



Complaints Management

PURPOSE

Empowerment Without Borders (EWB) recognises and values the importance of complaints as a means of improving the way it delivers services.

This policy and procedure outlines the processes to be followed to ensure that outcomes from complaints and other forms of feedback are as positive as possible for all involved.

POLICY

EWB is committed to:

- Ensuring the complaints process is made available and accessible to all stakeholders
- Acting fairly and justly and transparently when responding and resolving all complaints
- Providing a confidential, safe and culturally sensitive environment for stakeholders to raise and have their complaints heard and resolved
- Supporting those who choose to seek additional/alternative supports and services when making a complaint
- All stakeholders are listened to and treated with respect
- Ensuring complaints are resolved within the timeframes outlined in this Procedure.

PROCEDURES

Who can make a complaint?

Anyone can make a complaint including:

- Any person accessing EWB's services or activities
- An advocate
- Another service provider or professional
- A member of the public

Complaints can be made:

- In person
- By email
- In writing (a letter or other written form)
- By phone



Complaints can be made about any part of the quality or delivery of EWB's services or activities, such as if there is dissatisfaction

- With the way services or activities are provided
- With decisions that have been made
- About staff conduct
- About personal information not being kept private

Complaints can be anonymous. However, it is then extremely difficult to provide a full response to the complainant or to follow up to see if things have been rectified to their satisfaction.

Complaints that are received verbally will be documented by the person receiving the complaint and the document checked for accuracy with the complainant.

Complaints may be made to EWB, or directly to an external agency, although it is sometimes a requirement of these agencies that a direct approach be taken with the organisation involved first.

Complaints monitoring

All complaints will be recorded on the Complaints Register and monitored for resolution.

Notes on progression of the complaint will be noted on the register and the complaint closed when it has been resolved.

Where there is doubt about the end-resolution of a complaint, feedback will be sought from the complainant.

The Complaints Register will be monitored by the Board to identify systemic issues and/or continual improvement opportunities.

Complaints records and review

Accurate information relating to complaints received, including decisions made, actions taken and eventual outcomes, will be recorded and retained for 7 years from the date of the complaint to allow for:

- Review of complaints received
- The identification of systemic issues
- Response to any external agencies, if required

Records will be stored securely and will only be accessible to the people managing the complaint.



Complaints referrals

Complaints received may be referred to other bodies or agencies if needed, including:

- Staff-screening issues e.g. a staff member was found to have a criminal history
- Incidents relevant to other bodies e.g. Police, consumer affairs agencies or other regulatory bodies.

Information for people using EWB's services or activities

Information on EWB's complaints management system is available to all people accessing EWB's activities or services. EWB will work to ensure that all people

- Are aware of their right to make a complaint
- Feel empowered to make a complaint
- Are supported to make a complaint
- Are involved in the resolution process after making a complaint
- Know they won't be adversely affected as a result of making a complaint.

Language support for complainants

EWB will ensure that an interpreter and / or translator is available to provide language support to anyone wishing to make a complaint to EWB.

Steps in the complaint process

1. Receive complaint

Anyone expressing dissatisfaction with any aspect of EWB's work should be encouraged to talk to the person they have a concern with (if relevant) to try and resolve the issue prior to submitting a complaint.

If the complainant wishes to submit a complaint:

- Ensure that appropriate support and assistance is provided to them e.g. obtain an interpreter (information can be provided on external advocacy services)
- Ensure that they know that they can take their complaint to an external body if they wish. EWB will work with the external body by providing information, advice and assistance and, where possible, work towards a mutually agreed resolution with the client affected by the issue.



2. Record complaint

Capture as much detail as possible to understand the concerns. Information recorded should include:

- What happened
- Where it happened
- Date and time it happened
- Who was involved
- Any witnesses
- What they would like as an outcome.

When a complaint is received:

- Acknowledge and assess the complaint in a fair and timely manner
- Provide the complainant with expected timeframes for actions
- Take appropriate action in relation to the issues raised in the complaint
- Keep accurate details of the complaint and actions taken
- Take reasonable steps so complainants, or clients affected by the complaint, are not adversely affected as a result of making a complaint
- Ensure that information provided in the complaint is kept confidential.

3. Categorise complaint

Categorising complaints helps to prioritise based on seriousness. Matters concerning an immediate risk to safety or security will be addressed immediately and escalated appropriately.

Complaints are categorised as follows:

- Standard complaints – complaints that involve dissatisfaction about a decision that has been made, the conduct of a staff member, how services are being delivered, or allegations of discrimination
- Serious complaints – complaints related to incidents that involve:
 - Fraud
 - Physical or sexual assault, or sexual misconduct towards a person committed by a staff member
 - Physical or sexual assault, or sexual misconduct towards a client committed by another person whilst receiving services from EWB



- Abuse or neglect
- Serious unexplained injury
- Death of a person accessing EWB's activities or services

If the complaint is related to an incident – manage the incident as per the Incident Management policy.

4. Resolve complaint

Keep in mind:

- Procedural fairness must be applied when communicating with the complainant and when making decisions
- Ensure that the complainant is involved in the resolution process
- Keep the complainant informed during the resolution process
- Inform the complainant of the reasons for any decisions made
- Provide the complainant with ample time to provide feedback or to request redress or review.

5. Follow up complaint

If the complainant advises that they are satisfied with the resolution of their complaint, it can be closed in the complaints register.

If the complainant is not satisfied with the way that the complaint has been handled, listen to their issues and decide if any further actions can be taken to resolve the complaint. If this is not possible, again inform them that they can take their complaint to an external agency. Complaints can also be taken directly to the Commission.

6. Review complaint

Consider

- The cause
- The resolution
- Follow up feedback
- Lessons learned

Document the review to assist with the continual improvement process.



7. Monitor complaints (ongoing)

At regular intervals, the Board should review all recorded complaints to:

- Check that complaints are being resolved in a timely manner
- Look for patterns which might indicate systemic issues
- Look for patterns which might indicate improvements.

External agencies for referral

[Human Rights Commission of Qld.](#) – Hear complaints related to discrimination under the Qld. *Anti-discrimination Act 1991* as well as the *Human Rights Act 2019*.

[Human Rights Commission of Australia](#) – Hear complaints relating to discrimination, harassment and bullying based on:

- sex, including pregnancy, marital or relationship status including same-sex and de facto status, breastfeeding, family responsibilities, sexual harassment, gender identity, intersex status and sexual orientation
- disability, including temporary and permanent disabilities; physical, intellectual, sensory, psychiatric disabilities, diseases or illnesses; medical conditions; work related injuries; past, present and future disabilities; and association with a person with a disability
- race, including colour, descent, national or ethnic origin, immigrant status and racial hatred age, covering young people and older people
- sexual preference, criminal record, trade union activity, political opinion, religion or social origin (in employment only)

RELEVANT DOCUMENTATION

- Client Information Pack
- Complaint Record Form
- Complaints Register

OTHER RELEVANT POLICY AND PROCEDURES

- Incident Management
- Privacy
- Information Management



APPLICABLE STANDARDS AND LEGISLATION

Australian Council for International Development (ACFID) Code of Conduct – Commitment 7.3

Accountability to stakeholders

Age Discrimination Act (Cth.) 2004

Disability Discrimination Act (Cth.) 1992

Racial Discrimination Act (Cth.) 1975

Sex Discrimination Act (Cth.) 1984

Anti-discrimination Act (Qld.) 1991

Human Rights Act (Qld.) 2019