability Services Commissioner booklet 'Everything you wanted to know about complaints...'](#), - refer to Appendix.

5. Procedures

Making Participants Aware that Feedback, including Complaints, are Welcomed

- a) Participants are provided with information on how and where to provide feedback / make a complaint before services commence through provision of information:
 - In the *NDIS Service Agreement*
 - On the website
- b) Participants have the opportunity to provide feedback / make a complaint at any time and more particularly at the time of reviews and participant surveys
- c) Participants can complain directly to the Contact the NDIS Quality and Safeguards Commission
 - via phone 1800 035 544
 - by filling in an [online complaint form](#).

Making Workers Aware that Feedback, including Complaints are Welcomed

- a) Workers are provided with information at induction on how to provide feedback or make a complaint and then through annual training.
- b) Workers have the opportunity to provide feedback or make a complaint at any time and do not need to wait till formal reviews / supervision.
- c) In the event the complaint is about the Participant, the Worker will report to their direct manager.
- d) In the event the complaint is about internal grievances the Worker should refer to Managing a Grievance in the Human Resource Management Policy and Procedures.

Management of a Complaint

Management of a complaint will be handled as per any incident as follows. There are also **additional** steps to be taken and issues addressed.

- a. If a participant is making the complaint confirm if they wish to use an independent advocate to assist in making the complaint. This may be a family member, friend, trusted decision-maker or appropriate advocacy service. If / as required, assist the participant to access an advocate as required by referral to appropriate service such as, [Disability Advocacy Finder](#), [Disability Advocacy NSW](#) ; [Advocacy Queensland Incorporated](#); [Advocacy Tasmania](#); [Disability Rights Advocacy Service Inc South Australia](#); [Advocacy Western Australia](#); [ADACAS ACT](#); [Disability Advocacy Service NT](#)
- b. It is critical that the complainant (participant or their family member, Worker or other provider) feels the complaint has been adequately acknowledged and they are given time to express how it has affected them and what actions they would like to see taken.
- c. If possible, the AHP, taking the complaint from the participant, will talk fairly, sensitively and confidentially to the person making the complaint in a way which reflects their individual, cultural and linguistic needs.
- d. Obtain as much detail as possible about what happened and why the complaint has been made.
- e. Person who receives the complaint will discuss complaint with Director who will then contact the complainant as soon as practically possible, but at least within 24 hours.
- Person who receives the complaint is to complete an Incident and Complaint Report form and provide this to the Director. The report must include all necessary factual details, immediate actions that have been taken and any identified / planned follow-up actions.
- f. The incident is recorded in the Doctoroo Incidents and Complaints Register by the Director. Access to the register and any completed forms must be limited to senior staff only.
- g. The Director will, in collaboration with the complainant, decide on the course of action. The actions should include / address:
 - How to resolve the complaint. This could include acknowledgement, an apology, answers and / or action
 - Where appropriate, seeking feedback from others e.g. other clients / Participants, workers
 - When, how and through whom (e.g. advocate) complainant will be kept informed of progress
 - How to improve the service if / as required. This could include:

- Further training of staff / others involved
 - Reviewing and enhancing policies and / or procedures
 - Change of personnel
 - Changes to the environment / delivery mode for AHP services.
- h. If the complaint is of a serious nature (e.g. mandatory reporting required, could lead to litigation), a formal incident investigation will be conducted (use the *Incident Investigation* form) to explore what led to the complaint and if any steps are required to prevent it occurring again.
- Note:** If police are involved in the incident, no internal investigation is to commence until the police investigations are complete
- i. Start implementing agreed actions, keeping the complainant informed.
- j. Actions will be monitored by the Director and updates on progress will be added to the register until the incident is satisfactorily concluded
- If the complainant is not satisfied with the outcomes of the initial discussions, a third party (e.g. colleague, HR professional) will be called in to assist with discussions.
- k. The complaint is to be followed up as per incident management.
- l. If the complainant is still not satisfied with the way the complaint has been handled or the outcomes achieved, they can contact the [NDIS Quality and Safeguards Commission, National Disability Neglect & Abuse Hotline](#) and/or the relevant state / territory authority. Contact details will be provided to the participant.
- m. Complaints reports and all related documents are to be kept for 7 years.

Positive Feedback / Compliments Management

It is useful to keep a record of positive feedback / compliments received to review with colleagues / mentors. These can facilitate discussions on how to continuously improve. Record the details of the feedback / compliment in the Doctoroo Feedback / Compliments Folder.

6. Training Workers on Feedback / Complaints Management

All staff will receive initial and refresher training on Feedback and Complaints Management. This is to include examples of how to assure participants that feedback is welcome, what may constitute a 'complaint' and tips on being open to feedback. Refer to *Annual Training Plan*.

7. Appendix: How to respond to a complaint

The following is an extract from the NDIS Quality and Safeguards Commission's *Effective Complaint Handling Guidelines for NDIS Providers*

In responding to a complaint, the Four A's of successful resolution is a useful approach developed by the [Victorian Disability Services Commissioner in their booklet 'Everything you wanted to know about complaints...'](#):

The approach recognises that people who make a complaint are generally seeking one or more of these four outcomes:

- Acknowledgment
- Answers
- Action
- Apology

Acknowledgement

In many ways this is the most important step as it sets the tone for the rest of the process. Making a complaint can be difficult for people. It is important that people feel that their concerns have been understood and that the impact on them is recognised.

Acknowledgment can include:

- genuinely listening to the person without interrupting
- empathising
- making sure the person feels comfortable talking to you, and being aware of whether you are feeling defensive and how this may be perceived
- acknowledging how the situation has affected the person
- rectifying by asking the person what a good outcome would look like for them, and
- notifying the person regularly and promptly of the steps that will be taken in response to their complaint, ensuring commitments aren't made that can't be fulfilled.

Answers

People want to know why something has or has not happened, or why a decision was made. People need to understand what has happened in order to better understand how they can move on to resolving their concern. Answers should include a clear explanation that is relevant to the concern raised but **ONLY** if you know the facts.

Actions

People want you to fix or take steps to address their concerns. This may be in relation to their specific complaint, or more broadly around systems to ensure that similar issues won't occur for other people. Sometimes you won't be able to fix the issue raised, but you can initiate actions to prevent it from happening again. Taking action to prevent recurrence may validate the concern for the person making the complaint. A good way to approach actions is to use an action plan, which includes:

- 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 to the person making the complaint and the participant, and
- how the progress of the complaint actions and implementation will be oversights.

The action plan may be formulated with the person who raised the complaint and any participant affected by an issue raised in the complaint. It is really important to follow up with the person who made the complaint, and any affected participant, to make sure they are satisfied with the actions being undertaken, and that the actions relate appropriately to their concerns. This is also a good opportunity to seek their feedback on the complaints resolution process.

Apology

An apology may be part of, or the sole outcome a person is seeking when they make a complaint. It is important to consider who should provide the apology and the form of the apology. A genuine apology can be a meaningful step; however a poorly provided apology can make the situation worse. An apology should often come from the person complained about, as well as a more senior member of the organisation, in order for the person complaining to be satisfied that their concerns were taken seriously.

When providing an apology, it is helpful to consider:

- timeliness
- sincerity
- being specific and to the point
- accepting responsibility for what occurred and the impacts caused
- explaining the circumstances and causes (without making excuses), and
- summarising key actions agreed to as a result of the complaint.

A genuine and timely apology is a powerful healing force and a way to separate the past from the future, to put things to rest and get on with any agreed new arrangements.

After a complaint has been dealt with

It is important that you have systems in place to allow the organisation to reflect on the complaints process and any outcomes. This includes ensuring that you are checking in with the person who made the complaint for feedback around the finalisation of their complaint, and their response to any follow up or implementation of actions.

Things to consider:

- What was the complaint about? What service, policy or procedure did it call into question?
- What was the experience for the person who made the complaint, or for any affected participant? 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 effectively did you communicate with the person who made the complaint, 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?
- Does anything need to change in your complaints handling system or approach to dealing with complaints?
- Do staff require further training?
- Did the handling of the complaint reflect your stated values and expectations for complaint handling? Or, was the complaint perceived as something negative that needed to be dealt with as quickly as possible?