



## Complaint Handling Policy and Procedure

Version 4

*An amalgamation and update of the Client Compliant Policy, and Procedures for staff dealing with Complaints*

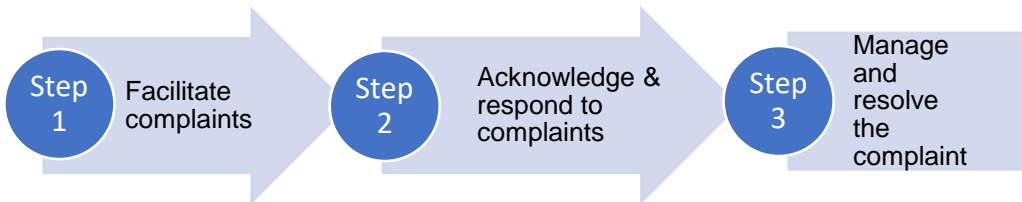
**Developed:** 2013

**Reviewed/Revised:** Complaints Policy reviewed in 2016, reviewed and amalgamated May 2023

**Consulted with:** Leadership, AF

**Endorsed by:** Leadership (May 2023)

Policy Type	Organisational
Responsible Position/Policy Owner	Governance Team
Review Date	Feb 2026
Scope	<p>This policy applies to all employees, volunteers, contractors, and our Board.</p> <p>Reference to employees in this document also includes volunteers, students and board members</p>
Purpose of the Policy	<p>To ensure Toora handles complaints fairly, efficiently and effectively.</p> <p>To provide guidance to employees and any person wishing to make a complaint about our services or our compliant management systems.</p>
Definitions	<p><b>Complaint</b> An expression of dissatisfaction made to or about us, our services, employees, or the handling of a complaint where a response is explicitly or implicitly expected or legally required.</p> <p><b>Dispute</b> An unresolved complaint escalated either within or outside of our organisation.</p> <p><b>Feedback</b></p>

	<p>Opinions, comments and expressions of interest or concern, made directly or indirectly, formally or informally, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.</p>
Policy	<p><b>Guiding Principles</b></p> <p>An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.</p>  <pre> graph LR     S1((Step 1)) -- Facilitate complaints --&gt; S2((Step 2))     S2 -- Acknowledge &amp; respond to complaints --&gt; S3((Step 3))     S3 -- Manage and resolve the complaint --&gt; End[ ]   </pre> <p><b>Facilitate Complaints</b></p> <p><i>People focus</i></p> <p>Toora is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, and complaint handling.</p> <p>Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.</p> <p>People making complaints will be:</p> <ul style="list-style-type: none"> <li>• provided with information about our complaint handling process and how to access it,</li> <li>• listened to, treated with respect and actively involved in the complaint process where possible and appropriate, and</li> <li>• provided with reasons for our decision/s and any options for redress or review.</li> </ul> <p><b>No detriment to people making complaints</b></p> <p>People making a complaint will not be adversely affected because a complaint has been made by them or on their behalf.</p> <p><b>Anonymous complaints</b></p> <p>We accept anonymous complaints via our feedback mechanisms and will carry out a confidential investigation of the issues raised where there is enough information provided.</p> <p><b>Accessibility and safety</b></p> <p>We will ensure that information about how and where complaints may be made to or about us is well publicised on our website, and in our services. We</p>

will ensure that our systems 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 or resolution of their complaint, we 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).

### **Respond to complaints**

#### **Early resolution**

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

#### **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, 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.

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**

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

#### **Manage the parties to a complaint**

##### ***Complaint against an employee or volunteer***

If a complaint has been raised against an employee of Toora, their direct manager will address the complaint with the employee involved.

If the complaint is of a serious or sensitive nature (work misconduct, bullying, confidentiality, etc.), the complaint must be directed immediately to the Director of Service Delivery (DSD). The DSD will follow the Client Protection Policy and Procedure if required. The CEO will manage any high-risk complaints or investigations and inform the Board as required.

Responding to the complaint may involve:

- Investigating the complaint and providing the staff member with an opportunity to respond to issues raised
- Attempting to mediate the dispute (if appropriate) and/or attempt to resolve the matter
- Taking further action necessary to resolve the issue (e.g. external mediation and dispute resolution services).

##### ***Complaint against a Team, another Client or General Service Delivery***

If a client has made a complaint about a team, service delivery in general, or another client, the Manager will address the complaint promptly with the team. The DSD will manage any serious complaints.

The CEO will manage any high-risk complaints or investigations and inform the Board as required.

#### *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.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of our service providers.

#### *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.

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

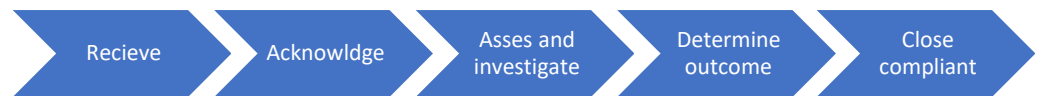
We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

#### *Accountability and learning*

#### *Analysis and evaluation of complaints*

	<p>We 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.</p> <p>We will run regular reports on:</p> <ul style="list-style-type: none"> <li>• the number of complaints received,</li> <li>• the outcome of complaints, including matters resolved at the frontline,</li> <li>• issues arising from complaints,</li> <li>• systemic issues identified, and</li> <li>• the number of requests we receive for internal and/or external review of our complaint handling.</li> </ul> <p>Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.</p> <p>Both reports and their analysis will be provided to the CEO, senior management and the Board for review, at least annually.</p> <p><b>Monitoring of the complaint management system</b></p> <p>We will continually monitor our complaint management system to:</p> <ul style="list-style-type: none"> <li>• ensure its effectiveness in responding to and resolving complaints,</li> <li>• identify and correct deficiencies in the operation of the system, and</li> <li>• monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.</li> </ul> <p><b>Continuous improvement</b></p> <p>We are committed to improving the way Toora operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:</p> <ul style="list-style-type: none"> <li>• support the making and appropriate resolution of complaints,</li> <li>• implement best practices in complaint handling,</li> <li>• recognise and reward exemplary complaint handling by staff,</li> <li>• regularly review the complaint management system and complaint data, and</li> <li>• implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.</li> </ul>
Procedure	<p>Toora encourages a culture that actively supports women to provide feedback and make complaints. We do this by:</p> <ul style="list-style-type: none"> <li>• Providing information on our website- including feedback and complaints form.</li> <li>• Providing all new clients with a complaints brochure.</li> <li>• Revisiting the complaints process with clients on a regular basis, via our case management framework.</li> <li>• Display our feedback and complaints procedure at every site.</li> <li>• Provide support and training to staff about complaints handling.</li> </ul>

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



### **Receive**

Complaints can come to us in several ways – for example:

- Directly to an employee
- Via the feedback and complaints form on our website
- Directly to a manager or senior member of staff
- Directly to the CEO
- Via a third party (family member, advocate, another organisation)

All complaints are to be logged on Tickit, along with any supporting information.

The Tickit 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,
- Any additional support the person making a complaint requires

For serious complaints or allegations of an employee, please refer to the Client Protection Policy for appropriate action.

### **Acknowledge**

We aim to resolve complaints as early as possible, or immediately. If the circumstances do not allow the complaint to be resolved immediately, the employee is to direct the complaint to the Manager.

If we are not able to resolve the complaint immediately, we will acknowledge receipt of each complaint promptly within 5 working days, with consideration given to the most appropriate medium (e.g. email, letter, phone with follow-up letter) for communicating with the person making a complaint.

If a person has made a verbal complaint, and the employee has resolved the issue immediately, the employee must still record that complaint, and how they resolved it on Tickit.

## **Assess and investigate**

### *Initial assessment*

After acknowledging receipt of the complaint, we will then determine how a complaint will be managed, we will consider:

- The nature and scope of the complaint
- 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
- If it would be best to appoint an external investigator

### *Investigating the complaint*

After assessing the complaint, we will consider how to manage it. We 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

We will commit to completing the investigation within 20 working days unless there are extenuating circumstances.

Serious complaints will require an investigation plan. See Investigation Plan template.

We will keep the person making the complaint 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 medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

## **Determine outcome and provide reasons for decision**

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

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

If a person is dissatisfied with Toora's findings or decision, they have several options available to them, including:

- Have a more senior person review the complaint and investigation
- Contacting the CEO to review the complaint and investigation
- Contacting an Official Visitor <https://ovs.act.gov.au/>
- Contacting the ACT Human Rights Commission  
<https://hrc.act.gov.au/complaints/>



**If the complaint cannot be resolved internally**

Where a complaint is not able to be resolved internally, an external agency will be engaged to conduct an investigation.

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

**Document**

We will keep records about:

- The complaint
- 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), and
- Any outstanding actions to be followed up, including analysing any underlying or root causes

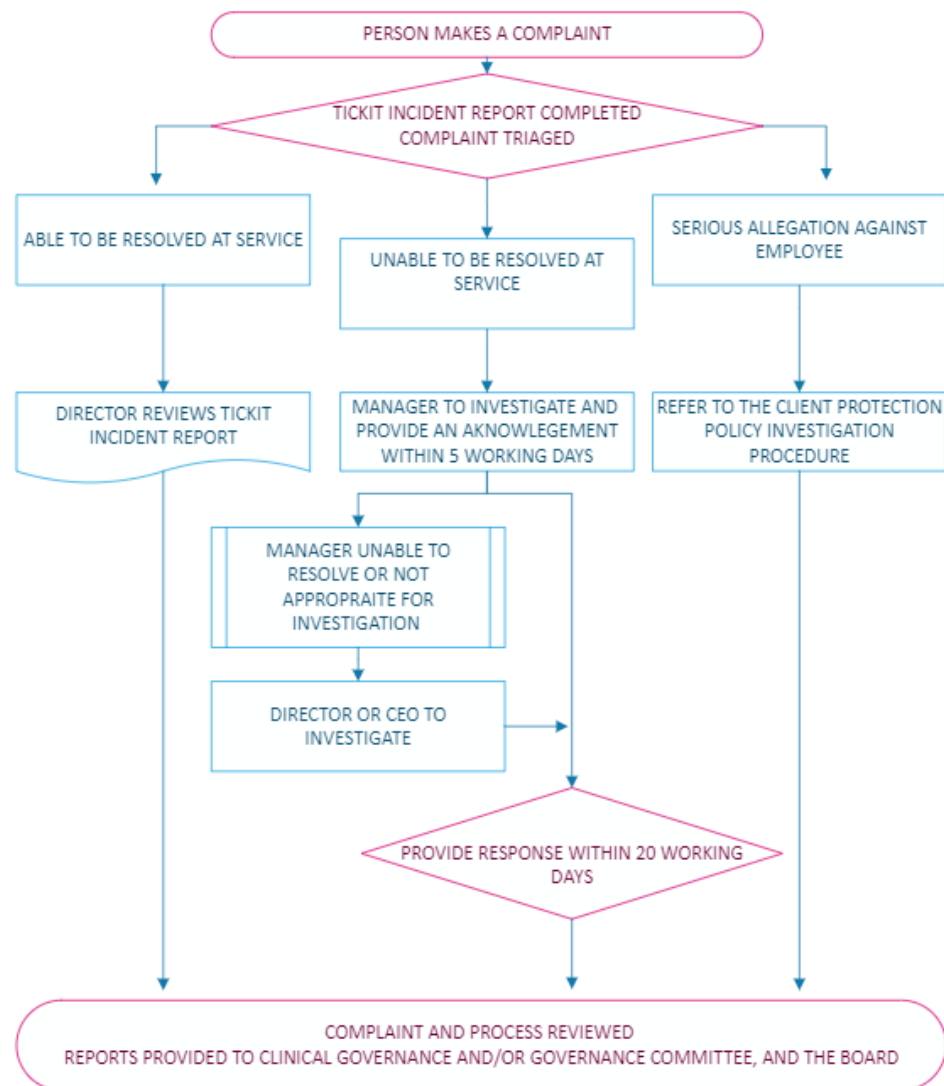
We will report any serious issue or significant event to relevant external bodies where required by law or contract– this could be government departments (contract requirements), ACNC, or our insurance providers.

**Analyse data**

We will ensure that outcomes are properly implemented, monitored and reported.

The Governance Officers will provide regular non-identifying reports to the Clinical Governance Committee, Governance Committee. Leadership, CEO and the Board will receive comprehensive reports.

## Complaint Flowchart



### Roles and Responsibilities

#### Board

Promote a culture that values complaints and their effective resolution by:

- Making a commitment to the safety of clients
- Ensure the organisation has an effectiveness and efficiency complaint management system

#### CEO

Promote a culture that values complaints and their effective resolution by:

- Report to the governing body on our complaint handling.
- Provide adequate support and direction to those responsible for handling complaints.
- Regularly review reports about complaint trends and issues arising from complaints.

	<ul style="list-style-type: none"> <li>• Encourage all employees to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li> <li>• Encourage employees to make recommendations for system improvements.</li> <li>• Support recommendations for service, employee and complaint handling improvements arising from the analysis of complaint data.</li> </ul> <p><b>Leadership team, Managers and Policy/Quality/Risk Officers</b> Demonstrate exemplary complaint handling practices by:</p> <ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</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 governing body on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve our complaints management system.</li> <li>• Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</li> <li>• Inform the CEO immediately of any high-risk complaints or issues</li> </ul> <p><b>Governance Officers</b></p> <ul style="list-style-type: none"> <li>• Provide advice and support regarding complaints and complaints handling</li> <li>• Provide regular reports to Leadership, the CEO and the Clinical Governance and Governance Committees</li> <li>• Provide the Board with an annual report on complaints and complaint handling</li> <li>• Inform the CEO immediately of any high-risk complaints or issues</li> </ul> <p><b>All Employees and volunteers</b> Understand and comply with our complaint handling practices by:</p> <ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Be aware of our complaint handling policies and procedures.</li> <li>• Assist people who wish to make complaints access our complaints process.</li> <li>• Be alert to complaints and assist in handling complaints to resolve matters promptly.</li> <li>• Resolve complaints immediately where appropriate</li> <li>• Refer more complex complaints, or complaints against employees to management, as per the Client Protection Policy</li> <li>• Log all complaints on Tickit</li> </ul>
References	<ul style="list-style-type: none"> <li>• Complaint Policy template – Institute of Community Directors</li> <li>• Privacy Act 1988</li> </ul>
Related Documents	<ul style="list-style-type: none"> <li>• Safeguarding and Client Protection Policy</li> <li>• Client Rights</li> </ul>

	<ul style="list-style-type: none"> <li>• Privacy and Confidentiality</li> <li>• Client Complaints Pamphlet</li> <li>• Toora Website – Feedback page</li> <li>• Code of Conduct</li> <li>• Child Protection Code of Conduct</li> <li>• Service Manuals</li> <li>• Client Manuals</li> <li>• Client Orientation documentation</li> <li>• Intake processes and documents</li> </ul>
Strategic Plan Alignment	<ul style="list-style-type: none"> <li>• 1.5 Improve our collection and analysis of data</li> <li>• 1.7 Improve how we measure client outcomes and impact</li> </ul>
Quality Improvement Alignment	<p><b>QIC</b></p> <p>Criterion 1.9 Feedback Management</p> <ul style="list-style-type: none"> <li>• 1.9.1 The organisation has a complaint system that includes how complaints are received, recorded, investigated, responded to, and reported to the highest level of management within defined timeframes</li> <li>• 1.9.3 Complaint data is used to improve systems, decision making and service delivery.</li> <li>• 1.9.4 Consumers and stakeholders are provided with information on how to make a complaint.</li> </ul> <p><b>Principles Child Safe Orgs</b></p> <ul style="list-style-type: none"> <li>• <b>2.1</b> Children and young people are informed about all of their rights, including to safety, information, and participation.</li> <li>• <b>2.4</b> Staff and volunteers are attuned to signs of harm and facilitate child-friendly ways for children to express their views, participate in decision-making and raise their concerns.</li> <li>• <b>4.2</b> Children and young people have access to information, support and complaints processes in ways that are culturally safe, accessible and easy to understand.</li> <li>• <b>Principle 6</b> – complaints management processes should be accessible, responsive to and understood by children and young people, families, staff and volunteers.</li> </ul> <p><b>National Regulatory System for Community Housing</b></p> <p>Performance Outcome 1:</p> <ul style="list-style-type: none"> <li>• The provider obtains feedback from tenants and residents on its services</li> <li>• Information is readily available and promoted to tenants on complaints and appeals</li> <li>• The provider manages complaints promptly and fairly</li> <li>• The provider regularly monitors the effectiveness of the complaints and appeals systems</li> <li>• The provider maintains a satisfactory level of tenant and resident satisfaction</li> </ul>

	<ul style="list-style-type: none"> <li>• The provider notifies the primary Registrar of any incident related to its operation (and response) that damages or has the potential to damage the reputation of the community housing sector</li> </ul> <p><b>ACNC Standards</b></p> <p>Standard 3: Compliance with Australian Laws</p> <p><b>National Model Clinical Governance Framework</b></p> <ul style="list-style-type: none"> <li>• 1.8 and 1.9 – Measurement and quality improvement</li> <li>• 1.11 – Incident Management systems and open disclosures</li> <li>• 1.13 and 1.14 – Feedback and complaints management</li> <li>• 1.25 and 1.26 – Safety and quality roles and responsibilities</li> </ul>
Risk Management Plan Alignment	TBC – to be updated with new Framework when finalised