



Complaints Handling Policy

Policy number		Version	1
Drafted by	Sharyn Marshall	Approved by Board on	26 th October 2017
Responsible person	Chairperson	Scheduled review date	25 th October 2019

PURPOSE

This policy is intended to ensure that Kyogle Together Inc. handles complaints fairly, efficiently and effectively.

The complaint handling system is intended to:

- enable a timely and cost-effective response to issues raised by people making complaints,
- boost public confidence in the organisations administrative process, and
- provide information that can be used to deliver quality improvements in the organisations products, services, human resources and complaint handling processes.

This policy provides guidance to board members, staff and the public about making a complaint and how it will be handled.

Scope

This policy applies to all staff & volunteers receiving or managing complaints from the public made to or about the organisation, regarding products, services, staff and complaint handling.

Staff grievances, code of conduct complaints and public interest disclosures are dealt with through separate mechanisms.

POLICY

Organisational commitment

This organisation expects staff and volunteers 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 volunteers and the way that commitment should be implemented.

Who	Commitment	How
Kyogle Together Inc. Board and Manager	Promote a culture that values complaints and their effective resolution	<p>Report publicly on Kyogle Together Inc.'s complaint handling process e.g. website, Facebook, newsletter etc.</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>Recognise and reward good complaint handling by staff.</p>
Manager and program coordinators responsible for complaint handling	Establish and manage the complaint management system.	<p>Provide regular reports to the Manager who will then report to the board on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with the Manager and implemented where appropriate.</p> <p>Recruit, train and empower all staff to resolve complaints promptly and in accordance with Kyogle Together Inc.'s policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on improvements to the organisation's complaint management system.</p> <p>Recognise and reward good complaint handling by staff.</p>

All staff and volunteers	Understand and comply with Kyogle Together Inc.'s complaint handling practices.	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Provide suggestions to management on improvements to the organisation's complaints management system.</p>
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Terms and Definitions

Complaint

Expression of dissatisfaction made to or about Kyogle Together Inc., its products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances [see the grievance policy]
- public interest disclosures made by staff [see the internal reporting policy]
- code of conduct complaints [see the code of conduct]
- responses to requests for feedback about the standard of service provision [see the definition of 'feedback' below]
- reports of problems or wrongdoing merely intended to bring a problem to the organisations notice with no expectation of a response [see definition of 'feedback']
- service requests [see definition of 'service request' below], and
- requests for information [see access to information policy].

Complaint management system

All policies, procedures, practices, staff, hardware and software used by the organisation in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of the organisation.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Kyogle Together Inc., about its products, services or complaint handling where a response is not explicitly or implicitly expected or legally required.

Service request

It is likely to include:

- requests for approval,
- requests for action,
- routine inquiries about the organisation's business,
- requests for the provision of services and assistance,
- reports of failure to comply with laws regulated by the organisation, and
- requests for explanation of policies, procedures and decisions.

Grievance

A clear, formal written statement by an individual staff member about another staff member, board member or a work related problem.

Public interest disclosure

A report about wrong doing made by a public official in New South Wales that meets the requirements of the *Public Interest Disclosures Act 1994*.

Steps in Complaint Handling



Step 1: Facilitate complaints

People focus

Kyogle Together Inc. is committed to seeking and receiving feedback and complaints about its services, systems, practices, procedures, products and complaint handling.

Any concerns raised through feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about the complaint handling process,
- provided with multiple and accessible ways to make complaints,
- listened to, treated with respect by all staff and volunteers and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for decision/s and any options for redress or review.

No detriment to people making complaints

Kyogle Together Inc. will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

The organisation will accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

Kyogle Together Inc. will ensure that information about how and where complaints may be made to or about the organisation is well publicised. The organisation will ensure that systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, the organisation will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

No charge

Complaining about Kyogle Together Inc.'s services, systems, practices, procedures, products and complaint handling is free.

Step 2: Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with Kyogle Together Inc. If a complaint is made to a volunteer they are required to put the person into contact with a staff member immediately. Ideally the complaint can be heard and an agreed outcome can be attained in the first conversation.

Responsiveness

The organisation will promptly acknowledge receipt of complaints.

Complaints will be assessed and prioritized 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: volunteers to staff, staff to Program Coordinators and Program Coordinators to Manager.

The organisation is committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process,
- the expected time frames for actions,
- the progress of the complaint and reasons for any delay, and
- their likely involvement in the process.

The organisation will advise people as soon as possible when unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

The organisation will also advise people as soon as possible when it is unable to meet time frames for responding to their complaint and the reason for the delay.

Objectivity and fairness

Kyogle Together Inc. will address each complaint with integrity and in an equitable, objective and unbiased manner.

The organisation will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

In some cases a complaint may be referred to the Community Justice Centres for independent mediation. This is a free service.

Responding flexibly

Kyogle Together Inc. staff are empowered to resolve complaints promptly and with as little formality as possible. The organisation will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

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

Confidentiality

The organisation 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 Kyogle Together Inc. as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Step 3: Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, Kyogle Together Inc. will work with the other organisation/s where possible to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

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

Where services are contracted out, Kyogle Together Inc. expects contracted service providers to have an accessible and comprehensive complaint management system. The organisation takes complaints not only about the actions of its staff but also the actions of service providers.

Complaints involving multiple parties

When similar complaints are made by related parties Kyogle Together Inc. will try to arrange to communicate with a single representative of the group.

Empowerment of staff

All staff managing complaints are empowered to implement the complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of the complaint management system.

Managing unreasonable conduct by people making complaints

Kyogle Together inc. is committed to being accessible and responsive to all people who approach with feedback or complaints. At the same time the organisations success depends on:

- the ability to do its work and perform its functions in the most effective and efficient way possible,
- the health, safety and security of staff, and
- the ability to allocate resources fairly across all complaints received.

When people behave unreasonably in their dealings with Kyogle Together Inc., their conduct can significantly affect the progress and efficiency of the organisations work. As a result, the organisation will take proactive and decisive action to manage any conduct that negatively and unreasonably affects it and will support staff to do the same in accordance with this policy. See policy on managing unreasonable conduct by people making complaints.

Complaint management system



Introduction

When responding to complaints, staff should act in accordance with the 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 the complaint management system are set out below.

Receipt of complaints

Unless the complaint has been resolved at the outset, the organisation will record the complaint and its supporting information. A unique identifier will also be assigned to the complaint file. This will be the complainant's initials and the complaints file will run in numerical order with the year. Starting at 1, eg. SM117. The files will be kept in a lockable filing cabinet.

The record of the complaint will document:

- the contact information of the person making a complaint,
- issues raised by the person making a complaint and the outcome/s they want,
- any other relevant information, and
- additional support the person making a complaint may require.

Acknowledgement of complaints

Kyogle Together Inc. will acknowledge receipt of each complaint promptly, and preferably within seven working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, the organisation will confirm whether the issue/s raised in the complaint is/are within its control. The organisation 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.

When determining how a complaint will be managed, the organisation will consider:

- how serious, complicated or urgent the complaint is,
- whether the complaint raises concerns about people's health and safety,
- how the person making the complaint is being affected,
- the risks involved if resolution of the complaint is delayed, and
- whether a resolution requires the involvement of other organisations.

Addressing complaints

After assessing the complaint, the organisation will consider how to manage it. This may include:

- giving the person making a complaint information or an explanation,
- gathering information from the product, person or area that the complaint is about, or
- Investigating the claims made in the complaint.

The organisation will keep the person making the complaint up to date on progress, particularly if there are any delays. The outcome of the complaint will also be communicated using the most appropriate medium. Actions decided upon will be tailored to each case and take into account any statutory requirements.

Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, Kyogle Together Inc. will contact the person making the complaint and advise them:

- the outcome of the complaint and any action taken,
- the reason/s for the decision,
- the remedy or resolution/s proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, any adverse findings about a particular individual are made, the organisation will consider any applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing findings with the person making the complaint.

Closing the complaint, record keeping, redress and review

Kyogle Together Inc. will keep comprehensive records about:

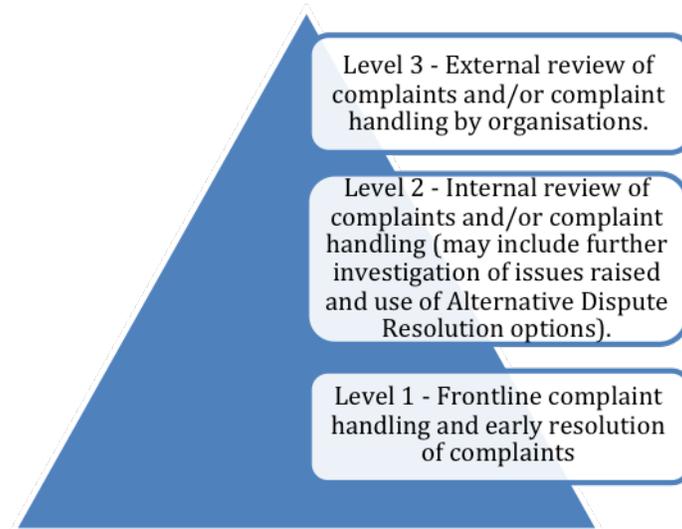
- how the complaint is managed
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- any outstanding actions that need to be followed up.

The organisation will ensure that outcomes are properly implemented, monitored and reported to the complaint-handling manager and/or senior management.

Alternative avenues for dealing with complaint

Kyogle Together Inc. will inform people who make complaints to or about it of any internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

The three levels of complaint handling



Kyogle Together Inc. aims to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, the organisation may decide to escalate the complaint to a more senior staff member within Kyogle Together Inc. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- possible referral to the Community Justice Centres for independent mediation, and/or
- facilitated resolution – where a person not connected with the complaint or Kyogle Together Inc. reviews the matter and attempts to find an outcome acceptable to the relevant parties.

Where a person making a complaint is dissatisfied with the outcome of Kyogle Together Inc.'s review of their complaint, they may seek an external review of the decision (by the Ombudsman for example).

Accountability and learning

Analysis and evaluation of complaints

The organisation will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be prepared on:

- the number of complaints received,
- the outcome of complaints, including matters resolved at the frontline,
- issues arising from complaints,
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of customer service and make improvements.

Both reports and their analysis will be provided to Kyogle Together Inc.'s Manager and senior staff for review.

Monitoring of the complaint management system

Kyogle Together inc. will continually monitor the complaint management system to:

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

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Continuous improvement

Kyogle Together is committed to improving the effectiveness and efficiency of its complaint management system. To this end the organisation will:

- support the making and appropriate resolution of complaints,
- implement best practices in complaint handling,

- recognise and reward exemplary complaint handling by staff,
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of analysis of complaints data and continual monitoring of the system.

Acknowledgements

The development of this policy has been informed by the following:

- Australian and New Zealand Standard Guidelines for complaint handling in organizations AS/NZS 10002:2014
- NSW Ombudsman Effective complaint handling guidelines, 2nd Edition, December 2010
- Victorian Ombudsman Councils and complaints - a good practice guide, February 2015
- Joint publication of the NSW Ombudsman and Department of Local Government Complaints Management in Councils Practice note no. 9, revised July 2009
- Ombudsman Western Australia Guidelines on complaint handling, November 2010
- Commonwealth Ombudsman Better Practice Guide to Complaint handling 1, April 2009
- NESTA Grumbles Gripes and Grievances The Role of Complaints in Transforming Public Services, April 2013
- Scottish Public Services Ombudsman SPSO Statement of Complaint handling Principles, 2011
- The British and Irish Ombudsman Association Guide to Principles of good complaint handling, 2007
- NSW Ombudsman Managing Unreasonable Complaint Conduct – a Model Policy and Procedure 2012
- Victorian Ombudsman Good Practice Guide, November 2007
- Disability Services Commissioner Victoria Good Practice Guide and Self-Audit Tool, 2nd Ed. 2013.