



## Subject: Feedback and Complaints

Model of Care Outcome: 1 – Upholding Human Rights



### Purpose

To provide a framework for addressing issues raised by complainants and enabling a timely and systematic response. Our complaints framework is in line with relevant legislation and regulations, and is designed to lead to improvements in service delivery.

### Policy statement

In line with our [Model of Care](#), we are committed to having an environment where feedback and complaints are welcomed and we view issues raised as an opportunity to improve services for clients.

Everyone can make a complaint or provide feedback (they do not have to be receiving services from us) and a person may make a complaint on behalf of someone else.

We see both positive and negative feedback as opportunities for service review and improvement.

### Who is this policy for?

This policy applies to CPA staff and clients and anyone who provides feedback or makes a complaint.

### Who is responsible for this policy?

There is no wrong avenue for a complaint to be raised. All staff are responsible for supporting complainants in accessing the complaints process.

The Complaints Coordinator is responsible for oversight of timely complaints handling.

The Senior Quality Manager is responsible for regular monitoring of feedback and complaints data.

## Policy in action

- Our [Model of Care](#) provides the framework for staff to provide supports and services to clients and includes the following principles:
  - everyone has a right to complain or provide feedback
  - we encourage feedback and complaints and have proactive ways of seeking feedback
  - we respect the complainant's dignity, rights and values
  - the complainant's privacy is protected and the complainant is not disadvantaged because of raising a complaint
  - we protect clients' privacy and only share information outside of CPA where consent has been given or where we are required to by law
  - complaints can be made anonymously and these will be investigated as far as possible
  - staff are equipped to manage complaints and disputes, and every attempt is made to resolve issues at the local level
  - the complaints process is clearly communicated and accessible and complaints will be acted on quickly, fairly and sensitively
  - we offer a sincere apology when a person is unhappy with any aspect of our services
  - complainants are supported to seek external review when they are dissatisfied with the complaint process/outcome
  - monitoring and analysis of feedback and complaints informs continuous improvement to our services.
- Staff are encouraged to lodge feedback and complaints on behalf of clients/families or others by completing the [client feedback form](#) on the intranet if assistance is required.
- Staff are protected from complainants who create high levels of disruption or distress.
- Records related to complaints are maintained for at least 5 years, or as required by law.
- Staff wanting to raise a complaint about an internal matter should follow the [Grievance Procedure](#).

## Definitions

*(Note: The meanings of words that are used a lot at CPA are located in the [CPA Common Definitions](#). The words in the list below are new and are only used in this policy and the other documents that are part of this policy).*

## Complaint

An expression of dissatisfaction with any support or service provided by CPA. This includes how a previous complaint was handled, for which a response or resolution is explicit or implicitly expected. A complaint can be related to any aspect of CPA's services, supports or business, including CPA's processes.

## Feedback

A comment, compliment or observation about a service where dissatisfaction is not expressed. Documented feedback can be used to inform continuous improvement initiatives.

## Complaints resolution

The closure of the complaint to the complainant's satisfaction once all appropriate steps have been taken to respond to the issue which caused the complaint and identifying and addressing any contributing factors. Where the complainant is not satisfied with the outcome, referral to external complaints bodies should be made. See [Making a Complaint - Escalation Steps](#).

## Customer

At CPA customers include the person accessing services or supports, their parents/carers and family members, client advocates and third-party referrers such as support coordinators or clinicians.

## Documents that are part of this policy

### Guidelines

[Feedback and Complaints Guidelines](#)

[Feedback and Complaints Policy – Easy Read for Clients](#) (on CPA website)

### Procedures

[Assessing Complaints](#)

[Logging and Managing Complaints](#)

[Making a Complaint – Escalation Steps](#) (on CPA website)

[Complaints Procedure \(Information for complainants\)](#) (on CPA website)

### Forms

Online [Feedback Form](#) (on CPA website - for complainants)

[Feedback Form](#) (on The Hub - for staff to log client complaints)

### Posters

[Feedback and Complaints Poster](#)

### Practice Guides

[Feedback and Complaints Practice Guide](#)

A copy of this policy is available on our website at <https://cerebralpalsy.org.au/who-we-are/policies/>.

## Related policies and further reading

[Rights Policy](#)

[Client Incident Response, Reporting and Investigation Policy](#)

[Conflicts of Interest Policy](#)

[Code of Conduct Policy](#)

[Good Working Relations Policy](#) (Grievance Procedure)

[Marketing and Communications Policy](#)

## NDIS Commission resources

For Customers: Video - [Understanding Complaints](#)

Fact Sheet - [How to make a complaint](#)

For Providers: [Effective Complaint Handling Guidelines for NDIS Providers](#)

## Websites

- Administrative Decisions Tribunal (NSW)  
[http://www.adt.lawlink.nsw.gov.au/adt/administrative\\_index.html](http://www.adt.lawlink.nsw.gov.au/adt/administrative_index.html)
- Anti Discrimination Board of NSW  
<http://www.antidiscrimination.justice.nsw.gov.au/>
- Australian Human Rights Commission  
<http://www.humanrights.gov.au/>
- NDIS Family and Carer Support  
<http://www.ndis.gov.au/families-carers>
- Office of the Australian Information Commissioner  
<https://www.oaic.gov.au/>
- Information and Privacy Commission (NSW)  
[http://www.ipc.nsw.gov.au/privacy/ipc\\_index.html](http://www.ipc.nsw.gov.au/privacy/ipc_index.html)
- ACT Office of the Children and Young People Commissioner  
<http://www.hrc.act.gov.au/childrenyoungpeople/>

<b>Policy Owner</b>	Chief Operating Officer
<b>Date Approved</b>	16/07/21
<b>Approval Authority</b>	CEO
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<b>Date for Next Review</b>	
<b>Related Legislation</b>	Disability & Community Services (ACT) Human Rights Act 2004 ACT Human Rights Commission Act 2005 NSW Disability Inclusion Act 2014 NSW Disability Inclusion Regulation 2014 NSW Civil Liability Act 2002 NSW Community Services (Complaints, Reviews and Monitoring) Act 1993 – makes retribution a criminal act and details penalties that apply AS/NZS 10002:2014: Guidelines for complaint management in organizations

## Revision history

*Note: Reviewed and rewritten policies and procedures took effect on 1 December 2016. For revision history prior to this date, contact the Company Secretary.*

Review Date	Revision Details
30/07/19	Updated Policy with definitions, link to new Guidelines document and updated links to more current reading resources
20/04/18	Updated policy to add responsibilities of Complaints Coordinator and Senior Quality Manager, and to add that staff are encouraged to log client feedback and complaints via the feedback form on the intranet.

	<p>Added NS4-1-Pr3 Making a Complaint – Escalation Steps.</p> <p>Updated NS4-1-Pr2 Logging and Managing Client Feedback/Complaints to align with new complaints management system in the CMS.</p> <p>Updated NS4-1-Pr1 Assessing Complaints to align 'Actions Required' section with updated procedure (NS4-1-Pr2).</p> <p>Updated website references.</p>
30/07/19	<p>Added NS4-1-G1 Feedback and Complaints Guidelines.</p> <p>Updated NS4-1-Pr1 Assessing Complaints.</p> <p>Updated Complaints Procedure (for complainants) – on CPA website.</p>
06/08/19	<p>Updated NS4-1-Pr3 Making a Complaint – Escalation Steps to add reference to NDIS Q&amp;S Commission in Step 5.</p>
20/01/21	<p>Added NS4-1-PG4 Feedback and Complaints Practice Guide (as approved by CEO 04/12/20).</p>
16/07/21	<p>Reviewed and updated to align with Model of Care and current practice. Replaced references to 'CMS/Brian' with 'Salesforce', and replaced references to 'The Hub' with 'the intranet'. Further updates as follows:</p> <ul style="list-style-type: none"> <li>• NS4-1 Policy: <ul style="list-style-type: none"> <li>○ Updated scope to add that the policy applies to anyone who provides feedback or raises a complaint (as well as to staff who respond to complaints).</li> </ul> </li> <li>• NS4-1-G1 Feedback and Complaints Guidelines: <ul style="list-style-type: none"> <li>○ Added that all staff are responsible for supporting complainants in accessing the complaints process and offering to put them in touch with a manager of their choice.</li> <li>○ Added that responses to complaints made via the NDIS Commission or other external regulator are to be approved by the Senior Manager Q&amp;S and, where required, escalated to the General Counsel.</li> <li>○ Added that the assigned owner of a complaint must alert the Complaints Coordinator of any complaint incorrectly assigned to them as soon as they receive the complaint.</li> <li>○ Updated Training section - removed reference to investigation training for managers; and added that staff working directly with clients are required to complete the online Complaints Handling training module.</li> <li>○ Added that quarterly reports are tabled at Board Services Committee meetings.</li> </ul> </li> <li>• NS4-1-PG4 Feedback and Complaints Practice Guide: <ul style="list-style-type: none"> <li>○ Updated to reflect that the policy applies to staff, clients and anyone that raises a complaint. Added induction Feedback and Complaints training.</li> <li>○ Added requirements in 'Practice Dos' to empathise with the complainant and acknowledge their view, and to advise that an interpreter can be provided if required.</li> <li>○ Updated Work Instructions to include: telling clients/families they can phone to lodge feedback and that staff should offer to assist them to provide feedback; that staff should try to resolve the complaint; and that staff should advise of CPA's formal complaints procedure and the process and direct them to the Policies page on CPA's website.</li> <li>○ Removed NS4-1-Pr2 Logging and Managing Client Feedback/Complaints from the Practice Guide as it is not relevant to staff accessing the Practice Guide.</li> </ul> </li> <li>• NS4-1-Pr1 Assessing Complaints: <ul style="list-style-type: none"> <li>○ Updated to state that Extreme and High level complaints are to be referred to the relevant client services GM (previously listed specific GMs).</li> </ul> </li> <li>• NS4-1-Pr2 Logging and Managing Complaints: <ul style="list-style-type: none"> <li>○ Updated to reflect current process and practice and responsibilities.</li> </ul> </li> <li>• NS4-1-Pr3 Making a Complaint – Escalation Steps <ul style="list-style-type: none"> <li>○ Updated the "what to expect" section to align with the Complaints Procedure (Pr4) and with MoC.</li> </ul> </li> <li>• Added NS4-1-Pr4 Complaints Procedure (Information for complainants) – previously only available on the CPA website</li> </ul>

	<ul style="list-style-type: none"> <li>○ Updated to add that serious allegations against CPA staff will be handled by a separate team or independent party.</li> <li>● Added NS4-1-G2 Feedback and Complaints – Easy Read Policy (previously only available on the CPA website).</li> <li>● Added NS4-1-App1 Feedback and Complaints – Easy Read Poster.</li> </ul>
18/08/21	Updated NS4-1-Pr4 Complaints Procedure (Information for complainants) with CPA's new PO Box address.