



PMAbility

Compliments and Complaints Management Policy Feb 2022

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Introduction

We acknowledge everyone's right to express their opinion about our services. We will provide our participants and the community with the opportunity to influence the way PMAbility works through meaningful engagement, listening and responding to feedback, and protecting their confidentiality and privacy.

Compliments and complaints provide valuable feedback about the level of participant satisfaction with our services. Along with other forms of feedback, they provide an opportunity to improve the delivery of services. They must be handled effectively and promptly, and recorded for coordination, analysis and reporting.

Resolving complaints at the earliest opportunity, in a way that respects and values the person's feedback, can be one of the most important factors in ensuring an opportunity to recover a person's positive feelings and confidence about our services. It can also help prevent further escalation of the complaint. To facilitate this, we will provide a responsive, efficient, effective and fair complaint management system.

This Policy is noted to follow the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018. These require registered NDIS providers to have an effective system for management and resolution of complaints about the supports or services they provide. The system in place must be appropriate to the size of the organisation and the complexity of the services and supports deliver.

It is a guiding principle of the National Disability Insurance Scheme Act 2013 (NDIS Act) that people with disability have the same right as other members of Australian society to pursue any grievance. Section 4 of the NDIS Act imbeds some general principles:

- ✓ Realise their potential for physical, social, emotional and intellectual development.
- ✓ Be supported to participate in and contribute to social and economic life to the extent of their ability.
- ✓ Be supported to exercise choice including in relation to taking reasonable risks in pursuit of their goals and the planning and delivery of their supports.
- ✓ Be respected for their worth and dignity and to live free from abuse, neglect and exploitation.
- ✓ Be able to determine their own best interests including the right to exercise choice and control and to engage as equal partners in decisions that will affect their lives to the full extent of their capacity.
- ✓ Have their privacy and dignity respected.
- ✓ Have the role of families, carers and other significant persons in their lives acknowledged and respected.
- ✓ Have access to advocates and supports which promote innovation, quality, continuous improvement, contemporary best practice and effectiveness

A person does not necessarily have to expressly state that they wish to make a complaint to have an issue or concern dealt with as a complaint. Regardless of whether it is a big or small issue, if it is treated seriously, it demonstrates to the person that their input is valued to improve the services bring delivered.

All organisations that deal with participants must be opened to receiving feedback and complaints. Feedback and complaints are a valuable tool for organisations about how they can improve the quality of their services. Encouraging feedback about your service is an important way to empower people to speak up. Paying attention to what they are saying, and how you have learnt from their feedback, without becoming upset or defensive that a complaint was received, sends a strong message that speaking up is worthwhile.

How a complaint is responded to is just as important as whether the complaint is resolved.

Even if you cannot fully resolve the complaint, it is critical that the person who made the complaint feels that they have been listened to; that their opinion was valued; and that you did everything you could to address their concerns.

The process really is as important as the outcome and is critical to building and strengthening relationships between participants and NDIS providers.

Mission Statement

We seek to provide a mechanism for people to manage their funds to a set budget. We provide a customised approach, with visual reminders and graphics representation of their spending patterns.

Our Values

Respect

We respectfully encourage each person to exercise choice and control and respect the diversity of each individual's needs.

Empowerment

We actively listen to better understand individual needs and expressed aspirations, maximising independence and building confidence and capacity

Integrity

We are open, professional, authentic and fair in everything we do.

Audience

The policy sets out how we will listen and respond to compliments and complaints and how we will use that feedback to develop and deliver policies, programs and services that support and enhance the well-being of all Western Australians.

Scope

This policy covers complaints made to PMAbility about provided, contracted, funded or regulated services including disability services, bookkeeping activities, central office. Complaints related to services provided by funded organisations should be referred back to the organisation's complaint management system in the first instance, where possible. Where the matter is unable to be resolved at this level, the complaint should be referred to PMAbility.

Compliments and complaints

What is a compliment?

Compliments are expressions of praise, encouragement or gratitude about services funded, contracted, regulated or provided by PMAbility. They provide valuable feedback about the level of satisfaction with service delivery.

Compliments provide:

- ✓ valuable indicators of the effectiveness of a service.
- ✓ useful insights about the aspects of service that are most meaningful to people.
- ✓ examples of good practice which can be shared throughout the business.
- ✓ an opportunity to recognise the efforts of staff and boost morale.

Staff should acknowledge compliments and thank participants for their interest and feedback. Where possible, participants should be informed how the feedback will be used and assured that it will be passed on to the relevant staff members. Sometimes it may be used as a testimonial on our website.

What is a complaint?

A complaint is defined as an expression of dissatisfaction with any service provided, contracted, funded or regulated by PMAbility. A complaint may also be made about the complaints handling process of PMAbility.

A complaint relates to a specific episode, occurrence or provision of service that has resulted in an impact on any individual or group. A general expression of concern is not a complaint. The definition of complaint used by PMAbility is the Australian Standard Customer Satisfaction – Guidelines for complaints handling in organisations AS ISO 10002-2014 which defines a complaint as ‘an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected’.

Complaint management require that:

- ✓ complaints are acknowledged, assessed and resolved in a fair, efficient and timely manner,
- ✓ appropriate action is taken in relation to issues raised in complaints,
- ✓ reasonable steps are taken to ensure that any person who makes a complaint, and any affected person with disability, is advised how to make a complaint to the NDIS Quality & Safeguards Commission, and
- ✓ appropriate support and assistance in contacting the NDIS Quality & Safeguards Commission in relation to a complaint is provided to any person making a complaint, and any affected person with disability.

Elements of the management process

PMAbility’s compliment and complaint management process is based on the following elements:

Visibility and accessibility

The management system will be visible and accessible to individuals and:

- explain how and where to make a compliment or complaint, including an anonymous complaint.
- consider specific needs of the individual or barriers they may experience.
- explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed.
- make websites accessible to people using screen readers and, if necessary, make publications and correspondence available in Braille, large print or audio formats for people with sight impairment and plain English.
- ensure offices are accessible for wheelchairs and to people with mobility impairment.
- ask people if they have any special requirements for access or communications.
- aid complainants with reading or writing difficulties to formulate and lodge complaints.
- accept complaints on behalf of people with intellectual impairment from representatives.
- provide a text telephone (TTY) service for people with a hearing impairment. explain how PMAbility will manage a complaint and the expected timeframe for resolution.
- support individuals so they can identify and seek their preferred outcome.

Responsiveness

The management system will be responsive and provide mechanisms and strategies to:

- promote participant rights, particularly those with special support needs, so they can actively participate in the compliments and complaints process.
- inform and train staff to use the compliment and complaint management system.
- support the complainant to seek the most appropriate resolution.
- ensure there is clarity about the requested outcome.
- provide a respectful, valuing and informative acknowledgement.
- actively listen, empathising and acknowledging when the service was not the best it could have been.
- monitor timeframes for resolution.
- communicate with all relevant parties about the progress to resolve the complaint.

Assessment and investigation

The management system will have mechanisms and strategies to:

- assess complaints for severity, safety, complexity, impact and the need for immediate action.
- collect adequate and appropriate information to inform systemic improvement.
- protect the privacy and confidentiality of the information people have provided.
- determine by whom and at what level the complaint should be dealt with.
- enable complaints to be considered independently, fairly and objectively.

Feedback

The management system will provide mechanisms and strategies to:

- explain what happened and why, what will be done to fix the issue, who will do it, how we will communicate our progress and how we will check things are on track.
- explain the reasons for the decision.
- provide an apology.
- where an apology is provided, ensure it is sincere, and accepts responsibility for what occurred and the impact.
- explain the circumstances without making excuses and summarise the key actions that will be taken.
- provide regular updates to the complainant if the resolution is delayed.
- notify the complainant of alternative complaint resolution pathways and review mechanisms.
- follow up with complainants to determine the effectiveness of the outcome, where appropriate.

Improvement focused

The management system will provide mechanisms and strategies to gather and record feedback and other information to:

- meet any statutory, policy or procedural reporting requirements.
- improve the training and capabilities of complaint management staff.
- analyse the complaint data and identify complaint trends for performance improvement.
- monitor the time taken to resolve complaints.
- notify service providers of any changes necessary arising from a complaint as part of a continuous quality improvement approach.

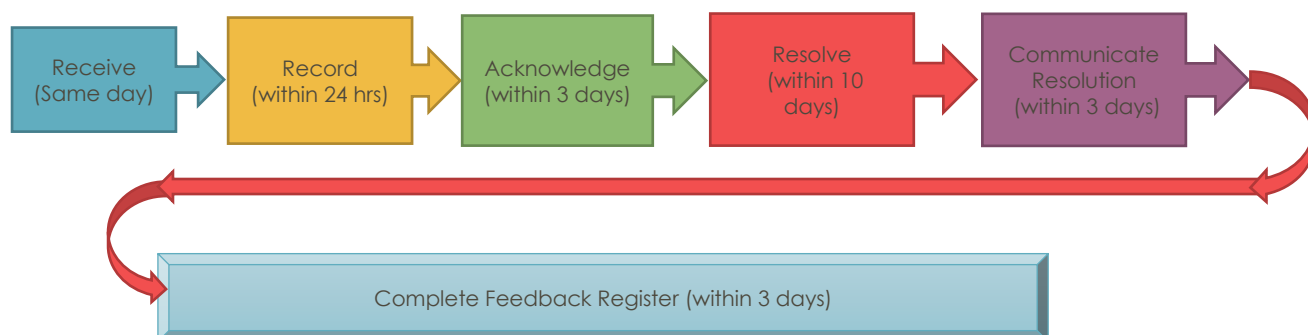
Complaint management process

Complaints and suggestions can be made via:

- 1) The Feedback component of the PMAbility website (under Contact us).
- 2) Contacting a staff member either verbally or in writing (via phone, sms or email).
- 3) Responding to questionnaires and surveys / audits.
- 4) Attending a meeting or case conference.
- 5) Contacting an external agency (advocate or NDIS Commission – via website).

Complaints could be lodged by:

- 1) The worker / staff member.
- 2) The participant or their nominee / carer.
- 3) The public.
- 4) An Advocate.
- 5) Anonymously



Receive

- Listen – openly to the concerns being raised by the complainant.
- Ask – the complainant what outcome they are seeking.
- Inform – the complainant clearly of the complaint process, the time the process takes and set realistic expectations.
- Accountable – be empathic towards the affected person and action all commitments made.
- Assess – create a prioritisation framework to identify situations which pose an immediate threat or danger or require a specialised response.
- Refer to the Compliment and complaint form template to assist in recording key information at the time of first contact.

Record

- Record – all information that is relevant to the compliment or complaint, in its original and simplest form.
- Store – in a compliment or complaint management system that also allows for data analysis.
- Protect – use a system that restricts access to participants who are involved in managing the compliment or complaint.
- Refer to the Template reporting system that can be used for reporting purposes.

Acknowledge

- Acknowledge – receipt of the complaint early to build a relationship of trust and confidence with the person who raised the complaint.
- Anonymity – a person may request to remain anonymous in their lodgement and therefore contact may not be possible or expected.
- Desired outcomes – provide realistic expectations and refer the matter to other organisations were identified as being more suitable to handle.
- Conflict of interest – avoid this by appointing a person unrelated to the matter as an investigator.
- Timeframes and expectations – provide these to the complainant where possible.

Resolve

- Involve the complainant – keep them informed of the progress of the complaint and discuss any disparities identified in the information held.
- Additional information – request when required but apply a timeframe that limits when it is to be provided.
- Extensions in time – consider only where necessary and always communicate any additional time requirements to the complainant with an explanation of the need.
- Record – continue to record all decisions or actions of the complaint investigation in the compliment and complaint management system.
- Focus – when investigating, focus on the identified complaint matters only. A complaint is not an opportunity to review the whole case.

Communicate resolution

- Outcome – Where possible, discuss the outcome verbally with the complainant before providing written advice and allow them the opportunity to make further contact following receipt of the written advice.
- Recourse – include what further action may be available to the complainant at the conclusion of the complaint investigation. An action of recourse may be to escalate the matter further with an external agency or for a further review within the organisation.
- Further reviews – providing a minimum of one further review will enable the first investigation to be reviewed for soundness and allow additional information not available in the first complaint to be included.
- Opportunities – develop a mechanism or process by which complaint outcomes can be relayed to the appropriate area within the organisation for action to improve service delivery.
- Feedback – develop a process that allows for a review of the complainant’s experience of the complaints process by encouraging and enabling feedback on how the process by which their complaint was dealt with.

Governance and accountability

Accountabilities and responsibilities that underpin the effective implementation of this policy are as follows:

Role	Actions and responsibilities
Business Owner	establishes, monitors and reviews all compliments and complaints management related policies and processes; audits the complaints management system; identifies trends and systemic issues in compliments and complaints; manages a central complaints telephone and email service, including registering, reviewing and referring complaints.

Staff	be aware of their roles, responsibilities, authorities and procedures; accept accountability for receiving, recording and reporting compliments and complaints.
External Consultant	provides education, training advice and support to divisions and areas relating to the compliments and complaints management policy and practice.

Should impartiality be a priority in resolving the issue then an external consultant may be used.

Record keeping requirements

A registered NDIS provider must keep and maintain appropriate records of all complaints received by the provider. This will include, where appropriate: information about the complaint; any action taken to remediate or resolve complaints, and the outcome of any action taken.

Records must be kept for 7 years from the date the record was made.

This requirement is fundamental to the proper functioning of complaints management and resolution system as it ensures that persons with disability and their families and carers are aware of their rights and can advocate for their needs and safety where appropriate.

It is also crucial that each person employed or otherwise engaged by the registered NDIS provider understands and can utilise the complaints management and resolution system. This ensures that such people know how to make a complaint if they become aware of issues or have concerns with the provider.

The requirement to document the system relates only to the system itself, as information provided in individual complaints must generally be kept confidential.

Results of a Complaint will be inputted to the Quality Management and Continuous Improvement process to assist PMAbility to learn from the experience and document a way to avoid similar complaints in the future.

It is necessary for NDIS providers to keep accurate records to enable them to identify any systemic issues and to be able to provide those records to the NDIS Quality & Safeguards Commissioner or quality auditor when required.

The rules relating to the complaints management and resolution system of a registered NDIS provider include an obligation to give people procedural fairness when dealing with a complaint. The NDIS Quality & Safeguards Commission has developed guidelines on procedural fairness, which are available here: [NDIS \(Procedural Fairness Guidelines\) 2018](#)

Register of Complaints / Compliments

Nature Complaint / Compliment	Date Received	Date Recorded	Date Acknowledged	Date Resolved	Date Communicate Resolution	Subject matter	Outcome / Learning

THE END