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1. Introduction

1.1 Purpose

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

Our complaint management system is intended to:

- Enable us to respond to issues raised by people making complaints in a timely and cost-effective way.
- Boost public confidence in our administrative process, and
- Provide information that can be used by us to deliver quality improvements in our services, systems and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

1.2 Scope

This policy applies to all staff receiving or managing complaints from the public made to or about us, regarding our services, staff and complaint handling.

Staff grievances, code of conduct complaints and public interest disclosures are dealt with through separate mechanisms.

1.3 Organisational Commitment

This organization expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the commitment of the organization and the way that the commitment will be implemented.

Commitment	How
Promote a culture that values complaints and their effective resolution.	<ul style="list-style-type: none"> • Report publicly on ASIS's complaint handling. • Provide support and direction to staff responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage all stakeholders to make recommendations for system improvements. • Recognise and reward good complaint handling by staff. • Support recommendations for service and complaint handling improvements arising from analysis of complaint data.
Establish and manage our complaint management system.	<ul style="list-style-type: none"> • Ensure regular reports on issues arising from complaint handling work. • Ensure recommendations arising out of complaint data analysis are canvassed and implemented where appropriate. • Recruit, train and empower staff to resolve complaints promptly and in accordance with ASIS's policies and procedures. • Be alert to complaints and work actively resolve them promptly. • Recognise and reward good complaint handling.
Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> • Treat all people with respect, including people who make complaints. • Assist people to make a complaint if needed. • Comply with this policy and its associated procedures. • Keep informed about best practice in complaint handling. • Provide feedback on issues arising from complaints. • Provide suggestions on ways to improve the organisations complaints management system. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data.

2. Terms and definitions

Complaint

Expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this policy can distinguished from:

- Public interest disclosures (see internal reporting policy)
- Code of conduct complaints (see code of conduct)
- Responses to requests for feedback about the standard of our service provision (see the definition of 'feedback' below)

- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response (see definition of feedback)
- Service requests (see definition of service request below, and
- Requests for information (see our access to information policy)

Complaint Management System

All policies, procedures and practices, staff, hardware and software used by us in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of our organization.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about us, about our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

Service request

The definition of a service request will vary depending on the organisation's core business. However, it is likely to include:

- Requests for approval
- Requests for action
- Routine inquiries about the organisation's business
- Requests for the provision of services and assistance
- Reports of failure to comply with laws regulated by the organization
- Requests for explanation of policies, procedures and decisions.

Grievance

A clear, formal written statement by an individual staff member about another staff member of a work related problem.

Policy

A statement or instruction that sets out how we should fulfil our vision, mission and goals.

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom.

Public interest disclosure

A report about wrong doing made by a public official in New South Wales that meets the requirements of the Public Interests Disclosures Act 1994.

NDIS Reportable Incidents

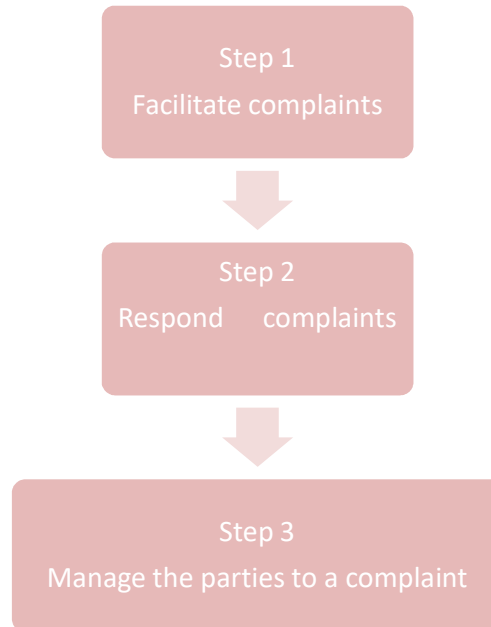
Reportable incidents will be reported to the NDIS Commission including:

- Death
- Serious Injury
- Abuse and Neglect
- Sexual or physical assault
- Sexual misconduct
- Unauthorised use of restrictive practice.

Not excluding reporting to appropriate authorities.

Please refer to NDIS Quality and Safeguards Commission Reportable Incidents Guidance.

3. Guiding Principles



3.1 Facilitate Complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable timeframe.

People making complaints will be:

- Provided with information about our complaint handling process
- Provided with multiple and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate and
- Provided with reasons for our decision/s and any options for redress or review

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicized. We 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 organization to assist or represent them in making and/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 (eg. Advocate, family member, legal or community representative, member of Parliament, another organization).

No charge

Complaining to us is free.

3.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with ASISI.

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 peoples 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 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.

Conflicts of interest whether actual or perceived will be managed responsibly.

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 ASISI as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organization, we will work with these other organization/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 organized to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organization, 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 the contracted service providers to have an accessible and comprehensive complaint management system. In such circumstances, we will take complaints about the services of our organization and that of the service providers.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

Managing unreasonable conduct by people making complaints

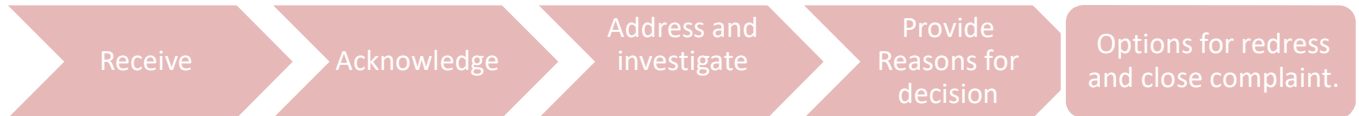
We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- 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 complaints we receive

When people behave unreasonably in their dealing 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 the conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

For further information on managing unreasonable conduct by complainants please see the Ombudsman's Managing Unreasonable Complainant Model Policy 2012.

4. Complaint management system



4.1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

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

4.2 Receipt of complaints

We will record each complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making the complaint
- Issues raised by the person making a complaint and the outcome/s they want
- Any other relevant information, and
- Any additional support the person making a complaint requires

4.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 5 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

4.4 Initial assessment and addressing of complaints

Initial Assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making the complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed we will consider:

- 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.

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person information or an explanation
- Gather information from the person or area that the complaint is about, or
- Investigate the claims made in the complaint

We will keep the person making the claim up to date on our progress particularly if there are 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.

4.5 Providing reasons for decisions

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 in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the Privacy and Personal Information Protection Act 1998 and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

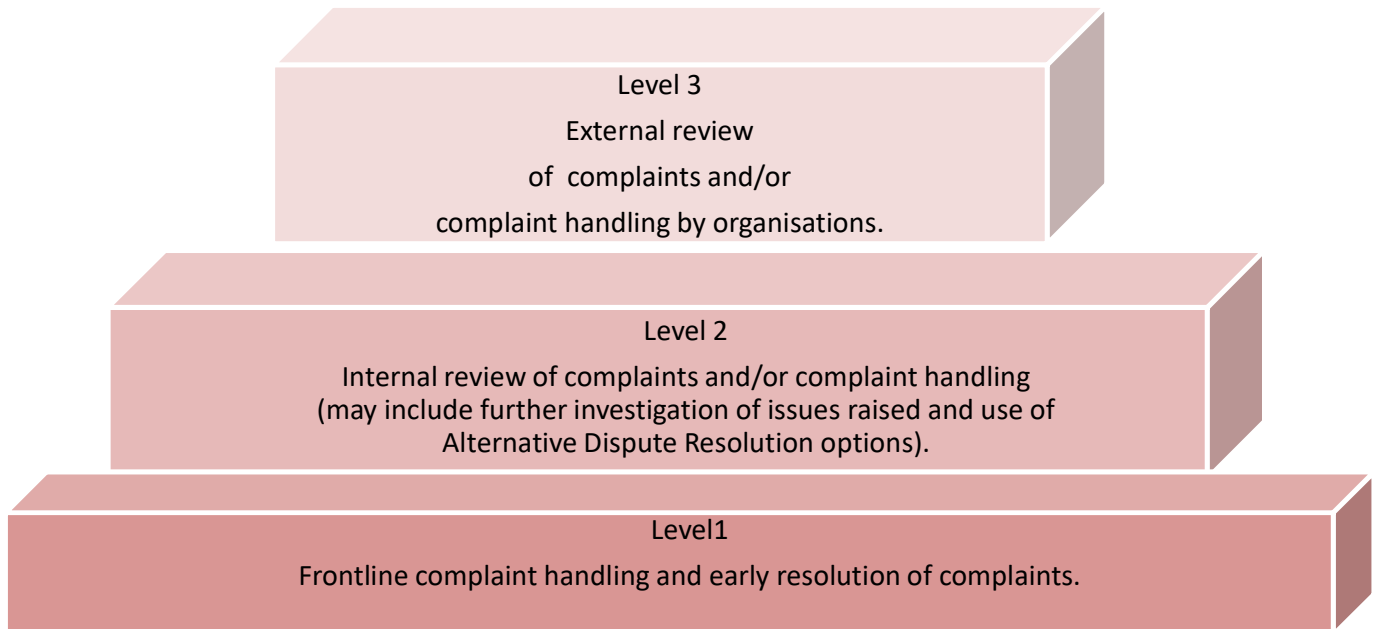
- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.

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

4.7 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 the NDIS Commission.

4.8 The three levels of complaint handling



We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint. This second level of complaint handling will provide for the following internal mechanisms:

- Assessment and possible investigation of the complaint and decision/s already made, and/or
- Facilitated resolution.

Where a person making a complaint is dissatisfied with the outcome of ASISI's review of their complaint, they may seek an external review of our decision by the NDIS Commission.

5. Accountability and learning

5.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline.
- Issues arising from complaints
- Systematic issues identified, and

- The number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure effectiveness in responding to and resolving complaints, and
- Identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits and complaint satisfaction surveys.

5.3 Continuous Improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end we will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling by staff
- Regularly review the complaints management system and complaints data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system. 1.