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1. Policy Statement

Connecting2Ability (C2A) is committed to developing a culture that values complaints and feedback. This policy details how C2A receives, assesses, resolves and follows up complaints to improve its culture, services and supports.

People focus: C2A is open to complaints from members of the public about standards of service delivery and organisational policies, procedures and practices. C2A is committed to promoting and implementing an accessible complaints system to address areas for improvement with its service delivery and to enhance the performance of the organisation and its staff.

Responsiveness: C2A will recognise and reward good complaint handling by staff by responding to complaints in a timely manner.

Objectivity and fairness: C2A will address each complaint with integrity and in an objective and impartial manner.

No detriment: C2A will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint is made by them or on their behalf.

2. Scope

All employees of C2A, self-employed contractors, agency, temporary and voluntary workers of C2A.

3. Complaints

A complaint is any concern, issue or allegation raised by an employee, client, family member, visitor or other stakeholder relating to service quality, conduct, safety, communication, decisions or organisational processes, where the individual expects the matter to be addressed.

A complaint can also be any issue or dispute raised by an employee concerning workplace conditions, employment practices, workplace interactions, allegations of unfair treatment or breaches of policy that the employee seeks to have addressed or resolved. These are also known as a grievance.

4. How to Make a Complaint or Provide Feedback

C2A have various ways for a person to make a complaint or provide feedback. A person can remain anonymous if they choose. The options are:

1. Verbally to the Business Manager or line manager.
2. Complete the online form on C2A's website.
3. Via email to feedback@c2a.org.au.
4. Complaints Form and Easy Read Complaints Form
5. Verbally to:
 - Quality, Clinical & Risk Manager on 0418 476 388.
 - People & Culture Manager on 0494 064 060.
6. Written letter to:

Complaints
362-364 Nepean Highway
Frankston VIC 3199

For anonymity, the online form on C2A's website under 'Feedback' is recommended.

Receiving Complaints

Good complaint handling is essential to C2A's core business. The timely resolution of complaints is essential to ensure that issues are addressed promptly and to the satisfaction of all parties involved. If the initial complaint is not resolved to satisfaction, escalate it to feedback@c2a.org.au.

The Business Manager or any site staff that receive a complaint, must summarise it in an email to feedback@c2a.org.au. The complaint must be recorded on C2A's **Complaints Register** and, if necessary, be sent to the relevant staff to manage.

- If comfortable to do so, the affected party should try to resolve the complaint as close to the source as possible. This can be informal and verbal. At this stage, every possible effort should be made to settle a complaint informally.
- The People & Culture team are available for informal and confidential discussions and advice for a grievance complaint.
- If the matter can't be resolved informally, the affected party has the option to submit a formal complaint.
- If the complaint is on another employee, in the interests of ensuring procedural fairness, the person(s) against whom the complaint is made will be given the full details of the allegation(s) against them and will be given the opportunity and a reasonable time to respond before the process continues.
- If the complaint still can't be resolved, refer the matter to the most senior manager for consideration and a final decision. A complaint taken to this level must be in writing from the employee.

5. General Principles

An effective feedback, compliment and complaint management system addresses the principles of visibility and accessibility, responsiveness, assessment and investigation, feedback, improvement focussed and service excellence.

C2A's approach concerning management supports:

- Clients understanding their rights and responsibilities.
- Information on the management process being easily accessible.
- Increased satisfaction of clients in the management of their compliments and complaints.
- Recording data to identify emerging and existing trends or systemic issues.
- Staff to demonstrate an awareness of the management processes.

- Staff to develop the range of skills and capabilities required to manage compliments, complaints and feedback.
- An organisational culture that is focused on effective, person-centred complaints resolution and utilising feedback for continuous improvement.

Visibility and Accessibility

The management process will be visible and accessible to individuals:

- Explain how and where to make a compliment or complaint, including an anonymous complaint.
- Ensure the website and service sites have information on how to lodge a compliment or complaint.
- Consider specific needs of the individual or barriers they may experience.
- Explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed.
- Explain how the organisation will manage a complaint and the expected timeframe for resolution.
- Support individuals to identify and seek their preferred outcome.

Responsiveness

The management process will be responsive and provide mechanisms and strategies to:

- Promote service user rights, particularly those with special support needs, so they can actively participate in the process.
- Inform and train staff to use the management system.
- Support the individual to seek the most appropriate resolution.
- Ensure there is clarity about the requested outcome.
- Provide a respectful, valuing and informative acknowledgement.
- Actively listen, empathising and acknowledging when the service was not the best it could have been.
- Monitor timeframes for resolution.
- Communicate with all relevant parties about the progress of the resolution of the complaint.

Assessment and Investigation

The management process will have mechanisms to:

- Assess complaints for severity, safety, complexity, impact and the need for immediate action.
- Collect adequate and appropriate information.
- Protect the privacy and confidentiality of the information.
- Determine who and at what level the complaint should be dealt with.
- Enable complaints to be considered impartially, fairly and objectively.

Feedback

The management process will provide mechanisms and strategies to:

- Explain what happened and why, and how their concerns will be addressed if the issue is found to be valid, and who will do it, how we will communicate our progress and how we will check things are on track.
- Explain the reasons for our decision.
- Provide a written acknowledgement if Connecting2Ability has failed to meet its service obligations.
- Where an acknowledgement is provided, ensure it is sincere, and accepts responsibility for what occurred and the impact.
- Explain the circumstances without making excuses and summarise the key actions that will be taken.
- Provide regular updates to the complainant throughout the process.
- Notify the complainant of alternative complaint resolution pathways and review mechanisms.
- Follow up with complainants to determine the effectiveness of the outcome, where appropriate.

Improvement Focussed

The management system will provide mechanisms and strategies to gather and record feedback and other information to:

- Meet any statutory, policy or procedural reporting requirements.
- Improve the training and capabilities of management staff.
- Analyse the complaint data and identify complaint trends for performance improvement.
- Monitor the time taken to resolve complaints.

Service Excellence

The management system and resolution process is a part of a quality culture where feedback, compliments and complaints are an opportunity for improvement through:

- Positive attitudes and respect for the person who has raised the matters.
- Values that reinforce the commitment of Connecting2Ability to quality service delivery and encouragement for provision of feedback on what is and what isn't working.
- A clear statement that no one will be adversely affected as a result of making a complaint or a complaint being made on their behalf.
- A policy that enables the management system to address and investigate issues relating to all employees, including senior management.
- Data analysis to identify and explore trends that highlight opportunities to improve service delivery and complaint handling.
- A commitment to continued training and development of the compliment and complaint management staff.
- A commitment by the organisation's leadership to an effective compliments and complaints management process as part of a robust quality improvement framework.

Note: For the purpose of this document, a privacy incident / complaint / breach that relates to a client, whether substantiated or unsubstantiated is managed in accordance with all regulatory bodies.

6. Procedure for Complaints Handling



The five key stages in C2A's complaint management system are set out below.

Receive

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information.

We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contacts information of the person making a complaint.
- Issues raised by the person making a complaint and the outcome/s they want.
- Any other relevant information.
- Any additional support the person making a complaint requires.

Acknowledge

We will acknowledge receipt of each complaint promptly and preferably within 4 business days of receiving it. Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the complainant.

Address and Investigate

Initial assessment - After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the complainant and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is.
- Whether the complaint raises concerns about people's health and safety.
- How the complainant is being affected.
- The risks involved if resolution of the complaint is delayed.
- Whether a resolution requires the involvement of other organisations.

Addressing complaints - After assessing the complaint, we will consider how to manage it.

To manage a complaint, we may:

- Given the person the unique identifier to the complaint file.
- Give the person information or an explanation.
- Gather information from the person or area that the complaint is about.
- Investigate the claims made in the complaint.

We will keep the complainant up to date on progress particularly if more time is needed to complete the investigation. We will communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and consider any statutory requirements.

Provide Reasons for Decision

Following consideration of the complaint and any investigation into the issues raised, we will contact the complainant and advise them:

- The outcome of the complaint and any actions undertaken.
- The reason/s for our decision.
- The remedies or resolution/s that is proposed or put in place.
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the Information Privacy Principles and any applicable exemptions in or made pursuant to that Instruction, before sharing our findings with the complainant.

Options for Redress and Close Complaint

Closing the complaint, record keeping, redress and review.

We will keep comprehensive records about:

- How we managed the complaint.
- The outcome/s of the complaint including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations.
- Any outstanding actions that need to be followed up. We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

We will advise the complainant of alternative avenues for dealing with complaints, this will include internal and/or external options available to them including relevant statutory authorities and oversight bodies such as the NDIS Quality and Safeguards Commission and Consumer Affairs Victoria.

If you are an NDIS client and are unhappy with C2A, you can make a complaint to the NDIS Quality and Safeguards Commission by:

- Phoning 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.
- National Relay Service at www.relayservice.gov.au then 1800 035 544.

If you are any other client (CoS, self-funded, etc) and are unhappy with C2A, you can make a complaint to the Disability Services Commissioner by:

- Phoning 1800 677 342.
- National Relay Service at www.relayservice.gov.au then 1800 677 342.
- Email complaints@odsc.vic.gov.au.

For counselling support, C2A encourages employees and voluntary workers to utilise the Employee Assistance Program online at TELUS Health or call 1300 361 008.

The general principles of this policy do not apply when an employee or voluntary worker has a complaint or grievance relating to the termination of their employment or if C2A implements, or it is reasonably anticipated, the commencement of disciplinary procedure against the employee or voluntary worker.

7. Responsibilities

C2A expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Manager:

- Promote a culture that values complaints and their effective resolution.
- Provide adequate support and direction to key staff responsible for handling complaints.
- Regularly review reports about complaint trends and issues arising from complaints.
- Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.

- Encourage staff to make recommendations for system improvements.
- Recognise and reward good complaint handling by staff.
- Support recommendations for, service, staff and complaint handling improvements arising from analysis of complaint data.

Staff whose duties include complaint handling:

- Demonstrate exemplary complaint handling practices.
- Treat all people with respect, including people who make complaints.
- Assist people make a complaint, if needed.
- Keep informed about best practice in complaint handling.
- Provide feedback to management on issues arising from complaints.
- Provide suggestions to management on ways to improve the organisation's complaints management system.
- Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

All Staff:

- Understand and comply with C2A's complaint handling practices.
- Treat all people with respect, including people who make complaints.
- Be aware of C2A's complaint handling policies and procedures.
- Assist people who wish to make complaints access C2A's complaints process.
- Be alert to complaints and assist staff handling complaints resolve matters promptly.
- Provide feedback to management on issues arising from complaints.
- Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

8. Ownership

C2A is nominated as the Owner of this policy.

9. Disclaimer

This Policy and Procedure document is designed to assist employees of C2A in performing their duties and responsibilities, and otherwise to set out general information in relation to certain subjects.

Non-compliance with legislative and other obligations can expose the organisation and individuals to risks, including physical, financial and reputational risks, and C2A regards non-compliance with this Policy as a serious matter and a breach of our Code of Conduct and may lead to disciplinary action up to and including termination of employment.

To the extent that this Policy and Procedure document requires an employee of C2A to do, or refrain from doing something, it constitutes a direction from C2A to the employee, with which the employee must comply.

C2A may alter or withdraw this Policy from time to time or choose not to apply any part or all this procedure in an instance at its absolute discretion, unless expressly stated otherwise in this document, or in an underlying template document contained on or linked through this page. Because this policy and procedure document and any underlying policies and procedures may be changed by C2A from time to time, this site should always be accessed to ensure that the policy and procedure being accessed is the current version. Employees should not rely on printed documents without checking the current status of this Policy and Procedure via Teams.