

Complaints, Compliments and Feedback Policy

1. Purpose

This policy outlines the principles and approach to addressing complaints, acknowledging compliments, and accepting and acting on feedback at Kirinari Community Services (KCS).

2. Scope

This policy applies to all customers, their families, carers, and members of the community who receive services from KCS or interact with KCS. This Policy applies when a customer, their family, carers, or community members want to lodge a complaint, make a compliment, or provide feedback.

All permanent, fixed-term, casual staff, volunteers and contractors involved in providing services at KCS must take responsibility for ensuring complete understanding of the commitments outlined in this Policy.

The following areas are out of scope of this policy

- Staff grievances – Refer to KCS Staff Member Grievance Management policy for further information.
- Community housing neighbourhood issues - Refer to Community Housing Neighbourhood Issues policy for further information.
- Community Housing Appeals of a decision - Refer to Community Housing Appeals Policy for further information.

3. Definitions

Term	Description
Complaint	An expression of dissatisfaction or concern, either written or verbal, regarding the services provided by KCS, its employees, contractors, or volunteers. This may be made by a customer or on behalf of a customer.
Complainant	The person who is making the complaint.
Informal Complaint	An informal complaint is one that is verbally received by a member of staff and is resolved with the agreement of the complainant verbally at a local level. An informal complaint is not subject to timeframes nor is it reportable
Formal Complaint	A written complaint received with the expectation of a formal investigation process subject to timeframes.
Anonymous Complaint	A complaint made to a service provider with no identifying information provided by the complainant. Anonymous complainants cannot be informed about the investigation progress or outcome of the complaint.
Compliment	An expression of satisfaction, appreciation, or positive feedback about the services provided by KCS, its employees, contractors, or volunteers.
Feedback	Information about KCS service, support or a staff members performance which is used as a basis for improvement

4. Policy Statement

KCS values feedback from customers, their families, carers, and the community.

KCS encourages customers and stakeholders where they have concerns to bring these to the attention of appropriate line managers at the earliest opportunity. The right of a customer, their family/friends, guardian, advocate, or member of the public to lodge a complaint is acknowledged and supported. KCS will endeavour to resolve all complaints at the level most local to where the issue has arisen.

KCS is committed to addressing complaints and acknowledging compliments in a fair, transparent, and timely manner. KCS demonstrates this commitment by:

- Providing information about how to lodge a complaint to all KCS customers when they first sign a service agreement with KCS.
- Ensuring that our customer complaints form is available to customers and that it can be accessed online.
- Accepting complaints from any customer or stakeholder, including customers who are children or young people.
- Using advocacy, multicultural and interpretive services as appropriate for persons from culturally and linguistically diverse backgrounds and people with disabilities.
- Upholding the right of customers to make a complaint about service provision, without any fear of retribution.
- Considering any complaint an opportunity for improvement in the way KCS operates.
- Investigating and resolving any complaint received in a prompt, fair and professional manner.

5. Complaints

KCS will apply the following principles in managing complaints:

Principle	Description
Visibility and Access	The complaints process is available and accessible to customers and stakeholders.
Responsiveness	Complaints are managed in a timely manner and are treated fairly.
Service Improvement	KCS will review complaints to identify any recurring or systemic issues.
Privacy	Complaints will be protected from disclosure. Personal identifiable information concerning the complainant will be collected in a way that complies with privacy legislation.
Accountability	Understanding how to manage complaints is part of the role of all employees.
Review process will be available	Internal and external review processes will be available if complainants are dissatisfied with the response to their complaint.
Assistance / Advocacy	Support and assistance will be offered to a complainant in the most appropriate format when they make a complaint e.g., interpreters and/or translators, advocates/ support people. KCS acknowledges that advocacy can play a critical role in assisting consumers to pursue and seek resolution of complaints. Customers have the right to involve an advocate of their choice to speak and act on their behalf during the complaints process, and KCS will uphold this right

KCS will accept anonymous complaints and investigate them as far as possible.

If the complaint is about a specific KCS staff member, that person will not handle or be involved with the enquiry or investigation into the complaint.

If a complaint contains information relating to an incident that is considered reportable then KCS will make a report to the relevant external regulator as per Service Providers' legal obligations.

Where a formal complaint is being made against the Chief People Officer, the CEO or delegate will be responsible for assuming control of the complaint in line with this Policy and Procedure.

If the CEO has a formal complaint made about them the CEO or Chief People Officer will inform the chair of the board and appropriate action in line with this Policy and Procedure will be taken by the chair or the Chief People Officer on the instruction of the Board Chair.

5.1 Lodging a complaint

A complaint may be made to any KCS staff member. Complaints may be made verbally or in writing.

Complaints can be lodged via multiple means including:

- By phone - complainants can call (02)60562111 or 1300 547 462 and ask to speak with Kirinari's Chief People Officer or Quality and Compliance Manager.
- In Writing – complainants can send a letter to

Quality and Compliance Manager
Kirinari Community Services
Level 1, Northpoint Tower
366 Griffith Road
Lavington NSW 2641

- Via Kirinari's Website

If the complainant requires assistance in lodging the complaint, KCS staff will provide reasonable support. The complaint date, nature of the complaint and any relevant data should be provided. Relevant documents should be attached to the complaint.

5.2 Informal complaints

Where a person complains verbally, the staff member receiving the complaint must take all reasonable action to resolve the issue. This will include explaining the complaints process if required.

Where the complaint cannot be resolved quickly (within 24 hours) it must be forwarded to the appropriate line manager.

The line Manager will try to resolve the issue by discussing it with those involved. If this is unsuccessful, or the person making the complaint wishes to progress to a formal complaint, then the manager will record all information on the Complaints Form located on the Kirinari Website.

5.3 Formal complaints

Receiving a complaint

- Line Managers who receive a formal complaint must advise the Quality and Compliance Manager of the complaint.
- The Quality and Compliance Manager monitors the Kirinari complaints email which is where all online complaints are received.
- The Quality and Compliance Manager will record the complaint in the Complaints Register which is to be securely stored with access restricted to authorised staff members.
- The Quality and Compliance Manager or relevant Line Manager must advise the Chief People Officer of all formal complaints.

Resolving formal complaints

- Acknowledgement – KCS will acknowledge receipt of the complaint within 1 business day of receiving the complaint. Acknowledgement will include advising the complainant who will be handling the complaint and an anticipated time when that person will make further contact. Acknowledgement may be made in person, by phone, email or in writing.
- Investigation – The complaint will be thoroughly investigated by an impartial representative to gather relevant information and assess the situation.
- Communication – Regular updates will be provided to the complainant on the progress of the investigation, estimated timelines for resolution and any additional information required.
- Resolution – KCS will aim to resolve complaints within 21 calendar days. For complex and contentious complaints, it may be necessary to seek information from external parties. When a matter is likely to take a longer

period to resolve, the complainant should be kept informed of progress at regular intervals, as agreed with the complainant.

- Outcome – Once a resolution is reached, the complainant will be notified of the outcome. If the complaint is substantiated, appropriate actions will be taken to address the issue and prevent its recurrence.
- Review / Appeal – If the complainant is dissatisfied with the outcome, they can request a review. The request should be submitted in writing within 14 calendar days of receiving the outcome. The review will be conducted by a designated senior staff member who was not previously involved in the investigation. Where a customer or other stakeholder remains dissatisfied with the outcome, they will be provided with the appropriate contact information of an external body for further advice/assistance.

5.4 Records management

Accurate written records must be kept of all communications that form part of the complaint process. This includes notes taken of conversations between the parties which relate to management of the complaint and all agreed actions and decisions made in relation to the complaint.

All records must be managed and stored confidentially:

- Only the people who are directly involved in the complaint, or in helping to resolve it, are to have access to information about the complaint as deemed necessary.
- All documentation of complaints managed under this policy will be held by the Manager Quality and Compliance
- Complaint documentation is to be kept separate from customer or staff member files.
- The privacy and confidentiality of parties will be respected.

All records relevant to this document are to be maintained in a recognised KCS recordkeeping system and managed in accordance with KCS' Record Management Policy and Procedure.

5.5 Complaints processes for children

KCS is a child safe organisation and as such recognises the responsibility to provide child friendly complaints processes. Generally, the complaints management principles and processes mentioned above apply to all complaints including those made by, or on behalf of children, however KCS demonstrate our commitment to child friendly complaints processes through the following:

- Complaints from children and young people are triaged when received and forwarded to a senior member of staff within our specialised children and youth team to manage the complaint.
- KCS staff are trained in how to respond to a complaint made by a child or young person.
- KCS have appropriate systems and processes to ensure compliance with external reporting obligations when complaints involve children and young people being harmed.
- KCS recognises the importance that safe, trusting relationships plays in encouraging children to speak up and make complaints. Regular, ongoing meetings are scheduled between children and KCS staff to seek feedback from children about their experience with KCS.
- KCS promotes protective behaviours by seeking to educate children about their rights, what behaviour they can expect from adults and providing them with information about various ways they can make a complaint.
- Complaints made by children are recorded within the standard forms for their regular meetings. These complaints are then forwarded to the Quality team for input onto the Complaints Register.
- Families / guardians of children are given a complaints information sheet upon commencement of services provided by KCS. Families / guardians are notified by KCS of any complaint made by or on behalf of their child.
- The reference person meeting (held minimum monthly) is the forum in which KCS support children through and communicate with them around the complaints process.

5.6 External investigation of complaints

If the Quality and Compliance Manager believes a complaint requires external independent investigation, the matter is referred to the Chief People Officer for approval.

All complaint investigations conducted by an external independent investigator will include the below investigative procedure:

- liaising with all relevant stakeholders, internal and external to the organisation
- preparing a report to the Quality and Compliance Manager
- updating the Quality and Compliance Manager during the investigation

- contacting and maintaining contact with the complainant throughout the investigation without pre-empting the outcome of the investigation, and
 - forwarding the report of the investigation and all other documentation or material associated with the complaint to the Quality and Compliance.
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6. Compliments

This refers to comments that provide positive feedback about a KCS staff member, service, or policy. Compliments should be responded to, thanking the person for their feedback, and be passed to the person/s directly involved in the matter and their manager. All compliments must be forwarded to KCS Quality and Compliance Manager for recording on the Compliments register.

7. Feedback

KCS actively seeks the input of customers and stakeholders and encourages them to provide feedback, both positive and negative, as a source of ideas for improving services and activities. Suggestions for improvement or innovation in service delivery, policy development and KCS business should be documented and forwarded to the local line manager.

7.1 Encouraging customer and stakeholder feedback

KCS staff are responsible for ensuring that customers and stakeholders are informed of what they can expect from the service and how they may provide feedback.

KCS staff are responsible for ensuring they are familiar with the procedures for customers and stakeholders to provide feedback, and for:

- accepting and reporting informal feedback
- offering customers an opportunity to provide formal feedback when appropriate.

7.2 Initiating and collecting customer and stakeholder feedback

Feedback may be provided by individual customers and stakeholders on their initiative or in response to requests from the organisation.

Individual customers and stakeholders may provide feedback verbally or in writing by:

- talking to KCS staff

- writing a letter or email
- completing the feedback form on the Kirinari website

Feedback received by operational staff is to be communicated to the Quality and Compliance Manager for recording. The Quality and Compliance Manager is responsible for reviewing feedback, communicating feedback themes to the organisation, and identifying any action required.

7.3 Using feedback for service improvement

Results from customer and stakeholder feedback will be reviewed and used to:

- inform service planning
- inform decision making

The KCS Quality and Compliance Manager will be responsible for maintaining and managing the systems used for recording and collating customer feedback.

The KCS Quality and Compliance Manager will be responsible for reporting feedback to the KCS Management Team.

8. Responsibilities

The Board of Directors:

- Receive regular reports on all formal complaints.
- Oversee any investigation of serious complaints involving suspected criminal or corrupt conduct.
- On advice of the CEO consider proactive measures that will address issues related to any consistent areas of complaint.
- Manage any formal complaints against the CEO.

The CEO:

- Ensure that KCS has an accessible and transparent complaints management process.
- Support and promoting through leadership KCS's commitment to manage complaints.
- Inform the Board of all formal complaints and resolution status.
- Receive regular reports on the complaints process, including reviewing trends.

Chief People Officer:

- Provide approvals for complaints requiring external investigation.
- Inform the CEO of all formal complaints and resolution status.
- The Chief People Officer is responsible for monitoring compliance with this Policy and Procedure.

The Quality and Compliance Manager

- Initiate investigation of formal or informal complaints where required.
- Ensure complainants are kept informed as to the progress in resolving their complaint personally or by delegation at local level.
- Ensure corrective action has been implemented in conjunction with the relevant line managers.
- On request of the Chief People Officer, has responsibility for organising the external investigation of formal complaints
- Monitor of the effectiveness of the complaints management process and report any refinements required.
- Conduct regular reviews of the complaints process.
- Provide the Chief People Officer with regular status reports on individual complaints.
- Report on trends and common problem areas.
- Ensure that the complaints register is appropriately maintained.

Managers:

- Ensure that KCS' Complaints, Compliments and Feedback Policy is available to all customers and stakeholders.
- Ensure that staff members are aware of this Policy and Procedure including their responsibilities in relation to the complaint management process and where to find further information.
- Encourage an environment where complaints are handled seriously, effectively, and confidentially.
- Ensure that complaints are managed within their areas of responsibility.
- Ensure sufficient clarity of roles, responsibilities, and accountabilities to enable complaints to be managed effectively and efficiently.
- Undertake investigations of complaints where requested, assisting in the development of fair and just outcomes and drafting responses as required.
- Escalate and document complaints in line with this Policy, including seeking early advice from KCS Quality and Compliance Manager.

Staff members:

- Ensure that they understand and follow this Policy and Procedure.
- Manage complaints received within their designated role, responsibilities, and accountabilities.
- Report and escalate complaints in line with this Policy and Procedure.
- Support customers to complete the complaint form if required.

9. Accreditation standards

Aged Care Quality Standards

- Standard 6: Feedback and Complaints
- Standard 8: Organisational Governance

National Disability Insurance Scheme Practice Standards

- Module 2: Provider Governance and Operational Management

National Community Housing Standards

- 3.1 Tenant Rights

10. Regulations, Policies, Procedures relevant to this policy

Legislation

- National Disability Insurance Scheme Act 2013 (Cth)
- NDIS (Complaints Management and Resolution) Rules 2018 (Cth)
- NDIS (Quality Indicators) Guidelines 2021 (Cth)
- Disability Act 2006 (Vic)
- Disability Inclusion Act 2014 (NSW)
- Aged Care Act 1997 (Cth)
- Aged Care Quality and Safety Commission Act 2018 (Cth)
- Housing Act 2001 (NSW)
- Community Housing Providers (Adoption of National Law) Act 2012 (NSW)

National Regulatory System for Community Housing (NRSCH) Performance Outcomes

- Performance Outcome1: Tenant and Housing Services

KCS Policies

- Duty of Care
- Code of Conduct

Related documents

- NDIS Practice Standards and Quality Indicators – November 2021
- NDIS Terms of Business
- Kirinari Community Services Ltd Constitution
- Aged Care Quality Standards 2019
- NSW State Government Community Housing Complaints and Appeals Management Framework
- KCS Complaints Register
- KCS Customer Feedback Form (Digital)

11. External Complaints Bodies / Resources

NDIS Quality and Safeguards Commission – 1800 035 544 or
<https://www.ndiscommission.gov.au>

Aged Care Quality and Safety Commission – 1800 951 822 or
<https://www.agedcarequality.gov.au>

NSW Office of the Children's Guardian – (02) 8219 3777 or
<https://ocg.nsw.gov.au>

Commonwealth Ombudsman – 1300 362 072 or
<https://www.ombudsman.gov.au>

NSW Ombudsman – 1800 451 524 or <https://www.ombo.nsw.gov.au>

VIC Ombudsman – 1800 806 314 or <https://www.ombudsman.vic.gov.au>

ACT Ombudsman – (02) 5117 3650 or <https://www.ombudsman.act.gov.au>

TAS Ombudsman – 1800 001 170 or <https://www.ombudsman.tas.gov.au>

Office of the Australian Information Commissioner – 1300 363 992 or <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

Victorian Disability Worker Commission – 1800 497 132 or <https://www.vdwc.vic.gov.au>

Consumer Affairs Victoria – 1300 558 181 or <https://www.consumer.vic.gov.au>

Victorian Equal Opportunity and Human Right Commission – 1300 891 848 or <https://www.humanrights.vic.gov.au>

ACT Human Right Commission – (02) 6205 2222 or <https://hrc.act.gov.au>

Australian Human Right Commission – 1300 369 711 or <https://humanrights.gov.au>

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