

Feedback and Complaints Policy

ONCALL

ONCALL/SACARE¹'s vision is to be nationally recognised as the leading integrated community service provider, empowering people to live their best lives. ONCALL is steadfastly focused on quality service that puts the client at the centre, is enabled through technology transformation, and delivered by people who are committed.

Quality and compliance are embedded into our daily actions and behaviours. ONCALL's policies and procedures provide the foundation and framework for our work and actions to ensure we provide best practice service quality and compliance. All staff are required to know and apply ONCALL policies and procedures that apply to their work.

Policy Purpose

This policy aims to:

- ensure the provision of an accessible and transparent feedback and complaints management system
- ensure all feedback and complaints are taken seriously, all people are treated fairly, matters resolved in a timely way, and any corrective actions are identified and acted upon
- ensure staff are trained, knowledgeable and capable of responding to, resolving and recording feedback and complaints objectively and fairly, and learning from feedback and complaints
- facilitate continuous improvement in services as a result of effective feedback and complaints management.

This policy covers the feedback and complaints management cycle – enabling, responding and resolving, recording, learning and improvement.

Policy Scope

Inclusions

This policy applies to all ONCALL staff, Board members, consultants and contractors, students, and volunteers. This policy includes feedback received from:

- Children and young people;
- People with disability;
- Members of the community;
- Parents, guardians, and advocates;
- Staff;
- Other external agencies.

Responsibilities

ONCALL is responsible to provide feedback and complaints management training including via staff induction.

It is everyone's responsibility to ensure the application of this policy by informing themselves of their roles and obligations under the Feedback and Complaints' Policy and Procedures, and completing all required training provided by ONCALL.

¹ ONCALL is inclusive of the following entities - ONCALL Group Australia; Ablecare Pty Ltd trading as ONCALL; SACARE Pty Ltd. Throughout this document, ONCALL/SACARE will be referred to as ONCALL.

This will facilitate a reflective and learning culture that listens to and measures staff and client satisfaction; responds to and learns from feedback and complaints; meets client expectations; and delivers on our values of respect, accountability, and service excellence.

Exclusions

Formal staff grievances are not covered by this policy. These are covered under the ONCALL Work Health and Safety Policy.

Policy Statement

ONCALL acknowledges and promotes everyone's right to express their opinion about our services. We will provide our staff, clients, carers, and advocates, with the opportunity to influence the way ONCALL works by meaningfully engaging with you; creating a culture that encourages feedback and complaints; providing an accessible and transparent feedback and complaints system; and listening, responding to, and learning from your feedback and complaints.

ONCALL's feedback and complaints management is modelled on the approach and principles of the Victorian Ombudsman² (Appendix 1), South Australian Ombudsman³, and the Queensland Ombudsman⁴ and is consistent with best practice and *ISO 10002:2018 Quality management – Customer satisfaction – Guidelines for complaints handling in organizations*.

Feedback and complaints management principles

ONCALL adheres to the following principles of feedback and complaints management in our interactions with staff, and with people with disability, their carers and advocates, families, and young people.

ONCALL's feedback and complaints management principles are:

- **Client and staff focused and proactive** – we actively seek feedback; we ensure you are not victimized or negatively impacted by providing feedback or a complaint
- **Committed** - to resolving complaints and a culture that recognises an individual's right to complain
- **Accessible** – providing feedback and complaints is easy; information is provided in a format suitable to individual's specific needs; support and advocacy is provided; feedback and complaints may be verbal, written, formal, informal and/or anonymous
- **Transparent** – clear information is provided on how to lodge feedback and/or a complaint, how it will be handled and timelines for resolution
- **Objective and fair** – feedback and complaints are handled courteously, impartially, and are assessed on merit
- **Privacy assured** - information is handled according to privacy laws and ONCALL's Privacy Policy
- **Accountable** – we provide reasons for decisions and access to review mechanisms; we report de-identified feedback and complaint information to ONCALL management and Board
- **Informs continuous improvement** – we use feedback and complaints to help us identify problems and improve services.

Proactive engagement and feedback

ONCALL proactively seeks feedback throughout the staff and client experience with ONCALL.

² *Complaints: Good Practice Guide for Public Sector Agencies September 2016*, Victorian Ombudsman

³ *Make A Complaint*, Ombudsman South Australia - <https://www.ombudsman.sa.gov.au/make-a-complaint>

⁴ *Complaints management*, Queensland Ombudsman - <https://www.ombudsman.qld.gov.au/improve-public-administration/public-administration-resources/complaints-management>

Staff feedback

ONCALL seeks and assesses staff views and opinions regarding their perception of the services provided by ONCALL, the way in which ONCALL is managed and what improvements can be made. Feedback may be verbal or written and may be anonymous. ONCALL ensures feedback opportunities adhere to ONCALL's feedback and complaints principles including ensuring that a staff member is not victimized or negatively impacted by providing feedback or a complaint.

ONCALL provides informal and formal structured feedback opportunities. Informal opportunities include, but are not limited to, discussion in regular supervision and with the Human Resources Team. Formal feedback opportunities include an employee engagement committee, an annual Employee Engagement/Staff Survey and Employee Exit Survey.

Participation in formal/structured feedback is encouraged but optional. Results are de-identified, are used to inform service and management improvements, and themes and proposed response actions are provided to ONCALL Executive Team, Senior Management and Board.

Staff who have any queries or concerns about feedback should contact their line manager or HR Manager.

Client feedback

ONCALL actively seeks client satisfaction feedback as an important indicator of whether we are achieving our objectives in delivering quality services and how services can be improved. Feedback may be verbal or written and may be anonymous. ONCALL ensures feedback opportunities adhere to ONCALL's feedback and complaints principles including ensuring that a client, family member, carer or advocate is not victimized or negatively impacted by providing feedback or a complaint.

ONCALL provides informal and formal/structured feedback opportunities. Informal opportunities include, but are not limited to, feedback provided by any client, family, carer or advocate interaction with staff. Any feedback requiring a response should be recorded in the Feedback Management System.

Any feedback or complaints regarding children or young people will be responded to within one business day.

ONCALL provides a formal feedback opportunity through Client/Stakeholder Engagement Committees and an annual Client Satisfaction Survey. Participation in the survey is encouraged but optional. Clients are provided with the necessary support to participate in the survey including through the provision of support by staff, a family member, or an advocate of their choice. (*Ref: ONCALL's Service Access and Exit Policy and Client Advocacy Policy*).

If a client is unable to participate in the feedback process ONCALL will seek the views of the client's nominated support or advocate as appropriate.

Client Satisfaction Survey results are de-identified, used to inform service and management improvements, and themes and proposed response actions are provided to ONCALL Executive Team, Senior Management and Board.

Feedback can be submitted via the following means:

- Anonymously (or identified) online at oncall.com.au/feedback
- Over the phone by calling 1300 962 468
- In person by speaking with ONCALL site manager, service delivery officer or support worker
- Via email to askqualityvic@oncall.com.au or feedback@oncall.com.au
- Clients, families, carers, or advocates who have any queries or concerns about feedback should contact AskQuality@oncall.com.au.

Community engagement

ONCALL actively engages with neighbours, other citizens, community organisations and program stakeholders when opening a new accommodation-setting. ONCALL provides a letter of introduction, containing contact details and alternative feedback channels, door knocks to neighbouring properties to provide a point of contact, and checks in periodically to promote and gather feedback.

Complaints' management cycle

The ONCALL complaints management cycle follows three stages of good complaint handling and a four-tiered approach in responding to complaints (Victorian Ombudsman, Appendix 1).

Stages of complaint handling

- Enabling
- Responding
- Learning and improving

Responding to complaints

- Frontline complaint resolution
- Investigation if required
- Internal review
- Access to external review

Enabling

ONCALL values and is committed to enabling all clients and staff to provide complaints and to the earliest identification and resolution of matters raised.

ONCALL will provide information on complaints is to clients, their families, carers, and advocates:

- in a way that is accessible for the needs of the individual
- at regular intervals including when a client commences new supports or services, at any time upon request, and annually for existing clients
- states their right to make a complaint including that it may be made anonymously
- details how and to whom to make a complaint
- provides details of supports available, including advocacy, to assist in making and working through a complaint
- explains the complaints' process, how they will be involved, and timelines for resolution
- details avenues of external review and escalation of required and appropriate
- provides reassurance that they will not be adversely affected as a result of making a complaint

Responding to complaints

Frontline/initial response

ONCALL staff will act responsively to a client's expression of dissatisfaction or complaint. They will support the client to state their concern or complaint and their desired outcome. They will seek to resolve the matter if possible and if not possible, will support the client, their family, carer or advocate in lodging a complaint.

If a complaint (verbal, written or anonymous) is provided to a staff member they will follow the Feedback and Complaints Procedures and principles in their interactions with clients. ONCALL staff will provide the client with information on what to expect and the timeframe for resolution as per the Feedback and Complaints Procedures.

Staff will refer clients to other bodies who may be relevant to assist with a complaint or concern (e.g NDIS Quality and Safeguards Commission) as per ONCALL's Feedback and Complaints Procedures.

Child Safety risks and concerns must be acknowledged within one business day. Staff are to follow the Child Safety Risks and Concerns Policy.

Internal assessment and investigation

If a complaint is unable to be resolved at the point of initial contact, a more senior staff member who has had no prior involvement in the matter will respond and work to resolve the complaint. The senior officer will assess the complaint for severity, safety, complexity, impact and the need for immediate action. They will operate according to the feedback and complaints management principles and the Feedback and Complaints Procedure.

The senior officer will:

- seek to identify and achieve a resolution
- actively consult the person lodging the complaint, their carer, family and/or advocate

- advise how long it will take to resolve the complaint (within 28 days)
- provide the client with a written response with reasons for any decision (within 28 days).
- provide details of ONCALL's internal review and of independent external review options.

Internal review

If the complainant is not satisfied with the process or outcome of the complaint, ONCALL will provide an independent internal review. The review will be undertaken by a more senior manager in Human Resources or the Executive Team who has had no prior involvement in the matter. The internal review will provide a systematic way of reviewing the complaints process and outcome to ensure the complaints process applied procedural fairness and complied with ONCALL's policy and procedural. The internal review will not re-investigate the complaint itself.

ONCALL will engage with, and provide regular updates to, participants during the complaints and review process. ONCALL will provide the client with a written response with reasons for the review decision and provide details of any independent external review options that may be available.

External review

ONCALL will provide complainants with written details of external review mechanisms available and how to contact them.

Learning and improving

ONCALL fosters an organisational culture that values and learns from experience including the reporting and review of client and staff feedback and complaints, as a means of improving service delivery and client and staff experience.

Recording

Staff are to record all client and staff complaints in the ONCALL Feedback Management System (FMS) as specified in the ONCALL Feedback and Complaints Procedures. Staff are to record comprehensive complaints information, including any decisions made and rationale for the decision/s.

The FMS ensures the recording of complaints information to:

- meet any statutory, policy or procedural recording and reporting requirements
- improve the training and capabilities
- analyse the complaint data and identify complaint trends for service improvement
- monitor the time taken to resolve complaints

ONCALL Quality Manager provides regular de-identified data reports to ONCALL Executive Team, Senior Management and Board to inform them of issues, risks, complaints resolution data, and opportunities for improvement.

ONCALL will regularly seek feedback on, and review, the complaints management system for service delivery, efficiencies, and effectiveness.

Managing unreasonable complainant conduct

Unreasonable complainant conduct is relatively rare and will be dealt with sensitively, respectfully, and consistently with reference to the resources developed by the New South Wales Ombudsman for managing unreasonable complainant conduct⁵. Staff must seek Senior Manager endorsement to initiate a response according to these guidelines.

⁵ *Managing unreasonable conduct by complainants Model policy August 2021* New South Wales Ombudsman
Managing unreasonable conduct by a complainant A manual for frontline staff, supervisors, and senior managers 2021 New South Wales Ombudsman

Privacy, confidentiality and protections

ONCALL adheres to the Australian Privacy Principles throughout the feedback and complaints management cycle. (Ref: ONCALL Privacy Policy). Feedback and complaints are treated as confidential information and will only be provided to people who need to know to deal with the feedback or complaint. Privacy Principles apply in the provision of any complaints' material to external review bodies. (Ref: ONCALL's Privacy Policy)

ONCALL fosters a culture of disclosure and learning. ONCALL will provide protections so that anyone who provides feedback or a complaint may do so confidentially and without fear of intimidation, victimisation, disadvantage or reprisal. In matters of the disclosure of misconduct ONCALL provides for Whistleblower protections (Ref: ONCALL Whistleblower Policy).

Breaches of this Policy

The breach of this policy by a team member, director or officer of the company may lead to disciplinary action being taken in accordance with the company's disciplinary procedure. Serious breaches may be regarded as gross misconduct.

All team members, directors and officers of the company will be expected to cooperate fully in any investigation into suspected breaches of this policy or any related processes or procedures. If an issue is identified with a supplier, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. We reserve the right to terminate our relationship with individuals and organisations in our supply chain if they breach this policy.

Definitions

COMPLAINT	An expression of dissatisfaction with the quality of an action taken, decision made, or service provided by an organisation or its contractor; or a delay or failure in providing a service, taking an action, or making a decision by an organisation or its contractor.
COMPLAINANT	A person, organisation or representative who makes a complaint
FEEDBACK	Any reaction, both positive and negative, to services delivered or conduct in providing services
FEEDBACK MANAGEMENT SYSTEM	A step-by-step way of receiving, recording, processing, responding to and reporting on feedback and complaints and using them to improve systems, decision-making and service delivery.
PROCEDURAL FAIRNESS	The fairness of the procedure by which a decision is made, rather than the actual outcome reached

Related Documents

Policy, Procedure, Manual

Child Safety Concerns Process
 Child Safety Risks and Concerns Policy
 Continuous Improvement Policy
 Diversity Policy
 Freedom From Abuse and Neglect Policy
 Participation, Empowerment, and Advocacy Policy
 Privacy Policy
 Responding to Allegations of Abuse and Neglect Procedure
 Service Access Policy

Staff Appraisal and Feedback Policy
Whistleblower Policy
Work Health and Safety Policy

Other

- Victorian Ombudsman Complaints: Good Practice Guide for Public Sector Agencies September 2016
- ISO 10002:2018 Quality management — Customer satisfaction — Guidelines for complaints handling in organizations
- Complaints management, Queensland Ombudsman - <https://www.ombudsman.qld.gov.au/improve-public-administration/public-administration-resources/complaints-management>
- Managing unreasonable conduct by complainants Model policy, New South Wales Ombudsman, August 2021 www.ombo.nsw.gov.au/news-and-publications/publications/guidelines/state-and-local-government/managing-unreasonable-complainant-conduct-a-model-policy-and-procedure
- Managing unreasonable conduct by a complainant A manual for frontline staff, supervisors and senior managers 2021 New South Wales Ombudsman https://www.ombo.nsw.gov.au/_data/assets/pdf_file/0009/114498/MUCC-2021_manual.pdf
- How Can I Make a Complaint Or Provide Feedback? (Department of Health Services, South Australia) <https://dhs.sa.gov.au/contact/feedback-and-complaints/how-can-i-make-a-complaint-or-provide-feedback>

Document Control

Approval and Review

DOCUMENT OWNER	Audit, Compliance and Risk Management Committee (ACRM)		
APPROVAL DATE	November 2023	REVIEW DATE	November 2025

Access and Feedback

This policy will be made available to all staff on the ONCALL intranet and ONCALL database (Periscope), and to directors in the ONCALL Board orientation.

Users should provide comments and feedback on the accuracy, currency, and useability of the policy document to AskQualityVic@oncall.com.au.