

1. PURPOSE

- 1.1. This procedure outlines UnitingSA’s commitment to client feedback and complaints management and has been framed around natural justice principles and individuals’ rights.
- 1.2. This procedure is designed to ensure that client complaints about UnitingSA services are managed through an effective, fair and consistent process.
- 1.3. Compliments, complaints and other forms of feedback provide valuable information on levels of client satisfaction and provide UnitingSA with an opportunity to improve services. Feedback will be taken seriously and is seen as an opportunity for continuous improvement.
- 1.4. Access to mediation services, external complaints handling services or advocacy agencies will be facilitated if the need arises and at the request of the complainant.
- 1.5. UnitingSA complies with the National Principles for Child Safe Organisations. National Principle 6 states that organisations should have processes to respond to complaints and concerns that are child-focused and uphold the rights of children and young people.
- 1.6. The more that organisations seek to involve children and young people in decision making, the greater the likelihood they will speak up when something is wrong and participate meaningfully in a complaints process.

2. SCOPE

- 2.1. This procedure applies to all UnitingSA employees, services, clients and support persons.
- 2.2. Employee grievances, code of conduct complaints and public interest disclosures are managed through separate mechanisms.

This procedure will be monitored and updated to reflect best practice, professional practice standards and guidelines, regulatory, and legislative requirements.

3. DEFINITIONS

Term	Definition
Complaints Management	The process of resolving individual complaints and identifying opportunities to make systematic improvements.
Compliment	an expression of praise, encouragement or gratitude about a service that is funded, regulated or provided. It may be made verbally or in writing and about an individual employee, a team or a service.
Corrective Action	identification and elimination of the causes of a problem, thus

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	preventing their recurrence.
Feedback	the voice of the clients having observations, complaints and suggestions with the service about the way we conduct our business. Feedback is a response to an observation, concern or suggestion.
LGBTQIA+	lesbian, gay, bisexual, transgender, queer/questioning, intersex, asexual and other diverse sexualities and gender identities.
Natural Justice	These principles involve ensuring that all parties affected by a grievance are granted a fair hearing prior to any resolution being attempted. In any complaint situation it is important that the principles of natural justice are applied.
Serious Complaint	a complaint which refers to claims of misconduct of employee or Volunteers, breach of confidentiality, suspicion of discrimination etc. A complex complaint is one that cannot be resolved until an investigation has been conducted.
Simple Complaint	a complaint will be classified as a simple complaint if it is likely to be easily resolved e.g. the community bus is running late, the maintenance person has not arrived etc. It is expected complaints of a simple nature will be responded to immediately or within one working day.

4. GUIDING PRINCIPLES TO MANAGE FEEDBACK AND COMPLAINTS

The UnitingSA approach to feedback and complaints management supports:

- 4.1. Our commitment to seeking and receiving feedback and complaints about our services, systems, practices, procedures and products.
- 4.2. Where possible, complaints will be resolved at first contact with UnitingSA.
- 4.3. Clients having an understanding of their rights and responsibilities to seek the most appropriate resolution to their feedback and complaints.
- 4.4. Clients being able to speak up and provide feedback and acknowledging when supports or services have not met the expectations or applicable standards.
- 4.5. All employees, volunteers and students complying with the relevant Code of Conduct. This Code outlines unacceptable behaviours towards clients, requires the reporting of concerns, breaches or suspected breaches, and details the protections available to individuals who make complaints or reports in good faith.
- 4.6. Prioritising child safety and child friendly complaints process as well as providing a safe environment for children and young people that supports their right to have a say about and be involved in decisions affecting their lives.
- 4.7. Concerns about the safety of a child or young person are dealt with as a matter of urgency.
- 4.8. Providing a safe environment for clients with disability and supporting their right to have a say about and be involved in decisions affecting their lives.
- 4.9. Providing a culturally safe organisation for Aboriginal and Torres Strait Islander clients and supporting their right to have a say about and be involved in decisions affecting their lives.
- 4.10. Providing a safe organisation for clients from culturally and linguistically diverse (CALD) backgrounds and supporting their right to have a say about and be involved in decisions affecting their lives.

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- 4.11. Providing a safe organisation for LGBTQIA+ clients and supporting their right to have a say about and be involved in decisions affecting their lives. This includes being mindful of this in seeking to involve an LGBTQIA+ client's family in a complaint process, as they may be fearful that any disclosure of abuse may also lead to disclosure of other details about them or to assumptions being made about their sexual identity.
- 4.12. Using a trauma informed approach and offering referrals to medical treatment, psychological support and other therapeutic services and helping clients to secure support. If the client does not want the referral, ensuring that services re-offer support at a later stage in case they change their mind.
- 4.13. Information on the feedback and complaint management process being easily accessible and well publicised.
- 4.14. Employees being educated to use a range of skills and capabilities required to manage compliments, complaints and feedback.
- 4.15. An organisational culture that is focused on effective, person-centred complaints resolution and utilising feedback for continuous improvement.
- 4.16. The recording of data to identify emerging and existing trends or systemic issues.
- 4.17. Clients to access external complaints handling services where required.

5. CHILD SAFETY COMPLAINTS MANAGEMENT SYSTEM GUIDING PRINCIPLES

UnitingSA refers to the principles within the NSW Ombudsman's Office "*Complaint Handling Guide: Upholding the rights of children and young people* (the Guide)" to guide our management of an effective complaint-handling system that prioritises child safety and promotes the rights of children and young people to have a voice in decisions that affect them. The Guide is divided into nine guidelines:

- 5.1. Embedding children's rights, safety and wellbeing into the complaints process: UnitingSA will promote and continuously improve a child-rights focused complaints culture. All children and young people, employees, volunteers, families and carers should feel supported in making a complaint to any UnitingSA service.
- 5.2. Reporting responsibilities: UnitingSA workers are required to comply with the Mandatory Notification (Reporting Harm & Risk of Harm to Children and Young People) procedure to protect the safety of children and young people. The roles and responsibilities of employees and volunteers in meeting these obligations are documented within the procedure.
- 5.3. Sharing information and communicating with stakeholders: UnitingSA workers are required to comply with the Information Sharing procedure that documents the relevant legislative responsibilities for information sharing to promote the safety and wellbeing of children and young people. Employees and volunteers are aware of what information they can share, with whom, and when and how it should be communicated.
- 5.4. Confidentiality and privacy: Children and young people have the same right to privacy, anonymity and confidentiality as adults (subject to reporting obligations). UnitingSA has a Privacy policy that sets out our privacy and legislative obligations to

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ensure we maintain confidentiality and protect personal information and client privacy.

- 5.5. Managing risks – complaints and incidents: It is important that services have a clear understanding of potential risks to children and young people and have strategies in place to prevent risks from occurring. UnitingSA services will monitor and reassess risks throughout investigation and complaints processes.
- 5.6. Conducting investigations involving children and young people: Complaints affecting children and young people will be properly investigated, taken seriously, and their rights are safeguarded throughout the investigation process. These investigations are planned, fair, proportionate and thorough, with findings supported by the available evidence.
- 5.7. Being fair and objective: Complaints processes should be fair to all parties involved, including affected children or young people and the subject of the complaint. An adult's opinion is not prioritised over a child's if they differ. Children and young people are listened to without judgement and their views are taken seriously.
- 5.8. Explaining outcomes and review options: It is important for services to be aware of what type of outcomes are available for different complaints and explain them to complainants, including children and young people. Final outcomes of a complaint, their reasons and options for review should also be clearly explained to the complainant and subject of the complaint.
- 5.9. Record keeping and complaints data: UnitingSA services will keep full and accurate records about complaints involving children and young people, in line with any legislative or other record-keeping requirements. These records will be analysed to improve service and identify trends and risks in the organisation.

6. PROCEDURE

6.1. STEP 1: RECEIVE AND ACKNOWLEDGE FEEDBACK AND COMPLAINTS

- 6.1.1. Anyone can make a complaint or provide feedback about a UnitingSA service by discussing issues directly with the service. Most complaints or feedback can be addressed quickly by discussing the issue (s) with the service either face to face or over the phone. Other options can include via email, letter, website feedback or feedback forms. If clients do not feel able to do this directly, one of our employees can provide assistance.
- 6.1.2. To support clients to make an effective complaint or provide feedback:
 - Encourage clients to ask for help as well as discuss the complaints and feedback process and possible resolution options about any issue. Employees then need to keep the person updated on outcomes throughout the process.
- 6.1.3. Encourage clients to document their concerns in writing. More complex concerns are better able to be managed if documented. This allows for the collation of relevant information in one document and presentation of information in a logical flow. It also provides the client with a written record of their concern.

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- 6.1.4. Focus on the facts and include important information:
- 6.1.4.1. Provide concise background information on the issue and outline any steps taken by the person to fix the problem. Include times, dates and names of employees and their responses. It's also useful to include copies of any forms, letters or documents that relate to the complaint or feedback.
 - 6.1.4.2. Be clear about the outcome to be achieved.
 - 6.1.4.3. Acknowledge that making a complaint or providing feedback can be a difficult experience for some people, particularly when it concerns support workers or services with whom they have an ongoing relationship. Support each person to access an advocate if required or ask a friend or family member to help.
 - 6.1.4.4. We generally provide initial acknowledgement of the feedback or complaint at the time of receipt or within two business days.
 - 6.1.4.5. Where possible, we will also resolve the matter in this timeframe.
 - 6.1.4.6. The Feedback Follow-Up Record form (Clients and External Stakeholders) should be used to track and manage the process for clients under 18 years. The complainants should be treated courteously and be kept informed of the progress of their complaint through the complaints-handling process. A written response will be provided within 30 days of receiving the complaint.
 - 6.1.4.7. To ensure we learn from our clients, feedback and complaints are categorised and recorded in our central Incident, Feedback and Complaints Management system (Riskconnect).

6.2. STEP 2: ADDRESS AND PRIORITISE

We ensure procedural fairness by gathering the relevant facts and circumstances to understand the issues. This may include:

- 6.2.1. Asking the client their opinion and resolution expectations of a complaint from the client's perspective and to provide more information about the feedback or complaint if required.
- 6.2.2. Notifying all affected parties and seeking their version of events and any relevant information.
- 6.2.3. Using a translator or interpreter or a different method to make a complaint to suit their communication needs, or other supports such as counselling or advocacy services.
- 6.2.4. Contacting other parties for information or evidence that could assist a resolution. Once we've gathered the relevant facts and circumstances, we'll decide on the appropriate and proportionate response to achieve the best outcome.
- 6.2.5. When UnitingSA receives client feedback or a complaint, we consider how we can best respond and prioritise the information. In assessing feedback and complaints, we consider:
 - The seriousness, complexity or urgency of the complaint and knowing when and how to escalate or refer a complaint to the appropriate person – i.e. a complaint of a criminal nature to be escalated to the relevant Executive team member immediately.

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- The risk implications if resolution of the complaint is delayed and whether a resolution requires the involvement of other organisations such as the NDIS Quality and Safeguards Commission and Aged Care Quality and Safety Commission.
- Client vulnerability issues that may require providing additional support ie the client may be having difficulty in communicating their complaint or the need for an interpreter or other translation services.
- Clarifying the information and how we can resolve a complaint straight away as well as confirming with the client regarding the action taken.
- The services, circumstances and products that caused the problem or complaint to occur.

6.3. STEP 3: INVESTIGATE

UnitingSA will investigate all client feedback and complaints. We will:

- 6.3.1. Allocate time and resources to investigate fully.
- 6.3.2. Review the service or product that the feedback or complaint refers to ie information on computer is different to information held on paper or email copies, employees have been mistakenly working to old versions of procedure or process documents or gaps in work instructions or processes.
- 6.3.3. Review procedures, processes, codes of practice, product information, account information, or service charters as relevant.
- 6.3.4. Share details of the complaint with relevant leaders and employees who need to know.
- 6.3.5. Gather files, correspondence (letters and emails), statements, incident notes and any meeting or telephone call notes related to the feedback and complaint.
- 6.3.6. Identify any areas of dispute between the client and the service.
- 6.3.7. Prioritise any areas that may need further investigation and consider time implications.

6.4. STEP 4: COMPLAINT RESOLUTION

After assessing a complaint, we will consider how to manage it including:

- 6.4.1. Acknowledging the complaint.
- 6.4.2. Providing information or an explanation to the client.
- 6.4.3. Reviewing client literature (leaflets, poster, FAQ etc.).
- 6.4.4. Reviewing an operational process.
- 6.4.5. Requesting a review of a policy or procedure.
- 6.4.6. Arranging education, guidance and support for employees.
- 6.4.7. Taking action to address employee work performance.
- 6.4.8. Taking positive steps to avoid repetition of the issue.
- 6.4.9. We will apologise to the client where appropriate and keep the client up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate communication channel. Which actions we decide to take will be tailored to each case and consider any legal requirements.

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6.5. STEP 5: CLOSING THE COMPLAINT

- 6.5.1. Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:
- 6.5.1.1. The outcome of the complaint and any action we took.
 - 6.5.1.2. Any corrective actions taken.
 - 6.5.1.3. The reason(s) for our decision.
 - 6.5.1.4. The remedy or resolution(s) that we have proposed or put in place and
 - 6.5.1.5. Any options for review that may be available to the complainant, such as an internal review, external review or appeal.
 - 6.5.1.6. Any outstanding actions that need to be followed up.
- 6.5.2. We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling leader and/or Executive team member.

6.6. STEP 6: REDRESS

- 6.6.1. In the event of the proposed course of corrective action being unacceptable to the complainant, the person managing the complaint will advise the complainant of his or her rights and avenues to take the matter further.
- 6.6.2. Internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

6.7. STEP 7: CONTINUOUS IMPROVEMENT

- 6.7.1. Feedback and complaints provide valuable information we can use to improve future client experiences and satisfaction.
- 6.7.2. To ensure we learn from clients, feedback and complaints are categorised and recorded in our central Feedback and Complaints Management system.
- 6.7.3. The data informs reports, which highlight trends and systemic issues.
- 6.7.4. From there, we develop strategies to continuously enhance our services and provide opportunities to innovate and improve UnitingSA's operational effectiveness. We deal with personal client information in accordance with the UnitingSA Privacy policy.
- 6.7.5. We are committed to improving the effectiveness and efficiency of our complaint management system. We will:
- Support the making and appropriate resolution of complaints;
 - Implement best practices in complaint handling;
 - Recognise and reward excellence in complaint handling by employees;
 - Regularly review the complaints management system and complaint data;
 - Implement appropriate system changes arising out of our analysis of complaint data and continual monitoring of the system.
- 6.7.6. All complaints of a criminal nature must be handled immediately and the Executive team member of the service notified. All criminal investigations will be referred to SAPOL.

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- 6.7.7. What if our clients are not satisfied? Upon request, the UnitingSA may decide on an appropriate additional response that is consistent with this procedure.
- 6.7.8. If clients are not satisfied with the way we handled their concerns, they can contact the in writing, by phone, in person or via an online form.

Phone: 1300 362 072

Email: ombudsman@ombudsman.gov.au

Website: www.ombudsman.gov.au/pages/making-a-complaint/

Post: GPO Box 442, CANBERRA ACT 2601

6.8. STEP 8: FEEDBACK ABOUT THE COMPLAINTS SYSTEM

- 6.8.1. Once a complaint has been managed and closed, it is important to review the process and any outcomes. This includes checking in with the client who made the complaint for feedback around the finalisation of their complaint as well as their response to any follow up or implementation of actions.
- 6.8.2. Further actions may include:
- Evaluating what the complaint was about - ie in relation to a service, procedure or process.
 - Gaining additional feedback from the client in relation to their experience in the complaints management process. Were the issues resolved for them?
 - Determining what information did the complaint provide that will allow services to identify and improve those services, policies and procedures and UnitingSA as a whole.
 - Evaluating how effectively we communicated with the client who made the complaint, any affected participants, affected employees and other stakeholders.
 - Assessing if people using our services, their families, carers and friends require more or improved information about their rights and the complaints process? Does the person who made the complaint feel more comfortable about speaking up in the future?
 - Reviewing the feedback and complaints management process.
 - Asking the question if we have adequate employee education and do employees require further education and in what area of the complaints management process?
 - Assessing if our complaint handling process reflected our Values and expectations for complaint handling? Identifying and implementing opportunities for improvement of the process.

6.9. RECORD KEEPING

- 6.9.1. All complaints will be captured within Riskconnect to support monitoring, reporting and trending.
- 6.9.2. Clients and their families are informed about record-keeping processes, including what information is kept, for how long, and how they can access records.

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- 6.9.3. Comprehensive records will be maintained 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).
- 6.9.4. All records must be retained in accordance with legislation and the Records Management procedure.

7. RESPONSIBILITIES

- 7.1. The **CEO** is responsible for promoting a culture that values feedback and complaints as well as their effective resolution.
- 7.2. The **Chief People, Partnerships & Quality Officer** is responsible for establishing and managing the organisation's feedback and complaint management system.
- 7.3. **Leaders** and **employees** are responsible for demonstrating high quality feedback and complaint handling practices.
- 7.4. This will be achieved by:
- Ensuring that information is made available at all points of entry to the service about the complaint and feedback management process. Client information should cover, at a minimum:
 - The client's rights and responsibilities;
 - The client's right to complain;
 - The range of internal and external avenues for lodging a complaint;
 - The option to initiate or request external investigation;
 - This may include posters, handbook information, brochures and verbal explanations;
 - Treating all people with respect, including people who make complaints.
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 - Treating all people with respect, including people who make complaints.

8. REFERENCES

- 8.1. Commonwealth Ombudsman Better Practice Guide to Complaint Handling
- 8.2. Complaint Handling Guide: Upholding the rights of children and young people (the Guide) 2019
- 8.3. National Principles for Child Safe Organisations

9. LEGISLATIVE REFERENCES / STANDARDS

- 9.1. Aged Care Act (Cth) 2024
- 9.2. Aged Care Rules (Cth) 2025

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- 9.3. Aged Care Quality Standards
- 9.4. Children and Young People (Safety) Act 2017
- 9.5. National Disability Insurance Scheme Act (Cth) 2013
- 9.6. NDIS (Complaints Management and Resolution) Rules 2018
- 9.7. National Safety and Quality Health Standards for community Managed Organisations

10. RELATED DOCUMENTS

- 10.1. Board of Directors Code of Conduct
- 10.2. Child Safety and Wellbeing Policy
- 10.3. Child Safety and Wellbeing Procedure
- 10.4. Duty of Care (Consumer Dignity of Risk and Choice) procedure
- 10.5. Employee Code of Conduct
- 10.6. Information Sharing Guidelines Procedure
- 10.7. Mandatory Notification – Child Safe Procedure
- 10.8. Minimising Restraint and Restrictive Practices procedure
- 10.9. People Management Procedure
- 10.10. Privacy Policy
- 10.11. Records Management Procedure
- 10.12. Social Inclusion Policy
- 10.13. Student Code of Conduct
- 10.14. UnitingSA Belonging Framework
- 10.15. UnitingSA Great Client Experience Framework
- 10.16. Volunteer Code of Conduct

11. DOCUMENT CONTROL

All records must be retained in accordance with legislation.

Version	Description of change	Approved by	Date approved	Review date	Owner
14.0		Executive	December 2022	June 2026	Chief People, Partnerships & Quality Officer
14.1	<ul style="list-style-type: none"> • Transferred to new template. • Updated internal system and document title references. • Review date extended to December 2026 to allow time for extensive review to be undertaken. 	Chief People, Partnerships & Quality Officer	1 June 2026	December 2026	

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