

POLICY AREA: Service Provision

Policy Applies: Whole of organisation, clients, their families, carers and advocates, members of the public

Authorised By: Board of Management

Prepared By: D. Fitzmaurice, Manager – Services and Outcomes

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COMPLAINTS POLICY

Purpose

This policy is to ensure that feedback and complaints are handled in a transparent, timely, fair and person focussed manner.

Definitions

A Complaint – is an expression of dissatisfaction with Alkira regarding service provision where a response is expected, explicitly or implicitly. It can also be about the way a complaint is handled. A person who receives services at Alkira, their family/friends, guardian, advocate (which may be a staff member or volunteer) or a member of the public may make a complaint about an Alkira service or Alkira staff members or incidents that involve staff and service users.

A complaint can be expressed in any form - verbally, in sign language, using a communication aid, phone, in writing via a client's diary or communication book, letter, email, or by using an Alkira Complaint form.

Guiding Principles

1. Alkira welcomes all comments, compliments and complaints. This feedback is valued and assists us in understanding what we are doing well and how we can improve our services.
2. Ensuring simple, fair and responsive arrangements for people who use this service to express dissatisfaction about any aspect of our service provision.
3. Alkira believes receiving and responding to complaints is vital as part of a broader quality culture that sees complaints as an opportunity for service improvement.
4. **Accessible:** We will be accessible to people with a disability and other key stakeholders through clear and effective communication methods. The information that we provide will be easy to understand and will clearly articulate the right to complain, how complaints can be made, who they can be made to, and how complaints to Alkira will be handled. All staff can respond to complaints and a person who makes a complaint will be given regular updates on the progress of their complaint.
5. **Person focussed:** We will respect and value the knowledge, abilities and experiences of people with a disability and will respond to their complaint in a way that suits their particular needs, wishes and circumstances. In fulfilling our role, we will try to achieve the best possible outcomes for people with a disability. All management and staff at Alkira are committed to providing an organisation and workplace where people feel free to speak about any problems or concerns that they may have.
6. **Responsive:** We will provide timely assistance to people who contact Alkira and we will keep all parties informed of the progress of complaints. Our responses will focus on addressing the issues raised in complaints, and not on assigning blame. In the event service expectations are not met, we will conduct a prompt investigation to resolve the issues and maintain communication with the person making the complaint.

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7. **Accountable:** We will aim to achieve our objectives in a transparent manner and will accept responsibility for decisions made by Alkira. Part of this transparency is being open to appropriate levels of scrutiny and ensuring that any conflicts of interest are disclosed and acted upon. We will report on the operation of the complaints process against documented performance standards to the Disability Services Commissioner. We will respond positively to clear recommendations by the Disability Services Commissioner for any corrective action that may be required to unresolved internal complaints.
 8. **Excellence:** We will strive to do our best and continually seek ways to improve how we do things. In doing this we will seek to promote a learning culture within Alkira, with the aim of ensuring that complaints are seen as vital to our commitment to continuous improvement. If we make a mistake, or our service doesn't meet peoples expectations, we want to know. We aim to solve the problem as quickly as possible. If it can't be resolved in 48 hours, a service manager will take responsibility for the matter.
 9. **Delays** – all attempts will be made to deal with complaints quickly, effectively and appropriately, and the time frames should reflect this. However it is also acknowledged that complaints may range in seriousness and complexity, which can cause delays.
 10. A set of person centred commitments will be upheld to clients, their family, carers and advocates who seek to assist clients to be heard. These are:
 - a) **To listen**
 - i. To listen to what is being said
 - ii. To keep listening
 - b) **To act on what we hear**
 - i. To find something we can do today or tomorrow
 - ii. To keep acting on what we hear
 - c) **To be honest**
 - i. To let people know what they are telling us will take time
 - ii. When we do not know how to help them get what they are asking for
 - iii. When what the person is telling us is in conflict with staying healthy or safe and we can't find a good balance between important to and important for
 11. **Privacy** – reasonable steps are taken to protect personal information from loss, unauthorised access, use, unauthorised disclosure or any other misuse during a complaints process.
 12. **Confidentiality** will be imposed to protect information, and the information does not have to be of a personal nature. A person given an assurance of confidentiality is being told that the organisation will put controls around how and when certain information will be used within the organisation and/or disclosed to an outside agency or person.
 13. **Natural justice** will be maintained by providing a person who may be affected by a decision about a complaint with a fair hearing before the decision is made. There are essentially three elements to natural justice:
 - a) **The notice requirement** – any person likely to be affected by a decision should be given notice of the issues and relevant information.
 - b) **The fair hearing rule** – the person should be given a reasonable opportunity to respond to the issues/information, and the decision maker needs to be able to **show** that they have given genuine consideration to the affected person's submission.

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- c) **The lack of bias rule** – the **person** making the decision must act impartially (without bias) in considering the complaint. Bias could arise if the decision maker has some financial or other personal interest in the outcome or has given the impression that they have prejudged the decision ahead of time
(Queensland Ombudsman, 2008: 12)

14. **Staff awareness** - There is little value in having a complaints management system if staff are not aware of it or are unsure of how to use it. Therefore, staff will be thoroughly trained in the application of the complaints policy and relevant procedures.
15. **Staff attitude** - While clear policy and procedures are important foundations, Alkira requires staff to have a positive attitude that views complaints as opportunities for improvement.

References – Internal

- Alkira Complaints Procedure
- The 'Four A's' – Effective Responses to Complaints Guide
- Summary of Alkira Complaints Procedure Flyer

References – External

- Disability Act 2006
- Disability Service Commissioner Complaints Culture Questionnaire
- Disability Services Commission <http://www.odsc.vic.gov.au/>
- Good Practice Guide and Self Audit Tool: Developing an effective person centred complaints management culture and system - Office of the Disability Services Commissioner – Second Edition 2013
- Incident Reporting Guidelines – Department of Health & Human Services www.fac.dhs.vic.gov.au
- International and Australian Standards on Complaint Handling

Review

Alkira at its own discretion reserves the right to change the policy and procedure in line with relevant legislation and organisational needs.

If this policy can be improved please submit a Continuous Improvement Form to the Quality & Systems Officer.
