

# Complaints Management

## Operational Policies

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### Introduction

This policy is intended to ensure that Summer Housing handles complaints fairly, efficiently and effectively. This policy provides guidance to Summer Housing employees on the key principles and concepts of our complaint management system.

### Scope

This policy applies to all employees, contractors and our board, receiving or managing complaints from tenants or stakeholders made to or about us, regarding our services and employees, or our complaint management process.

### Purpose

The purpose of this policy is to ensure that Summer Housing has a complaints management and resolution process compliant with the *National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018* (the **Rules**).

### Organisational commitment

This organisation expects employees at all levels to be committed to fair, effective and efficient complaint management. The following table outlines the nature of the commitment expected from employees and the way that commitment should be implemented.

Who	Commitment	How
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Who	Commitment	How
CEO or Chair of the Board	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> <li>• Report to the Board on complaint management.</li> <li>• Provide adequate support and direction to key employees responsible for complaint management.</li> <li>• Regularly review reports about complaint trends and issues arising from complaints.</li> <li>• Encourage all employees to be alert to complaints and assist those responsible for complaint management to resolve them promptly.</li> <li>• Encourage employees to make recommendations for system improvements.</li> <li>• Support recommendations for service, employees and complaint management improvements arising from the analysis of complaint data.</li> </ul>
Employees whose duties include complaint management (may include CEO or Chair of the Board)	Demonstrate exemplary complaint management practices	<ul style="list-style-type: none"> <li>• Treat all people with respect.</li> <li>• Assist people to make a complaint, if needed.</li> <li>• Comply with our policy and associated procedures.</li> <li>• Provide regular feedback to management and/or the Board on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve our complaint management system.</li> <li>• Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</li> </ul>
All employees	Understand and comply with our complaint management practices.	<ul style="list-style-type: none"> <li>• Treat all people with respect.</li> <li>• Be aware of our complaint management policy and procedures.</li> <li>• Assist people who wish to make complaints access our complaint process.</li> <li>• Be alert to complaints and assist employees management complaints resolve matters promptly.</li> </ul>

## Guiding principles

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

There are three phases of the complaint management system:

- Phase 1: Facilitate Complaints  
Phase 2: Acknowledge and respond to complaints  
Phase 3: Manage and resolve the complaint

## **PHASE 1: Facilitate Complaints**

### **People focus**

Summer Housing is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures and complaint management.

Any complaint made will be dealt with within a reasonable time frame, and no later than 28 days from the date of receipt.

Complaints that are assessed to be frivolous or vexatious will be disregarded.

People making complaints will be:

- provided with information about our complaint management process;
- listened to, treated with respect by employees and be actively involved in the complaint process where possible and appropriate; and
- provided with reasons for our decisions and any options for review.

No detriment to people making complaints

Summer Housing 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

Summer Housing accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

Accessibility

Summer Housing will ensure that information about how and where complaints may be made to or about us is publicised. Summer Housing will ensure that our systems to manage complaints are easily understood and accessible to everyone.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, Summer Housing 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).

## **PHASE 2: Respond to complaints**

Early resolution

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

#### Responsiveness

Summer Housing will acknowledge receipt of complaints within three working days of receipt.

Summer Housing is 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.

Summer Housing will advise people as soon as possible when Summer Housing 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).

#### Objectivity and fairness

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

Summer Housing will ensure that the person managing a complaint is different from any employee whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, a person other than the original decision maker will conduct internal reviews of how a complaint was managed.

#### Responding flexibly

Our employees are empowered to resolve complaints promptly and with as little formality as possible. Summer Housing will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

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

#### Confidentiality

Summer Housing 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 us as permitted under the relevant privacy laws and any relevant confidentiality obligations.

### **PHASE 3: Manage and resolve the complaint**

## Complaints involving multiple organisations

Where a complaint involves multiple organisations, Summer Housing 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 obligations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where our services are contracted out, Summer Housing expect contracted service providers to have an accessible and comprehensive complaint management system. Summer Housing takes complaints not only about the actions of our employees but also the actions of our contractors.

## **Alternative avenues for dealing with complaints**

Summer Housing will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

## **There are three levels of complaint management**

### Level 1: Frontline complaint management and early resolution of complaints

Summer Housing aims to resolve complaints at the first level, the frontline. Wherever possible employees will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

### Level 2: Internal review of complaints and/or complaint management

Where this is not possible, Summer Housing may decide to escalate the complaint to a more senior member of staff within our organisation. This second level of complaint management 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: External Review of complaints management by organisation

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of our decision.

## **Accountability and learning**

### **Analysis and evaluation of complaints**

Summer Housing 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.

Summer Housing may run reports 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 Summer Housing receive for internal and/or external review of our complaint management.

Analysis of these reports will be undertaken to monitor trends, measure the quality of our service and make improvements.

A report and the analysis will be provided to the Board for review annually.

### **Monitoring of the complaint management system**

Summer Housing will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints;
- identify and correct practice in the operation of the system; and
- monitoring may include the use of audits and complaint satisfaction surveys.

### **Continuous improvement**

Summer Housing is committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system.

To this end, Summer Housing will:

- support the making and appropriate resolution of complaints;
- implement best practices in complaint management;
- regularly review the complaint management system and complaint data; and
- implement appropriate system changes arising out of our analysis of complaint data and continual monitoring of the system.

## **Complaints Management Procedure**

### **Introduction**

When responding to complaints, employees act in accordance with complaint management procedures.

Employees should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

**The five key stages in our complaint management system are set out below**



## **1. Receive Complaint**

Unless the complaint has been resolved at the outset, Summer Housing will record the complaint and its supporting information in the Complaints Register.

The record of the complaint will document:

- Contact information of the person making a complaint and the date received;
- 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.

## **2. Acknowledge**

Summer Housing will acknowledge receipt of each complaint within three working days of receipt.

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

## **3. Assess and investigate**

Initial assessment

After acknowledging receipt of the complaint, Summer Housing will confirm whether the issue raised in the complaint is within our control. Summer Housing will also consider the outcome sought by the person making a complaint. When determining how a complaint will be managed, Summer Housing 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.

Investigating the complaint

After assessing the complaint, Summer Housing will consider how to manage it. Summer Housing may:

- Give the person making a complaint information or an explanation;
- Gather information about the issue, person or area that the complaint is about; or
- Investigate the claims made in the complaint.

The investigation process may include any of the following:

- document review;
- interview employees;
- interview tenant;
- interview managerial employees.

Summer Housing will keep the person making the complaint up-to-date on progress, particularly if there are any delays. Summer Housing will also communicate the outcome of

the complaint using the most appropriate medium. Which actions Summer Housing decide to take will be tailored to each case and take into account any statutory requirements.

**4. Determine outcome and provide reasons for decision**

Following consideration of the complaint and any investigation into the issues raised, Summer Housing will contact the person making the complaint and advise them:

- The outcome of the complaint and any action undertaken by Summer Housing;
- The reason/s for our decision;
- The remedy or resolution that Summer Housing have proposed or put in place; and
- Any options for review that may be available to the complainant, such as an internal review or external review.

**5. Close the complaint: document and analyse data**

**Document**

Summer Housing will keep records about:

- How Summer Housing managed the complaint;
- The outcome 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 to be followed up, including analysing any underlying or root causes.

**Analyse data**

Summer Housing will ensure that outcomes are properly implemented, monitored and reported to the Board.

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