

Policy Name:	Feedback and Complaints Policy	Policy Number:	EL0-010
Date Approved:	21 st February, 2018	Approved By:	Management Committee
Date Issued:	22 nd February, 2018	Review Date:	21 st February, 2021

1. Aim

Early Links encourages a culture of continuous improvement and sees feedback and complaints as important opportunities to improve practices, find solutions and make improvements.

Parents/carers and other external stakeholders are encouraged to provide positive feedback or negative feedback if dissatisfied or where they see opportunities for Early Links to improve.

This policy provides a framework for people to provide feedback and for Early Links staff members to work within to resolve complaints promptly and effectively.

2. Scope

This policy applies to all staff, clients and their families, carers or friends, visitors and all other community members who wish to provide feedback or make a complaint related to any aspect of Early Links activities.

3. Policy

3.1 Principles

Early Links will:

- Take all complaints seriously
- Provide a user friendly process which is applied positively, consistently and fairly
- Ensure that clients, their families, friends or carers and other stakeholders are aware of the Feedback and Complaints process and are encouraged to provide feedback or make complaints
- Provide people with opportunities to tell their story
- Provide people with appropriate support and assistance to work their way through this process
- Not make fun of or treat people unfairly/negatively for providing feedback or making a complaint¹
- Attempt to understand stakeholders' expectations regarding this process
- Address feedback and complaints as quickly as possible while ensuring the process is thorough
- Assess complaints for their seriousness and ensure that the appropriate level of management is delegated to address and resolve complaints appropriately

¹ S.47 of the Community Services (Complaints, Reviews and Monitoring) Act 1993 makes retribution a criminal act

- Resolve issues in a prompt, impartial and just manner
- Communicate with all stakeholders through and at the completion of the process. Where a formal complaint has been raised then the final notification will be in writing, including reasons for the decisions
- Protect individual's privacy and keep information confidential
- Not make assumptions or conclusions until all information has been carefully collected and considered
- Train staff how to effectively manage complaints
- Document the process of receiving, investigating and resolving complaints and periodically review the system to assess its effectiveness
- Log all feedback and complaints received on the ADHC Feedback and Complaints Management Log (FCML). The FCML can be accessed by the Service Manager.
- Acknowledge and celebrate positive feedback

3.2 Providing Feedback

Feedback may be provided where someone can see a way to improve processes or systems or to acknowledge and celebrate something being done well.

A Feedback Form should be filled in where possible when feedback is provided by parents/carers, young people receiving a service or external stakeholders. Where positive feedback is received the Service Manager is responsible for acknowledging the feedback and appropriately recognising the staff involved.

If the feedback is about the Service Manager, the Feedback Form can be referred directly to the President of the Early Links Management Committee.

Feedback which is recorded on a Feedback Form will be logged on both the Early Links Feedback and Complaints Register and the ADHC Feedback and Complaints Management Log by the Service Manager.

3.3 Making a Complaint

Complaints can be made if someone;

- is unhappy about how Early Links services and activities are provided (or not provided)
- is dissatisfied with the behaviour of Early Links staff members
- believes that Early Links services, activities, policies and procedures are inconsistent with its stated philosophy, vision, values and code of conduct or are illegal, unfair, unreasonable, unjust or discriminatory

Early Links uses a three tiered approach to complaints resolution:

3.3.1 Tier 1 – Service Level Complaints Resolution - Ideally, all complaints should be dealt with at this level, unless the issue is of a “serious” nature (see definition of serious complaint). At this level, staff are empowered to resolve complaints wherever possible at first contact from the person making the complaint. The aim is to resolve most complaints at this level as to avoid ongoing, unaddressed dissatisfaction.

3.3.2 Tier 2 – Management Level Complaints Resolution – if the complaint could not be

resolved at tier 1, for staff complaints and for “serious complaints”. These complaints are forwarded directly to the Service Manager for investigation and resolution.

3.3.3 Tier 3 – External Complaints Resolution – if the complaint could not be resolved at either tier 1 or 2 or where the person making the complaint is not satisfied with the process followed for managing the complaint.

A Feedback Form should be filled in where possible when a complaint is made. If the issue is resolved at the local level, the form should be completed and filed on the confidential Feedback and Complaints Register kept in the Service Manager’s locked filing cabinet.

If necessary, staff members will offer assistance to the person providing feedback or making the complaint to document and clarify the issue (refer to section 3.6).

However, if

- the person wants to raise a formal complaint,
- the feedback or complaint is about the staff member themselves,
- the issue is not appropriate to be addressed at the service level or
- the issue is categorised as a ‘serious complaint’ (See definitions)

then the Feedback Form needs to be promptly referred to the Service Manager for investigation and resolution.

If the person wishing to make a complaint does not feel comfortable raising the concern with local staff, where the issue is about management or the person feels their issue has been ignored by local staff members, then they may:

- Provide feedback or make a complaint to the Service Manager by mail, email, over the telephone or in person
- Complete a Feedback Form from the Early Links website (to be uploaded).

Where a complaint has been received by someone other than the staff responsible for that activity or service, the Feedback Form shall be promptly forwarded to the Service Manager.

If the complaint is about the Service Manager, the person making the complaint may raise the issue directly with the Service Manager. If they are unable to do this, or the matter is unresolved, they can take their concern directly to the President of the Early Links Management Committee.

3.4 Managing Complaints

All complaints will be managed in line with the Complaint Resolution Guidelines and Procedures and this policy. Privacy and Confidentiality in relation to the complaint will be maintained during the complaints resolution process.

Where the issue of concern is covered by legislative or funding body requirements then those requirements take precedence over Early Links procedures.

3.4.1 Serious Complaints

The Service Manager will decide on the appropriate person/s to investigate the complaint, establish an investigation plan and timeframe for completion and agree on communications protocols.

The investigator(s) will complete a Complaint Resolution Form including a summary of the investigation and their findings. The Complaint Resolution Form ensures we contact any external legislative bodies, capture the action plan for resolution, reflect on what we have learned from the complaint and ensure we respond to the complaint in a timely manner and send written confirmation to the person making the complaint during the process.

The Service Manager may consult with relevant parties including but not limited to the person making the complaint, investigator(s), relevant staff, supervisors, funding body and the President of the Management Committee prior to determining the outcome, action plans and communications processes.

The Complaint Resolution Form detailing the investigation outcomes, the decisions and action plans shall be completed by the Service Manager in a timely manner within 7-14 days of the complaint being made.

Action plans and outcomes shall be implemented and monitored by the Service Manager as appropriate.

3.4.2 Complaints (not defined as serious)

The Service Manager or delegate will develop an action plan to

- address the issue with the stakeholder
- investigate the issue
- develop and implement action plans
- review staff development needs and
- communicate the outcomes with the stakeholder

A Feedback Form should still be completed (either by the person making the complaint, or the supervisor) and a Complaint Resolution Form completed and submitted to the Service Manager within 7 days. The Service Manager may call upon internal and external resources (within their delegations) to fully investigate and resolve the issue.

3.5 Communication with the Stakeholder / Person making the complaint

The Service Manager will ensure that the person making the complaint is provided with information regarding the progress and, where appropriate, the outcome(s) of the feedback / complaint. Where a formal complaint has been raised then the final notification will be in writing, including reasons for the decisions and details of the appeal process.

3.6 Appeals

If the person making the complaint feels that the policy has not been followed and/or that the outcome was unfair, they can ask that their appeal is reviewed by more senior management or the Early Links Management Committee.

If the person making the complaint feels their issue has not been properly dealt with by the organisation, they may wish to take it to an external agency to see if they can help; for example, the relevant State Commissioner for EEO, the NSW Anti-Discrimination Board, the NSW Ombudsman, the Commonwealth Human Rights and Equal Opportunity Commission (HREOC). The person making the complaint can do this at any time of the investigation procedure.

3.7 Advocacy/legal advice/independent support

Early Links welcomes the inclusion of support for families which is external to the organisation, to assist families in their interactions with Early Links. Assistance may be provided by a friend, family member, staff member, translator, community visitor, advocate or anyone else who is acceptable to the family / person. Where necessary, Early Links will offer assistance to a family by making a referral to an advocacy service with the consent of the family.

Disability Advocacy NSW supports people with a disability in the Hunter, New England and Mid North Coast regions of NSW. <http://da.org.au/>

3.8 Promotion of the Early Links Feedback and Complaints Policy and procedures

Early Links will provide information about the Early Links Feedback and Complaints Policy and procedures to families using the following methods:

- in the Parent/Carer handbook (in development)
- in the Early Links Agreement of Service (NDIA funded families)
- on the Early Links website (in development)
- on promotional brochures about services

Early Links will include questions in any parent/carer satisfaction surveys to seek feedback about the confidence of families to use the complaints process if required, and any experience with doing so. This feedback will be used as a key performance indicator for Early Links.

4 References

Disability Service Standards

Standard 1 – Rights	
Practice Requirement 1	Each person is aware of their rights and can expect to have them respected
Practice Requirement 2	Service providers are to uphold and promote the legal and human rights of each person
Standard 4 – Feedback and Complaints	
Practice Requirement 1	Each person is treated fairly by the service provider when making a complaint.
Practice Requirement 2	Each person is provided with information and support to make a complaint
Practice Requirement 3	Each service provider has the capacity and capability to handle and manage complaints
Standard 6 - Service Management	
Practice Requirement 1	Each person receives quality services which are effectively and efficiently governed
Practice Requirement 2	Each person receives quality services that are well managed and delivered by skilled staff with the right values, attitudes, goals and

	experience
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NQS

QA6	6.1.2	Families have opportunities to be involved in the service and contribute to service decisions.
	6.2.1	The expertise of families is recognised and they share in decision making about their child's learning and wellbeing.

QA7	7.1.1	Appropriate governance arrangements are in place to manage the service.
	7.3.1	Records and information are stored appropriately to ensure confidentiality, are available from the service and are maintained in accordance with legislative requirements.
	7.3.2	Administrative systems are established and maintained to ensure the effective operation of the service.
	7.3.3	The Regulatory Authority is notified of any relevant changes to the operation of the service, of serious incidents and any complaints which allege a breach of legislation
	7.3.4	Processes are in place to ensure that all grievances and complaints are addressed, investigated fairly and documented in a timely manner.

National Regulations

Reg	168	Education and care services must have policies and procedures
	177	Prescribed enrolment and other documents to be kept by approved provider
	181	Confidentiality of records kept by approved provider
	181-184	Confidentiality and storage of records

NSW Disability Service Standard 4

Community Services (Complaints, Reviews and Monitoring) Act 1993 Section 47

Privacy Act 1988

Australian Privacy Principles - Privacy Amendment (Enhancing Privacy Protection) Act 2012

5 Persons Responsible

All staff members are responsible for

- observing confidentiality standards of Early Links and implementing this policy
- encouraging clients, service users, visitors, carers, families and other stakeholders to provide feedback or register complaints
- recording and addressing feedback or complaints directed to them
- working with staff, clients, visitors and families to resolve workplace issues where appropriate, or otherwise referring the matter to the Service Manager
- acknowledging positive feedback and recognising the persons involved
- providing clients, service users and their carers and family members with information about how to provide feedback or make a complaint
- reporting complaints and feedback to the Service Manager
- promptly reporting serious or formal complaints to the Service Manager

Service Manager is responsible for:

- ensuring feedback and complaints are investigated in a professional and timely manner

- working with staff, supervisors and person making the complaints to identify issues and solutions
- identifying and implementing appropriate action plans, aiming for continuous process improvement and operational excellence
- providing timely reports on investigation outcomes
- ensuring investigation outcomes are communicated in a timely manner to the person making the complaint(s)
- and approval of action plans and their implementation
- nurturing an organisational culture of continuous improvement
- logging all auditing services feedback and complaints logs for trends and areas for improvements
- ensuring staff members are appropriately trained and supported to implement this policy.
- oversight complaints received on the ADHC Feedback and Complaints Management Log (FCML).
- making notifications according to legal requirements
- oversight and review of the effectiveness of the Feedback and Complaints management process.
- reporting to the Management Committee at monthly committee meetings regarding any complaints received

Management Committee is responsible for:

- Approval of this policy
- Making decisions on complaints referred to the Management Committee
- Ensuring that the Service Manager undertakes the responsibilities outlined in this policy

6 Definitions

Early Links – all Early Links Incorporated services and programs

Management Committee – the governing body of Early Links, comprised of elected or appointed members who jointly oversee the activities and legal responsibilities of the organisation

Staff – refers to employees and volunteers of the organisation

Client – any person for which Early Links provides a service

Family – refers to the parents/caregivers of the children or young people that are clients of the organisation

Visitor – any person who is visiting an Early Links service who is not a staff member, client or family

Complaint – an expression of dissatisfaction when anyone is concerned or unhappy about the nature and quality of their interaction with Early Links, its staff, services, products or activities.

Feedback Form – standard form utilised for recording negative feedback, a complaint, or positive feedback and which is stored for future reference.

Contractor/ Contract Labour: any person entering Early Links premises in pursuance of a contract made between Early Links and the contractor, and includes the contractor's employees, agents, sub-contractors and any person subject to the contractor's control or instruction. For example builder, cleaner etc

Feedback – information provided by a stakeholder to Early Links regarding a service, process or activity where the stakeholder does not necessarily expect a formal response or direct action as a result. Feedback may be provided where someone can see a way to improve processes or systems, or to acknowledge and celebrate something being done well

Investigator – a person who examines a complaint and reports on the findings

Serious Complaint – a complaint

- where a client, service user or staff member is alleged to be at risk of harm
- where mandatory reporting or other legal reporting may be required
- where three or more similar complaints about a service or staff member have been raised within six months or less
- where a person making the complaint threatens to take the issue to the media

- alleging fraud, corruption, discriminatory or illegal behaviour
- which, if proven, amounts to serious misconduct under the Code of Conduct
- where a staff member or the Service Manager is accused of misconduct

Stakeholder – the people who receive a service, their families, carers and friends, donors, supporters, funding bodies, suppliers, or those have contact with or an interest in Early Links and its services, activities and outcomes. In the context of this policy, a stakeholder may be someone who has made a complaint or provided feedback to Early Links.

This policy needs to be read in conjunction with the following Early Links policies and procedures:

Compliance Policy	ELG-026
Performance Management & Review Policy	ELO-090
Complaint Resolution Guidelines	ELO-010B
Complaint Resolution Procedures	ELO-010A
Complaint Flowchart	ELO-010C
Child Protection Policy	ELO-002
Providing Client Advocacy & Support Policy	ELO-045
Client Feedback Policy	ELO-091
Conflict of Interest Ethics Policy staff	ELP-036