

## 2.4 Feedback and Complaints Management

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Braver Together values all feedback, such as comments, compliments, suggestions, and complaints. Systems are in place to ensure that all clients have knowledge of and access to a complaints management and resolution system. Complaints and other feedback made by all parties are welcomed, acknowledged, respected and well-managed.

To achieve this outcome, the following indicators are demonstrated:

- As Braver Together is a Sole Trade, the management of feedback and complaints is combined, providing a manageable complaint resolution system. The system is relevant and proportionate to the scope and complexity of services that Braver Together offers.
- The policy and system follow principles of procedural fairness and natural justice and complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.
- Upon receipt of a Service Agreement, each client is provided with information on how to give feedback or make a complaint, including avenues external to the provider, and their right to access advocates.
- Regular check-ins that strengthen the therapeutic relationship between the Director and the client provide a supportive environment for any feedback and/or complaint; often catching issues and concerns before they emerge as a complaint, as evidenced by no record of any complaint since the commencement of operation.
- The feedback and complaints management system uses standard systems that have demonstrated synergies with continuous improvement.
- An annual review cycle of policies is in place to ensure currency of the policy and practice with the scale and complexity of the business.
- A proposed schedule for seeking feedback from each client is flexible enough to be administered to clients and provide opportunity for feedback to be obtained. Copies of the feedback surveys are found in the [Appendices of the Handbook](#):
  - o An online Feedback Form, which is more open-ended
  - o A quick 2-minute, online three (3) to six (6) months check in survey
  - o A slightly longer, 5-minute, online nine (9) to twelve (12) months check-in survey

At present, the organisation supports one client, so the more formal arrangement of a proposed three (3) month check-in occurred verbally, which is acceptable within the philosophy and service model of the business. A nine (9) to twelve (12) month check-in will facilitate a more formal annual review.

- As written within the comprehensive Human Resources Management Policy, all new workers will be made aware of, trained in, and will comply with the required procedures in relation to complaints handling.
- Supporting Documents
  - o [Feedback and Complaints Management Policy](#)
  - o [Incidents or Complaints Report](#)
  - o [Incident or Complaints Investigation Report](#)
  - o [Incidents and Complaints Register](#)
- Other relevant documentation:
  - o [Service Agreement](#)
  - o [Induction Checklist](#)
  - o [Mandated and Annual Training Calendar](#)



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- NDIS Support Plan
- [Client Survey Forms](#)
- [Compliance Calendar](#)



## Feedback and Complaints Policy

Braver Together values all feedback, such as: comments, compliments, suggestions and complaints from our participants and partners. Feedback provides a valuable and authentic way to ensure that people are treated fairly and kindly when they use our services. Feedback is taken seriously as an important source of information that is seen as an opportunity for improvement.

This policy and the associated practice statement relate to the following national standards:

National Disability Insurance Scheme (NDIS) Practice Standards and Quality Indicators. July 2020 v3	National Standards for Disability Services. December 2013 v1	National Quality Standard (Early Childhood). October 2018.
2.5. Feedback and Complaints Management: Each participant has knowledge of and access to the provider's complaints management and resolution system. Complaints and other feedback made by all parties are welcomed, acknowledged, respected and well-managed.	4.1. Individuals, families, friends, carers and advocates are actively supported to provide feedback, make a complaint or resolve a dispute without fear of adverse consequences. 4.2. Feedback mechanisms including complaints resolution, and how to access independent support, advice & representation are clearly communicated to individuals, families, friends, carers and advocates.	1.3.2. Critical reflection. Critical reflection on children's learning and development, both as individuals and in groups, drives program planning and implementation 6.1.1. Engagement with the service. Families are supported from enrolment to be involved in the service and contribute to service decisions.

### Scope

1. The scope of these Terms of Service applies to all workers, business partners, and clients.

### Outcome

2. The outcome of the Braver Together Feedback and Complaints Policy is that all clients and stakeholders will feel comfortable, equipped, and supported in contributing feedback, such as: comments, compliments, suggestions, concerns, and complaints about the quality and effectiveness of our services. Braver Together views all Feedback as a valuable and authentic way to ensure that people are treated fairly and kindly when they use our services. Feedback is taken seriously as an important source of information that is seen as an opportunity for improvement.

### Principles

3. The principles that underpin Braver Together's approach to feedback and complaints.  
An effective feedback and complaint handling system addresses the principles of being supportive, accessible, responsive, perceptive, transparent, purposeful, and effective
  - a. **Supportive.** People, when they clearly understand their rights and responsibilities, are enabled to be directors of their supportive services and not just participants.
    - i. information on the feedback and complaint management process being easily accessible
    - ii. increased satisfaction of clients in the management of their feedback, concerns, and complaints
    - iii. the recording of data to identify emerging and existing trends or systemic issues
    - iv. workers to demonstrate an awareness of feedback and complaint management processes
    - v. workers to develop the range of skills and capabilities required to manage feedback
    - vi. an organisational culture that is focused on embracing an effective, person-centred feedback system that includes a clear and manageable complaints resolution system that utilises all types of feedback for continuous improvement
  - b. **Accessible.** The feedback and complaints management process will be visible and accessible to individuals and:



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- i. explain how and where to give feedback or make a complaint, including an anonymous complaint
  - ii. ensure the website and service sites have information on how to lodge feedback or make a complaint
  - iii. consider specific needs of the individual or barriers they may experience
  - iv. explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed
  - v. explain how Braver Together will manage a complaint and the expected timeframe for resolution
  - vi. support individuals to identify and seek their preferred outcome.
- c. **Responsive.** The feedback and complaints management process will be responsive and provide mechanisms and strategies to:
- i. promote service user rights, particularly those with special support needs, so they can actively participate in the feedback and complaints process
  - ii. inform and train workers to use the feedback and complaint management system
  - iii. support the individual to seek the most appropriate resolution
  - iv. ensure there is clarity about the requested outcome
  - v. provide a respectful, valuing, and informative acknowledgement
  - vi. actively listen, empathising and acknowledging when the service was not the best it could have been
  - vii. monitor timeframes for resolution
  - viii. communicate with all relevant parties about the progress of the feedback or the resolution of the complaint.
- d. **Perceptive.** The feedback and complaints management process will have mechanisms to:
- i. assess complaints for severity, safety, complexity, impact, and the need for immediate action
  - ii. collect adequate and appropriate information
  - iii. protect the privacy and confidentiality of the information
  - iv. determine who and at what level the feedback or complaint should be dealt with
  - v. enable complaints to be considered independently, fairly, and objectively.
- e. **Transparent.** The feedback and complaints management process will provide mechanisms and strategies to:
- i. explain what happened and why, what will be done to fix the issue, and who will do it, how we will communicate our progress and how we will check things are on track
  - ii. explain the reasons for the decision
  - iii. provide an apology where the organisation has failed to meet its service obligations
  - iv. where an apology is provided, Braver Together will ensure that it is sincere, and that Braver Together accepts responsibility for what occurred and the impact
  - v. explain the circumstances without making excuses, and summarise the key actions that will be taken
  - vi. provide regular updates to the complainant if the resolution is delayed
  - vii. notify the complainant of alternative complaint resolution pathways and review mechanisms
  - viii. follow up with complainants to determine the effectiveness of the outcome, where appropriate.
- f. **Purposeful.** The feedback and complaint management system will provide mechanisms and strategies to gather and record feedback and other information to:
- i. meet any statutory, policy or procedural reporting requirements
  - ii. improve the training and capabilities of complaint management workers
  - iii. analyse the complaint data and identify complaint trends for performance improvement
  - iv. monitor the time taken to resolve complaints
  - v. notify service providers as part of a continuous quality improvement approach.



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- g. **Effective.** The feedback and complaint management system and resolution process are a part of a quality culture where feedback and complaints are an opportunity for improvement through:
  - i. positive attitudes towards dealing with feedback and complaints and respect for the person who has raised the matters
  - ii. values that reinforce the commitment of Braver Together to ensure a quality service delivery through a system that encourages the provision of feedback on what is and what is not working
  - iii. a clear statement that no one will be adversely affected because of providing feedback or making a complaint being made on their behalf
  - iv. publishing and adhering to a policy that enables the feedback and complaint management system to address and investigate issues relating to all employees, including senior management.
  - v. data analysis to identify and explore trends that highlight opportunities to improve service delivery and the handling of feedback and complaints
  - vi. a commitment to continued training and development of the capabilities of feedback and complaint management workers
  - vii. a commitment by the organisation's leadership to an effective feedback and complaints management process as part of a robust quality improvement framework.

### Definitions

- 4. The definitions used in this policy
  - a. **Concern** – a notification that a person is worried that something is not working, has gone wrong or is otherwise not as it should be.
  - b. **Complaint** – formal advice that an incident has occurred, something is not working the way it should, something is inappropriate, or someone is at risk. A serious incident process is required for legal and contractual purposes when a complaint is about a serious incident.
  - c. **Feedback** – is not limited to complaints or concerns, it also includes comments, compliments, and suggestions about our service and how we undertake our service with respect to our participants, workers, business partners, advisors, people with disability, families, carers, service providers and regulators
  - d. **Near Miss** – an unplanned act, omission, event, or circumstance that could have resulted in an injury or illness to people, danger to health, and / or damage to property or the environment.
  - e. **People** – is a term used to refer to workers and service users or clients who receive a service from Braver Together

### Legislation

- 5. Relevant legislation and policy
  - a. Carers Recognition Act 2010 (Federal): <https://www.legislation.gov.au/Details/C2010A00123>
  - b. Children and Young People Act 2008 (ACT): <https://www.legislation.act.gov.au/a/2008-19>
  - c. Discrimination Act 1991 (ACT): [https://www.legislation.act.gov.au/a/1991-81/Discrimination Regulation 2016](https://www.legislation.act.gov.au/a/1991-81/Discrimination%20Regulation%202016)
  - d. National Disability Insurance Scheme 2013: Principles: [Part 2—Objects and principles](#)
  - e. National Standards for Disability Services: <https://www.dss.gov.au/our-responsibilities/disability-and-carers/standards-and-quality-assurance/national-standards-for-disability-services>
  - f. National Disability Insurance Scheme Quality and Safeguarding Framework: <https://www.dss.gov.au/disability-and-carers/programs-services/for-people-with-disability/ndis-quality-and-safeguarding-framework>
  - g. United Nations Convention on The Rights of Persons with Disabilities: <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html>
  - h. Work Health and Safety Act 2011 (ACT): <https://www.legislation.act.gov.au/a/2011-35/>, and <https://www.legislation.act.gov.au/sl/2011-36/>
  - i. Work Health and Safety Regulation 2011 (ACT): <https://www.legislation.act.gov.au/sl/2011-36/>



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- j. Work Health and Safety (Work Health and Safety Consultation, Cooperation and Coordination Code of Practice) Approval 2018: <https://legislation.act.gov.au/ni/2018-725/>

### Contact

Questions about the Feedback and Complaints Policy should be directed to **Director (or Delegate)** on **connect@bravertogether.com.au** or **0408417800**.

### Approvals

Date of approval: **20 Aug 2021**

Date of review: **5 May 2022**

Signature of Director: *Carolyn Harkness*

