



Reliant Healthcare Pty Ltd
Suite 11.01, 60 Castlereagh Street
Sydney NSW 2000
ABN: 52 162 843 209

CO2 Complaints Management and Feedback Policy

Distribution

<i>Position</i>	<i>Person Responsible</i>	<i>Document Type</i>
Chief Executive Officer	Alexandra Conroy	Master
General Manager	Jillian Conroy	Electronic - Document Centre
All Staff	Alexandra Conroy	Presentation

Revision history

<i>Revision Number</i>	<i>Date</i>	<i>Details</i>
A	Nov 2014	Original
A1	Oct 2015	Updated
A2	Apr 2016	Reformatted
A3	March 2023	Updated

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Reliant Healthcare is committed to ensuring a consistent and coordinated approach is adopted to complaints management across all sectors of the business.

Purpose

This policy is intended to ensure that Reliant handles complaints fairly, efficiently and effectively. Our complaint management system is intended to:

- Enable Reliant staff to respond to issues raised by people making complaints in a respectful, timely and cost-effective way;
- Boost public confidence in our administrative process; and
- Provide information that can be used by us to deliver quality improvements in our services, staff and complaint handling.

This policy provides guidance for people who wish to make a complaint on the key principles and concepts of our complaint management system.

Definitions

Complaint

Expression of dissatisfaction made to or about Reliant, our 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 [grievance process is outlined in the staff manual]
- responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback'], and
- requests for information.

Complaint

An expression of dissatisfaction or feedback made to or about Reliant Health Care, relating to its products, services, staff or the handling of a complaint where a response or resolution is expected or required.

Complaint Management System

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

Dispute

An unresolved complaint escalated either within or outside of Reliant.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Reliant, about the services or complaint handling where a response is not explicitly or implicitly expected or legally required. Reliant is committed to ensuring opportunities for formal and informal feedback are sought through:

- Social Media: via comments in public or in private.
- Inquiries/Comments: via email, website, verbally or in writing.

All feedback is to be recorded in writing and filed for review by Reliant staff as part of Reliant's commitment to continuing service adjustments and improvements.

Grievance

A clear, formal written statement by an individual staff member about another staff member or a work related problem. The Reliant Grievance process for staff can be located in the Staff Handbook.

Organisational Commitment

Reliant expects staff 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 the way that commitment should be implemented.

<p>Board</p>	<p>Promote a culture that values complaints and their effective resolution</p>	<p>Report on Reliant’s complaint handling to the appropriate regulatory body. Provide adequate support and direction to key staff responsible for handling complaints. 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 resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Recognise and reward good complaint handling by staff.</p> <p>Support recommendations for workshop’s, service, staff and complaint handling improvements arising from the analysis of complaint data.</p>
<p>General Manager</p>	<p>Establish and manage our complaint management system.</p>	<p>Provide regular reports to the Board of Directors on issues arising from complaint handling work. Ensure recommendations arising out of complaint data analysis are canvassed with the Board of Directors and implemented where appropriate.</p> <p>Recruit, train and empower staff to resolve complaints promptly and in accordance with reliant’s policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve the organisation’s complaint management system. Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Recognise and reward good complaint handling by staff.</p>
<p>Coordinators</p>	<p>Demonstrate exemplary complaint handling practices</p>	<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 the General Manager on issues arising from complaints.</p> <p>Provide suggestions to the General Manager on ways to improve the organisation’s complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by the General Manager.</p>
All Staff	Understand and comply with Reliant’s complaint handling practices.	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of Reliant’s complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access Reliant’s complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by the General Manager</p>

Guiding Principles

Step 1: Facilitate Complaints

People focus

Reliant is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling. Reliant will acknowledge receipt of a complaint within two working days and endeavor to deal with any concerns raised in feedback or complaints within a 14 day time-frame. People making complaints will be:

- Provided with information about our complaint handling process
- Provided with information about how to make a complaint to the appropriate regulatory body or external agency.
- Provided with multiples and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- Be kept informed of the progress of their complaint, this includes

- any action taken
- the reasons for the decision made; and
- options to have the decision reviewed and

No detriment to people making complaints

Reliant 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

Reliant accepts anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

Reliant will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems, to manage complaints are easily understood and accessible to everyone, particularly people who may require access to communications support such as captioning, sound field system, or Auslan interpreters. If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we 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 to Reliant is free.

Step 2: Response to Complaints

Early Resolution

Where possible, complaints will be resolved at first contact with Reliant.

Responsiveness

Reliant General Manager or delegated person (Director or staff member) will promptly acknowledge receipt of complaints by email. The General Manager or delegated person will assess and prioritise complaints 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. Reliant are 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 our actions,
- the progress of the complaint and reasons for any delay,
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

Reliant Staff will advise people as soon as possible when we are 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). Reliant Staff will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and Fairness

Reliant staff will:

- Address each complaint with integrity and in an equitable, objective and unbiased manner.
- 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.

Responding Flexibly

The Reliant General Manager (or delegated Director or Staff member) are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives. Reliant Staff 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 Reliant General Manager (or delegated Director or Staff member) 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 Reliant 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, Reliant 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 our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, Reliant expects contracted service providers to have an accessible and comprehensive complaint management system. Reliant takes complaints not only about the actions of our staff but also the actions of service providers.

Complaints involving multiple parties

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

Referring complaints

Reliant may refer complaints to other bodies if required to do so by law. For example, if a complaint raises an issue that concerns the possible commitment of a criminal offence, it must be referred to the appropriate law enforcement.

Empowerment of staff

The General Manager of Reliant has empowered the Coordinators to implement our 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 our complaint management system.

Managing unreasonable conduct by people making complaints

Reliant is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

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

When people behave unreasonably in their dealings with Reliant, their conduct can significantly affect the progress and efficiency of our work. As a result, Reliant will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy. For further information on managing unreasonable conduct by people making complaints please refer to the links for relevant state Ombudsman and further information on Unreasonable Complaint Conduct models:

- NSW: www.ombo.nsw.gov.au

- Queensland: <https://www.ombudsman.qld.gov.au>

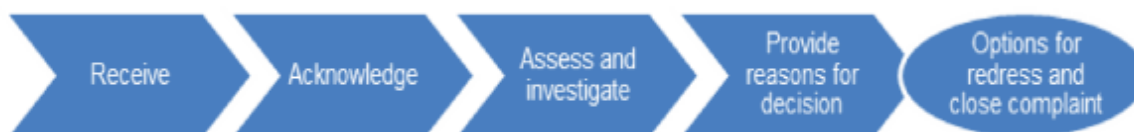
- Australian Capital Territory: <http://www.ombudsman.act.gov.au/>

- Victoria: <https://www.ombudsman.vic.gov.au>
- Western Australia: <http://www.ombudsman.wa.gov.au/>

Complaint Management System

Introduction

When responding to complaints, staff should act in accordance with Reliant’s complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation (especially state or territory legislation) and/or regulations when responding to complaints and feedback. The five key stages in our complaint management system are set out below.



Stage 1: Receipt of Complaint

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file. A ‘case - complaint’ will be created for the complaint in our system.

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,
- any additional support the person making a complaint requires

Stage 2: Acknowledgement of Complaint

Reliant will acknowledge receipt of each complaint promptly, and preferably within two working days.

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

Stage 3: Initial Assessment and addressing of Complaint

Initial assessment by General Manager (or delegated Director or staff member)

The General Manager after acknowledging receipt of the complaint will confirm whether the issue/s raised in the complaint is/are within our control. Reliant 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, Reliant 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, Reliant will consider how to manage it. To manage a complaint Reliant may:

- give the person making a complaint information or an explanation,
- gather information from the product, person or area that the complaint is about, or
- investigate the claims made in the complaint.

Reliant will keep the person making the complaint up to date on our progress, particularly if there are any delays. Reliant will also communicate the outcome of the complaint using the most appropriate medium. Which actions Reliant decide to take will be tailored to each case and take into account any statutory requirements. If a complainant is unsatisfied with the outcome, Reliant will provide information as to how a complaint may be made to the relevant statutory body or external agency.

Stage 4: Providing Reasons for Decisions

Following consideration of the complaint and any investigation into the issues raised, Reliant will contact the person making the complaint and advise such person, having regard to the need to preserve confidentiality, of the following matters:

- the outcome of the complaint and any action we took,
- a summary of the reason/s for our decision,
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant including an internal review, external review or appeal
- their right to submit a complaint to the relevant statutory body or external agency

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the relevant state Privacy and Personal Information acts:

- Commonwealth: Privacy Act 1988.
- NSW: Privacy and Personal Information Protection Act 1998.
- Queensland: Information Privacy Act 2009.
- Australian Capital Territory: Information Privacy Act 2014.
- Victoria: Privacy and Data Protection Act 2014.
- Western Australia: Freedom of Information Act 1992.

Stage 5: Closing the Complaint, record keeping, redress and review

We will keep comprehensive records about:

- how we managed the complaint,
- 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

Reliant will ensure that outcomes are properly implemented, monitored and reported to the complaint handling staff member and the General Manager. Records of the complaint will be filed as confidential, then destroyed after 7 years. The exception being if the situation regarding the complaint matter has arisen within that period of time.

Alternative avenues for dealing with complaints

Reliant will inform people who make complaints to or about us about any internal or external review options available to them including The NDIS Quality and Safeguard Commission, any relevant Ombudsman, the National Disability Insurance Agency, or any other relevant oversight bodies.

The three levels of complaint handling



Reliant 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, Reliant may decide to escalate the complaint to a more senior officer within the organisation. 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,
- facilitated resolution (where a person not connected with the complaint 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 Reliant’s review of their complaint, they may seek an external review of our decision (by the appropriate external authority)

Accountability and learning

Analysis and evaluation of complaints

Reliant 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 run on and reported by the General Manager to the Board of Directors at each Board meeting under “WHS, Legal, and Risk Register – key issues and risks”:

- 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 our customer service and make improvements. A periodic review of Reliant's complaints system will be conducted annually.

Monitoring the Complaint Management System

Reliant will continually monitor our 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

Reliant is committed to improving the effectiveness and efficiency of our complaint management system. To this end, we 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 our analysis of complaints data and continual monitoring of the system.

Further Considerations

Reliant has a policy framework for managing complaints, depending on the nature and circumstances of the complaint. More than one policy may apply to a particular complaint. All complaints will be managed in accordance with the relevant legislation and Policy Directive. This will include identifying an appropriate advocate should the person making the complaint wish to contact an independent advocate.

Complaints requiring mandatory external notification may need to be referred to an external agency such as Police, NSW Health, professional registration body, or other agency.

Reference

[NSW Health Complaint Management Policy](#)

[NDIS \(Complaints Management and Resolution\) Rules 2018](#)

[NDIS NDIS Quality and Safeguards Commission Effective Complaint Handling Guidelines](#)

[Aged Care Quality and Safety Commission](#)

Supporting documentation

Attached is supporting documentation in relation to this Complaints Management Policy. The attached documents include:

- CO2-1 Complaints Management & Feedback Policy Aged Care
- CO2-2 Complaints Management & Feedback Policy NDIS
- CO9 - Open Disclosure Policy
- CO11 - Risk Management Policy
- CO8 - Incident Management Policy
- CO2-3 Feedback Procedure

CO2
Complaints Management Policy
Rev A1 March 2023
Approved:

A. Conroy
Chief Executive Officer