

## Complaints Management Procedure

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### 1 Purpose

The Complaints Management Procedure describes the system and process for clients, employees and other stakeholders, to provide Kudos Services (Kudos) with complaint feedback that may arise during service delivery.

Complaints received will be listened to, recorded, reported, monitored and responded to in a timely, respectful way and used to continually improve services and support provided by Kudos.

The Complaints Management Procedure also serves to encourage feedback and to mitigate complainant dissatisfaction with the complaints process and avoid minor grievances escalating into major incidents.

### 2 Scope

The Complaints Management Procedure is relevant to all Kudos clients, members, board members, volunteers, contractors and the broader community who provide feedback.

The procedure relates to anonymous, informal and formal complaints both simple and serious in nature.

Member Grievances are covered by the Member Dispute and Grievances procedure.

### **3 Guiding Principles**

The lodging and response to complaints will be managed using the following guiding principles to achieve an acceptable outcome for all parties.

#### **3.1 Accessible**

Individuals are encouraged to provide feedback about the service, including concerns and complaints. This will be easy for them to do and include lodging anonymously if preferred.

The complaints process will be actively promoted across different mediums.

#### **3.2 Responsiveness**

All complaints and concerns are responded to promptly and sensitively.

Options for complainants with particular needs; for example, cultural and linguistic diversity will be afforded the same complaints process, using additional supports e.g. interpreter services.

#### **3.3 Procedural Fairness**

Complainants will be treated fairly throughout the process and awareness by members of a real or perceived power imbalance between the parties will be recognised and removed.

#### **3.4 Efficiency**

Complaints will be handled in a way that is proportionate and appropriate to the type and level of complaint received.

#### **3.5 Information Handling**

Complaint information will be gathered confidentially to review cases, identify risks and trends and report on how complaints have led to improvement.

#### **3.6 Confidentiality**

Complaints will be investigated privately, and complaint information will be stored in a secure location and accessed only by authorised members.

### 3.7 Transparency

Relevant facts and decisions will be openly communicated and shared while protecting privacy.

Joint problem solving, between the organisation and the complainant will be promoted to foster the best possible outcome.

### 3.8 Appropriate Resolution

Complaints are dealt with in a way that is complete, fair and provides acceptable outcomes that satisfy the complainant and the organisation wherever possible.

### 3.9 Integration

The handling of complaints is part of the organisation's core business and as services may be jointly provided in partnership with other agencies, integration of complaints handling will be conducted when able.

### 3.10 Improvements

Concerns and complaints will be used to evaluate and improve our services and processes, including the complaints management process.

## 4 Procedure

### 4.1 Making a Complaint

A complaint is an expressed concern or issue communicated by a complainant. Members receiving this information will attempt to resolve the problem with the complainant.

An example of a complaint could be failure to communicate an appointment change, a concern about payroll, invoice payment or breaches in confidentiality etc.

The complainant can lodge a complaint in several ways:

- face to face: either at service delivery or through an arranged meeting with Kudos
- phone: by calling Kudos on (08) 8348 6500
- letter: by posting to Kudos at PO Box 285 Fullarton SA 5063
- email: by email to Kudos at [contactus@kudoservices.com.au](mailto:contactus@kudoservices.com.au)
- website: via the Feedback tab.

Any complaints specific to ECEI can be lodged by:

- email: [ecei.southaustralia@dis.gov.au](mailto:ecei.southaustralia@dis.gov.au)

## 4.2 Receiving and recording a complaint

Upon receipt of a complaint members will:

1. openly accept the feedback as an opportunity for improvement
2. provide their name and role
3. listen without interrupting
4. recognise the person's feelings, using reflective language
5. be open and respectful
6. explain the complaints process
7. document the complaint on the Compliments and Complaints form
8. if determined to be of a sensitive nature, refer feedback to the relevant Line Manager to complete the Compliments and Complaints form/inclusion within the Register
9. notify the external funder of the complaint, where applicable and if contractually agreed to, and
10. discuss the feedback with Line Manager to determine severity and appropriate response (risk assessment).

## 4.3 Acknowledgment of complaint

All complaints will be acknowledged in a timely way using one of the following methods:

Complaint method	Acknowledgement Type	Information Provided	Acknowledgement Timeframe
Face to face	Face to face	Rights and Responsibilities Sheet and Complaints Flow Chart	Immediate
	Letter	See Complaints Acknowledgement letter	Within three working days
Phone	Phone	Rights and Responsibilities and Complaints Flow Chart	Immediate
	Letter	See Complaints Acknowledgement letter	Within three working days
Letter	Letter	See Complaints Acknowledgement letter	Within three working days
Email	Email	Acknowledgment of complaint and further contact will be made on completion of investigation	Immediate (automated response)
Website	Email	Acknowledgment of complaint and further contact will be made on completion of investigation	Immediate (automated response)

Please note:

- for any complaint deemed serious in nature (severity score of high or extreme), written acknowledgement must be provided by the Chief Executive Officer (CEO)
- any complaints leading to a member feeling threatened, unsafe or disrespected may be deferred or referred to a Line Manager
- complaint acknowledgement requires the complainant to provide accurate contact information when lodging a complaint, and
- where a complaint investigation may take longer than the anticipated 30 days, regular contact with the complainant is required and is to be recorded on the Compliments and Complaints Register
- where a complaint is lodged to an external, contracted service provider, the complaint will be addressed by that organisation's complaints procedure in the first instance.

Kudos will be notified by that agency of the complaint and the resolution and the Quality Team will record the complaint and include relevant details in the Compliments and Complaints Register.

#### 4.4 Assessment and Review

Upon receipt of complaint(s), each complaint will be assessed by the Line Manager immediately to determine risk using the Complaint Severity Assessment Matrix. In the event the complaint may relate to that respective Line Manager; the complaint will be assessed by a member of the Senior Management Team.

For complaints deemed high or extreme, the Line Manager will escalate to the Senior Manager for discussions with the CEO to assign a Complaints Manager to determine risk and subsequent investigation and action plans.

For risks that are deemed low to medium, the complaint will be investigated by the relevant Line Manager.

Using the Consequence and Likelihood Matrix below, the Complaints Manager will assess the complaint and record the score within the complaint and complaint record.

## Complaint Severity Assessment Matrix

Rating	Description of Impact/Consequences				
	Examples	Minor	Moderate	Major	Extreme
Financial	<ul style="list-style-type: none"> <li>* Revenue loss</li> <li>* Contract loss</li> <li>* Cost increase</li> <li>* Financial or Budget Liability</li> <li>* Compensation/Fines</li> </ul>	Impact <\$1k	Impact between \$1k - \$10k	Impact between \$10k - 50k	Impact > \$50k
Member Performance	<ul style="list-style-type: none"> <li>* Wilful misconduct</li> <li>* Poor performance</li> </ul>	Brief or once-off intervention/instruction by management is required.	Performance Management process required	Performance management with training	Termination of Employment
Member	<ul style="list-style-type: none"> <li>* Payroll issues</li> <li>* HR issues</li> </ul>	Once off complaint which can be resolved immediately with management support	<p>Member complaint which can be resolved with ongoing management support</p> <p>Systematic issue identified requiring rework of policy/process</p>	Potential exit of members and/or threat of legal/industrial action	Exit of member(s) and/or legal/industrial action
Service Delivery/Quality	<ul style="list-style-type: none"> <li>* Client relationship damaged</li> <li>* Safety concerns</li> </ul>	Once off client complaint which can be resolved immediately with management support	Once off/ongoing client complaint which can be resolved with ongoing management support and process changes	Serious threat to client service contract that require escalated management response	Loss of a client service contract
Political/Reputation	<p>Reputational Damage including:</p> <ul style="list-style-type: none"> <li>* Adverse press</li> <li>* Ministerial fallout</li> <li>* Reputation damage</li> <li>* Adverse Media Attention</li> </ul>	Once off internal issue which can be resolved immediately with management support	Internal/local issue which can be resolved with ongoing management support	<p>Local issue, isolated concerns raised by interest groups with no media interest.</p> <p>Serious threat to client service contract</p>	<p>Public, industry, funder and/or media interest/complaints.</p> <p>Loss of a client service contract</p>

## Likelihood Table

Probability categories	Definition
Almost Certain	Expected to occur again, either immediately or within a short period (likely to occur most weeks or months)
Likely	Will probably occur in most circumstances (several times a year)
Possible	Probably will recur, might occur (may happen every one to two years)
Unlikely	Possibly will recur (could occur in two to five years)
Rare	Unlikely to recur - may occur only in exceptional circumstances (may happen every five to 30 years)

## Severity Matrix

	Extreme	Major	Moderate	Minor	Insignificant
Almost certain	4	4	3	2	2
Likely	4	4	3	2	2
Possible	4	3	3	2	1
Unlikely	4	3	2	1	1
Rare	3	2	2	1	1

## Action Required

Level	Severity	Action required
1	Low	<p><b>Acceptable</b></p> <p>Manage by routine procedures.</p> <ul style="list-style-type: none"> <li>Complaint reviewed as per complaints management procedure</li> <li>Line manager informed</li> <li>Improvement strategies developed, and</li> <li>If relating to client complaints, report to Therapy Leadership Group.</li> </ul>
2	Moderate	<p><b>Conditionally Acceptable</b></p> <p>Line Management responsibility must be specified with defined actions.</p> <ul style="list-style-type: none"> <li>Complaint reviewed as per complaints management procedure</li> <li>Line manager informed</li> <li>Improvement strategies developed, and</li> <li>Report to relevant senior manager and if related to client complaints, the Therapy Leadership Group.</li> </ul>
3	High	<p><b>Conditionally Acceptable</b></p> <p>Senior Management attention and planning required.</p> <ul style="list-style-type: none"> <li>Complaint investigated as per complaints management procedure</li> <li>Relevant senior manager and CEO informed</li> <li>Review of policies and procedures</li> <li>If related to client complaints, report to the Therapy Leadership Group, and</li> <li>Report to senior management team, CEO and Board.</li> </ul>
4	Extreme	<p><b>Unacceptable</b></p> <p>Work/activity to cease, immediate action required (detailed research and management planning required at CEO and senior leadership levels).</p> <ul style="list-style-type: none"> <li>Immediate action required</li> <li>Notify relevant senior manager and CEO immediately</li> <li>Detailed investigation undertaken</li> <li>Review of policies and procedures</li> <li>If related to client complaints, report to the Therapy Leadership Group, and</li> <li>Report to senior management team, CEO and Board.</li> </ul>



## 4.5 Investigation

Where severity is rated higher (high or extreme) complaint investigation is required.

It is not intended that all of the actions outlined below will be completed, in exact order, in every situation. Complaint management is a complex and sensitive undertaking that needs to be adapted depending on circumstances.

The Complaint Manager and/or delegate is responsible for investigating the complaint immediately. The investigation process is conducted using the guiding principles and involves the following:

1. Collect the relevant facts;
  - a. Interview all people involved in the complaint, including the complainant and/or client;
  - b. Collect relevant records; and
  - c. Assess policies and procedures and other documents.
2. Analyse the information collected;
3. Make findings about the events and underlying causes;
4. Consider strategies and making recommendations for improvements; and
5. Prepare report as required.

Investigations should be completed within 30 days unless otherwise indicated. The complainant will be kept informed of the timeframes involved in this step.

## 4.6 Resolution

Where a resolution is not achieved following this process the complainant will be provided with information about what the next steps might be for them. The complainant will be provided with a resolution letter containing information regarding external bodies they can raise their complaint with, including:

- The NDIS Quality and Safeguards Commission <https://www.ndiscommission.gov.au/>
- The Health and Community Services Complaints Commissioner [www.hcsc.sa.gov.au](http://www.hcsc.sa.gov.au)
- Disability Advocacy and Complaints Service of SA [www.dacssa.org.au](http://www.dacssa.org.au)

The Line Manager will inform the CEO of an unresolved complaint.

Where the complaint implies serious misconduct, e.g.: serious risk to health and safety of members or clients, or a criminal offence, or where mandatory reporting is required, Kudos will deal with the complaint under the relevant legislation and policies. For example: referral of the matter to Police or other agency e.g.: Return to Work.

#### 4.7 Response

Upon completion of the review and/or investigation process the complainant and members involved will be informed of the outcomes.

Where the severity score of the complaint was rated low and medium, if required, a response letter will be sent to the complainant and/or client by the relevant Senior Manager.

Where the score was rated high or extreme, a face-to-face meeting will be offered to the complainant with Relevant Senior Manager and/or CEO and a response letter will be provided by the CEO.

The Therapy Leadership Group meeting will regularly review the Compliments and Complaints Register to discuss complaints and consider trends and improvement opportunities.

#### 4.8 Anonymous Complaint

Where a complainant wishes to remain anonymous, information will be provided to them (where possible) regarding Kudos's ability to adequately investigate the issue or concern. Where possible, the reason for providing an anonymous complaint will be established for improvement purposes.

The complaint will be recorded in the Compliments and Complaints Register and reviewed and/or investigated in line with the information provided.

The complaint will be reported and used for improvement of services.

#### 4.9 Withdrawal of the complaint

A complaint can be withdrawn by the complainant at any time either verbally or in writing to the relevant Manager. A withdrawal letter will be provided to the complainant and recorded in the Compliments and Complaints Record.

Where information can be gained as to why the complaint is being withdrawn this shall be included in the Compliments and Complaints Record.

#### 4.10 Declining a Complaint

Where the complaint may be deemed unreasonable e.g.:

1. not made in good faith
2. lacking in substance.

The CEO or delegate will notify the complainant in writing if their complaint has been declined.

A claim may also be declined if:

1. A claim has been commenced (either by the complainant or Kudos) in a court or before another judicial authority
2. The subject matter of the complaint has been lodged with an external agency and it is more appropriate for the matter to be dealt with by that agency, or
3. Kudos has already dealt with the substance of the complaint at its original disclosure in the past.

#### 4.11 Follow Up

The Quality Team will track complaint information using the Compliments and Complaints Register and individual complaint forms will be held securely.

#### 4.12 Evaluate and Improve

All complaints will be reviewed at Therapy Leadership Group meetings with the intent to make necessary improvements to service delivery. Complaints of a sensitive nature will be de-identified to ensure confidentiality.

## 5 Responsibilities

### 5.1 Roles and Responsibilities

Role	Responsibility
Complainant	<ul style="list-style-type: none"><li>• lodges a concern or complaint as described in the Rights and Responsibilities Sheet</li><li>• provides a clear and honest account of their concerns and their expectations for the complaint outcome</li><li>• engages openly in the complaint process, including participating in discussion with other parties to resolve their concerns</li><li>• responds to requests for information in a timely manner</li><li>• provides a support person where applicable to assist them in the complaint process, and</li><li>• participates in the complaint resolution process.</li></ul>
Members and Employees	<ul style="list-style-type: none"><li>• understand feedback is recognised as a complaint</li><li>• have awareness of the complaints process and implements the procedure in their work as needed</li><li>• completes complaint resolution training</li><li>• promotes the complaints process to clients as required</li><li>• rectifies informal, simple complaints where possible</li><li>• escalates the complaint in a timely way where required</li><li>• participates in complaints investigation as required, and</li><li>• improves own work processes in response to the outcomes of complaints.</li></ul>

Role	Responsibility
Line Manager	<ul style="list-style-type: none"> <li>• awareness of the complaints management systems and promotion of the procedure within their teams</li> <li>• train and support members in the complaints management system</li> <li>• contribute to addressing corrective actions to improve systems and processes</li> <li>• receive and acknowledge complaints as they are received</li> <li>• establish the complaint investigation process</li> <li>• lead complaint investigations as required</li> <li>• participate in complaint assessment and investigation</li> <li>• respond to complaints in a timely way when needed</li> <li>• maintain contact with the complainant during the complaints process</li> <li>• report complaints immediately to their Line Manager within their respective business units, notify the relevant funder as required and report to the Therapy Leadership Group as required</li> <li>• manage escalation of serious complaints, and</li> <li>• provide authority for members to resolve simple, informal complaints.</li> </ul>
Quality Team	<ul style="list-style-type: none"> <li>• develop and review the Complaints Management Procedure and its associated documentation as scheduled and as required</li> <li>• train and support members in the complaints management system</li> <li>• maintain the complaint record and Compliments and Complaints Register, including corrective actions to improve systems and processes</li> <li>• promote client and member involvement in the review and improvement of the Complaints Management Procedure</li> <li>• monitor and review risks and trends and report on how complaints have led to improvement to the Senior Leadership Team and Therapy Leadership Group</li> <li>• provide reports to Board for those rated high or extreme in the severity matrix (below), and</li> <li>• monitor feedback.</li> </ul>
Complaint Manager	<ul style="list-style-type: none"> <li>• have the Influence to bring people together and respond to complaints accordingly</li> <li>• act with confidentiality and discretion</li> <li>• maintain a strong client focus</li> <li>• follow the complaints process in agreed timeframes</li> <li>• keep a log of conversations, correspondence and other documents</li> </ul>

Role	Responsibility
	<ul style="list-style-type: none"> <li>• track the progress of the review and/or investigation and resolution of the complaint</li> <li>• record the views of the complainant about the events that occurred and the outcome they are seeking</li> <li>• outline how and when risk was assessed and follow up action taken, including notifications to managers, insurers and others</li> <li>• record decisions about the facts and the causes of the complaint</li> <li>• record the outcomes of the complaint</li> <li>• record any recommendations for change and how they will be determined, and</li> <li>• elevate to the Senior Leadership Team.</li> </ul>
CEO	<ul style="list-style-type: none"> <li>• provide resources necessary to implement the Complaints Management Procedure effectively, including member training</li> <li>• respond to complaint escalation procedures where necessary and provide support and advice to members</li> <li>• submit serious and formal complaints to the Board or relevant Committee as required</li> <li>• approve escalation of serious complaints to external agencies, insurers etc., and</li> <li>• decision to decline or delegate responsibility to decline a complaint.</li> </ul>
Therapy Leadership Group	<ul style="list-style-type: none"> <li>• receive complaint reports</li> <li>• review case studies</li> <li>• provide expert advice on Complaints Management Procedure</li> <li>• support member training and education</li> <li>• escalate system/organisation wide issues to the Senior Leadership Team, and</li> <li>• design improvements and supports implementation of corrective action to prevent complaint recurrence.</li> </ul>
Senior Management Team	<ul style="list-style-type: none"> <li>• address system/organisation wide issues.</li> </ul>
Board and Committees	<ul style="list-style-type: none"> <li>• receive complaint reports for those rated high or extreme in the severity matrix (below), and</li> <li>• provide expert advice in regard to response of serious complaints.</li> </ul>

## 5.2 Compliance, monitoring and review

The Complaints Management process will be monitored and evaluated by:

- internal quality compliance audits
- regular procedure review as scheduled or as required, and
- client and member feedback.

This procedure defines the minimum expectation of Kudos members and employees.

Any member found to be in breach of the requirements set out in this policy and any related procedures may be subject to disciplinary action in accordance with the Kudos Disciplinary Action and Termination Procedure.

### 5.3 Reporting

Kudos will ensure that reporting mechanisms are implemented to ensure Board, Senior Management, appropriate Committees and Members and are routinely informed about compliments and complaints.

Category	Reported by	Reported to	Information Reported	Frequency
Compliments	Quality Team	Board Senior Management Team Therapy Leadership Group Members and Employees	Number of compliments reported Business unit feedback relates to Common trends/themes identified	Monthly
Complaints	Quality Team	Board Senior Management Team Therapy Leadership Group Members and Employees	Number of complaints reported Business unit feedback relates to Number of low, moderate, high and extreme risk rated complaints reported Number of open complaints Number of complaints closed < 30 days Number of complaints closed > 30 days Number of complaints referred externally Number of funders notified of complaints Common trends/themes identified Number of improvement opportunities identified Number of service improvements made	Monthly

## 6 Terms and Definitions

Term	Definition
Complaint	An expression of dissatisfaction made to an organisation by members, clients and/or stakeholders related to its services, products or the complaints handling process itself
Informal Complaint	A complaint made verbally and likely to be easily resolved and can be responded to promptly
Formal Complaint	A complaint made in writing and formally recorded and responded to. May refer to misconduct of members, breach of confidentiality etc. To achieve resolution, it requires an investigation to be conducted
Complaint Manager	A person who is responsible for the management of the complaint
Compliments and Complaints Register	A register to record all feedback including comments, compliments and complaints. Does not include any references to sensitive information
Complainant	A person who makes a complaint and includes the person on whose behalf a complaint is made. A complainant may be a client, provider, members member or any other stakeholder
Corrective Action	Identification and elimination of the causes of the problem, preventing their reoccurrence
Dispute	A disagreement that may arise from an unresolved complaint
Escalation	The process of requiring further advice, or assistance to achieve resolution, including from external agencies
Continual Improvement	Recurring activities to increase the level of service delivery and organisational effectiveness

## 7 Related Legislation and Documents

Category	Link
Agreements	<ul style="list-style-type: none"> <li>• NDIS Partners in the Community Program – ECEI Services Grant Agreement</li> </ul>
Kudos Policy Documents	<ul style="list-style-type: none"> <li>• Complaints Procedure Process Map</li> <li>• Compliments and Complaints Form</li> <li>• Complaint and Investigation Form</li> <li>• Compliments and Complaints Register</li> <li>• Complaint Acknowledgement letter</li> <li>• Complaint has been Resolved letter</li> <li>• Complaint has been Declined letter</li> <li>• Complaint is Unresolved letter</li> <li>• Complaint Withdrawal letter</li> <li>• Employee Dispute and Grievances Procedure</li> </ul>



Category	Link
<a href="#">NDIS Practice Standards - Core Module</a>	<u>Provider Governance and Operational Management</u> <ul style="list-style-type: none"> <li>• Risk management</li> <li>• Feedback and complaints management</li> </ul>
<a href="#">National Standards for Disability Services</a>	<ul style="list-style-type: none"> <li>• Standard Four: Feedback and complaints</li> </ul>
Legislative Documents	<a href="#">National Disability Insurance Scheme Act 2013 (Cth)</a> <a href="#">Disability Services Act 1993 (SA)</a> <a href="#">National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 (Cth)</a> <a href="#">National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (Cth)</a> <a href="#">National Disability Insurance Scheme (Quality Indicators) Guidelines 2018 (Cth)</a> <a href="#">The United Nations Convention on the Rights of the Child</a>
Associated Links	<a href="#">Health and Community Services Complaints Commissioner (HCSCC) South Australia</a> <a href="#">Disability Advocacy and Complaints Service of SA Inc</a> <a href="#">NDIS Quality and Safeguards Commission</a> <a href="#">Kudos Services Website</a>

## 8 Feedback

8.1 Feedback about this document may be provided by emailing [quality@kudoservices.com.au](mailto:quality@kudoservices.com.au).