



5.17 COMPLAINT MANAGEMENT

1. PURPOSE

This policy outlines Kurrajong's approach to receiving, managing and resolving complaints in a fair, accessible and timely manner. Complaints raised by workers about employment matters will be managed in accordance with [Policy 3.06 Staff Grievance](#).

2. POLICY AIMS

Kurrajong aims to:

- Maintain an accessible and responsive complaints system.
- Ensure complaints are managed fairly and in accordance with procedural fairness.
- Support people to raise complaints without fear of reprisal.
- Comply with NDIS Quality & Safeguards Commission's Practice Standard Feedback and Complaints Management.
- Use feedback to drive continuous improvement.

3. ROLES AND RESPONSIBILITIES

Board – Provides oversight of the complaints management system.

CEO – Accountable for the effectiveness of the system and compliance of the complaints management system.

Complaints Officer – Responsible for managing complaints, maintaining the register, and reporting.

Managers – Responsible for supporting local resolution and escalating complaints as required.

Workers – Must respond to complaints in accordance with this policy and associated procedures.

4. GUIDING PRINCIPLES

- Kurrajong is guided by the principles of the NDIS Complaints Rules and is committed to upholding the rights of people with disability, including dignity, choice, safety, participation, and access to advocacy.
- Kurrajong supports the rights of people with disability to:
 - Be treated with dignity and respect
 - Live free from abuse, neglect and exploitation
 - Exercise choice and control, including taking reasonable risks

- Participate in social and economic life
- Access advocacy and supports
- Have their privacy and confidentiality respected
- Be supported in decision-making, including involvement of families and carers where appropriate

Kurrajong maintains clear processes to receive, investigate and resolve complaints from clients, families and advocates, and to ensure they understand how to raise concerns and access support.

What is a complaint?

A complaint is an expression of dissatisfaction about a service, support, or how a previous complaint was handled, where a response or resolution is expected. Complaints may be made verbally, in writing, or through behaviour indicating dissatisfaction.

Kurrajong values complaints as an opportunity to improve services and strengthen relationships.

Complaints may be raised at any level of Kurrajong. All complaints must be taken seriously, with appropriate consideration given to the person making the complaint and any person with disability affected.

5. PROCEDURES

1. **Safe and quality services.** Kurrajong is responsible for ensuring safe and quality services. Complaints and feedback are used to monitor service quality and identify opportunities for improvement.
2. **NDIS Registration.** Kurrajong will maintain a complaints system that meets NDIS registration requirements.
3. **Person with disability.** Kurrajong will involve the person with disability in the complaint process to the extent possible. They will be kept informed of progress, decisions, reasons for decisions, and options for review.
4. **Safety in Raising Complaints.** Clients and families can make complaints without fear of retribution. Complaints will be handled confidentially where possible. Complaints may also be made anonymously through Kurrajong's independent reporting service, [Speak Up](#).
5. **Four As of successful resolution to be implemented.** Kurrajong aims to provide
 - Acknowledgement of Concerns
 - Clear Answers
 - Appropriate Action
 - An Apology where warranted.
6. **Decision makers.** Relevant decision-makers, including authorised representatives, advocates or guardians, will be involved where appropriate, in accordance with supported decision-making principles. More information about supported decision making is contained in Kurrajong's [Policy 6.17 Supported Decision Making and Guardianship](#).

7. **Complaints Management System.** A positive attitude and commitment to resolving complaints in a timely manner reduces the number of issues that could potentially be raised with the NDIS Commission unnecessarily. This includes:

Accessibility

- a) Having a clear documented process displayed in every service. **Form 126 Complaint or Incident Reporting Procedure** clearly demonstrates how clients and families can make a complaint to Kurrajong, and if needed, how to access external support to do this. Kurrajong also provides access to an independent and confidential reporting service, **Speak Up** (managed by Stopleveline), which allows clients, families, and workers to raise concerns anonymously or outside of usual reporting channels.
- b) Having posters and booklets outlining NDIS Practice Standards, including Complaint Management displayed or made accessible to clients in every service.
- c) Information about how to make a complaint will be provided in accessible formats and supports will be offered to assist people to make a complaint.

Training

- d) Clients and supported employees receive training through Rights and Responsibilities programs
- e) All staff complete mandatory complaint management training at induction.
- f) Staff acknowledge the Code of Conduct annually.

Feedback Mechanisms

- g) Enabling clients and families to make a complaint through multiple channels, including **Form 109 Complaint or Incident Reporting Form**, direct communication with staff or managers, or Kurrajong's independent and confidential reporting service, **Speak Up** (managed by Stopleveline).
- h) Seeking feedback from clients and families through a variety of strategies, including:
 - Confidential electronic and paper surveys offered to people at point of service that are read, analysed and followed up by the Quality & Safeguards Manager.
 - Documented exit interviews offered to every client and supported employee as they leave the organisation. These are read, analysed and followed up by the Quality & Safeguards Manager.
 - Ensuring clients and supported employees have opportunity to have their say at every client and employee meeting with a standing agenda item inviting feedback and complaints.
 - Coordinating Employee Satisfaction Focus Groups across all Commercial Enterprises annually, facilitated by independent volunteers and responses fed back to Managers and the Executive.

- i) Informing clients of external services that can help them to make a complaint such as Riverina Disability Advocacy Service (RDAS), NDIS Quality and Safeguards Commission, and for supported employees, the Complaint Resolution and Referral Service (CRRS).
- j) Inviting RDAS into our services annually, or whenever available, to educate clients about their right to make a complaint and making their brochures and phone numbers accessible in every service.
- k) Ensuring each complaint is acknowledged, assessed and resolved in a fair, efficient and timely manner (see clause 8 Procedural Fairness).
- l) Ensuring that appropriate action is taken in relation to issues raised in complaints.

Supports

- m) Providing appropriate support and assistance in contacting the NDIS Commission to any person making a complaint in relation to any affected client.
- n) Using risk assessment including risk to the safety, health and wellbeing of people with disability, will be key in determining appropriate and proportionate complaints processes.
- o) Ensure privacy and confidentiality rights of complainant and any affected client are maintained.

8. **Procedural Fairness.** Kurrajong will ensure complainants are given procedural fairness. This includes:

- Respecting confidentiality, and if during the investigation that becomes impossible, notifying all impacted people.
- Assuring people know they have the right to an advocate.
- Ensuring investigations are conducted impartially and free from bias. Where this cannot be achieved, the Complaints Officer or an independent party will be involved.
- Ensuring all parties have the opportunity to respond to the complaint.
- Adhering to documented and communicated timeframes for complaint handling.
- Allowing people the right to contest a resolution.
- Escalating the complaint if requested by the complainant or if circumstances warrant an escalation to the next step of the process.
- Ensuring that all communication about the complaint, including investigation and resolution, is presented to the client or family in a language and in terms they understand.

9. **Referring complaints.** Kurrajong will refer complaints to external authorities where required by law, including where criminal conduct or mandatory reporting obligations arise.

10. **Documentation** - All complaints will be documented, including details of the issue, actions taken, and outcomes. Records will be stored securely.

- All complaints must be documented, including the issue, actions taken, and outcomes. Complaints must be recorded using Form 109 Complaint or

Incident Reporting Form. Records will be securely stored, entered into the Complaints Register, and a copy of the final outcome provided to the complainant.

11. **Confidentiality** - Confidentiality will be maintained where possible; however, information may be disclosed where required to investigate or by law.
12. **Vexatious complaints:** Complaints made in good faith will not result in adverse consequences. Complaints identified as deliberately false or malicious may be managed in accordance with relevant disciplinary or conduct policies.
13. **Post Complaint Review.** Kurrajong will reflect on the complaints process and any outcomes and check in with the complainant for feedback around the finalisation of their complaint and their response to any follow-up or implementation of actions.

Things to consider:

- What was the complaint about? What service, policy or procedure did it call into question?
- What was the experience for the person who made the complaint, or for any affected client? Were the issues resolved for them?
- What information did the complaint provide that will allow you to identify and improve those services, policies and procedures and Kurrajong as a whole?
- How effectively did you communicate with the person who made the complaint, any affected participants, affected staff and other stakeholders?
- Do people using Kurrajong services, their families, carers and friends require more or improved information about their rights and the complaints process? Does the person who made the complaint feel more comfortable about speaking up in the future?
- Does anything need to change in Kurrajong's complaints handling system or approach to dealing with complaints?
- Do staff require further training?
- Did the handling of the complaint reflect Kurrajong stated values and expectations for complaint handling? Or was the complaint perceived as something negative that needed to be dealt with as quickly as possible?

12 **Reviewing and improving the Complaints Management and Resolution System**

- a. The Kurrajong complaints system allows complaints to be identified, issues addressed and actions taken. Feedback received is systematically reviewed to ensure the effectiveness of the system and identify systemic issues that need to be addressed in the processes.
- b. Statistical information can be collected and provided to the NDIS Commission if required.
- c. The complaints system includes a process for escalating complaints to the Chair of the Board.
- d. The Complaints Officer will maintain a Complaints Register and provide regular reports to the Board to support oversight and continuous improvement.
- e. Complaint records will be retained for a minimum of 7 years.