



**Australian  
Lions Hearing Dogs**

**FEEDBACK AND  
COMPLAINTS HANDLING  
POLICY & PROCEDURES**



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## Glossary of terms

Term	Definition
<b>Complaint</b>	A complaint is an expression of dissatisfaction made to or about ALHD, services and staff.
<b>Complainant</b>	An individual and/or company making a complaint
<b>Complaint management system</b>	The policies, procedures, staff and software utilised to manage complaints
<b>Feedback</b>	Comments, suggestions, matters for concern made to ALHD either directly or indirectly or implicitly or explicitly.
<b>Investigation</b>	An investigation is where ALHD investigates the complaint (s) made by the complainant. The complaint is assessed and evaluated against relevant legislation and/or organisation policies and procedures and should identify findings being made.
<b>Internal Review</b>	An internal review is a systematic way of reviewing a complaint management processes. The grounds need to be tested and evaluated against relevant legislation and/or organisation policies and procedures and should identify findings being made.
<b>External Review</b>	An external review is conducted by external parties.
<b>Policy</b>	A statement of intent that sets out how an organisation should fulfil their vision, mission and goals
<b>Procedure</b>	A statement or instruction that sets out how a policy will be implemented and by whom



## Policy Purpose

This policy is to ensure that complaints are handled transparently, efficiently and effectively.

**Objectives:** The complaint management system aims to achieve the following:

- Ensures that every participant has knowledge about making and resolving complaints and can easily access complaints management and resolution processes
- Ensures a fair, accountable, transparent and responsive management of complaints
- Ensures issues raised by people are handled promptly in a timely and efficient manner
- Ensures people with disability, their families, carers, advocates and workers have the right to make a complaint, and raise issues without fear of any adverse consequences
- ALHD welcome, acknowledge and respect complaints, suggestions or any other feedback, regardless of how this is provided.
- Identifies key areas for continuous improvement and enables ALHD to deliver quality improvement in products, services and staff
- ALHD aim is to manage feedback and complaints using contemporary best practice methods.
- We ensure reasonable steps are taken to advise the complainant that they can raise the complaint with the Commission, and provide support if appropriate;
- We ensure our complaints process is publicly accessible, including how complaints can be made to us and the Commission
- We will protect the identity of people making complaints where this is practical and appropriate.
- Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, and any relevant confidentiality obligations.

## Scope

This policy applies to all staff handling complaints and people who have dealings with ALHD.

## Policy Statement

ALHD is committed to providing effective complaints management by delivering a transparent, effective and efficient feedback and complaint handling management system. ALHD recognises that having an effective feedback and complaint handling management system provides the opportunity to deliver a higher level of services to its participants.

Our complaints management system is based on the principles of procedural fairness and natural justice and complies with the requirements under the [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#). These Rules require that all ALHD implements and maintain a Complaint management and resolution system, which is accessible, fair and responsive.

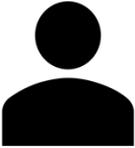
Complaints (and compliments!) are welcome as we use all feedback as a mechanism to support continuous improvement in our business.

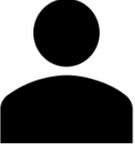


While we encourage complaints in the first instance to us, individuals wishing to raise a complaint about our service directly with the NDIS Commission may do so if they so wish.

Where appropriate, ALHD can refer complaints to the NDIS Commissioner or other body and notify other bodies under relevant Commonwealth, State or Territory laws.

### Roles and Responsibilities

CEO	Responsibility	Delivery
	<p>Establishing a culture that promotes the value of complaints which ensures an effective resolution</p>	<p>Openly reports on ALHD's complaint handling</p> <p>Reviews and identifies issues and encourages staff to make recommendations to implement ongoing continuous improvement</p> <p>Ensures the complaints process is effectively administered</p> <p>Supports and ensures staff are trained in complaint management process</p>

Manager responsible for complaint handling	Responsibility	Delivery
	<p>Manage and maintains the complaints management system</p>	<p>Frequently reports to Head of Organisation on issues raised from complaint handling.</p> <p>Analyses complaint data and recommends with Head of organisation to implement quality improvement processes.</p> <p>Supports and encourages staff to recognise way to improve the complaints management system</p> <p>Provides adequate training to staff to ensure complaints are handled in a timely manner.</p> <p>Acknowledges and rewards staff who handle complaints with efficiency and effectively.</p>

Staff whose duties include complaint handling	Responsibility	Delivery
	<p>Ensures all complaints are handled in accordance with ALHD's complaint handling practices</p>	<p>Comply with the feedback and complaints policy and procedures</p> <p>Provide feedback to senior management on issues arising from complaints</p> <p>Treats all people including complainants respectfully and fairly.</p> <p>Aids complainants where required</p> <p>Applies best practice in complaint handling</p>

All staff	Responsibility	Delivery
	<p>Demonstrates compliance with ALHD's complaint handling policy</p> <p>Attend training on complaints management</p>	<p>Provide feedback to senior management on issues arising from complaints</p> <p>Treats all people including complainants respectfully and fairly.</p> <p>Be abreast of ALHD's complaint handling policy and procedures</p> <p>Implement quality improvement changes as directed by senior management from evaluation of complaints and data analysis.</p>



## Procedure Purpose

This procedure has been developed to provide guidance to all staff in complaint management and resolution handling to ensure all complaints are managed consistently, fairly, efficiently and within agreed timeframes.

This procedure should be read in conjunction with the [Feedback and Complaints handling policy](#) and with the [NDIS Complaints management and Resolution Rules 2018](#).

## Complaint pathways

A complaint can be received via several different pathways, including:

	Telephone
	Email
	Fax
	in person
	Letter
	Website

## Staff training

We commit to the following:

- Appropriate time spent to train staff on an ongoing basis to ensure understanding of the [NDIS Complaints management and Resolution Rules 2018](#).
- Allocate sufficient time and resources to handle complaints. This extends to recognising a complaint.
- Undertake training, where appropriate. Records of any complaints management training will be retained on HR records.
- Ensures clear delegations and responsibilities in relation to complaints processes.



### **How we provide an easy and accessible Complaints pathway**

ALHD has a Feedback and Complaints form that can be completed by a complainant. NDIS participants will be advised about the Feedback and Complaints process during development and review of their Service Agreement and Support Plans and reminded by staff about the process on an ongoing basis. ALHD also has an Easy English Complaints Guide, which will be made available to participants upon entry into the service. ALHD also will advise participants about the complaints process as part of the Delivery Manual.

Any person can make a complaint (including an anonymous complaint) about the services provided. ALHD also advise participants at commencement of service that they can complain in the first instance to the NDIS Commission using 1800 035 544 if they have a complaint. In all cases, participants are provided information about avenues external to the provider and their right to access advocates during the complaints process.

Appropriate support and assistance in contacting the Commissioner in relation to a complaint will be provided to any person who makes a complaint and each person with disability affected by an issue raised in a complaint.

Complaints made anonymously will be accepted and managed as much as is practical in the same way as all other complaints. These complaints will also be entered into our complaints system and reviewed to inform continual improvement.

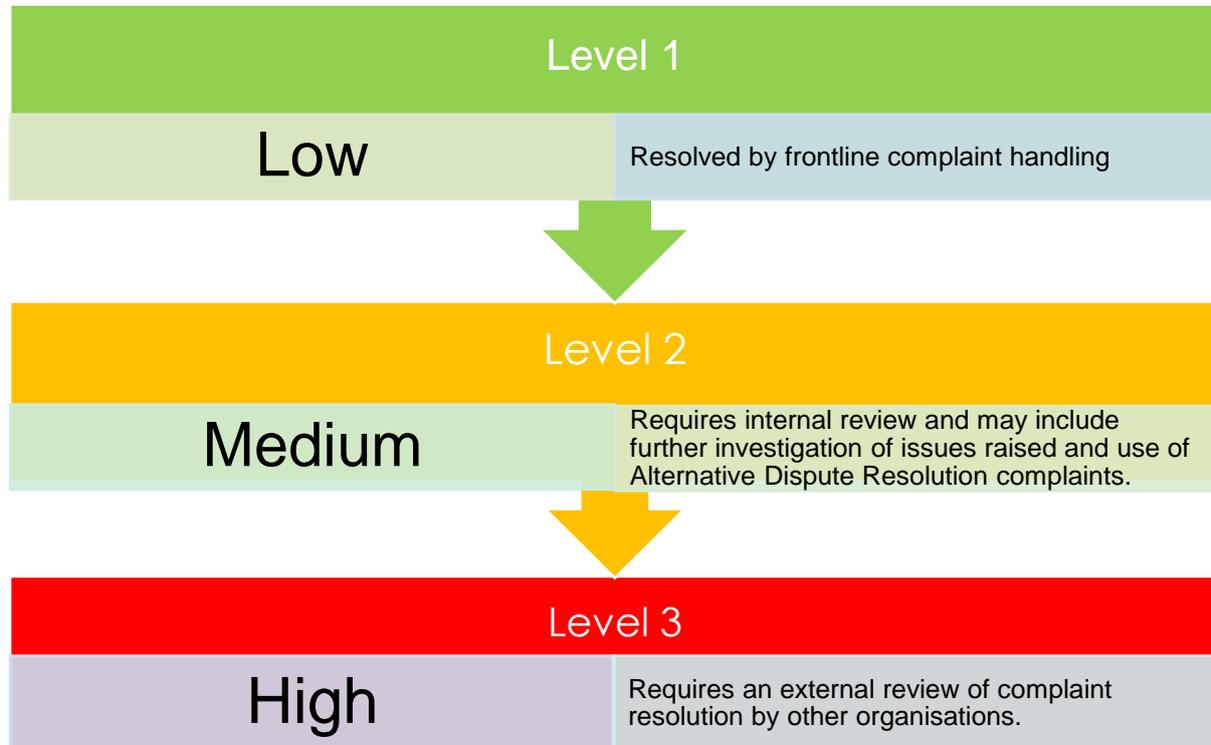
Our Feedback and Complaints policy is publicly accessible via our website.

Further, information on how to contact the NDIS Commissioner in the first instance and help and support to do so will also be offered to any person with a disability who is affected by an issue that has been raised in a complaint.

ALHD ensures that any person wishing to make a complaint either directly to ALHD or to the NDIS Commissioner, will not be disadvantaged or suffer any consequences by doing so.

## Defining the complaint stages

There are three levels of complaints:



## Process for complaints handling



## Receipt of complaints

A complaint and its supporting documentation will be logged and recorded on the Feedback and complaints register and will be given a unique identifier file number.

The Feedback and complaints register will document the following:

- The name and contact details of the complainant
- The issues / matters raised by the complainant
- The outcome(s) and/or resolution the complainant wishes to achieve
- The level of the complaint (Low, Medium or High)
- The relevant person (s) in which the complaint has been forwarded to



## Acknowledgement of Complaint

A complaint must be acknowledged and receipted within (*insert the specified timeframe. i.e. 3 business days*)



## Initial assessment and addressing complaints

### Initial assessment

After the staff member has acknowledged receipt of complaint, the complaint should be assessed for the following

- whether the issue raised is within ALHD's control
- whether the complaint needs to be raised with the commission
- consider the outcome sought by the complainant
- identify if there are any other issues that may need to be recorded
- whether the complainant has been offered appropriate support, assistance or independent advocacy

### Assess the level of complaint

When assessing of the level of complaint, the following should be taken into consideration:

- the urgency and complexity of the complaint
- whether the complaint involves other people's health and safety
- whether the resolution requires external involvement
- The possible delays in resolving the complaint and the risk involved

To ensure ALHD's transparency the complainant will be kept informed at all stages of the complaint process and will be informed if there will be any possible delays.



## Decisions and resolution

After the assessment and investigation of the issue(s) raised with the complaint, **Office Manager** will contact the complainant and advise the following:

- the outcome of the complaint and actions taken
- the reasons for decision
- any improvements made and resolution (s)



If there are adverse findings about an individual, ALHD will review applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing findings with the person making the complaint.



## Closing the complaint, record keeping

ALHD will keep records of the following:

- How the complaint was handled and managed
- The resolution (s) of the complaints
- Actions which need to be followed up
- Quality improvements identified and implemented as a result of feedback or complaint
- Records will be maintained for seven years from the date the record was created.
- A key driver of satisfaction is timeliness. As such, complaints shall be resolved within 21 days of receiving the complaint.
- If this is not achievable, a justification i.e. no response from complainant, shall be documented on the Feedback and Complaints Register.

## Reporting, monitoring and Continuous improvement

### Reporting:

ALHD remains committed to continually improving its service delivery. Feedback is analysed by the data recorded on the feedback and complaints register.

Reports are run based on the following:

- The amount of complaints received
- The outcome of complaints
- Issues identified from complaints
- Systemic issues identified
- Timeliness of complaints resolution
- The number of requests received for internal or external review of ALHD's complaint handling

ALHD commits to accurately record statistical data and report information relating to complaints to the Commissioner upon request of the Commissioner.

### Monitoring

ALHD will continually monitor its feedback and complaints handling register to identify insufficiencies and ineffectiveness of the delivery of service by ALHD and staff. It is also monitored to identify any systemic issues in responding to and resolving complaints.



## Continuous improvement

ALHD will undertake an annual survey of its complainants to understand client satisfaction with the Feedback and complaints management process. The results of the survey will be published in the Annual report.

Results of monitoring and continuous improvement processes will be fed into the Continuous Improvement Register.

## Related documents/resources

### *Applicable NDIS Practice Standards Policies and Procedures*

- **Feedback and Complaints**
- Quality management
- Risk Management
- Incident Management
- Easy English – Feedback and Complaints
- Easy English – Advocacy
- Easy English – Quality Improvement

### *Applicable ALHD Policies and Procedures*

- Delivery Manual

### *Applicable Forms/Registers*

- Continuous Improvement Register
- Feedback & Complaint Form
- Feedback & Complaints Register
- Risk Identification Form
- Risk Treatment Plan
- Individual Risk Assessment Form
- Participant incident report form
- Incident Register
- Risk Register

### *Applicable Legislation and NDIS requirements*

- [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#)
- National Disability Insurance Scheme (Quality Indicators) Guidelines 2018
- Privacy and Personal Information Protection Act 1998
- <https://www.oaic.gov.au/privacy-law/privacy-act/>
- [NDIS Code of Conduct](#)



## Document Control

### Document Details

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