

Complaint Handling Policy

1. Introduction

Sherwood Care take all complaints seriously is committed to promoting a positive attitude and workplace culture towards complaints, recognising that complaints and feedback about our services can provide invaluable information about how we can improve the quality of our services.

Sherwood Care acknowledges that people with disability have the same rights as other members of society to pursue any grievances and that empowering people with disability to voice their concerns is likely to make them feel valued and respected.

Sherwood Care will manage complaints in a manner that ensures procedural fairness and emphasises quick and fair resolution of complaints.

2. Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

3. Scope

This policy applies to all staff (paid and volunteer) and contractors receiving or managing complaints from the public and Participants made to or about us, regarding our products, services and staff, or our complaint handling process.

4. Organisational commitment

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

Who	Responsibility	How
Director Operations Manager Head of Personal Support	Promote a culture that values complaints and their effective resolution.	<p>Treat all people with courtesy and compassion, including people who make complaints.</p> <p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.</p>

Who	Responsibility	How
		<p>Acknowledge, investigate and finalise complaints in a timely manner.</p> <p>Foster a workplace culture that protects complainants from any repercussions, reprisals or victimisation in relation to the submission of a complaint.</p>
Director	Demonstrate exemplary complaint handling practices	<p>Treat all people with courtesy and compassion, including people who make complaints.</p> <p>Assist people to make a complaint, if needed.</p> <p>Comply with our policy and associated procedures.</p> <p>Provide regular feedback to management team members and Head of Personal Support on issues arising from complaints.</p> <p>Provide suggestions to Head of Personal Support on ways to improve our complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by the Head of Personal Support.</p> <p>Promote a workplace culture that protects complainants from any repercussions, reprisals or victimisation in relation to the submission of a complaint.</p>
All staff	Understand and comply with our complaint handling practices.	<p>Treat all people with courtesy and compassion, including people who make complaints.</p> <p>Be aware of our complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access our complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Commitment to protecting complainants from any repercussions, reprisals or victimisation in relation to the submission of a complaint.</p>

5. Definition

A complaint is an expression of dissatisfaction made to or about Sherwood Care in relation to our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

6. Commitment

Sherwood Care values all feedback and complaints because we are committed to ongoing improvement and increasing the quality of supports that we provide our Participants.

We are committed to protecting complainants from any repercussions, reprisals or victimisation in relation to their submission of a complaint. If any staff member found to have engaged in such behaviour, including but not limited to victimisation, withdrawal of supports (or threats to), reprisal, will be subject to disciplinary action.

7. Facilitating complaints

Sherwood Care is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame, which may depend on the severity and/or complexity of the issues raised in the complaint.

Sherwood Care will ensure that complainants and any person with a disability affected by the issues raised in a complaint, are:

- appropriately involved in the resolution of the complaint; and
- kept informed of the progress of the complaint, including: any action taken, the reasons for decisions made and options to have decisions reviewed.

Any person may make a complaint either in person, verbally, by telephone or in writing by post or by email. Sherwood Care will accept anonymous complaints and will carry out a confidential investigation of the issues raised where there is enough information provided.

Anonymous complaints can be posted to the Sherwood Care's Head Office or can be submitted via our website.

Any person is able to make an anonymous complaint can do so by completing an online feedback form on the website or by completing a Feedback form and posting it to Head Office. Each Participant will receive a welcome pack, which will include a Feedback form and reply-paid postage.

Complaints will be properly documented and handled in a fair, objective and confidential manner and Sherwood Care will work proactively to ensure complainants and people with disability who may be impacted by the issues raised in a complaint will not suffer any reprisals or be adversely affected for having made a complaint.

Sherwood Care will ensure that information about how and where complaints may be made to or about us is publicised on our website. We will ensure that our Complaint Handling Policy and Complaint Management System is accessible to everyone, particularly people who may require assistance with making complaints.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. If a person with disability affected by an issue raised by a complaint has a decision maker, advocate or substituted or informal decision maker, Sherwood Care will include and recognise these persons in the management and resolution of the complaint.

8. Complaints to the NDIS Quality and Safeguards Commission

Staff are to inform Participants and any other person who wishes to make a complaint that they can make a complaint to the NDIS Commission about supports and services provided by Sherwood Care. This includes people with disability, their families, friends, carers,

advocates or guardians, workers or volunteers or any other person who wishes to make a complaint.

Staff are to offer support to any person in making a complaint to the NDIS Commission, which can be done in the following ways:

- phoning 1800 035 544 (free call from landlines) or TTY 133 677 (interpreters can be arranged)
- using the National Relay Service and asking for 1800 035 544
- completing a complaint contact form to let the NDIS Commission on the Commission's website
(<https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=PRD00-OCF>)

9. Responding to complaints

Where possible, complaints will be resolved at first contact with the staff member who receives the complaint. In the first instance, staff are expected to acknowledge, assess and if possible, resolve the complaint.

Staff will then need to document the complaint and submit relevant documentation to the complaints email address - glenwood@sherwoodcare.com.au. This will then be reviewed by either the Operations Manager, Head of Personal Support, or the Director.

Staff are to ensure that they have advised the complainant and any person with disability affected by issues raised in the complaint about their right to access an Independent Advocate. Refer to Advocacy Policy for further information.

Sherwood Care will promptly acknowledge receipt of complaints and assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately to either the Operations Manager, Head of Personal Support, or Director.

Any complaint that raises issues including allegations of criminal conduct, abuse, neglect, or exploitation of a Participant is to be immediately reported to the Operations Manager, Head of Personal Support, or Director so that appropriate follow-up action can be taken and relevant authorities notified. Staff are also to refer to the Incident Management Policy in relation to our obligations to notify the NDIS Commission of any Reportable Incidents.

Any complaint that raises issues of staff misconduct must be notified to our Head of Personal Support and the relevant Manager so that these issues can be addressed in accordance with relevant Human Resources Policies, Procedures and Legislation. Staff are also to refer to Sherwood Care's Whistle-blowers Policy regarding their obligations to report any witnessed or alleged instances of staff misconduct.

We will inform complainants and, if required, persons with disability affected by issues raised in the complaint of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- how they will be involved in the process
- the possible or likely outcome of their complaint.

- how to complain to the NDIS Commission

Upholding the principles of Natural Justice and Procedural Fairness, we will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities and are encouraged to provide feedback on the effectiveness and efficiency of all aspects of Sherwood Care' complaint management system.

10. Complaints about the CEO

If somebody wishes to make a complaint about the Director, the Operations Manager will be the contact person for the complainant and will be responsible for overseeing the management and resolution of the complaint. This will include referring the complaint to Sherwood Care' HR department. In these instances, the Operations Manager is required to seek permission from the complainant to engage with an Independent Mediator to engage both the Director and complainant in resolving the complaint. If the complaint cannot be resolved, the Operations Manager is responsible for supporting the complainant to refer the complaint to the NDIS Commission.

11. Analysis and evaluation of complaints

Sherwood Care will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management. Sherwood Care may also be required to provide statistical information about complaints to the NDIS Commission upon request.

The Director and Operations Manager will conduct periodic reviews of all complaints and run regular reports on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified
- regular analysis of these reports will be undertaken to monitor trends, measure the quality of our Participant service and make improvements.

12. Monitoring of the complaint management system

Sherwood Care will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints; and
- identify and correct deficiencies in the operation of the system; and

13. Continuous improvement

Sherwood Care is committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:

- evaluate the effectiveness of our complaint management system in identifying, investigating, and resolving complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- ensure our staff are trained and able to understand how to receive, manage and resolve complaints
- regularly review, at least annually, the complaint management system and complaint data; and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

14. Record Keeping

Sherwood Care will keep and maintain appropriate records of all complaints received, including:

- information about the complaint
- any action/s taken to remediate or resolve complaints; and
- the outcome of any action taken.

Records of the complaints must be kept for a period of 7 years.

Complaint Management System

A Participant information pack will be provided to our Participants as well as their parents/guardians, which outlines Sherwood Care' Complaint Handling Policy, Complaint Management System and explains their rights and options regarding making complaints and complaint resolution.

All persons making a complaint will be notified in writing of the receipt of said complaint within 5 business days of receipt of that complaint. Sherwood Care will ensure complaints are dealt with in a timely manner, and complainants will be informed that they have **at any time during the complaints process, the right to complain directly to NDIS Commission** if the person is not satisfied with the outcome of the complaint.

Introduction

Complaint Management System refers to all policies, procedures, practices, staff, hardware and software used by Sherwood Care in the management of complaints.

When responding to complaints, staff (paid and volunteer) act in accordance with complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below:

1. Receive

Upon receiving a complaint, staff are to record the complaint and collate any supporting information/documentation regarding the complaint.

Staff then need to email the complaint, with relevant documentation attached, to the complaints email addresses ([Email]). This will then be reviewed by either the Operations Manager or Director.

The email must contain the following information:

- Contact information of the person making a complaint and the date received;
- Issues raised by the person making a complaint and the outcome/s they are seeking;
- Details of any persons with disability affected by issues raised in the complaint;
- Details of any support the complainant may require;
- Details of any support persons affected by the issues raised in the complaint may require;
- Any other relevant information; and
- Details of any actions taken by the staff member to address the issues raised in the complaint.

2. Acknowledge

With the exception of any extenuating circumstances, the Director, Operations Manager or Head of Personal Support is responsible for acknowledging the receipt of every complaint within 5 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter, telephone) for communicating with the person making a complaint. This will be based on the complainant's preference.

The Operations Manager is responsible for sending the complainant an Acknowledgement of Complaint letter, which will include:

- That the complaint has been received and will be investigated;
- The date by which we expect to have an outcome for the complaint;
- How to make a complaint to the NDIS Commission; and
- Contact details of the Complaint Handling Officer

3. Assess and investigate

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 person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

The person with principal responsibility for the assessment and investigation of any complaint, particular where the issues are of a significant or sensitive nature, is the Operations Manager.

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, including people with disability accessing our services and supports
- How the person making the complaint is being affected
- How any person with a disability is affected by the issue/s raised in the complaint
- The risks involved if resolution of the complaint is delayed; and
- Whether a resolution requires the involvement of other external/independent organisations.

After assessing the complaint, we will consider how to manage it. We may:

- Give the person making a complaint information or an explanation
- Gather information about the issue, person or area that the complaint is about; or
- Investigate the claims made in the complaint.

Staff are required to keep the person making the complaint up-to-date on our progress, particularly if there are any delays.

Staff are to ensure that any person/s with disability affected by any issues raised in the complaint are kept informed regarding the progress of the complaint. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

Staff are to complete an action plan, which stipulates:

- What will be done
- Who will do it
- When it will be done by
- How the progress of the complaint and outcomes will be communicated to the complainant and the person with disability impacted by issues raised in the complaint
- How the progress of the complaint actions will be monitored

4. Determine outcome and provide reasons for decision

Following investigation and assessment of the complaint, we will provide a Complaint Outcome Letter to the complainant, which will include:

- The investigative actions undertaken in relation to the complaint;
- The follow up actions that have occurred or will occur in relation to the issues raised in the complaint;
- The outcome of the complaint and any action/s we took in investigating the issues raised;
- The remedy or resolution/s that we have proposed or put in place;
- The status of the complaint (e.g. closed/finalised);
- An invitation to further discuss the complaint or management of the complaint;
- Any options for review that may be available to the complainant, such as an internal review or external review;
- That the complainant may contact the NDIS Commission in relation to the complaint and how to do this.

5. Close the complaint: document and analyse data

We will keep 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); and
- Any outstanding actions to be followed up, including analysing any underlying or root causes.

We will ensure that outcomes or agreed actions are properly implemented, monitored, and reported to the Operations Manager and the Head of Personal Support