

Feedback and Complaints

Record of Policy Development

Version	Date approved	Date of last review	Date for next review
4.0	January 2008	July 2021	July 2023

Responsibilities and Delegations

This policy applies to:	Board, staff, volunteers, contractors and students (herein referred to as 'Personnel') and customers
Policy Approval	Policy Committee

Policy Context – this policy relates to:

Standards	<ul style="list-style-type: none"> • National Standards for Disability Services (Standard 4) • NDIS Practice Standards and Quality Indicators • NDIS Quality and Safeguards Commission Effective Complaint Handling Guidelines for NDIS Providers • NDIS Code of Conduct • Carers Charter WA • NDIS (Complaints Management and Resolution) Rules 2018 • NDIS (Procedural Fairness) Guidelines 2018 • Health and Disability Services Complaints Office WA
Legislation	<ul style="list-style-type: none"> • NDIS Act 2013 • Carers Recognition Act 1994 WA • Health and Disability Services (Complaints) Act 1995 WA • Disability Services Act 1993 Part 6 WA • Mental Health Act 2014 Part 19 WA
Contractual obligations	<ul style="list-style-type: none"> • NDIS • Department of Communities • Department of Health - DSOA
Organisation policies	<ul style="list-style-type: none"> • Customer Rights • Whistleblowers • Families & Carers • Service Entry & Exit • Employees and Volunteers Code of Conduct
Forms, record keeping, other documents	<ul style="list-style-type: none"> • Feedback and Complaints Form / Work Instruction • Customer Charter & Customer Support Guide • Customer Complaints Resolution Information Sheet • Response to Outcome of Complaint Letter

Published	<ul style="list-style-type: none"> This Policy and Procedure is published on the Interchange website for the ease of access by external parties.
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Policy

Interchange actively seeks feedback both positive and negative from customers, families, carers, service providers, regulators and personnel to ensure people are treated fairly when they use our services. Feedback and complaints are an important source of information and are used to improve our services wherever possible.

If you would like assistance to make a complaint Interchange is able to link you to agencies that can provide support to access translation, advocacy, or other support services required. Please inform a staff member that you would like assistance so we can help. Alternatively, customers can access advocacy support through external organisations and provide Interchange with the details.

Interchange believes:

- everyone has the right to provide feedback and complaints
- everyone has the right to support and advocacy to provide feedback or make a complaint
- in fostering a service culture that encourages open and honest communication
- informing customers of the standard of service they can expect
- encouraging and making it easy for people to provide feedback and being sensitive to any cultural requirements
- robust complaints processes and systems are an important part of quality service management and help safeguard people with disability
- feedback and complaints identify risks to people with disability but also visitors and staff
- feedback and complaints support Interchange to meet its occupational health and safety obligations
- feedback and complaints will be recorded, analysed and opportunities for Interchange to continuously improve its services identified, and
- positive feedback enables Interchange staff to know what part of services are working well for the customer.

Definitions

Concern – a notification that a person is worried that something is not working, has gone wrong or is otherwise not as it should be.

Complaint – formal advice that an incident has occurred, something is not working the way it should, something is inappropriate, or someone is at risk. A serious incident reporting process is required for legal and contractual purposes when a complaint is serious and reportable. All complaints, whether minor or major in nature will be entered into the Customer Record System.

Feedback – all feedback, whether positive or negative in nature will be entered into the Customer Record System. An informal complaint usually offered verbally, is quickly resolved and does not require investigation.

Mediation – the process of talking to two separate people or groups involved in a disagreement to try to help them to agree or find a solution to their problems usually with an impartial third party.

Procedures

Customer Feedback & Complaints

- All customers are provided with information about their rights in regard to feedback and complaints when commencing services.
- All feedback will be recorded in the Customer Record System by the employee receiving the feedback or complaint.
- When a concern is raised, the employee involved will listen and attempt to work with the customer to address the issue. The emphasis will be on resolving problems at first contact, through listening, problem solving, providing an explanation, giving more information, suggesting a solution or expressing understanding and empathy in situations where a solution is unlikely.
- Should this not result in resolution, the employee will escalate the matter to their line supervisor who will provide the customer with the *Interchange Customer Complaints Resolution* information sheet, outlining the process to be followed to make a formal complaint and have it addressed.
- Customers who make a complaint will:
 - ✓ be reminded of the *Interchange Feedback and Complaints Information Sheet* given on commencement of services
 - ✓ be advised they have the right to have support and advocacy during this process
 - ✓ be assisted to access the appropriate support and advocacy as required
 - ✓ be provided with the appropriate forms to document the complaint if they wish to do this in writing
 - ✓ be advised they can choose to discuss the complaint with the employee working with them or their supervisor if they choose
 - ✓ be advised that if the complaint concerns the conduct of an employee, that this will be reviewed by the relevant supervisor
 - ✓ be advised of their right to independent advocacy or representation of their own choice and assisted to access that support if they wish to engage it
 - ✓ be advised that an Executive Manager will be notified of the complaint and will ensure an appropriate person to review and document the complaint with the parties involved
 - ✓ have their complaint dealt with confidentially and quickly, in an atmosphere of equity and trust
 - ✓ have their complaint documented, and
 - ✓ have a copy of the complaint documentation provided to them

Acknowledgement of Feedback & Complaints

- Interchange seeks to acknowledge receipt of a complaint within one business day and resolve complaints within 21 business days. If requested the complainant will receive a letter of resolution from Interchange.
- In the event that the matter is not resolved, it will be referred to an Executive Manager or Chief Executive Officer who will endeavour to resolve the situation and document the agreed resolution and provide a copy to the parties involved.

Mediation

- All customers with unresolved feedback or complaints will be offered internal mediation. Information regarding mediation will be contained in the response to customer feedback and complaints.
- Interchange recognises there may be requests or feedback from customers (or their substitute decision makers) that we cannot reasonably meet based on constraints of funding, risk or service management and/or regulatory requirements. The outcome may be that Interchange cannot continue to deliver services to the customer.
- Any customer who believes they have unfair restriction to services or Interchange initiated service exit will be offered mediation and right of reply to the CEO to ensure the perspective and rights of customers are considered.
- If the customer remains dissatisfied, they will be advised of their right to escalate the matter to the NDIS Quality & Safeguarding Commission.
- When and if required customers will be directed to an advocacy agency to assist them with mediation or engaging with the Quality & Safeguards Commission.
- Offers of conciliation with the NDIS Quality & Safeguards Commission will be accepted by Interchange to ensure we provide transparency, achieve shared resolution, and identify areas for continuous improvement.

Using Feedback for Service Improvement

- When customer feedback or complaints are received Team Leaders will be responsible for maintaining and managing the Customer Record System used for recording and collating customer feedback.
- The Quality & Safeguarding Lead will be responsible for preparing a report on feedback and complaints, monthly to Executive Team and Board.
- Results from customer feedback will be reviewed by People & Culture Leadership Team and used to inform service development and planning.