

Feedback and Complaints

Record of Policy Development

Version	Date approved	Date of last review	Date for next review
8.0	January 2008	August 2023	August 2026

Responsibilities and Delegations

This policy applies to:	Board, employees, volunteers, contractors and students and others acting on behalf of Interchange, and customers and other stakeholders.
Policy Approval	Policy Committee

Policy Context – this policy relates to:

Standards	• 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
Contractual obligations	• NDIS • Department of Communities • Department of Health – DSOA • Interchange Service Agreement
Organisation policies	• Protecting Customer's Human Rights • Whistleblowers • Families & Carers • Service Entry & Exit • Employees and Volunteers Code of Conduct • Advocacy

Forms, record keeping, other documents	• Feedback and Complaints Resolution Process • Board Charter • Complaint resolution Letter
Published	• This Policy and Procedure is published on the Interchange website for the ease of access by external parties.

Policy

Interchange actively seeks feedback both positive and negative from customers, families, carers, service providers, regulators and people acting on behalf of Interchange 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 a customer would like assistance to make a complaint an Interchange team member will link them to agencies to access translation, advocacy, or other support services. 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, gender based or other specific needs and 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, visitors employees and other stakeholders
- 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 people 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

- All customers are provided with information about their rights regarding feedback and complaints when commencing services.
- All feedback will be recorded in the Customer Record System by the employee receiving the feedback or complaint. Emails to hello@interchangewa.org.au will be recorded immediately in the Customer Records Management system, and forwarded to the appropriate Quality Lead who will communicate to the relevant internal stakeholders.
- When a concern, feedback or complaint is raised, the person involved will listen and attempt to work with the customer to address the issue.
- The aim is to resolve 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.
- If the issue is not resolved, it is escalated to the Line Manager, who will provide the customer with the Interchange Customer Complaints Resolution information sheet, and the associated form if they wish to put it in writing, or they can record all the facts to formalise the complaint if required.
- Where the complaint relates to Violence, Abuse, Neglect, Exploitation and Discrimination of a customer, a Reportable Incident will be submitted to the NDIS Quality and Safeguards Commission withing the legislative timelines.
- All employees will follow both internal complaints policy, other related policies, and work alongside the Commission to safeguard the person.
- Customers who make a complaint will:
 - ✓ Be given the *Interchange Feedback and Complaints Resolution Process*
 - ✓ 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 or other representative of Interchange, that this will be reviewed by the relevant supervisor immediately
 - ✓ Have principles of confidentiality and natural justice applied
 - ✓ 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
- ✓ Be provided with a copy of the formal complaint documentation
- ✓ Be asked to complete a satisfaction survey to provide feedback on the complaint handling process.

Acknowledgement

- Interchange seeks to acknowledge receipt of a complaint within two business days and resolve complaints within 21 business days
- All written complainants will receive a letter of investigation outcomes and options for resolution

Investigation

All formal complaints will be investigated by a Quality Lead (QL), who will research, interview people and document the issues, identify findings for each part of the complaint, and make a suite of recommendations, the process will include:

- Access and review the Customer Record System to determine the documentation concerning the issue
 - Review all incident reports, case notes, health and other Plans, Goal plan and Risk assessments as relevant
 - Review any previous complaints from this customer or similar incidents
 - Where an interview with the customer:
 - a) Forms part of their right to be heard
 - b) Is deemed helpful
 - c) Will not have a harmful impact, this must be considered as part of the investigation process.
- We recognise the right of a customer to have a support person present. This can be internal or external to the organisation
- Interview relevant parties to determine the facts of the issue, timelines and any adverse effects
 - Draft the letter to the customer and seek approval from the relevant Line Manager and the Risk, Quality and Audit Lead (RQAL), finalise the content and respond to the complainant (checking authorised consent is in place, if this is not the customer)
 - Work with the Line Manager concerned, and other relevant parties to implement, monitor and track the progress of the recommendations and report monthly to the management team

In the event of serious or criminal misconduct, the QL will raise this with the RQAL for consultation with internal relevant management who will determine if an independent investigation or immediate action is required.

Criminal misconduct is reportable to the police by the organisation and will be escalated to management urgently upon notification. A criminal investigation may supersede an internal investigation, or they may continue at the same time.

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 & Safeguards 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 a Quality Lead will be responsible for maintaining and managing the Customer Record System used for recording and collating customer feedback. Risk Quality and Audit 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 the Leadership Team and used to inform continuous improvement.