



NDIS and Aged Care Complaints and Feedback Policy and Procedure

ABN 55 956 904 691

Policy number:	7		
Responsible person:	Chief Executive Officer	Approved by Board on:	June 2019
Date written:	January 2016 Revised March 2024	Scheduled review date:	March 2027

Purpose

The purpose of this policy and procedure is to provide the overarching framework for the management of all complaints and feedback related to RLOA.

Scope

This Policy and procedure relates to all NDIS participants, Home Care consumers and the members of the wider community where RLOA services are provided.

Principles

The principles that underpin the RLOA Policy and Procedure include:

- Respect – demonstrating high level ethical practice;
- Non-disclosure – not disclosing information unless prior permission is granted;
- Professional Conduct – maintaining a high level of professionalism, competence and reliability to follow guidelines without exception;
- Integrity – demonstrating reliability, trustworthiness, truthfulness and honesty;
- Transparency – open and honest and consistent practice, documentation and information security;
- Clarity – All communications with the stakeholders shall be clear and concise.

Procedural Statement

RLOA is committed to engaging and promoting active participation of RLOA employees, volunteers, participants, consumers, families and carers and relevant others by engaging in practices that assist the organisation in being more responsive to need and providing quality support.

RLOA acknowledges that everyone has the right to make a complaint and / or provide feedback, whether they be a person receiving support or from the wider community. Every complaint or provision of feedback is an opportunity for our organisation to improve our services.

RLOA is committed to handling feedback and resolving all individual complaints in a confidential, fair, equitable and timely manner and without fear of retribution.

Policies can be established or altered only by the Board; Procedures may be altered by the CEO.

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RLOA will ensure culturally appropriate support is provided to people who are unable to independently lodge a complaint or provide feedback. When an individual would like to raise feedback or complain about RLOA, they have a number of options at their disposal.

The person providing feedback or making the complaint may choose to lodge a complaint or provide feedback or via the feedback option on the RLOA website. A person may also choose to contact RLOA by telephone or email to outline their dissatisfaction or to provide feedback on a range of services.

Procedural Steps

Complaints:

Step 1 (Day 1)

The RLOA relevant staff member will:

- Make initial contact with the complainant within the first 48 hours to gather information and record details on the RLOA Complaint Register
- Draft Acknowledgement of Complaint Letter template
- Provide draft Acknowledgement of Complaint Letter to relevant senior manager for review and feedback
- Make adjustments to the draft Acknowledgement of Complaint Letter as required and send to complainant.
- Allow the complainant to outline any contact that has been made with RLOA; and offer a face to face meeting if so desired.
- Give the complainant the opportunity to have a support person present with them at such a meeting. With consideration given to any culturally appropriate or additional supports that may be required to support the complainant to fully engage in the process.
- If a face to face meeting has been scheduled, appoint a person to take the minutes of the meeting and provide a copy of the record of interview to the complainant at the end of the meeting.
- Ask the complainant to read the record of interview and sign and date the document as a true and accurate capture of their complaint and statements regarding the substance of the complaint and their desired resolution to the matter and actions to be undertaken by RLOA management.
- Attach the record of interview to the complaints folder and make an entry of the date of the meeting, and brief note about stage of the complaint process on the RLOA Complaint Register.
- Advise the complainant that RLOA will seek to resolve the complaint within 7 days.
- Make a note in the RLOA Complaint Register about the stage of the process and date in comments column to ensure tracking of progress and timing.

Step 2 (Day 2 to Day 4)

The RLOA employee responsible for dealing with the complaint will:

- Develop the questions for the investigation process involving relevant parties involved in the complaint
- Develop a plan and outline any actions or dialogue that has been undertaken with the complainant
- Schedule interviews with all parties involved in the incident
- Facilitate the interviews and ensure that records of interview are taken on Record of Interview Form
- Ensure interviewees sign and date the record of interview as an accurate capture of the interview

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- Collate all records of interview and develop preliminary conclusions and proposed strategies toward resolution of the complaint.
- Identify the course of actions that need to occur as a result of highlighted systemic issues through the course of inquiry and investigation.
- Consult with a senior manager about interviews, any systemic issues arising from the process and planned strategies for resolution of the complaint prior to providing advice to complainant.
- Make a note in the RLOA Complaint Register about the stage of the process and date in comments column to ensure tracking of progress and timing.

Step 3 (Day 5)

The RLOA employee dealing with the complaint will:

- Prepare a draft Complaint Investigation Report outlining the substance of the complaint; summary of findings, parties involved and a proposed solution to the issues raised and any actions / strategies that may need to be undertaken to mitigate further occurrences of the complaint.
- Provide the draft Complaint Investigation Report to the relevant Senior Manager for review, Senior Manager will provide any additional input or direction in relation to the process as required.
- Make any adjustments to the Complaint Investigation Report as advised by Senior Manager and return adjusted complaint investigation report for final review and advice from Senior Manager.
- Contact the complainant by telephone to inform them that the process has been completed and outline the findings of the investigation into the complaint and to advise that a written response will be provided within two days.
- Make a note in the RLOA Complaint Register.

Step 4 (Day 6)

The RLOA employee dealing with the complaint will:

- Draft the finalisation of the complaint formal letter and outline the findings of the investigation as discussed over the phone on day 5 and briefly document the agreed resolutions / mitigation strategies.
- Make an entry to the RLOA Complaint Register stating that the complaint has been closed.

Complaint Appeals

Complainant is not satisfied with the outcome of the complaint.

If the complainant is dissatisfied with the outcome of their complaint, they may contact the Chief Executive Officer (CEO) in writing outlining the reasons why they are not satisfied with the outcome. Alternatively, complainants may wish to make a telephone call to speak to the CEO.

It is the role of the CEO to evaluate the complaints management processes and to determine if mechanisms have been effectively supported and maintained.

Step 1

The CEO will:

- Contact the complainant by telephone and advise that they will undertake a review of the process within 7 days.
- Enter a note on the RLOA Complaint Register.

Step 2

The CEO will:

- Develop a review letter using the **Review Letter Template** regarding the initiation of the review of the complaint and send this to the complainant.
- Enter a note on the **RLOA Complaint Register**.

Step 3

The CEO will:

- Decide whether there is sufficient evidence to warrant the complaint being opened for investigation once more after looking at the process undertaken and the findings etc.
- Advise the employee responsible for the initial process, and the relevant Senior Manager, that the review process is underway.
- Contact the complainant by telephone to advise of the decision and advise what the actions related to review process will be.

Step 4

The CEO will:

- Will contact the complainant and advise them of the outcome of the review process.
- Advise the complainant that if they are still unsatisfied with the outcome, they can contact the NDIS Quality and Safeguards Commission or the, Aged Care Quality and Safety Commission or relevant Ombudsman to seek an external review of the matter.
- Develop a Finalisation of Complaint Formal Letter and send it to the complainant about the outcome of the review.
- Enter a note on the RLOA Complaint Register.



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Feedback:

RLOA is committed to engaging and promoting active participation of RLOA employees, volunteers, participants, consumers, their family members and or carers and relevant others and the community and engaging in practices that assist the organisation in being more responsive to need and providing quality services.

These procedures are designed to provide guidance for RLOA employees to ensure feedback is received appropriately and that such feedback is documented and forms part of RLOA continuous improvement activities into the future.

Procedural Statement

RLOA encourages positive and negative feedback as a means to develop more responsive supports and to continuously improve the quality of those supports.

In addition, all RLOA employees have an opportunity to provide feedback at any time through the Staff Suggestion arrangements.

RLOA understands that real engagement in continuous improvement requires not just static surveys but creating a culture of continuous improvement where feedback is occurring regularly. Survey tools are appropriate for the audience to enhance their full participation to the process.

Motivating staff performance through mechanisms that take feedback and turn it into tangible recognition and awards for individuals.

Feedback is integral to meeting RLOA organisational goals and objectives.

- Lead by example in providing constructive feedback;
- Promptly engage with individuals who offer feedback to clarify and seek further information about what they want to achieve through providing their feedback;
- Record relevant information to assist in the process of continuous improvement;
- Encourage and promote RLOA employees, volunteers, participants, consumer, families and others to provide feedback;
- Gain feedback from our partners and community organisation's;
- Reinforce that the giving of feedback is accepted in the spirit in which it is offered;
- Seize upon opportunities to improve practice through feedback;
- Manage the process of staff suggestions and process improvements effectively;
- Document feedback and manage upwards through organisational channels to effect positive change.

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RLOA employees will:

- Be positive ambassadors for the organisation;
- Apply inclusive practices to support participants in providing feedback;
- Remain actively engaged in providing constructive feedback to their RLOA Line Supervisors;
- Encourage feedback from others.
- Record all feedback on the feedback register which is maintained by the executive team..

Continuous improvement Registers

RLOA maintains a RLOA Continuous Improvement Register for NDIS and Aged Care in which information is captured from the range of identified sources within this procedure, and in addition remains a repository for any additional opportunities for improvement sourced through social reforms and other ad hoc sources.

In addition, all relevant improvement strategies associated with RLOA Internal and External Quality Audits are saved on the continuous improvement and implementation of improvements are monitored by the Executive team and the CEO.

The **NDIS Continuous Improvement Register** is managed and maintained by the Executive Leader Support Services (ELSS). The Service Managers are responsible for reporting continuous improvements are escalated to the ELSS. The ELSS will ensure improvement actions are recorded, implemented, reviewed, and inculcated into improvements for the organisation

The **Aged Care Home Care Continuous Improvement Register** is managed and maintained by the Executive Leader Business Development (ELBD). The Home Care Manager and Home Care team are responsible for reporting continuous improvements in team meetings or via email in-between meetings. ELBD will ensure the register remains current, new actions are implemented within the service..

The CEO will review the continuous improvement registers quarterly.

Advocacy Services

Should a person wish to engage an Advocacy Service, RLOA will work to resolve the complaint with the Advocate and the Participant/consumer. RLOA staff must ensure consent is received from the Participant/ Consumer to exchange information with the Advocate.

Communication Assistance Services

National Relay Service Phone:

1300 555 727 A telephone service for people who have speech impairment or deafness.

Translating and Interpreting Service Phone:

13 14 50 A telephone and in-person interpreting service for people who do not speak English or are more confident communicating in a language other than English.

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Related Legislation and Documentation

National Disability Insurance Scheme Act 2013
Work Health & Safety Act Qld 2011
Disability Services Act 2006
Mental Health Act Qld 2000
Disability Discrimination Act 1992
Human Rights and Equal Opportunity Commission Act 1996
Australian Human Rights Commission Act 1986
Aged Care Act, 1997 (*Cth*)
Work Health and Safety Act and Regulations 2011 (*Cth*)
Aged Care Quality and Safety Commission Act 2018 (*Cth*)
Aged Care Quality and Safety Commission Rules 2018 (*Cth*)
Australian Privacy Principles 2013
Privacy Act 1988 (*Cth*)
Privacy Amendment (Private Sector) Act 2000 (*Cth*)

Quality Standards

NDIS Quality and Safeguarding Framework
Aged Care Quality and Safety Commission
Quality of Care Principles 2014: Standards 6, 8
ISO 10002:2018 Quality management -- Customer satisfaction -- Guidelines for complaints handling in organizations.
AS/NZS ISO 31000:2009 Risk Management Principles and Guidelines
AS/NZS ISO 9001