

Policy Statement

This policy is intended to ensure that HPA Inc handle complaints fairly, efficiently, and effectively.

HPA Inc complaint management system is intended to:

- enable HPA to respond to feedback and complaints raised by people in efficiently and effectively with acceptable outcomes
- boost participant, family, carer, and stakeholder confidence in our administrative process
- provide information that can be used as continuous improvement in being able to deliver quality improvements in our services.

Scope

This policy provides guidance to staff, participants, carers, guardians, family, stakeholders, and community who wish to make a complaint on the fundamental principles and concepts of our complaint management system.

HPA Incorporated (HPA) has an environment where complaints and concerns, compliments, and suggestions (feedback) are welcomed and viewed as an opportunity for acknowledgement and improvement. This process is to ensure that individuals have the right to make comments and complaints and are encouraged to exercise their right in blame-free and resolution-focused culture, respecting an individual's right to privacy and confidentiality.

It is acknowledged that feedback and complaints are vital to review internal performance and processes and to seek continuous improvement of services as we seek to achieve our care commitment. Participants, families, advocates, or other stakeholders may submit a complaints/Feedback Form about HPA supports or services, Staff, and/or contractors.

Participants will be given information in Easy Read Format if required.

It is HPA Inc policy to follow the principles of procedural fairness and natural justice and comply with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.

HPA Inc maintains, complaints and feedback can be managed effectively through:

- an open and transparent complaint handling system
- the observation of the principles of natural justice and compliance with relevant mandatory reporting under Australian law
- the commitment to the right of stakeholders to complain either directly or through their representatives
- undertaking procedural fairness to reach a fair and correct decision
- taking reasonable steps to inform the complainant of the NDIS Commission Complaints process, including the use of various communication means such as oral and written
- following HPA Privacy Policy
- abiding by HPA Incorporated and NDIS Code of Conduct
- training Staff in the complaint's process and the rights of all stakeholders to complain
- complaints being considered seriously and with respect
- informing participants and Staff about their rights to complain and guiding them on how to make a complaint during the assessment, orientation processes and in our welcome information
- the provision of support for those people who may need assistance to make a complaint or provide feedback

- the protection of complainants against retribution or discrimination
- the prompt investigation and resolution of complaints
- communicating and consulting with participants, family and advocates during the complaint's process and providing feedback and resolutions
- the consistent interpretation and application of policies and processes
- the provision of opportunities for all parties to participate in the complaint's resolution process
- the acceptance of HPA and its staff being accountable for actions and ensuring follow through of all decisions and outcomes from the complaint
- the commitment to resolve problems at the point of service or through referral to alternatives
- the commitment to use the complaint as a means of continuous improvement, planning, delivery, and review of services
- referring complaints and feedback into Continuous Improvement Policy
- annually auditing of the Complaints, Compliments and Feedback Policy.

Definition

Complaint: An expression of dissatisfaction or a circumstance regarded as a cause for such expression.

Procedure

Complaint / Feedback Process

Complaints and suggestions can be made through:

- the utilisation of the Complaint / Feedback Form
- contacting a member of staff verbally or in writing. The staff must offer to document the complaint on behalf of a participant (if required) and refer the matter to the CEO or delegate
- contacting the CEO or delegate, verbally or in writing
- responding to questionnaires and surveys
- sending an email to our contact email
- attending meetings/care conferences
- contacting external complaint's agencies (Such as the NDIS Commission)
- communicating orally, or in writing, or any other relevant means.

Complaints / Feedback can be made by:

- staff
- the participant
- the public
- an advocate
- a family member
- carers
- anonymously.

Results are recorded in Complaint Register to allow for input into Continuous Improvement processes. The Continuous Improvement Register will be used to record improvements that have been established after the finalisation of the Complaints Management Process.

If a complaint is about:

- support or services - the complaint will be dealt with by the CEO or delegate
- a worker - the complaint will be dealt with by GMO / FAM or delegate
- Executive Manager – will be dealt with by CEO or delegate
- the CEO or delegate – will be managed by President or delegate, or an external person or body may be engaged.

Staff, participants and/or person's responsible, visiting health professionals and visitors are informed of the complaints process through:

- information pack for participants
- website
- staff orientation and training
- meetings
- participant agreements
- contractor agreements.

Complaint Management Process

The process and investigation must adhere to the principles of impartiality, privacy, confidentiality, transparency, and timeliness. Complaints will not be discussed with anyone who does not have responsibility for resolving the issue. HPA must take into consideration any cultural and linguistic needs of the participant and provide the relevant support mechanism such as interpreters or similar.

Stage 1 Acknowledge

Acknowledge all complaints quickly (within one (1) working day, where possible).

Stage 2 Review of the Complaint

- Consult with the participant regarding their desired outcome.
- Inform the complainant of support regarding - their right to an advocate, an interpreter, stages of decision-making, mechanisms to protect privacy, ability to complain to the NDIS.
- Determine the type of complaint - service, support, or process.
- Notify the complainant of each stage of their complaint.
- If a meeting is required, then it will be held in a safe environment that has been determined by the complainant and at a time relevant to the participant.
- Where the complainant is a recipient of disability services under the NDIS, check the participant record for a preferred contact for complaints or ask the participant if they would like to nominate a contact from one of HPA persons assigned to handle complaints.

Stage 3 Assessing the Complaint

During the assessment of the complaint, the CEO / GMO / FAM or delegate must prioritise the complaint and determine a resolution pathway (where required). After the pathway has been established, the complaint will be investigated.

Stage 4 Investigation and Decision Process

- At the time of lodgement, determine if it is practicable to find an immediate resolution.
- The CEO / GMO/FAM or delegate must keep the complainant informed about the complaint.
- Consult with the complainant to gather information about the underlying issue.
- Analyse antecedents and underlying issues in determining a decision.
- Written responses must be sent with outcome / decision.
- Respond to the complainant with a clear decision.

Stage 5 Post Decision

After investigation and a satisfactory response has been documented the CEO /GMO / FAM or delegate will:

- inform the complainant of the decision, including the reason for the decision and giving options for reviewing the decision
- ensure that the complaint investigation has been satisfactorily completed
- determine if the complainant is satisfied with the outcome
- follow-up and consult with complainants about any concerns
- ascertain preventative actions and continuous improvement
- consider if there are any systemic issues
- record the information about the complaint in the Complaint's Register.
- record the details of the improvement from the complaint in Continuous Improvement Register, if required.

Complaints resolution will be monitored according to the audit schedule and feedback will be provided to the complainants personally.

Documentation

All complaints will be recorded in a Complaints Register.

- Information in the register will include:
 - information about the complaint
 - identified issues
 - actions are undertaken to resolve the complaint
 - the outcome of the complaint.
- Upload the documents, including Compliments, Complaint/Feedback forms into the computer system.
- Keep a copy of the information given to complainant in the file.
- Keep all complaint documents for seven (7) years from the day of record.
- Collect statistical and other information to:
 - review issues raised.
 - identify and address systematic issues.
 - report information to the Commissioner if requested by the NDIS Commissioner.
- The Policy review will occur if there are legislative changes or regularly (at least annually).

Unresolved Complaints

Unresolved complaints will be referred to the CEO or delegate for investigation and resolution. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be escalated to a person nominated by the complainant (with the complainant's permission).

When complaints cannot be resolved internally, the complainant may be referred to the external agency, listed below:

Complaints Resolution and Referral Service

Free call: 1800 880 052

TTY: 1800 301 130

National Relay Service (NRS): 1800 555 677

Translating and Interpreting Service (TIS): 13 14 50

Email: crs@workfocus.com

Website: www.crs.net.au

Ombudsman NT

12th Floor, NT House

22 Mitchell Street,

Darwin NT 0800

Free call: 1800 806 380

Phone: (08) 8999 1818

Fax: (08) 8999 1828

Email: nt.ombudsman@nt.gov.au

Website: www.ombudsman.nt.gov.au

Health and Community Services Complaints Commission

5th Floor, NT House

22 Mitchell Street

DARWIN, NT 0800

Free call: 1800 004 474

Phone: (08) 8999 1969

Fax: (08) 8999 6067

Email: hcscc@nt.gov.au

Website: www.hcscc.nt.gov.au

Australian Competition & Consumer Commission (ACCC)

Darwin office

Level 8 National Mutual Centre

9-11 Cavanagh St

Darwin NT 0800

Phone: (08) 8946 9666

Fax: (08) 8946 9600

Website: www.accc.gov.au

NDIS Quality and Safeguards Commission

Level 3 Jacana House

39-41 Woods St

DARWIN, NT 0800

Free call: 1800 035 544

Email: contactcentre@ndiscommission.gov.au

Website: www.ndiscommission.gov.au

Related Documents

- Complaint / Feedback Form
- Service Agreement
- Continuous Improvement Policy
- Risk Management Policy
- Easy Read information
- NDIS Complaint Form.

References

- Work Health and Safety Act (2011)
- NDIS Practice Standards and Quality Indicators 2018
- NDIS (Complaints Management and Resolution) Rules 2018
- Privacy Act (1988).

Document Control

Document details	
Document title	HPA Feedback and Complaints Policy
Policy reference and version	1.10 Version 2.1
Date approved	19/03/2024
Statutory regulation	
Document review (e.g. annually)	2027

Change history			
Version	Date	Author	Change details
2.0	07/12/2023	Stephanie Ransome	Policy review
2.1	19/03/2024	Denise Watson	Minor formatting updates

Acronyms used in this document	
Acronyms	Full form
HPA	Helping People Achieve
NDIS	National Disability Insurance Scheme
NDIA	National Disability Insurance Agency
CEO	Chief Executive Officer
GMO	General Manager Operations
FAM	Finance and Administration Manager

Policy Approval

Approved by:
Kerry Whiting
 Chief Executive Officer
 HPA Incorporated


 Signature

19/03/2024

Staff Signature			
Print Name			
Signature		Date	