



# HumanAbility Ltd

## Feedback and Complaints Management Policy

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## 1. Policy Statement

- 1.1. HumanAbility Ltd (HumanAbility) considers feedback about our performance and actions as critical to the ongoing improvement of the organisation. This form of communication and information provided can be used to ascertain areas for driving the enhancement of the safety and quality of delivered services which support HumanAbility in achieving its strategic objectives and vision.
- 1.2. Management of feedback and complaints provides an opportunity to have issues resolved effectively, ensures identified risks are managed appropriately and actions implemented to improve quality and service delivery.
- 1.3. Feedback may be presented in multiple formats, including formal and informal methods. All feedback will be managed in a way that is consistent with relevant legislation, policies and guidelines.
- 1.4. The Feedback and Complaints Management Policy (this Policy) is intended to ensure that HumanAbility manages complaints fairly, efficiently and effectively.
- 1.5. This Policy provides guidance to HumanAbility staff and people who wish to make a complaint on the key principles and concepts of our complaint management process.

## 2. Scope

- 2.1. This Policy applies to all staff (paid and volunteer), members, contractors and HumanAbility's governing body who receive or manage feedback and complaints from the public. This Policy is in relation to HumanAbility's feedback and complaint handling process.

## 3. Organisational Commitment

- 3.1. HumanAbility expects staff at all levels to be committed to fair, effective and efficient complaint handling and resolution.
- 3.2. We recognise that the nature of our work and the diversity of needs and opinions of stakeholders mean that there is a potential for conflicting views about appropriate outcomes in some of our work. The organisation is committed to fairly considering divergent views and opinions and testing them on the best evidence available. Where divergent views persist, they will be recognised and reported along with the decisions and/or recommendations made.
- 3.3. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented. 'Repeated behaviour' refers to the persistent nature of the behaviour and can involve a range of behaviours over time.

**Table: Staff Behaviour Commitments**

Who	Commitment	How
Chief Executive Officer or Chair of the Board	Promote a culture that values complaints and their effective resolution	<p>Report to the governing body on our complaint handling.</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 process improvements.</p> <p>Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.</p>
Staff whose duties include complaint handling (may include Chief Executive Officer or Chair of the Board)	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people to make a complaint, if needed.</p> <p>Comply with this Policy and associated procedures.</p> <p>Provide regular feedback to management and/or the governing body on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve our complaints management process.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
All staff	Understand and comply with our complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of our complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access our complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p>

## 4. Terms and Definitions

### 4.1. Complaint:

An expression of dissatisfaction made to or about HumanAbility, its services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required (AS/NZS 10002:2014 *Guidelines for complaint management in organization*).

4.2. Complaint handling/management process:

All policies, procedures, practices, staff, hardware and software used by HumanAbility in the management of complaints. All parties will be treated with respect.

4.3. Dispute:

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

4.4. Feedback:

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

4.5. Grievance:

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

4.6. Policy:

A statement of instruction that sets out how HumanAbility should fulfil its vision, mission and goals.

4.7. Procedure:

A statement or instruction that sets out how HumanAbility policies will be implemented and by whom.

## 5. Guiding Principles

5.1. Process:

An effective complaint handling process must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.





## 5.2. Facilitate Complaints:

### *People focus*

- HumanAbility is committed to seeking and receiving feedback and complaints about its services, practices, procedures, products and complaint handling.
- Any concerns raised in feedback or complaints will be dealt with within a reasonable timeframe.
- People making complaints will be:
  - provided with information about HumanAbility's complaint handling process and how to access it
  - listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
  - provided with reasons for the organisation's decision/s and any options for redress or review.

### *No detriment to people making complaints*

- HumanAbility will take all reasonable steps to ensure that people making a complaint/s are not adversely affected because a complaint has been made by them, or on their behalf.

### *Anonymous complaints*

- HumanAbility accepts anonymous complaints if there is a compelling reason to do so and will conduct a confidential investigation of the issues raised where there is enough information provided. We accept that anonymous complaints mean that there is a more limited capacity for their resolution and there is not an opportunity to provide direct feedback to the complainant.

### *Accessibility*

- HumanAbility will ensure that information about how and where feedback can be provided or complaints may be made, to or about, the organisation is well publicised on its website. HumanAbility will ensure that its processes 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, HumanAbility 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).



### 5.3. Respond to complaints:

#### *Early resolution*

- Where possible, complaints will be resolved at the time of first contact with HumanAbility.
- When appropriate, HumanAbility may offer an explanation or apology to the person making the complaint.

#### *Responsiveness*

- HumanAbility will promptly acknowledge receipt of complaints.
- HumanAbility 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.
- HumanAbility is committed to managing people's expectations, and will inform them as soon as possible, of the following:
  - the complaints process
  - the expected timeframes for 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.
- HumanAbility will advise people as soon as possible when it is 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).
- HumanAbility will also advise people as soon as possible when it is unable to meet its timeframes for responding to their complaint and the reason for its delay.

#### *Objectivity and fairness*

- HumanAbility will address each complaint with integrity and in an equitable, objective and unbiased manner.
- HumanAbility will ensure that the person handling a complaint is different from any staff member, about whose conduct or service is the subject of the complaint.
- Conflicts of interest, 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*

- HumanAbility's staff are empowered to resolve complaints promptly and with as little formality as possible. It will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.
- HumanAbility will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

#### *Confidentiality*

- HumanAbility will protect the identity of people making complaints where this is practicable and appropriate.
- Personal information that identifies individuals will only be disclosed or used by HumanAbility as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

#### 5.4. Manage the parties to a complaint:

##### *Complaints involving multiple agencies*

- Where a complaint involves multiple organisations, HumanAbility 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 HumanAbility, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.
- Where HumanAbility services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management process which is consistent with this Policy. HumanAbility takes complaints, not only about the actions of its staff but also the actions of its service providers, seriously.

##### *Empowerment of staff*

- All staff managing complaints are empowered to implement HumanAbility's complaint management process as relevant to their role and responsibilities.
- Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of the organisation's complaint management process.



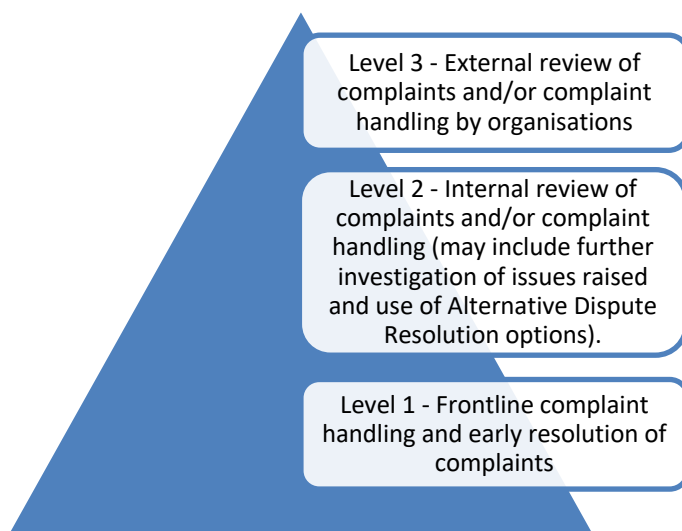
### *Managing unreasonable conduct by people making complaints*

- HumanAbility is committed to being accessible and responsive to all people who approach the organisation with feedback or complaints. At the same time HumanAbility's success depends on:
  - its ability to do work and perform functions in the most effective and efficient way possible
  - the health, safety and security of staff; and
  - its ability to allocate resources fairly across all the complaints we receive.
- When people behave unreasonably in their dealings with the organisation, their conduct can significantly affect the progress and efficiency of HumanAbility's work. As a result, HumanAbility will take proactive and decisive action to manage any conduct that negatively and unreasonably affects the organisation and will support its staff to do the same in accordance with this Policy.

### *Alternative avenues for dealing with complaints*

- HumanAbility will inform people who make complaints to or about the organisation of any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

### *The three levels of complaint handling*







#### *Level 1*

- HumanAbility 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.

#### *Level 2*

- Where Level 1 resolution is not possible, HumanAbility may decide to escalate the complaint to a more senior officer within its 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).

#### *Level 3*

- Where a person making a complaint is dissatisfied with the outcome of the review of their complaint, they may seek an external review of HumanAbility's decision (i.e. through the Australian Charities and Not-for-Profits Commission).

## **6. Accountability and Learning**

### 6.1. Analysis and evaluation of complaints:

- HumanAbility will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the Board.
- HumanAbility will undertake regular reporting 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 our customer service and make improvements.
- Both reports and their analysis will be provided to the Chief Executive Officer, senior management and to the Board for review, at least annually.



## 6.2. Monitoring of the complaint management process:

- HumanAbility will continually monitor its complaint management process to:
  - ensure its effectiveness in responding to and resolving complaints
  - identify and correct deficiencies in the process; and
  - monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

## 6.3. Continuous improvement:

- HumanAbility is committed to improving the way the organisation operates, including management of the effectiveness and efficiency of its complaint management process.
  - 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 complaint management process and complaint data; and
  - implement appropriate process changes arising out of our analysis of complaints data and continual monitoring of the system.