

## 2.5 Complaints and Feedback Management

### 1.0 Purpose

This policy is intended to ensure that complaints are handled fairly, efficiently, and effectively. Our complaint management system is intended to:

- Respond to issues raised by individuals making complaints in a timely and cost-effective manner.
- Boost participant confidence in our administrative process.
- Provide information to deliver quality improvements in our services, supports, roles and complaint-handling processes.
- Ensure the safety and wellbeing of all participants, including children, by addressing complaints in a manner that considers their specific needs.

### 2.0 Scope

This policy guides our staff and participants who wish to make a complaint on the fundamental principles and concepts of our complaint management system. It applies to all participants, including children, their families and other stakeholders.

### 3.0 Policy

Gem Complete Health Services (GCHS) will create an environment where all forms of feedback (including compliments, suggestions, complaints, and concerns) are welcomed and viewed as an opportunity for acknowledgement and continuous improvement. This process ensures that individuals have the right to make complaints and are encouraged to exercise their rights without the fear of judgement. This will create a resolution-focused culture that respects an individual's right to privacy and confidentiality.

All staff, participants, family, advocates, visiting health professionals and visitors are informed of our complaints process via:

- Participant Intake Information
- Initial access to Support
- Staff Orientation, induction, and training
- Meetings, reviews, and assessments
- Participant agreements (service agreements and accommodation agreements)
- Contractor agreements

#### 3.1 Child-Specific Provisions

- Children and their parents or guardians are specifically encouraged to provide feedback or make complaints. The organisation will ensure that the complaint process is accessible, age-appropriate and supportive for children.
- Complaints involving or made by children will be handled with additional care, ensuring their safety, privacy and wellbeing are prioritised.

Participants, their families or advocates and any other stakeholder may submit the Feedback Form regarding all aspects of Gem Complete Health Service's support, services, staff, or contractors.

It is our responsibility to follow the principles of procedural fairness and natural justice and to comply with the standards as stipulated under the *National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018*.

Gem Complete Health Services maintains that complaints and feedback can be managed effectively through:

- Implementing an open and transparent complaints-handling system.
- Observing the principles of natural justice and compliance with relevant mandatory reporting under Australian Law.
- Committing to the rights of stakeholders to complain either directly or through a representative.
- Undertaking procedural fairness to reach a fair and correct decision.
- Informing complainants, including children, of their rights and providing appropriate support such as advocacy or interpreters.
- Maintaining complete confidentiality and privacy.
- Abiding by the NDIS Code of Conduct.
- Training staff in our complaint process and the rights of all stakeholders, including children, to complain.
- Considering all complaints seriously and respectfully.
- Advising participants, including children and their parents and staff members of their right to complain.
- Providing support for people, including children, who may need assistance to make a complaint.
- Protecting complainants, especially children, against retribution and discrimination.
- Promptly investigating and resolving complaints, with a focus on child safety where relevant.
- Communicating and consulting with participants, family and advocates during the complaints process and providing feedback and resolutions.
- Providing opportunities for all parties, including children, to participate in the complaint resolution process.
- Accepting accountability for actions and decisions taken due to a complaint.
- Using complaints as a means of improving planning, delivery and review of services through our Continuous Improvement Processes.
- Referring complaints and feedback to Gem Complete Health Service's Feedback Management Register.
- Including all changes in Gem Complete Health Service's Continuous Improvement Register.

### **3.2 Complaints Related to Specialised Substitute Residential Care**

In providing services to children in specialised substitute residential care, we recognise the unique vulnerabilities and needs of these individuals. We are committed to handling any complaints regarding the care and support provided with sensitivity and urgency. All complaints will be addressed in accordance with our child safety policy and protection protocols, ensuring the voices of children and young people are heard and respected. Complaints may be submitted by the children themselves, their guardians, or advocates acting on their behalf. We will ensure that any issues raised are resolved promptly, with particular attention to the wellbeing and safety of the children involved, while maintaining compliance with all relevant child protection legislation and NDIS standards. Where necessary, external agencies or authorities may be involved to ensure the matter is handled appropriately.

## 4.0 Procedure

Term	Definition
Complaint	An expression of censure, discontent and dissatisfaction or a circumstance regarded as a cause for such expression

### 4.1 Complaint Process

Complaints and suggestions can be made by:

- Using the Feedback form through the organisation's Customer Relationship Management System (CRM)
- Contacting a member of staff, verbally or in writing. Our staff may complete the Feedback document on behalf of the participant if required and refer the matter to the Director's representative.
- Contacting the Director's representative verbally or in writing.
- Responding to feedback questionnaires and surveys which Gem Complete Health Services sends to our participants bi-annually.
- Sending an email to: [info@gemcompletehealth.com.au](mailto:info@gemcompletehealth.com.au).
- Attending stakeholder meetings/care conferences.
- Contacting external complaint agencies, e.g. NDIS Quality and Safeguards Commission.
- Communicating orally, in writing, or any other relevant means

#### Child-Specific Provisions

- For children, complaints can also be made through a simplified process, such as an easy-read form, a trusted adult, or using a child-friendly method.
- Complaints from children will be prioritised, and the child will be provided with an advocate or trusted adult to support them through the process.

Complaints may be made by:

- Staff
- Participants
- The public
- Advocates/Family members
- Carers
- Anonymous person/s
- Children of their parents/guardians

Results are recorded in a Feedback Register which allows for input into our continuous improvement processes. All additions to the organisation's feedback register are kept confidential as per our Privacy Policy. The Continuous Improvement register will be used to record changes that are established after the finalisation of the complaint management process.

## 4.2 Guide to Feedback Allocation

If a complaint is about:

- Support or services: Feedback will be dealt with by the director's representatives (e.g., General Manager)
- Staff Members/Volunteers/Contractors: Feedback will be dealt with by the Human Resources Coordinator and the staff's direct supervisor.
- The Director: An external person or body may be approached (e.g. NDIS Quality and Safeguards Commission).
- Children: Complaints involving children will be handled with additional care by an individual from the management team who is trained in child safe practices. If necessary, the child or their parents will be referred to an external child protection agency.

## 4.3 Complaint Management Process

The process and investigation must adhere to the principles of impartiality, privacy, confidentiality, transparency, and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. Gem Complete Health Services must consider any cultural and linguistic needs of a participant and provide the relevant support mechanism such as an interpreter or similar.

Step	Description
1. Acknowledge the complaint	<ul style="list-style-type: none"> <li>• Acknowledge all complaints quickly, within one (1) working day, where possible.</li> <li>• For complaints involving children, ensure that the acknowledgement is communicated in an age-appropriate manner.</li> </ul>
2. Review the complaint	<ul style="list-style-type: none"> <li>• Consult with the participant regarding their desired outcome</li> <li>• Inform the complainant, including children, of support regarding: <ul style="list-style-type: none"> <li>○ their right to an advocate and interpreter</li> <li>○ stages of decision-making</li> <li>○ mechanisms to protect privacy</li> <li>○ their right to complain to the NDIS Quality and Safeguards Commission</li> <li>○ progress and outcomes</li> </ul> </li> <li>• Determine the type of complaint (i.e. service, support, or process).</li> <li>• Notify the complainant of each stage of their complaint.</li> <li>• If a meeting is required, it will be held in a safe environment that has been determined by the complainant and at a time relevant to the participant. Where the complainant is a child or a recipient of disability services under the NDIS, their preferred contact for complaints will be checked, and they will be asked if they would like to nominate a trusted adult from our organisation to handle the complaint.</li> </ul>
3. Assess the complaint	<ul style="list-style-type: none"> <li>• Prioritise the complaint and determine a resolution pathway (where required).</li> <li>• Investigate the complaint, with special consideration for complaints involving children.</li> </ul>
4. Investigation and Decision Process	<ul style="list-style-type: none"> <li>• The assigned representative should determine if it is practicable to find an immediate resolution.</li> <li>• Keep the complainant, including children, informed about the status of the complaint.</li> <li>• Consult with the complainant to gather information about the underlying issue.</li> <li>• Analyse antecedents and underlying issues when determining a decision.</li> <li>• Written responses must be approved by the Director or responsible delegate before being sent out.</li> <li>• Respond to the complainant with a clear decision.</li> </ul>

5. After the Decision	<p>After investigation and a satisfactory response has been documented, the assigned representative will:</p> <ul style="list-style-type: none"> <li>• Inform the complainant/s of the decision, including the reason for the decision, and provide options for reviewing the decision.</li> <li>• Ensure that the complaint investigation is satisfactorily completed.</li> <li>• Determine if the complainant is satisfied with the outcome.</li> <li>• Follow up and consult with the complainant/s about any concerns.</li> <li>• Ascertain preventative actions and continuous improvement.</li> <li>• Consider if any systemic issues need addressing.</li> <li>• Record the information about the complaint in the Feedback Register.</li> <li>• Record the details of the improvement stemming from a complaint in the Continuous Improvement Register, if required.</li> </ul> <p>The complaint resolution will be monitored according to the audit schedule and feedback will be provided to the complainant.</p>
-----------------------	---

## 4.4 Documentation

All complaints will be recorded in a Feedback register. Information in the register will include:

- Complaint details
- Identified issues
- Actions undertaken to resolve the complaint
- Outcome of the complaint

All documents, including Feedback Forms, are to be uploaded into the organisation's CRM

Copies of any information provided to the complainant are stored in the file. A copy of all complaint documents is retained in the file for seven (7) years from the day of record. If the documents relate to a participant under the age of 18 years, the documents will be retained until the participant turns 25 years of age.

- Statistical and other information will be collected to:
  - Review the issues raised
  - Identify and address systemic issues
  - Report information to the Commissioner, if requested by the NDIS Quality and Safeguards Commissioner

A policy review will occur if there are legislative changes or when determined by a regular or annual review

## 4.5 Unresolved Complaints

Unresolved complaints will be referred to the Director or delegate responsible for investigation and resolution. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be escalated to an individual nominated by the complainant (with the complainant's permission).

When complaints cannot be resolved internally, the complaint may be referred to:

### NDIS Quality and Safeguards Commission

Phone: 1800 035 554 (free call from landlines) to TTY 133 677

National Relay Service and ask for 1800 035 544

Interpreters can be arranged

To complete an NDIS Complaint Contact Form online go to:  
<https://ndiscommission.gov.au/contact-us/makeacomplaint>



## 5.0 Related Documents

- Feedback Form
- Complaints and Feedback Standard Operating Procedure
- Complaint Register
- Continuous Improvement Register
- NDIS Complaint Contact Form
- NDIS Making a Complaint (Easy Read)
- Risk Management Policy and Procedure)

## 6.0 References

- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2020
- Privacy Act 1988
- Work Health and Safety Act 2011