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# FEEDBACK and COMPLAINTS Policy and Procedure

## 1. Introduction

Irabina Autism Services (hereafter referred to as Irabina) has a commitment to quality service delivery supported by Continuous Improvement Strategy across all service areas of the organisation for the purpose of maintaining the highest quality services to those who rely on the organisation for assistance in various forms delivered by Irabina employees.

Irabina has a commitment to listen to and learn from anyone being able to speak up about quality of Irabina's services. Feedback in the form of complaints, suggestions or compliments is a major component of the Irabina Continuous Improvement Strategy. Complaints, suggestions and compliments provide the organisation and its employees with unique information about the quality of service delivered by Irabina from the perspective of service users.

## 2. Purpose

This Policy provides all Irabina stakeholders with an understanding of our approach to managing feedback and complaints, and the procedures that will be followed. The purpose of this policy is also to ensure that consumer feedback, including compliments, suggestions and complaints contribute to the continual improvement of the Irabina services, and that feedback is appropriately heard.

All Irabina staff are responsible for respectfully acknowledging feedback and reporting information via relevant tools and processes.

## 3. Scope

This Policy covers the management of feedback (comments, compliments and suggestions for improvement) and complaints received from all Irabina stakeholders such as families/ consumers, groups of consumers, advocates of consumers and other third parties where these parties have an association to an act or event that involves a person who receives goods or services delivered by Irabina, from receipt through to reporting and continuous improvement.

The Policy applies to all Irabina staff and all services delivered by Irabina.

This Policy does not cover the management of staff grievances which will be managed by the Staff Grievance and Complaints Policy.

## 4. Policy Statement

Irabina acknowledges the right of parents/ families and other stakeholders to express their opinion (suggestion, complaint or compliment) about our staff or services Irabina provides. They also have a right to be informed about the procedures that Irabina follows to manage complaints and feedback effectively, and how Irabina will learn from these processes.

Suggestions, compliments and complaints must be handled respectfully, effectively and promptly and recorded for coordination, analysis and reporting.

Complaints will be resolved at the earliest opportunity in a way that respects and values that feedback, and provides an opportunity to recover the person's positive feelings and confidence about our service. It can also help prevent further escalation of the complaint. To facilitate this, Irabina will provide a responsive, objective and fair feedback process and will maintain an effective Complaints Management System, consistent with best practices.

## 5. Principles

The management of feedback and complaints at Irabina is underpinned by the following principles:

<b>Accountability</b>	Accountabilities for managing feedback and handling complaints are clearly established and responses to them are monitored and reported to senior management and the Irabina Board.
<b>Complainant protection</b>	Complainant(s) will not be adversely affected as a result of making a complaint or providing feedback.
<b>Continuous quality improvement</b>	Feedback (including compliments) and complaints are a source of improvement for Irabina. Information recorded will be used to inform planning, service and practice change, and continuous quality improvement.
<b>Natural justice</b>	The standards of natural justice will apply to the management of all complaints at Irabina. Natural justice means that a person whose rights or legitimate expectations may be affected by a decision has the right to know the detail of any allegations against them and relevant information relating to the making of the decision, and be provided with a reasonable opportunity to respond and/or make submissions about such matters.
<b>Outcome</b>	All complaints will be addressed with the intent of achieving a transparent and fair outcome.
<b>Privacy and confidentiality</b>	Details of complaints will be limited to appropriate persons depending on the nature of the complaint, line manager, and privacy considerations.
<b>Procedural fairness</b>	Complaints will be managed in accordance with the standards of procedural fairness. The complainant and/or the respondent can request a review of their complaint by an independent person from within Irabina, if they believe that it has not been managed fairly.
<b>Responsiveness</b>	Feedback and complaints will be acknowledged promptly, addressed according to urgency, and complainants (and respondents) will be kept informed throughout the process.
<b>Visibility and access</b>	The process for making a complaint and investigating it (or providing feedback) is communicated clearly, is easy to access and understood by stakeholders.

## 6. Key Responsibilities

All Executive Team members and Managers are responsible for:

- promoting a culture of effective complaint management in their area of responsibility,
- managing complaints in accordance with the Complaints Management Policy,
- conformance with specific requirements of funding bodies and contracts in regard to complaints management.

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Role	Responsibility
Chief Executive Officer	<ul style="list-style-type: none"> <li>Ensures there is an effective Complaints Management System in place and reviews the adequacy of the system in managing complaints on a regular basis.</li> <li>Provides resources to ensure the implementation of policy and procedures relating to complaints management.</li> <li>Manages escalated complaints and complaint reviews.</li> <li>Reports any significant complaints to the Irabina Board and/or the Finance, Risk and Audit Committee.</li> </ul>
Executive Managers	<ul style="list-style-type: none"> <li>Responsible for the effective management of complaints in their portfolios.</li> <li>Analyse feedback and manage escalated complaints where required.</li> <li>Drive and facilitate relevant process and quality improvements.</li> <li>Communicate with complainant and respondent for escalated complaints where required.</li> </ul>
Complaints Officer	<ul style="list-style-type: none"> <li>First point of contact for complainants.</li> <li>Facilitates complaint resolution with Irabina Managers and escalates to relevant Executive Team member or CEO where required.</li> <li>Ensures each complaint, resolution and relevant decisions are recorded; follow up with relevant Manager or Executive Manager where required.</li> <li>Prepares quarterly Complaints and Feedback Report</li> <li>Prepares and lodges annual complaints report to Disability Support Commissioner</li> </ul>
Chief Financial Officer	<ul style="list-style-type: none"> <li>Ensures there is an effective system to record and manage complaints and reviews the adequacy of the system in managing complaints on a regular basis.</li> <li>Reports any significant complaints to Irabina Board or to the Finance, Risk and Audit Committee.</li> </ul>
Managers	<ul style="list-style-type: none"> <li>Ensure complaints received are responded to and resolved within timelines specified in this Policy.</li> <li>Record all complaints, resolutions and decisions in a relevant register, as specified by Complaints Officer.</li> <li>Escalate complaints as required.</li> <li>Pass a feedback received from stakeholders to relevant staff, analyse changes required and make relevant recommendations to Executive Team where required.</li> </ul>

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Role	Responsibility
Employees/Volunteers	Irabina employees are responsible for ensuring complaints are acknowledged, recorded and are accountable for actions taken as a result of a complaint.

### 7. Definitions

Term	Meaning
Appropriate Person	A Manager or a member of Executive Team determined to manage a complaint, based on their authority and knowledge of best practice/ quality requirements.
Consumer	All end users (parents/guardian/carers, those with autism and related conditions, Professionals, Schools, etc) of goods or services provided by Irabina or is directly affected by, the services.
Complaint	In this policy, the term 'complaint' is defined as expression of dissatisfaction made to an organisation, related to its products or service, or the complaints-handling process itself, where a response to resolution is explicitly or implicitly expected.
Complainant	The person making a complaint.
Compliment	A compliment is an expression of praise, encouragement or gratitude about a service that is funded, regulated or provided. It may be about an individual staff member, a team or a service.
Feedback	An opinion, suggestion or expression of interest in services or the complaint handling process that may not require a formal investigation, but will inform continuous improvement.
Respondent	The Irabina staff member/s who are the subject of a complaint.
Stakeholder	Includes current and ex-clients and their families or carers, members of the public and other service providers.

### 8. Procedure

#### 8.1 Management of Complaints and Feedback

8.1.1 All staff must provide information to consumers and other stakeholders about how to make a complaint. This may include a copy of the Irabina Feedback, Suggestions and Complaints Form. When appropriate, staff will assist a consumer/stakeholder to document their complaint, or support them to find someone to help them document their complaint.

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8.1.2 Complaints can be received verbally (face-to-face, phone call) or in writing (letter, email, text message, Irabina Feedback, Suggestions and Complaints Form). Where possible, complaints will be managed and resolved at first contact by front line staff.

8.1.3 All complaints are to be recorded in complaints register. Complaints are not to be recorded in case notes or Communication books.

8.1.4 Complaints received in writing, must be scanned and kept within complaint management system. The original should be disposed of securely.

8.1.5 For complaints received after hours or on the weekend that may be assessed as high risk, staff should contact on-call nominated personnel for advice and support in dealing with immediate needs regarding the complaint. If the complaint could be assessed as a 'high risk', on-call personnel will notify the relevant Executive Team member / CEO.

8.1.6 During the initial and follow-up assessment of the complaint, the Manager or Complaints Officer (depending on how the complaint was received) will:

- a) Seek further information from the complainant and/or relevant staff, if required.
- b) Consult with the relevant Executive Team member, or CEO to determine the 'Appropriate Person' to manage the complaint (normally that would be a Manager/ Supervisor of a staff member who is the subject to complaint). This may include the allocation of complaint to another nominated person within Irabina to manage, if the Manager who received the complaint:
  - is the subject of the complaint;
  - believes there could be a conflict of interest, if they manage the complaint;
  - is not confident they could manage the complaint in accordance with the principles and requirements outlined in this policy.
- c) Escalate a complaint and request an additional investigation related to a staff member conduct where initial assessment will demonstrate a potential for serious misconduct or significant performance issues.

*NOTE: If the complaint concerns child safety, the Irabina Complaints Officer will manage the complaint in the following manner:*

- i. Discuss the support requirements for a client/ parents (or other stakeholders such as carers) making a complaint, including access to a support person, advocate or legal advice.*
- ii. Ensure statutory obligations and/or mandatory reporting requirements are met, including internal incident reporting, reporting to Victoria Police, and the Commission for Children and Young People if related to allegations of child abuse at Irabina.*

8.1.7 The Irabina staff member managing the complaint will contact the complainant (using the complainant's preferred mode of communication – verbal and/or written) and the respondent, within 1 day of being appointed, to:

- a) Acknowledge that the complaint has been received.
- b) Provide the complainant and respondent with their contact details.
- c) Outline the process for managing the complaint, including: timelines, what the complainant and respondent can expect, and options if they are unhappy with the resolution proposed.
- d) Contact Manager People & Culture for advice on investigation process and any disciplinary process for staff member, if the complaint concerns a staff member.

8.1.8 The Irabina staff member managing the complaint will try to resolve the complaint to the satisfaction of all parties within 30 days, with the following possible outcomes:

- Complaint is resolved - no further action will be taken,
- Complaint is resolved - action taken.
- Complainant (or Respondent) is not satisfied with proposed resolution.

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8.1.9 Where a complainant or respondent (if complaint concerns a staff member) is not satisfied with the proposed resolution / outcome (or any aspect of the complaints management process):

- i. The complainant or respondent can request a review from a nominated person from within Irabina.
- ii. The complainant should be referred to the appropriate oversight body, such as: the Victorian Ombudsman, the Victorian Health Complaints Commissioner, the Federal Privacy Commissioner, the Disability Services Commissioner, the Mental Health Complaints Commissioner.
- iii. The respondent can seek advice from other professional body, legal practitioner or escalate their concerns to Irabina CEO or Irabina Board.

8.1.10 In a situation where the complaint cannot be investigated and resolved within the specified 30 days, the Irabina staff member managing the complaint will formally notify the complainant, and any respondents, about the reason for the delay and inform them of the expected timelines.

8.1.11 Irabina will formally respond to the complainant and respondent, by communicating the findings of the examination of their complaint and proposed resolution, verbally and in writing. If the complainant indicates that they are not satisfied with the proposed resolution, the person responsible for managing the complaint must record this decision in complaints register.

8.1.12 If the complaint concerns child abuse at Irabina, the allegation, investigation and outcomes must be reported to the Commission for Children and Young People by the CEO.

8.1.13 Further details of complaints management process are reflected in the Complaint Management Flowchart (refer to Attachment 1 of this Policy).

*NOTE: Information related to the handling, investigation and outcomes of complaints must be stored in complaints register/system only, and should not be recorded in client files, case notes, communication books, or handover documents. Confidential information relating to Irabina staff will be retained and stored by the Manager People & Culture.*

### 8.2 Complaint and feedback reviews to inform continuous improvement

8.2.1 A report of feedback/complaints data will be prepared every quarter. Irabina Executive Team will consider the quarterly Complaints and Feedback Report, submitted by the Complaints Officer, and approve implementation of associated recommendations for improvement, where appropriate. At least once a year, Irabina Board will review the complaints data and the outcomes of quality improvement projects, systems changes, and staff training in response to complaints received, for clinical governance implications. (Report may also be copied to the Finance, Risk & Audit Committee).

8.2.2 Where feedback provided to staff and/or managers has the potential to inform staff recognition, practice change, or continuous improvement, and staff have permission to share the information, they should record the feedback in a feedback register.

8.2.3 Complaints can be received through a series of reporting methods. The Feedback, Suggestions and Complaints Form is available to families via our website and clearly displayed at all sites. This form includes the contact details for a range of bodies families can complain to, at any point in the complaints process such as:

#### *Disability Services Commissioner*

The Disability Services Commissioner works with people with a disability, and disability services to resolve complaints.

Telephone: 1800 677 342 (free call), TTY service for people with hearing or speech difficulties: 1300 726 563

[Disability Services Commissioner website](http://www.odsc.vic.gov.au/) <<http://www.odsc.vic.gov.au/>> (external link, opens in a new window)

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### *Health Complaints Commissioner*

The Health Complaints Commissioner receives and resolves complaints about healthcare and the handling of health information in Victoria.

Telephone: 1300 582 113, [Health Complaints Commissioner website](https://www.hcc.vic.gov.au/) <https://www.hcc.vic.gov.au/> (external link, opens in a new window)

### *Mental Health Complaints Commissioner*

The Mental Health Complaints Commissioner can assist you if your complaint is about a public mental health service in Victoria.

Telephone: 1800 246 054, [Mental Health Complaints Commissioner website](http://www.mhcc.vic.gov.au/) <http://www.mhcc.vic.gov.au/> (external link, opens in a new window)

### *Victorian Ombudsman*

The Ombudsman has the power to investigate complaints about State and local government authorities. The Ombudsman investigates complaints made about decisions, actions or inaction by these bodies.

Telephone: 9613 6222, Regional: 1800 806 314, [Ombudsman Victoria website](https://www.ombudsman.vic.gov.au/) <https://www.ombudsman.vic.gov.au/> (external link, opens in a new window)

### *Office of the Commissioner for Privacy and Data Protection*

The Privacy and Data Protection Commissioner will investigate complaints about a Victorian Government agency or local council's failure to comply with one or more of the Information Privacy Principles.

Telephone: 1300 666 444, [Office of the Commissioner for Privacy and Data Protection](https://www.cpdp.vic.gov.au/) <https://www.cpdp.vic.gov.au/> (external link, opens in a new window)

### *For further information*

The Department of Health and Human Services, Complaints Unit provides support and assistance in the management and development of complaints policies, guidelines and processes.

The Complaints Unit provides a complaints line for departmental staff, consumers and members of the public to register their feedback and complaints.

Complaints line: 1300 884 706, Email: [complaints.reception@dhhs.vic.gov.au](mailto:complaints.reception@dhhs.vic.gov.au)

Complaints Unit

GPO Box 4057

Melbourne VIC 3001

## 9. Related Documents

Consumer Charter

Continuous Improvement Policy

Records Management Procedure

## 10. Attachments

Attachment 1: Complaints Management Flowchart

