

COMPLAINTS AND FEEDBACK POLICY AND PROCEDURE 3.04-1

Applies to: Coast and Country Community Services	Version: 1
Adherence to the policy – All Workers (including contractors)	Date approved: 11/11/25
Position Responsible – CEO	Next review date: 11/11/27

1.0 Purpose

This policy is intended to ensure that complaints are handled fairly, efficiently and effectively.

The resolution of complaints will be consistent with a rights-based principle which is also fundamental to the United Nations Convention on Human Rights.

The complaint and feedback management system intend to:

- provide a well-handled system than values the customer's opinions, and takes all feedback seriously, with the intent to improve the relationship between our organisation and our customers.
- empower all employees and customers to feel free to voice their complaint or provide feedback.
- allow Coast and Country Community Services (CCCS) to respond to issues raised by individuals making complaints in a timely and cost-effective way.
- boost customers confidence in our administrative processes.
- provide CCCS with information that will help us deliver quality improvements in our services, supports, roles, and complaints handling process.

2.0 Scope

Our Complaints and Feedback Policy is Coast and Country Community Services' commitment to a positive complaints culture within our organisation, from the highest management levels to our frontline staff. The policy provides the foundation for all other components of a quality complaints management and resolution framework. The policy also provides guidance to our staff and customers (who may wish to make a complaint or provide feedback) on our complaint management system's fundamental principles and concepts.

A designated Complaints Officer will handle all complaints and feedback received by Coast and Country Community Services. All staff are bounded by Age Care standards and the National Disability Insurance Scheme (NDIS) Code of Conduct.

3.0 Policy

Coast and Country Community Services will create an environment where complaints and concerns, compliments and suggestions are welcomed and viewed as an opportunity for acknowledgement and improvement. This process is to ensure that individuals have the right to make complaints and are encouraged to exercise their right in a blame-free and resolution-focused culture, respecting an individual's right to privacy and confidentiality.



Coast and Country Community Services will appoint a staff member to be the designated Complaints Officer. The Complaints Officer is responsible for coordinating and handling complaints and feedback and ensuring the complaint or feedback is properly managed.

It is acknowledged that Coast and Country Community Services view all comments and complaints as a vital contribution to our internal review of performance and processes which assists in developing the continuous improvement of our services, as we work towards achieving our care commitment.

A person does not necessarily have to expressly state that they wish to make a complaint to have the issue or concern dealt with as a complaint. Regardless of whether an issue is big or small, it will be treated seriously, and Coast and Country Community Services will ensure the person is advised on how valuable their opinion is to our organisation. We will use such information to continuously improve our Services delivery.

Customers, families, advocates or other stakeholders may submit a Complaint and Feedback Form regarding Coast and Country Community Services's supports, services, staff, or contractors. The customers can be provided information in Easy Read format if required.

The Complaints Officer will ensure that the complainant can physically access all meetings to resolve the complaint by reviewing the environment to ensure that the meeting site is accessible for those with mobility issues.

It is our policy to follow the principles of procedural fairness and natural justice and comply with the requirements under the Age Care standards and National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 and NDIS (Procedural Fairness) Guidelines 2018 including:

- informing a person if their rights or interests may be adversely or detrimentally affected in a direct and specific way.
- giving notice of each prejudicial matter that may be considered against them.
- giving a reasonable opportunity to be heard on those matters before the adverse action is taken.
- putting forward information and submissions in support of an outcome that is favourable to their interests.
- ensuring that the decision to take adverse action should be soundly based on the facts and issues that were raised during that process, and this should be apparent in the record of the decision.
- ensuring that the decisionmaker should be unbiased and maintain an unbiased appearance.

Coast and Country Community Services ensures complaints and feedback are managed effectively through:

- implementing an open and transparent complaint handling system.
- observing the principles of natural justice and compliance with relevant mandatory reporting under Australian law.
- committing to the right of stakeholders to complain either directly or through a representative.
- undertaking procedural fairness to reach a fair and correct decision.
- taking reasonable steps to inform the complainant to the Aged Care Quality and Safety Commission or My Aged Care or NDIS commission complaints process, including the use of various communication means, e.g. oral and written
- maintaining complete confidentiality and privacy
- training staff in our complaint process and the rights of all stakeholders to complain



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- considering all complaints seriously and respectfully
- advising customers and staff members of their right to complain
- guidance regarding the complaint process is outlined in the welcome information provided to our customers
- provision of support for people who may need assistance to make a complaint
- protection of complainants against retribution or discrimination
- prompt investigation and resolution of complaints
- communicating and consulting with customers, family and advocates during the complaints process and providing feedback and resolutions
- interpretation and application of policies and processes
- providing opportunities for all parties to participate in the complaint resolution process
- ensuring that complainant is involved in the resolution of the complaint
- keeping complainant informed of the progress of the complaint:
 - actions taken
 - the reasons the decisions are made and options to have decisions reviewed
 - ensuring that the decisionmaker or advocate is included and recognised in the process
 - accepting Coast and Country Community Services and staff accountability for actions and decisions taken due to a complaint
 - committing to resolving problems at the point of Services or through referral to alternatives
 - committing to use complaints as a means of improving planning, delivery and review of services through our continuous improvement processes
 - referring complaints and feedback into our continuous improvement cycle
 - annually auditing the Complaints and Feedback Policy and Procedure.

4.0 Definitions

Term	Definition
Complaint	An expression of dissatisfaction with a support or Services, including how a previous complaint was handled, for which a response or resolution is explicitly or implicitly expected.

Role	Role requirements
Complaints Officer	The role of the Complaints Officer is to: • manage the complaint process • manage reviews and make recommendations for continuous improvement using the information gained from the issue of the complaint • stand independently from the management to allow customers and staff members to be able to make a complaint about the management of the organisation • provide feedback and advice, as required • review the complainant 's needs to ensure that their mode of communication is managed (e.g. Easy Read, large print, translated documents, etc.) • collaborate with the complainant and their advocate



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	• keep all parties informed during all stages of the complaint management process • handle all appeals related to the outcome of the complaint • complete all necessary reports and documents, including providing information to complainants and management • record all information into the Complaint Register • review the Complaint Register at monthly management meetings.
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5.0 Procedure

5.1 Complaint process

Complaints and suggestions can be made by:

- using the Complaints and Feedback Form or the Anonymous Complaints and Feedback Form
- contacting a member of staff, verbally or in writing, our staff must offer to document the complaint on behalf of the customer if required and refer the matter to a Manager
- contacting the Complaints Officer, verbally or in writing
- responding to questionnaires and surveys
- sending an email to our contact email
- attending meetings/care conferences
- contacting external complaint agencies, e.g. Aged Care Quality Safety Commission or NDIS Quality and Safeguards Commission
- communicating orally, in writing, or any other relevant means.

Complaints may be made by:

- staff
- customers/clients
- public
- advocates
- family members
- carers
- anonymous person/s.

Results are recorded in the Complaint Register, which allows for input into our continuous improvement processes. The Continuous Improvement Register will be used to record improvements that are established after the finalisation of the complaint management process.

If a complaint is about:

- **Support or services:** The complaint will be dealt with by the Complaints Officer.
- **Staff member/s:** The complaint will be dealt with by the Complaints Officer.
- **Operations Manager:** The Chief Executive Officer
- **CEO:** The Chairperson of the board or a nominated board member.
- **Board Member:** An external person or body may be approached, e.g. Aged Care Quality Safety Commission or NDIS Quality and Safeguards Commission.

All staff, customers, family and advocates, visiting health professionals and visitors are informed of our complaints process via:

- participant welcome information
- initial access to supports
- staff orientation, induction and training
- Meetings, reviews and assessments
- participant agreements
- contractor agreements and
- Coast and Country Community Services webpage

5.2 Complaint management process

The process and investigation must adhere to the principles of impartiality, privacy, confidentiality, transparency and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. Coast and Country Community Services must take into consideration any cultural and linguistic needs of a participant and provide the relevant support mechanism, such as an interpreter or similar.

Complainants are provided with access to our Complaints and Feedback form. These may be accessed via staff or management. The Complaints Officer will review the individual's needs and undertake to assist them via the best means appropriate to suit their needs. The variance between individuals requires a personal approach, but may include:

- offering an advocate
- providing text telephone (TTY) Services to people with a hearing impairment
- ensuring the meeting site is walking frame or wheelchair accessible
- offering independent assistance to read and write to formulate and lodge a complaint
- seek information from the complainant to determine any special requirements (e.g. access or communication).

The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

- Acknowledgement:
 - genuinely listening without interruption
 - empathising
 - ensuring the complainant feels comfortable (e.g. being aware that staff may be defensive and consider how this is perceived)
 - acknowledgement of the effect of the situation on the individual
 - resolving to a good outcome
 - notifying regularly and promptly on steps undertaken.
- Answers:
 - clear explanations relevant to the issue which is provided ONLY once all the facts are known.
- Actions (Action Plan):
 - what will be done?
 - who will do it?
 - action plan completion date
 - how progress will be communicated to all parties involved

- oversight of actions.
- Apology:
 - consider the form of the apology and the managerial level of response
 - consider timeliness, sincerity
 - be specific and direct
 - accept responsibility if appropriate and provide information on the cause and impacts
 - provide an explanation without excuses
 - provide a summary of key actions agreed on to move forward and resolve the issue.

5.2.1 non-investigation complaint process

All complaints, where possible, will be managed directly and quickly at the point of Services unless the complaint requires investigation (see the procedure outlined below). The non-investigation complaint process is as follows:

1. Issue reviewed by the Complaints Officer.
2. The complainant will be consulted, and the issue discussed, to determine actions required to resolve the issue. During this process, Coast and Country Community Services will offer complainant support from an independent advocate to reduce stress and anxiety.
3. All available options will be discussed with complainant and their advocate.
4. Where possible, a collaborative decision is finalised (i.e. acknowledgement, answer, action or apology).
5. The complainant is informed of the decision and the reasons for the outcome.
6. The complainant can seek to have the decision reviewed if they are not happy with the resolution; this may lead to implementing the complaint investigation process.
7. In the event of a complainant seeking a review, a review of the decisions may be resolved quickly by the Complaints Officer completing the above points (2 to 5) again.

5.2.2 Complaint Investigation Process

Step 1. Acknowledge

1. Acknowledge all complaints quickly, within one working day, where possible.

Step 2. Review of the complaint

1. Inform the complainant, before any consultative meeting, that they can an advocate or support a person present throughout the process.
2. Offer to locate an independent advocate for the participant, if required.
3. Involve the complainant and their advocate using a consultative process to ensure their voice, views and preferred outcomes are heard and discussed.
4. Determine the type of outcome that the complainant is seeking (i.e. acknowledgement, answers, actions or apology). Information will be used to ensure that the complainant's feedback and requirements are at the core of the complaint investigation and management process.
5. Inform the complainant of:
 - their right to an advocate and interpreter
 - the stages of the complaint management and decision-making process
 - mechanisms implemented to protect the complainant's privacy
 - their right to complain to the Aged Care Quality and Safety Commission or the NDIS Quality and Safeguards Commission at anytime

- actual progress and outcomes of the investigation.
1. Determine the type of complaint (i.e. Services, support or process).
 2. Notify the complainant and their advocate at each stage of the investigation and seek their feedback.
 3. If a consultative meeting is required, it will be held in a safe environment that has been determined by the complainant and at a time relevant to the customer.

Step 3. Assessing the complaint

1. When assessing a complaint, the Complaints Officer must prioritise the complaint and determine a resolution pathway (where required).
2. After the pathway is established, the complaint will be investigated.
3. Feedback from the complainant or their advocate must be used as part of this process (e.g. consultation meeting data).

Step 4. Investigation and decision making

1. When the complaint is lodged, the Complaints Officer should determine if it is practicable to find an immediate resolution (see 5.2.1 non-investigation complaints process).
2. During the investigation and decision-making process, the Complaints Officer will:
 - keep the complainant informed about each stage of the investigation process
 - consult with the complainant to gather information about the underlying issue/s
 - analyse antecedents and underlying issues when determining a decision
 - review and approve all written reports and documents, before them being sent out to all parties
 - respond to the complainant with a clear decision and any next actions (if any)
 - inform the complainant that they have the right to reject the outcome
 - inform the complainant of their right to make a complaint directly to My Age Care or NDIS.

Commissions by:

• Age Care Quality and Safety Commission - Complaints & concerns 1800 951 822
• NDIS Commission phoning 1800 035 544 (free call from landlines) or TTY 133 677 (interpreters can be arranged).
• using a National Relay Services and asking for 1800 035 544.
• completing an online complaint contact form.

Step 5. After the decision

- 1) After investigation and a satisfactory response has been documented, the Complaints Officer will:
 - inform the complainant and their advocate of the decision, including the reason for the decision, and they will provide options for how the complainant can review the decision
 - ensure that the complaint investigation is satisfactorily completed
 - determine if the complainant is satisfied with the outcome

- follow-up and consult with the complainant/s about any concerns
- close out the complaint.

5.3 Review and improvement

Coast and Country Community Services takes a systematic approach to incorporate a review of all issues raised by a complaint to identify and address any possible systemic issues and determine any continuous improvement actions identified during the complaints process.

The review and improvement process includes:

- ascertaining preventative actions and continuous improvement
- considering if any systemic issues require addressing
- recording the information regarding the complaint in the Complaint Register
- recording the details of the improvement stemming from a complaint in the Continuous Improvement Register (if required)
- training staff in any new systems or actions
- adjusting policies and procedures
- monitoring the complaint resolution according to the internal audit schedule
- providing feedback to the complainant personally to inform them of the outcomes and influences their issue raised within our organisation.

5.4 Documentation

All employees are provided training regarding the complaints process during orientation and are provided with the Staff Handbook, which includes information on the complaints process provided (see Staff Training).

The complaints process is available for customers, families, carers and advocates via the information provided in our Customers Handbook and through the provision of Easy Read documents (as required).

Documentation of the complaint process is as follows:

- All complaints will be recorded in the Complaint Register, and information in the register will include the:
 - complaint details
 - identified issues
 - actions are undertaken to resolve the complaint
 - the outcome of the complaint.
- All documents, including the Complaint and Feedback Forms, are uploaded into the computer system.
- Copies of any information provided to the complainant are stored in their relevant file.
- All documents are kept confidential, and access is only permitted to employees relevant to the complaint. The Complaints Officer determines who is relevant.
- A copy of all complaint documents will be retained in the file for seven years from the record date. If the documents relate to a participant under the age of 18 years of age, the documents will be retained until the participant turns 25 years of age.
- Statistical and other information will be collected to:
 - review issues raised
 - identify and address systemic issues
 - report information to the Commissioner, if requested by the age Care Quality Safety

Commission or NDIS Quality and Safeguards Commission.

A policy review will occur if there are legislative changes or when determined by a regular or annual internal audit review.

5.5 Unresolved complaints

Unresolved complaints will be referred to the Complaints Officer for investigation and resolution. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be escalated to a person nominated by the complainant (with the complainant's permission).

When complaints cannot be resolved internally, the complainant may be referred to the:

- Age Care Quality and Safety Commission - Complaints & concerns 1800 951 822
- **NDIS Quality and Safeguards Commission** - Phone: 1800 035 544 (free call from landlines) or
- TTY 133 677
- National Relay Services and ask for 1800 035 544 - Interpreters can be arranged.

6.0 Related documents

- Complaints and Feedback Form
- Anonymous Complaints and Feedback Form
- Complaints Process Checklist
- Complaints Register
- Continuous Improvement Policy and Procedure
- Continuous Improvement Register
- Continuous Improvement Plan
- Customers Handbook
- Staff Handbook
- Staff Training Record
- Staff Training Plan
- Training Attendance Register – In-house
- Risk Management Policy and Procedure
- Services Agreement

7.0 References

- Age Care Act 2024
- Age Care Quality Standards
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2021 (V4)
- NDIS Act 2013 (Commonwealth)
- NDIS (Procedural Fairness) Guidelines 2018
- Privacy Act 1988 (Commonwealth)
- Anti-Discrimination Act 1977