

Purpose

The purpose of this policy is to ensure there are clear and transparent processes for the timely and confidential 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.

Feedback and complaints provide Afford with essential information to continually improve our services and provide a better experience and outcomes for our clients and stakeholders.

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 Employee Grievance Policy.

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

Definitions

Client - people who use Afford services, with the exception of Supported Employees.

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

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

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

Executive Director – any one the following:

- Chief Operations Officer (COO)
- Chief Financial Officer (CFO)
- Executive Director Consumer Experience and Safeguarding
- Executive Director People and Organisational Development
- Executive Director Strategy and Growth.

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

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

Our Organisation – description of 'Afford'.

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

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

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 can be made:
 - 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.
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, including to 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 the Universal Declaration of Human Rights and how (if at all) it may apply in their situation.
6. All people providing feedback and complaints must be treated fairly and with courtesy and respect.
7. Each individual complaint will be treated on its merits, fairly and without bias or conflict of interest.
8. Employees must not treat people differently, disadvantage them, discriminate against them, or expose them to retribution for providing feedback or making a complaint.
9. Employees must uphold people's rights to privacy when providing feedback or making a complaint.
10. Information provided in a complaint is 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 are 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 can be made to is made available:
 - a. At all Afford sites
 - b. On the Afford website or Afford regulated social media platforms
 - c. In materials provided to clients when they start receiving Afford services
 - d. In a range of accessible formats.
13. Complaints must be categorised according to severity level. Initial categorisation must be conducted by the employee receiving the complaint. Final categorisation must be conducted by their line manager.
14. Afford will review all feedback and complaints within their teams within 24 business hours of notification to determine any immediate action required.
15. Afford will assess all complaints and apply a level of criticality to the matter. Using this criticality Afford will apply an escalating scale of action to match the scale of the complaint.
16. Where complaints are received by the Consumer Experience and Safeguarding team directly from the NDIS Quality and Safeguards Commission the relevant Executive Director will be notified immediately via email.

17. 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.
18. 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 Principal Advisor, Safeguarding can provide advice regarding reportable incidents if required.
19. All complaints must be investigated to determine the cause and if any corrective action is required.
20. Where accusations of abuse and/or neglect are made the employee receiving the complaint must follow the Incident Management Policy and Procedure and Reportable Incidents Procedure.
21. Executive Directors 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.
22. 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.
23. Afford will not tolerate online, verbal or physical threats made to employees while responding to a complaint.
24. 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.
25. The Quality and Practice team are responsible for undertaking, or organising, an independent review or investigation of complaints as directed by an Executive Director.
26. All feedback and complaints must be recorded in the Afford Complaints Management System. 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.
27. For complaints involving clients, employees must record the reference number from the Complaints Management System in the client's progress notes.
28. Employees must formally acknowledge receipt of critical and major complaints immediately on receipt, and all other complaints within two working days.

29. 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.
30. 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.
31. Managers must ensure their employees are trained in identifying, recording, responding to, and escalating complaints.
32. 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.
33. The Director, Quality and Practice 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.
34. The Executive Leadership Team are responsible for using feedback and complaints data to inform decision making, particularly in relation to service delivery.
35. Afford's Complaints Management System will undergo periodic review to ensure ongoing effectiveness.
36. 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 Safeguarding 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.