

NDS Quality and Safeguards Sector Readiness Project

Complaints Management – Self-Assessment and Action Plan

This self-assessment resource supports providers to review and develop feedback and complaints management systems, policies, and processes. This tool supports those seeking to improve practice. This resource is a starting point and is general in nature.

Review the information and consider how your organisation's response will be specific to the size and scope of the organisation, the types of supports and services being delivered and the people accessing supports and services.



Introduction - Complaints Management and the NDIS.

People with disability have the same right as other members of society to pursue a grievance. This is one of the guiding principles of the National Disability Insurance Scheme Act 2013.

People with disability face multiple barriers to making complaints about the supports or services they receive. These include lack of knowledge about their rights, fear, negative experiences with past complaints (such as not being believed) and barriers to communicating their feedback or complaints.

All NDIS providers, whether registered or unregistered, are expected to ensure they are providing safe and quality services to people with disability – this includes being able to effectively manage complaints.

The NDIS Practice Standards and Quality Indicators on Feedback and Complaints Management expect organisations to have a culture and complaints management system in place which:

- welcome complaints, acknowledge complaints, and respects peoples' right to complain
- is centred on people with disability
- is accessible to all people with disability and their networks and seeks their view of the complaints system's accessibility
- provides each person with disability information on how to give feedback or make a complaint, including avenues external to the provider, and their right to access advocates
- provides each person with disability a supportive environment to provide feedback and/or make a complaint
- are clear, simple, consistent and outcomes focused
- are accountable and demonstrate continuous improvement
- are well managed, maintained and proportionate to the scope and complexity of supports being provided
- follow principles of procedural fairness and natural justice
- provide all workers with the information, guidance and support needed to handle complaints and comply with the required procedures.

Complaints Management – Self-Assessment and Action Plan

The aim of this self-assessment checklist and action plan is to support providers to have feedback and complaints management systems, policies, and processes in place.

Use the checklist to evaluate your organisation’s complaints management and resolution system and make an action plan of areas for improvement.

Instructions

1. **Read each statement** and compare it against your organisation’s complaints management and resolution processes.
2. It can be helpful to invite a group of stakeholders to contribute, including people with disability, families and support workers to complete this checklist either together or individually.
3. Consider all evidence available to you - see **Sources of Evidence** on page 3.
4. Complete the **Actions and Behaviours** column, to record how you meet the statement.
5. Complete the **Evidence** column, consider how you would evidence the statement as part of an audit.
6. Complete the **Gaps and Improvements** column to identify how you need to improve. Allocate specific tasks to specific people, include timelines and review dates for completion.

*The statements included in the self-assessment are not an exclusive list and will need to be adapted to the size and scope of your organisation, and the services you provide.



Questions to reflect on: At the end of each section there are additional questions for reflection and discussion.



Links to additional resources: Have been provided to assist you with your review.

Sources of Evidence

There are many sources of evidence for you to consider when working through the checklist:

- feedback from people with disability and their networks
- feedback from workers at all levels
- your mission statement and organisational values
- your policy, procedures, systems, and documents for capturing complaints and feedback
- your external communications and documents
- service files for the supports and services you deliver
- intake/induction processes for new people accessing your services
- workforce records e.g., HR, induction, training, supervision
- registers: E.g., complaints, continuous improvement, incidents, risk
- agendas and minutes e.g., team meetings, leadership meetings.



A person centred, accessible and human rights approach.

We value feedback from people with disability and their support networks and acknowledge their right to address any complaint.

We ensure that our system is set up in a way which is accessible and enables feedback and complaints.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
The human rights of people with disability are central to the values of our organisation and workers. We view complaints as an opportunity to improve a person's experience of our services.	<input type="checkbox"/>	<input type="checkbox"/>			
We include people with disability and their support network in the development and review of our organisation's complaints policy and procedures.	<input type="checkbox"/>	<input type="checkbox"/>			
Information is available in a variety of formats to meet the communication needs of people with disability, such as plain English, Braille and Auslan.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Information is available in a variety of languages to meet the needs of your service users from Aboriginal and Torres Strait Islander and culturally and linguistically diverse backgrounds.	<input type="checkbox"/>	<input type="checkbox"/>			
Where required, access to translating and interpreting services are provided. How to do this is clear in our procedures.	<input type="checkbox"/>	<input type="checkbox"/>			
Complaints and feedback are accepted using a range of different methods, such as in-person, in-writing (email, fax, letter, via website), by telephone.	<input type="checkbox"/>	<input type="checkbox"/>			
People are supported to make a complaint. We encourage people to have an advocate and we assist them to connect with an independent advocate, as needed.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We include the person making the complaint in the process as much as possible and regularly communicate with them on the progress of the complaint.	<input type="checkbox"/>	<input type="checkbox"/>			
We provide information on the right to review and redress, including details of independent agencies who can be contacted, such as the WA Ombudsmen.	<input type="checkbox"/>	<input type="checkbox"/>			
We provide information on how to contact the NDIS Commission directly.	<input type="checkbox"/>	<input type="checkbox"/>			
There is no impact to a person's funding, and no charges are applied to a person, for making a complaint.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We discuss with people their right to contact a third party, such as the NDIS Quality and Safeguards Commission.	<input type="checkbox"/>	<input type="checkbox"/>			



Questions to reflect on:

- Consider the people you support. Do the systems you have in place meet the accessibility and cultural needs of the people who access your services?
- Does your system clearly document where workers who manage complaints can access materials in accessible and culturally appropriate formats?



Try these resources as a starting point to assist you with promoting and encouraging complaints:

- Promoting your complaint process, using posters like [NDS It's ok to complain](#) can help to reinforce that complaints are welcomed.
- NDIS Quality and Safeguards Commission resources have been produced to encourage people to '[Speak up](#)' and '[Make it known to make it make it better](#)'.
- [Queensland Ombudsman - Website complaints visibility and accessibility](#) offers tips on making a complaints webpage more accessible.



A positive culture that promotes and welcomes complaints.

We value complaints and feedback and support our workers to do the same. We use our regular touchpoints with people with disability and their networks to encourage feedback. We consider what we need to do to make it easier to provide feedback and make our complaints information easy to find.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
<p>We actively promote our feedback and complaints process – for example through:</p> <ul style="list-style-type: none"> <input type="checkbox"/> welcome pack <input type="checkbox"/> service agreement <input type="checkbox"/> webpage <input type="checkbox"/> email signatures <input type="checkbox"/> newsletters for people with disability and their networks <input type="checkbox"/> via social media <input type="checkbox"/> in brochures <input type="checkbox"/> posters in our offices. 	<input type="checkbox"/>	<input type="checkbox"/>			
<p>All our workers promote the feedback and complaints processes to people accessing the service.</p>	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We discuss complaints in meetings with people with disability and their networks, such as intake and service review meetings.	<input type="checkbox"/>	<input type="checkbox"/>			
We acknowledge the value, input, and feedback from people with disability every time we respond to feedback or a complaint.	<input type="checkbox"/>	<input type="checkbox"/>			
We regularly identify the importance of responding to all feedback and complaints with our workers.	<input type="checkbox"/>	<input type="checkbox"/>			
We regularly communicate the value of the complaints and feedback processes with all our workers and people with disability.	<input type="checkbox"/>	<input type="checkbox"/>			
We include the importance of feedback and complaints and information as part of the induction of all new workers. This includes our policy and processes.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We provide regular training to all workers, on the complaints process, policy and procedures.	<input type="checkbox"/>	<input type="checkbox"/>			
We regularly encourage workers to identify and tell us about feedback and complaints. This includes talking about the process itself and how it is working.	<input type="checkbox"/>	<input type="checkbox"/>			
We respond positively, when workers report an issue, concern or complaint and acknowledge the contribution.	<input type="checkbox"/>	<input type="checkbox"/>			
All our workers understand and embrace their role and responsibilities in the complaints management process.	<input type="checkbox"/>	<input type="checkbox"/>			





Questions to reflect on:

- How do you support your workers who receive complaints, to ensure they remain positive and objective in their approach?
- How do you check that the people who access your supports and services know how to give you feedback and make a complaint if needed?



Try these resources as a starting point for training your direct workers in responding to complaints.

- [NDS Video - The 4 A's of Complaints](#)
- [NDS Complaint Handling for Staff training resource](#)

A documented, transparent and accountable complaints management system.

We recognise the role of accurate documentation in the effective management of complaints. We are open about the complaints we receive.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Our policies and procedures are clearly documented and outline the step by step process and the roles/responsibility. They include contact details for any people responsible for complaints.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Workers at all levels receive training in the organisation's policy and procedures.	<input type="checkbox"/>	<input type="checkbox"/>			
We document the initial complaint, any follow-up communications with the people involved, including desired outcomes and agreed timelines.	<input type="checkbox"/>	<input type="checkbox"/>			
We identify any risks for the person making the complaint, worker or organisation and record this as part of our risk management processes.	<input type="checkbox"/>	<input type="checkbox"/>			
We document discussions and communications regarding the outcomes of the process with all parties concerned.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We document any decisions and the reasons for those decisions.	<input type="checkbox"/>	<input type="checkbox"/>			
If an investigation is completed, we keep comprehensive notes and an investigation report.	<input type="checkbox"/>	<input type="checkbox"/>			
All personal information about the person making the complaints and any people who are the subject of a complaint is kept confidential. Information is only used for addressing the complaint or any actions required.	<input type="checkbox"/>	<input type="checkbox"/>			
We maintain a complaints register for tracking complaints and outcomes. This register is linked to our continuous improvement register.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Our complaints system offers the capacity to complain directly to the board.	<input type="checkbox"/>	<input type="checkbox"/>			
All records related to the complaint are kept for seven years.	<input type="checkbox"/>	<input type="checkbox"/>			
We include reports on complaints in our annual report. For example, number of complaints received, trends on areas of complaints and areas for continuous improvement.	<input type="checkbox"/>	<input type="checkbox"/>			



Questions to reflect on:

- If received in person or by telephone, how do you support your workers to ensure a record of the discussion is documented, including all discussion points, who was involved, any agreed timelines and actions?
- How do you ensure your complaint information is documented ensuring privacy and confidentiality of the person making complaint and any workers involved?





Try these resources as a starting point for developing your complaints management system (policies, procedures and processes).

- [NDS Complaints management in disability services](#)
- [NDIS Commission - Managing Complaints](#)
- [OAIC - Privacy management framework: enabling compliance and encouraging good practice](#)
- [NDS Risk Incidents and Complaints pdf](#)

Complaints are prioritised, by being responsive and outcomes focussed.

The focus of our complaints management system is improved services for people with disability.

We lead our teams to listen to people with disability and introduce service improvements immediately where there is opportunity to do so.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Our complaints procedure includes timelines for acknowledgment, follow-up and resolution.	<input type="checkbox"/>	<input type="checkbox"/>			
Workers responsible for handling complaints are trained in complaints management and investigations.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
During worker training and professional development, we discuss immediate resolutions to issues which may be raised as complaints.	<input type="checkbox"/>	<input type="checkbox"/>			
We always ask people what their preferred resolution or outcome is. The organisation seeks to meet this outcome wherever possible.	<input type="checkbox"/>	<input type="checkbox"/>			
If the preferred outcome is unable to be met, the person making the complaint is provided with the reasons.	<input type="checkbox"/>	<input type="checkbox"/>			
Workers are aware of how to escalate serious complaints which need immediate response from senior management.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We follow up on any actions required as a result of the complaint, to ensure they were completed.	<input type="checkbox"/>	<input type="checkbox"/>			
Where appropriate, we discuss the outcomes of feedback and complaints with our workers.	<input type="checkbox"/>	<input type="checkbox"/>			



Questions to reflect on:

- How do you ensure that complaints management is compliant with your timelines?
- What happens if key personnel responsible are on leave?
- Is the person who manages complaints at your organisation, responsible for other roles and responsibilities? How will these be managed if a high risk and time consuming complaint is received?



Complaints are responded to fairly.

Our processes are aligned with the principles of procedural fairness. We support all people involved in complaints made in connection with our supports and services.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We acknowledge that mistakes will happen. When they do we respond quickly and support all the people involved.	<input type="checkbox"/>	<input type="checkbox"/>			
We provide information about external bodies to raise the complaint with, for example the NDIS Commission, if the outcome is not satisfactory.	<input type="checkbox"/>	<input type="checkbox"/>			
We have processes and documented strategies in place for declaring and managing conflict of interest.	<input type="checkbox"/>	<input type="checkbox"/>			
We manage complaints in an objective and unbiased manner.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We take steps to ensure there are no repercussions for people who make a complaint.	<input type="checkbox"/>	<input type="checkbox"/>			
We have whistle-blower policy and procedures in place for workers who want to raise an issue anonymously.	<input type="checkbox"/>	<input type="checkbox"/>			
Our process for complaints from people outside the organisation, includes the option to make complaints anonymously.	<input type="checkbox"/>	<input type="checkbox"/>			
<p>Supporting the person making the complaint</p> <p><input type="checkbox"/> We ensure the person has the opportunity to provide information relating to the complaint.</p> <p><input type="checkbox"/> The person is involved and kept informed throughout the process.</p> <p><input type="checkbox"/> If any of the agreed timelines are not going to be met, the person is informed of this, the reason (if appropriate) and new timeline.</p>	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Findings and resolutions of any investigation are communicated to the person.	<input type="checkbox"/>	<input type="checkbox"/>			
<p>Supporting people who are subject to complaint</p> <p><input type="checkbox"/> We ensure the person who is the subject of a complaint has the opportunity to respond to the complaint and any adverse findings.</p> <p><input type="checkbox"/> We make people aware they can have a support person present at meetings.</p> <p><input type="checkbox"/> The person is provided with the reasons and any outcomes of investigations.</p>	<input type="checkbox"/>	<input type="checkbox"/>			
We have supports in place such as mechanisms for debrief, supervision or Employee Assistance Programs for workers who are subject to complaints.	<input type="checkbox"/>	<input type="checkbox"/>			





Questions to reflect on:

- Have you considered how you will manage complaints made indirectly, for example through social media?
- Have you considered additional training for people who are responsible for managing complaints? Some areas could be managing conflict, human rights and investigating complaints.
- How do you monitor that there is no detrimental impact to people who have made a complaint?



For information and resources to support people responsible for handling complaints, see NDS Sector Tools, Resources and Information for Lead Complaints Handlers.

A robust and effective complaints management system that focuses on continuous improvement.

We have systems and processes in place, to monitor feedback and complaints, and to review the effectiveness of our organisation's complaints management.

Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We view feedback and complaints as crucial to delivering quality services to people with disability.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
Feedback and complaints received are discussed at operational meetings to drive service improvement.	<input type="checkbox"/>	<input type="checkbox"/>			
Feedback and complaints received are discussed at all levels of our organisation, including Board and senior leadership level.	<input type="checkbox"/>	<input type="checkbox"/>			
A summary of the complaints and feedback received is provided to the governing body every 3 – 6 months.	<input type="checkbox"/>	<input type="checkbox"/>			
Information about each complaint is entered into the complaints register.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
A member of the senior leadership team analyses the data for systemic issues and opportunities for continuous improvement.	<input type="checkbox"/>	<input type="checkbox"/>			
Our complaints system is reviewed for effectiveness as part of our internal audit schedule.	<input type="checkbox"/>	<input type="checkbox"/>			
Our service files are reviewed for feedback and complaints which have not been captured through the system.	<input type="checkbox"/>	<input type="checkbox"/>			
The system has trigger points which require further investigation. For example, where the situation presents a risk to a person or when multiple complaints are received in the same service area.	<input type="checkbox"/>	<input type="checkbox"/>			



Organisational Statement	Yes	No	Actions / Behaviours How I / We do this?	Evidence Where can this be found?	Gaps Improvements?
We seek feedback from the people who make a complaint, on our complaints process to identify opportunities to improve the process and experience for people with disability and their networks.	<input type="checkbox"/>	<input type="checkbox"/>			
We conduct internal reviews of our process, to identify improvements to the process.	<input type="checkbox"/>	<input type="checkbox"/>			



Questions to reflect on:

- When you receive a complaint for one service area of the organisation, do you have a process to consider the issues and outcomes in the context of the other services you provide?
- How do you ensure you close the loop and provide the outcomes to the person who made the complaint?
- If you receive positive feedback about services, how are you capturing this information?



For resources about complaints registers

- [NDS Complaint and Feedback Register Manual](#)



Please note: This tool was last updated in August 2023. National Disability Services Limited (NDS) believes that the information contained in this publication is correct at the time of publishing. However, NDS reserves the right to vary any of this publication without further notice. This resource will need to be adapted to meet the specific needs of your organisation and the people who use your services. The information provided in this publication should not be relied upon instead of other legal, medical, financial, or professional advice. Please always refer to online documents for latest versions including the NDIS Practice Standards.

