

Complaints Policy

The purpose of this policy is to ensure that Anglicare NSW South, NSW West & ACT (Anglicare) handles complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- enable us to respond to issues raised by people making complaints in a 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 to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

Scope

All complaints made by service users, volunteers (including foster carers), family members, members of the community and stakeholders, are in scope of this procedure.

Staff grievances or investigation of client allegations of abuse are dealt with in the Workplace Grievance Policy and Procedure and the Allegations of Harm to Children and Young People Procedure.

Policy

1. Organisational commitment

1.1 Commitment from staff and implementation

Anglicare 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.

Who	Commitment	How
Board	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> • Review reports on complaint trends
Head of Anglicare (Chief Executive Officer)	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> • Report publicly on Anglicare's complaint handling • Review reports on complaint trends • Support and direct key staff with complaint handling • Encourage recommendations for system improvements • Support recommendations arising from reports

		<ul style="list-style-type: none"> Recognise and reward good complaint handling by staff
Executive Managers	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> Provide reports to CEO Canvass recommendations with CEO and implement Encourage recommendations for system improvements Recognise and reward good complaint handling by staff Ensure staff have completed Anglicare's Cultural Safety training
Managers and staff responsible for complaint handling	Administer Anglicare's complaint management system	<ul style="list-style-type: none"> Canvass recommendations with Executive Manager and implement where appropriate Recruit and train staff to resolve complaints promptly Encourage recommendations for system improvement Encourage all staff to be alert to complaints and to assist with resolving complaints promptly Assist people make a complaint, if needed. If the complainants is from a different cultural background, inform them of their right to have an advocate throughout the complaints process. Ensure staff have completed Anglicare's Cultural Safety training Recognise and reward good complaint handling by staff
All staff	Understand and comply with Anglicare's complaint handling practices.	<ul style="list-style-type: none"> Treat all people with respect, including complainants Be aware of Anglicare's complaint policies and procedures Assist people to access Anglicare's complaint process Be alert to complaints and assist with resolving complaints Provide feedback on issues arising from complaints Implement changes as directed by management

1.2 Child safety

Any information provided in the course of a complaint, or in the course of a discussion about the possibility of making a complaint, that raises concerns about the safety of a child or young person, will be immediately acted upon by Anglicare, irrespective as to whether the individual decides to proceed with lodging a complaint. All information regarding concerns about the safety of a child or young person is to be escalated to the attention of Anglicare's management and may be required to be reported to police and other authorities in accordance with Anglicare's Child Protection Policy and Procedure, Reportable Conduct Procedure and the provisions of the *Children and Young Persons (Care and Protection Act) 1988 (NSW)* and the *Children and Young People Act 2008 (ACT)*.

1.3 Other vulnerable people

Any information provided in the course of a complaint, or in the course of a discussion about the possibility of making a complaint, that raises concerns about the safety of people with disabilities, older Australians, or adults experiencing difficult life experiences within Anglicare services, will be immediately acted upon by Anglicare, irrespective as to whether the individual decides to proceed with lodging a complaint.

All information regarding concerns about the safety of a vulnerable client is to be escalated to the attention of Anglicare's senior management and may be required to be reported to police and other regulatory bodies in accordance with legislative or regulatory requirements.

Anglicare will ensure that any person who makes a complaint, and each person with disability affected by an issue raised in such a complaint, is advised how that complaint or issue may be raised with the NDIS Commissioner (see Clause 1.7 in the Complaints Procedure).

Complaints about the Chief Executive Officer may be made to the Board Chair.

1.4 Cultural Safety

Anglicare recognises First Nations Australians and/or people from a CALD background can sometimes experience cultural difficulties lodging a complaint. For that reason, staff handling the complaint must have completed Anglicare's training in Cultural Safety. In addition, the complainant should be informed of their right to have an advocate of their choice, throughout the complaints process.

Intergenerational trauma is a widespread experience for Aboriginal and/or Torres Strait Islander peoples. Moreover intergenerational trauma impacts many of the Aboriginal families and communities Anglicare serves and sometimes is reflected in anger, frustration and withdrawal, etc. Staff should avoid defensiveness and instead focus on 'deep listening' of the concerns and experiences of the complainant. Further consideration needs to be given to the history of intergenerational trauma within the community the complainant belongs. Specialist assistance can be obtained through the Senior Advisor Cultural Safety.

1.5 Sanctuary

Consistent with the principles of the Sanctuary Model (Anglicare's overarching practice framework), all Anglicare staff involved in managing and investigating complaints need to refrain from engaging in any labelling or blaming of complainants (for example "what's wrong with this person?"). Staff should avoid defensiveness and instead focus on open questioning, reflecting on the concerns of the person making a complaint:

- What is the person's experience of Anglicare's services?
- What role might trauma have played in their decision to lodge a complaint?
- What has happened to them that has lead them to decide to lodge a complaint?

2. Terms and Definitions

Complaint

Expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A person does not necessarily have to expressly state that they wish to make a complaint to have an issue or concern dealt with as a complaint.

A complaint covered by this Policy can be distinguished from:

- workplace grievances [see our Workplace Grievance Policy and Procedure]
- 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']
- service requests [see definition of 'service request' below], and
- requests for information [see our Privacy Policy].

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 Anglicare.

Feedback

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

Service request

The definition of a service request includes:

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

Grievance

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

Policy

A statement of instruction that sets out how we should fulfill our vision, mission and goals.

Procedure

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

3. Guiding principles



3.1 Facilitate complaints

People focus

Anglicare is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, and complaint handling. Complaints can be lodged through the complaint form on the Anglicare and Diocesan websites.

All complaint matters will be resolved with written confirmation of the outcome of the complaint investigation by the responsible manager within 20 business days. In the event that the complaint takes longer than 20 working days to investigate, the investigating staff member must ensure that there is regular contact with the person making the complaint to advise of the progress.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiple options and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate
- if, from a different cultural background, informed of their right to have an advocate throughout the complaints process, and
- provided with reasons for our decision/s and any options for redress or review.

No detriment to people making complaints

We 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

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

Accessibility

We 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 assistance.

Program staff will provide Anglicare written information and brochures about complaints to clients and volunteers at the earliest possible stage of their involvement with Anglicare.

No charge

Complaining to us is free.

3.2 Respond to complaints

Early resolution

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

Responsiveness

We will promptly acknowledge receipt of complaints.

We 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.

We are committed to managing people's expectations, and will inform them as soon as possible, as well as others impacted by the complaint, 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.

We 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).

We 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

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

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

If the complainant is either a First Nation's Australian or someone from a CALD background, we will ensure that staff handling the complaint have completed Anglicare's Cultural Safety training.

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

Our staff 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.

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

Confidentiality

We 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 Anglicare as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, we 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.

Complaints involving multiple parties

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

Empowerment of staff

All staff managing complaints are empowered 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

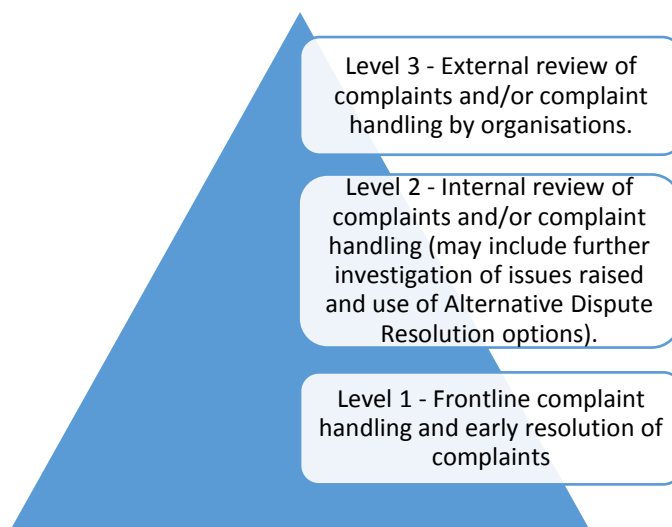
We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- 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 us, their conduct can significantly affect the progress and efficiency of our work. As a result, we 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 see our policy on managing unreasonable conduct by people making complaints.

4. The three levels of complaint handling



We aim 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, we may decide to escalate the complaint to a more senior officer within Anglicare. 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 Anglicare review of their complaint, they may seek an external review of our decision (by the Ombudsman for example).

5. Accountability and continuous improvement

5.1 Analysis and evaluation of complaints

We 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:

- 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 Anglicare's CEO and senior management for review.

5.2 Monitoring of the complaint management system

We 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.

5.3 Continuous improvement

We are 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.

5.4 Training

Anglicare managers are responsible for ensuring staff are trained in how to receive, manage and resolve complaints.

Related documents

- Client Rights and Responsibilities Policy
- Child Protection Policy
- Complaints Procedure
- Elder Abuse Policy
- Elder Abuse Procedure
- Investigations Policy
- ISOPro reporting system
- Workplace Grievance Policy

Relevant legislation/guidelines

- Australian and New Zealand Standard Guidelines for complaint handling in organisations AS/NZS 10002:2014
- *Privacy Act 1998*

Responsibilities

Anglicare operational policy documents must be ratified by the Chief Executive Officer. This document will be reviewed annually using organisation wide consultative processes prior to ratification.

Feedback

Feedback on this policy can be emailed to policy@anglicare.com.au.

Compliance

Non compliance with this policy may result in disciplinary action up to and including dismissal.

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