

Purpose

The purpose of this policy is to ensure there are clear and transparent processes for the management of feedback and complaints received from all people and organisations.

People accessing or involved in our services in any way have the right to be heard and their view considered - they will receive the assistance and response required regardless of their feedback or complaint.

Scope

This policy applies to all services and operations of Afford and all Afford employees, volunteers, and contractors.

It applies to feedback and complaints received from parties external to Afford.

This policy does not apply to feedback and complaints from Afford employees. This is covered by the Grievance Policy.

This policy does not apply to feedback and complaints submitted under Whistleblower protections. This is covered by the Whistleblower Protection Policy.

Definitions

Client is a person/people who use Afford services.

Complaint is any expression of dissatisfaction with any aspect of Afford's services, decisions, policies, fees, employee, or functions where a response is requested or clearly implied.

Complainant is a person, organisation, its representative, or any advocate making a complaint.

Employees are people who work for Afford, whether paid or unpaid.

Executive Director is any one of the following roles Chief Operations Officer (COO), Chief Financial Officer (CFO), Executive Director People and Organisational Development.

Feedback is a comment expressing approval, praise, admiration, or thoughts on how Afford could improve its service.

Manager is any person who is employed by Afford and has one or more employees reporting to them.

Outcome is the resolution of a complaint. The resolution may or may not meet the expectations or requirements of the complainant.

Services are the various supports we provide, irrespective of what type they are.

Safety Assurance, Feedback, Incident and Risk Evaluation (SAFIRE) is the electronic incident management system where feedback and complaints are recorded.

Policy Statements

1. Feedback and complaints provide valuable information about Afford's services, systems, and employees, and help identify good practice and areas for improvement. At times it can be the first time Afford becomes aware of an allegation of abuse and/or neglect which would then be handled according to the Incident Management Policy.
2. All employees must actively encourage feedback and complaints and acknowledge and support the right of clients and others to provide feedback and complain.
3. Feedback and complaints will be able to be made through the following means:
 - a. In person
 - b. By phone
 - c. In writing
 - d. By email
 - e. Via the Afford website
 - f. Via an external agency, for example, the NDIS Quality and Safeguards Commission
 - g. Anonymously
 - h. To anyone in the organisation, there is a "no wrong door" approach
 - i. On a person's behalf with that person's consent
 - j. Via Afford's Voice of the Consumer program.
4. Employees must encourage and promote the feedback and complaints process. This includes:
 - a. Explaining the feedback and complaints process.
 - b. Assisting people to describe and report their feedback and concerns.
 - c. Where a complaint relates to impact on a client, ensuring that the client is safe and supported.
 - d. Seeking input from the complainant about what they would like the resolution to be.
 - e. Ensure people understand the outcome of their feedback or complaint.
 - f. Letting them know they can complain to an external complaints body at any stage of the process.
 - g. Ensure people are kept informed of the progress of the complaint, including any action taken, reasons for any decisions made and options for review of decisions in relation to complaints, (i.e., external agencies).
5. Employees must help people to provide feedback or make a complaint if they ask for help. This could include:
 - a. Helping people complete documentation.
 - b. Providing interpreters.
 - c. Providing information, and helping them access advocacy or other services available.
 - d. Helping people understand their rights and how to exercise these in the relevant situation.
6. All people providing feedback and complaints must be treated fairly and with courtesy and respect.
7. Employees must not treat complainants differently, disadvantage them, discriminate against them, or expose them to retribution for making a complaint.
8. Each Individual complaint will be treated on its merits, fairly and without bias or conflict of interest.
9. Employees must uphold people's rights to privacy and confidentiality when providing feedback or making a complaint.

10. Information provided in a complaint must be kept confidential and only disclosed if required by law or if the disclosure is otherwise appropriate in the circumstances.
11. People providing feedback or making complaints will be entitled to have a support person throughout the process.
12. Information about how to provide feedback and complaints, how they are handled, and external bodies that complaints must be made available:
 - a. At all Afford sites
 - b. On the Afford website and Afford regulated social media platforms
 - c. In materials provided to clients when they start Afford services
 - d. In a range of accessible formats.
13. Complaints and feedback must be recorded by the employee in SAFIRE. SAFIRE will automatically categorise the seriousness of the complaint or feedback and it will then flow to the relevant line manager for review. Initial categorisation is conducted by the employee receiving the complaint. Final categorisation must be conducted by their line manager via the Feedback Review Form in SAFIRE.
14. Employees must report all complaints to their manager as soon as possible, and within a maximum of 24 business hours. Critical and major complaints must be reported immediately.
15. Managers and Directors must review all feedback and complaints occurring within their teams within 24 business hours of notification to determine any immediate action required.
16. Managers must notify the Executive Director, Consumer Experience, and Impact immediately via email when complaints are received from the NDIS Quality and Safeguards Commission.
17. Where complaints are received by the Consumer Experience and Impact Team directly from the NDIS Quality and Safeguards Commission the relevant Executive Director will be notified immediately via email.
18. Where a complaint is about the CEO, employees must forward the complaint to the Company Secretary, who must then provide the complaint to the Chair of the Board.
19. Where the Manager or Director identifies conduct that may be reportable to authorities as a result of their initial review, the relevant Executive Director must be notified immediately so that appropriate action can be taken in line with the Reportable Incidents Procedure, Child Safety and Wellbeing Policy, Compliance Management Policy and/or Health Safety and Wellbeing Policy. The Director, Risk, Quality and Compliance can provide advice regarding reportable incidents if required.
20. Where a complaint is categorised as Critical, the employee must report the complaint via telephone to their manager immediately. The complaint is then escalated through the line of management to the responsible Executive Director and the CEO.
21. The CEO must notify the Board within 24 hours of being made aware of a critical complaint that causes or has the potential to cause severe impact to Afford, our clients and/or our people. This may include significant disruption to operations, an emergency management situation, or a threat to the safety of our clients and our employees.

22. Board members must acknowledge receiving this notification within 24 hours. This must be via email, text message or telephone call to the CEO.
23. The Executive Director must assess critical complaints and provide a recommendation to the Executive Leadership team about whether a response is required under the Crisis Management or Business Continuity Plans.
24. All complaints must be investigated to determine the cause and if any corrective action is required.
25. Where accusations of abuse and/or neglect are made the employee receiving the complaint must follow the Incident Management Policy and Procedure and NDIS Quality and Safeguarding Reportable Incidents Procedure.
26. Where a complaint is categorised as major, the employee must report the complaint via telephone to their manager immediately. The complaint is then escalated through the line of management to the responsible Director.
27. All employees must handle complaints efficiently, in a person-centred, transparent manner and work towards a fair resolution. Where possible complaints should be handled within the service area the complaint was received. However, Directors must handle major complaints, and Executive Directors must handle critical complaints.
28. Afford will not tolerate online, verbal, or physical threats made to employees while responding to a complaint.
29. Human Resources must provide support to managers to investigate complaints that contain allegations of breach of the Code of Conduct by employees. This may be by providing support to managers to undertake their own investigations, or for independent investigation of critical complaints.
30. The Director Risk, Quality and Compliance will be responsible for undertaking, or organising, an independent review or investigation of complaints as directed by an Executive Director.
31. All feedback and complaints must be recorded in SAFIRE. This includes details of the feedback or complaint, any support provided to use the complaint process, the actions taken and a record of the complainant's satisfaction with the outcome.
32. For client complaints, SAFIRE will automatically generate a progress note in CIMS, noting that a complaint has been made.
33. Employees must formally acknowledge receipt of critical and major complaints immediately on receipt, and all other complaints within two working days.
34. Unless a shorter timeframe is legislated by an external complaints body, all complaints must be investigated and resolved within 28 days. Employees must notify the complainant if it will take longer than this, for example when Afford is awaiting an external body to complete their investigation first.
35. If a person is not happy with the outcome of their complaint, they can ask for a review by a more senior person in Afford.
36. Managers must ensure their employees are trained in identifying, recording, responding to, and escalating complaints.

37. Managers must ensure that employees now how and when to escalate chronic expressions of dissatisfaction when a complainant's behaviour impacts staff wellbeing.
38. Where corrective actions are identified following a complaint investigation, the employee allocated the action must ensure these are completed within the set timeframe. Executive Directors must approve any extensions to corrective action timeframes.
39. The Director, Risk, Quality and Compliance is responsible for monitoring trends in feedback and complaints, corrective actions taken in response to complaints and reporting on these to the Executive and Board.
40. The Executive Leadership Team is responsible for using feedback and complaints data to inform improvements to Afford's services and performance.
41. Afford's Complaints Management System will undergo periodic review to ensure ongoing effectiveness.
42. Records of complaints must be retained as per Commonwealth, State and Territory document retention legislation.

Breach of Policy

Employees who do not comply with this policy will be subject to disciplinary action.

The Executive Director, Consumer Experience and Impact is responsible for addressing breaches of this policy.

Responsibilities

All employees must adhere to this policy.

Line Managers must ensure employees understand and adhere to this policy.

Senior Leaders are accountable for communicating and ensuring the implementation of this policy within their areas of responsibility.

The Policy Owner is responsible for ensuring this policy is implemented and up to date, and providing a framework for monitoring effectiveness and compliance.

Where a position or organisational unit title changes, or is no longer the title that appears in this policy document, and where a position and/or deliberative body named in the policy approval pathway has changed, the nearest appropriate equivalent body or position will have the same role and/or responsibility until this policy is updated.

Associated Documents

Feedback and Complaints Procedure

Incident Management Policy and Procedure

Reportable Incidents Procedure

NDIS Code of Conduct

Investigation Guideline

Exceptions

The only exception that will be approved to this policy is an extension to the resolution timeframe. Such extensions must have written approval via email from the relevant Executive Director.

Consultation

The following were consulted during the development of this policy:

Executive Leadership Team
Senior Leadership Team
Document Review Group

Policy Owner

The owner of this policy is the Chief Operating Officer.

Policy Approval

This policy was approved by the Chief Operating Officer.