

Feedback and Complaints Management Policy

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1. Introduction

1.1. Scope

- 1.1.1. This Policy applies to the provision of all services and supports at Early Autism Services.
- 1.1.2. All permanent, fixed term and casual staff, contractors and volunteers are required to take full responsibility for ensuring full understanding of the commitments outlined in this Policy.
- 1.1.3. The relevant persons specified in the column corresponding to a procedure described in this Policy have the responsibility to implement the relevant systems, procedures, workflows and other strategies referred to in the relevant procedure.

1.2. Purpose

- 1.2.1. This Policy and the Policies and Procedures and related documentation set out in section 1.5 below (Related Documentation) supports Early Autism Services to apply the Feedback and Complaints Management NDIS Practice Standard.
- 1.2.2. Early Autism Services is committed to ensuring that each participant has knowledge of and access to the provider's complaints management and resolution system. Complaints and other feedback made by all parties are welcomed, acknowledged, respected and well-managed.

1.3. NDIS Quality Indicators

- 1.3.1. In this regard, Early Autism Services aims to demonstrate each of the following quality indicators through the application of this Policy and the relevant systems, procedures, workflows and other strategies referred to in this Policy and the Related Documentation
- 1.3.2. A complaints management and resolution system is maintained that is relevant and proportionate to the scope and complexity of support delivered and the size and scale of the organisation. The system follows principles of procedural fairness and natural justice and complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- 1.3.3. Each participant is provided with information on how to give feedback or make a complaint, including avenues external to the provider, and their right to access

advocates. There is a supportive environment for any person who provides feedback and/or makes complaints

- 1.3.4. Demonstrated continuous improvement in complaints and feedback management by regular review of complaint and feedback policies and procedures, seeking participant views on the accessibility of the complaints management and resolution system, and incorporation of feedback throughout the provider's organisation
- 1.3.5. All workers are aware of, trained in, and comply with the required procedures in relation to complaint handling.

2. Policy Statement

2.1. General

- 2.1.1. Early Autism Services is committed to providing high-quality services that meet the needs of our clients. We recognise that complaints and feedback are valuable opportunities for us to improve our services and ensure that we meet the expectations of our stakeholders. Our Complaints Management System is designed to ensure that complaints are handled fairly, promptly, and effectively, in accordance with the principles of procedural fairness and natural justice, and in compliance with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.

3. Policy

3.1. General

- 3.1.1. Autism Services aims to ensure:
 - a. a system to manage and resolve complaints is maintained that follows principles of procedural fairness and natural justice and complies with the requirements under the *National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018* (Complaints Management System)
 - b. Clients have knowledge of and access to the Complaints Management System;
 - c. Clients are provided with information on how to give feedback or make a complaint, including avenues external to the provider, and their right to access advocates;
 - d. complaints and other feedback made by all parties are welcomed, acknowledged, respected and well-managed.

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- e. all clients, and their families, carers, representatives and advocates are encouraged and supported to provide feedback, provide compliments or raise any concerns they have about Early Autism Services' service or organisation including making complaints;
- f. all feedback and complaints are handled promptly, fairly, efficiently and effectively through our complaints management system;
- g. that we provide a satisfactory resolution to complaints within a reasonable timeframe;
- h. appropriate actions are taken to improve our services where required and that we provide better outcomes to our stakeholders;
- i. there is demonstrated continuous improvement in complaints and feedback management by regular review of complaint and feedback policies and procedures, seeking of client/participant views on the accessibility of the Complaints Management System, and incorporation of feedback throughout the provider's organisation; and
- j. all Workers are aware of, trained in, and comply with the required procedures in relation to complaints handling.

3.2. Who can make a complaint?

- 3.2.1. Any of Early Autism Services' clients, families, carers, advocates, statutory bodies, government agencies, stakeholders, Workers or any other person may make a complaint to or about Early Autism Services, its practitioners, employees, contractors, volunteers and other Workers
- 3.2.2. A complaint may be made on an anonymous basis. You can make an anonymous complaint:
 - a. by calling the number in section 4.1(e) below and stating that you wish to make an anonymous complaint (so we don't ask you to identify yourself); or
 - b. in writing by filling out a Feedback and Complaints Form but not including your name or other details that may identify you and posting it to the address specified in section 4.1(d) below.

4. Procedures for making complaints

4.1. How to make a complaint

- 4.1.1. A person wishing to make a complaint may do so:
 - a. in person to the Principal or a Worker;

- b. by email to omurphy@earlyautismservices.com
- c. on our website <https://earlyautismservices.com.au>
- d. by post to: P O Box 5039 Darling South, Vic, 3145; or
- e. verbally by telephone to 0403 714 314

4.1.2. The Principal will be responsible for receiving any email and postal correspondence and managing the receipt and resolution of complaints in accordance with section 5.

4.1.3. For all verbal and written complaints received in a form other than the Feedback and Complaints Form, the recipient of the complaint will request the complainant to provide their complaint in the form of the Feedback and Complaints Form.

4.2. How to make a complaint to the NDIS Commission

4.2.1. A complaint can be made to the NDIS Commission by:

- a. Phoning: 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.
- b. [National Relay Service](#) and ask for 1800 035 544.
- c. Visiting <https://www.ndiscommission.gov.au/about/complaints> and completing a [complaint contact form](#).

4.2.2. The NDIS Commission can take complaints about:

- a. services or supports that were not provided in a safe and respectful way
- b. services and supports that were not delivered to an appropriate standard

4.2.3. You can make a complaint to the NDIS Commission on an anonymous basis.

4.3. How to make a complaint about Reportable Conduct

4.3.1. There are five types of 'reportable conduct': (reportable conduct encompasses allegations of child abuse (and other child-related misconduct) made against any EAS workers and volunteers by clients, their families, members of the public and/ or other workers and volunteers). The Reportable Conduct Scheme applies to all EAS workers and volunteers, even if the reportable conduct has happened outside the workplace

- a. sexual offences committed against, with or in the presence of a child
- b. sexual misconduct committed against, with or in the presence of a child
- c. physical violence against, with or in the presence of a child
- d. any behaviour that causes significant emotional or psychological harm to a child
- e. significant neglect of a child.

(for a more detailed list of reportable conduct offences, see the information sheet <https://ccyp.vic.gov.au/assets/resources/RCSInfoSheetUpdates/Information-Sheet-2-What-is-reportable-conduct-22.12.21.pdf>)

- 4.3.2. **Within three business days** after becoming aware of a reportable allegation, heads of organisations must notify the Commission for Children and Young People that a reportable allegation has been made against one of their workers or volunteers. (Report via secure web form <https://ccyp.vic.gov.au/report-an-allegation>)
- 4.3.3. **Within 30 calendar days after becoming aware**, heads of organisations must provide certain detailed information about the allegations and their proposed response to Commission for Children and Young People see <https://ccyp.vic.gov.au/reportable-conduct-scheme/about-the-reportable-conduct-scheme/> for more details
- 4.3.4. If staff are aware of Reportable Conduct (their own or another worker or volunteer) they are expected to notify EAS by entering an Incident into the Incident Management System. Flow Logic which will be distributed to the head of the organisation (principal Debra Goldfinch). If the reportable conduct involves the Principal, see 5.1 for further actions.
- 4.3.5. Staff also have the option to report directly to the Commission of Children and young people or if they have reasonable grounds to believe that there has been an incident(s) of Reportable Conduct, that is not shared by EAS and the Principal (Reasonable grounds means a set of facts or circumstances that goes beyond mere suspicion, and would satisfy an ordinary cautious and prudent person). This report can be lodged via a Public Notification. <https://ccyp.vic.gov.au/report-an-allegation/notify-about-a-reportable-allegation/>

4.4. Support and assistance in relation to making complaints

- 4.4.1. All Workers shall be responsible for ensuring appropriate support and assistance is provided to any person in connection with this Complaints Management System including any person who wishes to make, or has made, a complaint by:
- a. providing accessible information to complainants (including the Feedback and Complaints Summary and this Complaints Management System) in relation to how to make a complaint;
 - b. providing a safe environment for a complainant to make a complaint or provide negative feedback without fear of adverse consequences, retribution or loss of service as a result of making a complaint;
 - c. treating all complainants with respect, recognising that the complaint is important to the complainant;
 - d. maintaining the confidentiality of parties involved in the complaint in accordance with section 7 below;

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- e. facilitating the participation of an advocate or other representative or support person in connection with the discussion and resolution of a complaint, if required;
- f. providing Clients, families, carers and advocates with access to this Complaints Management System and the Feedback and Complaints Summary;
- g. complying with this Complaints Management System and the Feedback and Complaints Summary;
- h. advising complainants and potential complainants in relation to how a complaint or issue may be raised with the NDIS Commission and giving appropriate support and assistance to people affected by an issue raised in a complaint to contact the NDIS Commission;
- i. appropriately responding to complaints, acknowledging, assessing and resolving the matter in a fair, efficient and timely manner with as little formality as a proper consideration of the complaint allows;
- j. taking action in relation to issues raised in complaints;
- k. if a serious risk is identified, take corrective action;
- l. keeping parties to the complaint appropriately involved and informed of the progress of the complaint;
- m. ensuring that feedback and complaints data (both positive and negative) is considered in training and in planning service and support delivery;
- n. ensuring the complaints process is procedurally fair and follows the principles of natural justice as set out in the *NDIS (Procedural Fairness) Guidelines 2018*; and
- o. reviewing and evaluating the accessibility and effectiveness of the Complaints Management System and continually improving its processes.

4.5. Protection for worker disclosures

- 4.5.1. Workers are supported by the Principal and Key Management Personnel to report incidents and complaints. There are no negative consequences for Workers in doing so. All Workers are advised that they can make a complaint on behalf of a person, parent/guardian or child to Early Autism Services or to the NDIS Commission. All Workers are required to comply with this Complaints Management System and be aware of their roles and responsibilities in receiving, supporting, managing and resolving incidents and complaints.

5. Persons who will manage the receipt and resolution of complaints

5.1. Executive of People, Culture and Partnerships

- a. Executive of People, Culture and Partnerships,
 - i. the complaint will normally be managed and dealt with by another Senior Staff Member at Early Autism Services, however, if no such person exists or if it is otherwise inappropriate given the nature of the complaint for the Senior Staff Manager to manage the complaint, an External Complaint Manager will manage and deal with the complaint,
- b. a person other than the Executive of People, Culture and Partnerships,
 - i. the complaint will normally be managed and dealt with by the Executive of People, Culture and Partnerships unless the Executive of People, Culture and Partnerships determines that an External Complaint Manager should manage and deal with the complaint.
- c. staff have the option to report directly to the Commission for Children and Young People, refer back to 4.3.5.

5.2. Complaint Manager

- a. More than one person may act as Complaint Manager for organisational reasons or to avoid conflicts of interest or the appearance of bias.
- b. More than one person may act as Complaint Manager for complaints involving multiple persons if required in order to avoid conflicts of interest or the appearance of bias.
- c. If the complainant is not satisfied with the investigation and proposed resolution of their complaint in accordance with section 7, they can seek a further review of the complaint by an External Complaint Manager (that has not previously acted as Complaint Manager in relation to the complaint). When undertaking their review of the complaint, the External Complaint Manager must follow the same process in resolving the complaint as the Complaint Manager and as otherwise set out in section 7.

6. Procedure for resolving complaints

6.1. General

- 6.1.1. The Policy is supported by the following Procedures which are intended to clarify the responsibilities of the board, Principal, Key Management Personnel, Workers and other persons and make explicit the underlying principles of the Policy.

6.2. Overview

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- 6.2.1. Any Worker at Early Autism Services may be a recipient of a complaint. However, in all cases, the Complaint Manager is primarily responsible for managing the process and resolution of complaints in accordance with this policy.
- 6.2.2. The Complaint Manager will use all reasonable endeavours to complete the following process (Complaints Process) within 21 days. The Complaint Manager will keep the complainant up-to-date on the progress of the Complaints Process, particularly if there are any delays. It may be appropriate for the Complaints Process to be extended to ensure relevant parties are afforded procedural fairness.
- 6.2.3. The Complaints Process is to be applied in receiving and resolving all complaints at Early Autism Services but the individual elements and actions the Complaint Manager decides to take may be tailored to each complaint (subject to any legislative requirements).
- 6.2.4. As part of the handling of a complaint under the Complaints Process, procedural fairness must be afforded to a person (including a Worker) if their rights or interests may be adversely or detrimentally affected.

6.3. Receive complaint

- 6.3.1. In the case of a verbal complaint, the recipient of a complaint should:
 - a. genuinely listen to the complainant, their support person or advocate;
 - b. make sure the complainant feels comfortable;
 - c. acknowledge how the situation has affected the person;
 - d. thank the complainant for making the complaint;
 - e. take detailed notes of the complainant and the complaint including whether the complaint is specifically about the conduct of identifiable Workers or about the provision of supports and services that incidentally identify Workers;
 - f. encourage and offer support to the complainant to confirm their verbal complaint in writing by filling out a Feedback and Complaint Form;
- 6.3.2. At the time of acknowledging the complaint, the recipient of the complaint should also ask the complainant if they would like any additional support or assistance in relation to making, discussing and resolving the complaint or if they would like any family member, carer or advocate to be involved in the discussion and the Complaints Process.
- 6.3.3. If a Worker at Early Autism Services other than the Principal receives a complaint, they must immediately notify and provide to the Principal all information known to the

Worker about the complainant and the complaint including any notes regarding a verbal complaint taken by the recipient or the written complaint itself.

- 6.3.4. If the complaint is in respect of the Principal, the Principal shall coordinate, notify and provide all information provided to or known to them and the recipient to the Complaint Manager that will be managing the complaint.

6.4. Record the complaint

- 6.5. The Complaint Manager shall register the complaint in the complaints register maintained in accordance with section 10.
- 6.6. The Complaint Manager shall update the complaint record in the complaints register at each material step of this Complaints Process.

6.7. Acknowledgement of complaint

- 6.7.1. The Complaint Manager shall acknowledge the complaint within 3 days of it being received. Consideration will be given to the most appropriate medium (e.g. email, letter, and phone) for acknowledgement and all further communications with the complainant.
- 6.7.2. To the extent that the Complaint Manager acknowledges a complaint verbally, they should also provide written acknowledgement.
- 6.7.3. When acknowledging the complaint, the Complaint Manager shall also indicate to the complainant a time frame for discussion, investigation (if required) and resolution.
- 6.7.4. If the complainant had previously indicated to Early Autism Services that they require an advocate or representative to be involved in their dealings with Early Autism Services, the Complaint Manager will:
- 6.7.5. Enquire as to whether an advocate (including an independent advocate) or representative will be included in the Complaints Process; and
- 6.7.6. If an advocate or representative is to be involved, offer to facilitate arrangements for such an advocate (including an independent advocate) or other representatives to be included in the Complaints Process.
- 6.7.7. If a person with a disability affected by an issue raised in a complaint has a decision-maker advocate or substituted or informal decision-maker, these people should be

included and recognised and raised as potential support persons or interested parties in any discussion and resolution of the complaint.

6.8. Initial Assessment

- 6.8.1. The Complaint Manager will confirm whether the issue(s) raised in the complaint are within Early Autism Services' control. The Complaint Manager will also consider the potential outcome(s) that may be sought by the complainant (if not known) and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.
- 6.8.2. When determining how a complaint will be managed, the Complaint Manager will consider:
- a. the nature of the matter being dealt with;
 - b. how serious, complicated or urgent the complaint is;
 - c. whether the complaint is specifically about the conduct of an identifiable Worker(s) or about the provision of supports and services that incidentally identify Workers;
 - d. if about the conduct of identifiable Worker(s):
 - i. whether confidentiality can be maintained consistently while affording procedural fairness to the Worker(s); and
 - ii. which (if not all) of the procedural fairness considerations set out in the Early Autism Services Procedural Fairness Considerations document should be afforded to the Worker(s);
 - e. whether the complaint raises concerns about people's health and safety;
 - f. how the complainant or person with a disability is being affected;
 - g. the risks involved if the resolution of the complaint is delayed;
 - h. whether facts in issue are in dispute and investigations are required;
 - i. the options for resolving the matter;
 - j. the gravity of possible findings that may be reached;
 - k. the sanctions that could be imposed based on those findings;
 - l. whether a resolution requires the involvement of other organisations; and
 - m. the Early Autism Services Assessment, Investigation and Resolution considerations document.

6.9. Discuss the complaint

- 6.9.1. The Complaint Manager shall organise a time to discuss the complaint with the complainant (and any advocate or support person). Depending on the severity of the

complaint, the Complaint Manager has the discretion to determine to undertake an investigation of the complaint prior to discussing the complaint.

- 6.9.2. Consideration should be given to the most appropriate medium for the discussion (in person, via video chat or on the telephone).
- 6.9.3. During this discussion, the Complaint Manager should:
- a. genuinely listen to the complainant, their support person or advocate and provide the complainant with a reasonable opportunity to present their complaint, without interrupting;
 - b. make sure the complainant feels comfortable;
 - c. acknowledge how the situation has affected the complainant and any person with disability;
 - d. ask the complainant what a good outcome to the complaint would look like for them;
 - e. not dismiss the complaint on a view of the facts that is not raised with or apparent to the complainant; and
 - f. identify any material information relevant to the complaint provided by the complainant or any other person which was shared on a confidential basis (or may be confidential in nature). If it would be difficult to maintain confidentiality while resolving the complaint, for procedural fairness reasons, inform the complainant of this difficulty and ascertain if the complainant wishes for the Complaints Process to continue.
- 6.9.4. The Complaint Manager shall explain to the complainant and any family member, carer, representative or advocate that the complainant wishes to be involved in the Complaints Process, the next steps that will be taken in response to the complaint.
- 6.9.5. Depending on the type and severity of the complaint, the Complaint Manager shall either:
- a. discuss with the complainant an immediate resolution to the complaint (for smaller matters); or
 - b. conduct further investigations in relation to the complaint.
- 6.9.6. If the complaint is specifically about the conduct of identifiable Worker(s) or any other person where adverse action could be taken in relation to the person, the Complaint Manager shall organise a time to discuss the complaint with the Worker(s) or other person.
- 6.9.7. In such circumstances, the Worker(s) or such other person:

- a. must be given a reasonable opportunity to be heard and to put forward information and submissions in support of an outcome that is favourable to their interests; and
- b. should be afforded procedural fairness by the Complaint Manager, who should adopt some or all of the considerations set out in the Early Autism Services Procedural Fairness considerations document.

6.10. Investigate the complaint

- 6.10.1. After assessing the complaint (and potentially, discussing the complaint with the complainant) the Complaint Manager will consider whether an investigation is required in which case, the Complaint Manager may (among other things):
 - a. give the complainant an explanation as to whether an investigation will occur;
 - b. gather information about the issue, person or area that the complaint is about (or request an external investigator to do so at the direction of the Complaint Manager); and/or
 - c. investigate the claims made in the complaint (or request an external investigator to do so at the direction of the Complaint Manager).
- 6.10.2. If the complaint is about the conduct of an identifiable Worker(s) or may involve a person's rights or interests being adversely or detrimentally affected in a direct and specific way as a result of or in connection with the complaint:
 - a. an investigation must occur as part of the Complaints Process;
 - b. the Worker(s) or such other person must be given a reasonable opportunity in a fair and impartial manner to be heard on those matters before adverse action is taken, and to put forward information and submissions in support of an outcome that is favourable to their interests; and
 - c. the Worker(s) or such other person should be afforded procedural fairness including by the Complaint Manager adopting some or all of the considerations set out in the Early Autism Services Procedural Fairness Considerations document.
- 6.10.3. The Complaint Manager shall inform the complainant in writing within 10 days of the complaint being received of what is being done to investigate and resolve it, and the expected time frame for resolution.
- 6.10.4. The Complaint Manager or an external investigator should have regard to the Early Autism Services Assessment, Investigation and Resolution considerations document when conducting an investigation.

- 6.10.5. Depending on the findings from the investigations, the Complaint Manager may have further discussions with the complainant, Workers and other interested parties.

6.11. Take appropriate action in relation to the complaint

- 6.11.1. The Complaint Manager shall decide in respect of the complaint. The Complaint Manager or an external investigator should have regard to the Early Autism Services Assessment, Investigation and Resolution considerations document when making a decision.
- 6.11.2. Prior to making any adverse finding, the Complaint Manager should provide any Worker against whom an adverse finding may be made:
- a. with a reasonable opportunity to comment on the proposed adverse finding; and
 - b. with procedural fairness including by the Complaint Manager adopting some or all of the considerations set out in the Early Autism Services Procedural Fairness Considerations document.
- 6.11.3. Any adverse finding should be soundly based on the facts and issues that were raised during the Complaints Process.
- 6.11.4. The Complaint Manager shall inform the complainant of the outcome and the reasons for any decisions made including:
- a. the outcome of the complaint and any action taken;
 - b. the reason(s) for the decision; and
 - c. the remedy or resolution(s) proposed or put in place.
- 6.11.5. If an apology is in order, the Complaint Manager shall ensure that the appropriate person makes the apology and informs the complainant why the situation arose and what the organisation intends to do to avoid further grievance in respect of the subject matter of the complaint.

6.12. Rights to the review of complaints

- 6.12.1. The complainant and any affected person with a disability should be notified that if they are not satisfied with the investigation and proposed resolution of the complaint, they can seek a further review of the matter by an External Complaint Manager.
- 6.12.2. The External Complaint Manager must follow the same Complaints Process in resolving the complaint as the Complaint Manager.

6.13. Referral to NDIS Commission

6.14. If the complainant is still not satisfied with the outcome after a review of the complaint has been completed, the complainant should be referred to the NDIS Commission and provided information and support to make the complaint externally if necessary including whether they would like such information to be provided to any family member, carer, representative or advocate.

6.15. In this regard, Early Autism Services shall take reasonable steps to ensure that the complainant and each person with a disability affected by an issue raised in the complaint, is advised how that complaint or issue may be raised with the NDIS Commission by:

- a. referring them to the Feedback and Complaints Summary previously provided to them and explaining to them that such document includes information about how complaints may be raised with the NDIS Commission;
- b. directing them to NDIS Commission Complaints Website; and
- c. asking the complainant if they require any support or assistance in raising the complaint with the NDIS Commission including whether they would like the Feedback and Complaints Summary, this Policy or any other information to be provided to any family member, carer, representative or advocate.

6.16. Support for Persons Implicated

6.16.1. No action will be taken against employees who are implicated in a report under this Policy until an investigation has determined whether any allegations against them are substantiated. However, an employee who is implicated may be temporarily stood down on full pay whilst an investigation is in process, or may be temporarily transferred to another office, department or workplace, if appropriate in the circumstances. Any such stand-down or temporary transfer may only continue for the duration of the investigation. If the investigation determines that the allegations are not substantiated, the employee or officer must be immediately reinstated to full duties.

6.16.2. Any disclosures that implicate an employee or officer must be kept confidential, even if the Discloser has consented to the disclosure of their identity and should only be disclosed to those persons who need to know the information for the proper performance of their functions under this Policy, or for the proper investigation of the report.

6.16.3. An employee or officer who is implicated in disclosure has a right to be informed of the allegations against them and must be allowed to respond to those allegations and

provide additional information, if relevant, in the course of an investigation into those allegations (subject to the Discloser's right to anonymity).

- 6.16.4. Support available for persons implicated in a report under this Policy includes:
- a. connecting the person with access to the Employee Assistance Program (EAP)
 - b. appointing an independent support person from the People & Culture team to deal with any ongoing concerns they may have
 - c. connecting the person with third-party support providers such as Lifeline (13 11 14) and Beyond Blue (1300 22 4636).

6.17. Training Procedures

- 6.17.1. All Workers will be trained in receiving complaints, the NDIS Code of Conduct requirements and the NDIS Worker Orientation Module.
- 6.17.2. All Workers will be trained on the Complaints Management System during their induction, and as part of ongoing refresher training and/or when processes change.
- 6.17.3. Training will include open communication strategies such as acknowledging the grievance without being defensive and making apologies while accepting responsibility for what occurred.
- 6.17.4. A Complaint Manager will be trained in complaints management and resolution in supporting clients throughout the Complaints Process and appropriately responding to complaints in an empathetic manner.
- 6.17.5. A Complaint Manager will be trained in conducting serious incident investigations, including investigating incidents that may involve a criminal element and in applying Procedural Fairness, which is detailed in the *NDIS (Procedural Fairness) Guidelines 2018* and the Early Autism Services Procedural Fairness considerations.

7. Privacy and Confidentiality

7.1. General

- 7.1.1. Early Autism Services will take reasonable steps to ensure that information provided in a complaint and during the Complaints Process is kept confidential and only disclosed if required by law or if the disclosure is otherwise appropriate in the circumstances. Without limiting the generality of the above, Early Autism Services considers that it would be appropriate to disclose such confidential information in the following circumstances:

- a. the disclosure of the complaint related information is to the Principal, Key Management Personnel, Complaint Manager, an employee, contractor or other Worker who is directly or indirectly involved in the Complaints Process;
- b. the disclosure of the complaint related information is to a lawyer or other advisor of Early Autism Services;
- c. the disclosure of the complaint related information is reasonably required to enable a complaint is to be properly investigated; or
- d. the disclosure of the complaint-related information is to the NDIS Commission, the police or otherwise required by law.

8. Record keeping

8.1. General

- 8.1.1. A register of complaints will be kept in a complaint register for a minimum of seven years after the complaint has been made. The register will be maintained by the Principal or Key Management Personnel and will record the following for each complaint or appeal:
 - a. details of the complainant and the nature of the complaint;
 - b. date lodged;
 - c. action taken (and in the event of adverse action, any facts and issues that were raised during the Complaints Process and upon which the adverse action was based);
 - d. date of resolution and reason for decision;
 - e. indication of the complainant being notified of the outcome; and
 - f. complainant response and any further action.
- 8.1.2. Copies of all correspondence will be kept on the relevant Client's file.
- 8.1.3. The complaints register and files will be confidential, and access will be restricted to the Principal, Key Management Personnel and any Complaint Manager.
- 8.1.4. A statistical summary of complaints will also be kept in and maintained by the Principal or Key Management Personnel and reviewed annually. The Principal will be responsible for reporting complaints to the board at least annually.
- 8.1.5. Results from this report will be reviewed by the Principal and Key Management Personnel and used to:
 - a. inform training by including a review of complaints (on an anonymous basis) in complaints handling training activities; and

- b. inform service delivery by taking the learnings from training activities.

9. Continuous improvement of the complaints management system

9.1. General

- 9.1.1. This Policy, the Complaints Management System, the Complaints Process and the complaints register will be reviewed and evaluated by the Principal and Key Management Personnel at least annually. This will include:
- a review of all complaint and feedback policies and procedures;
 - a review of Client and Worker feedback about the accessibility and effectiveness of the Complaints Management System; and
 - implementation of a continuous improvement plan based on the review and feedback received.

10. Definitions

10.1. Definitions

Term	Meaning
Early Autism Services	means Early Autism Services (Australia) Pty Ltd ABN 39 632 134 028
Clients	means clients of Early Autism Services (including an NDIS participant).
Complaint	is an expression of dissatisfaction with a support or service, including how a previous complaint was handled, for which a response or resolution is explicitly or implicitly expected.
Complaint Manager	has the meaning given to that term in section 6.
Complaints Process	has the meaning given to that term in section 7.
A complainant	is an employee, client, advocate, entity, member of the public or other person who expresses their dissatisfaction about Early Autism Services to either the organisation itself or an external body.

Feedback and Complaints Management Policy

External Complaint Manager	means such a person as determined by the Principal and Key Management Personnel that would meet the criteria set out in the Early Autism Services Criteria for Complaint Manager or Incident Manager document.
Feedback and Complaints Form	means the Early Autism Services Feedback and Complaints Form.
Feedback and Complaints Summary	means the document of that name which summarises the Early Autism Services Feedback and Complaints Process.
Key Management Personnel	means Debra Goldfinch, Benjamin Wessels, Vincent Scarlata and other key management personnel involved in Early Autism Services from time to time.
Legislation Register	means the register of legislation, regulations, rules and guidelines maintained by Early Autism Services.
NDIS Commissioner Complaints Website	means https://www.ndiscommission.gov.au/about/complaints .
Policy Register	means the register of policies of Early Autism Services.
Principal	means Debra Goldfinch.
Senior Staff Member	means any senior member of staff or Key Management Personnel at Early Autism Services other than the Principal.
Worker	means a permanent, fixed term or casual member of staff, a contractor or volunteer employed or otherwise engaged by Early Autism Services and includes the Principal.

11. Policy Governance

11.1. Relevant Legislation, Regulations, Rules and Guidelines

11.1.1. Legislation, Rules, Guidelines and Policies apply to this Policy and Related Documentation as set out in the Legislation Register.

11.2. Related Documentation

11.2.1. The application of the above policy by Early Autism Services is supported in part by and should be read alongside the Policies and Procedures and related documentation corresponding to this Policy in the Policy Register.

11.3. Inconsistency

11.3.1. If and to the extent that the terms of this Policy are or would be inconsistent with the requirements of any applicable law, this Policy is deemed to be amended but only to the extent required to comply with the applicable law.

11.4. Policy Details

Policy Author	Quality, Risk and Accreditation Manager
Executive Owner	Executive Director of People, Culture and Partnerships
Approved By	Chief Executive Officer
Approval Date	March 2023
Review Date	March 2025
Version	2.0