Complaints Management – Self-Assessment and Action Plan

This resource was developed by the NDS Quality and Safeguards Sector Readiness Project and is funded by the Government of Western Australia Department of Communities.

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.

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# 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** section, to record how you meet the statement.
5. Complete the **Evidence** section, consider how you would evidence the statement as part of an audit.
6. Complete the **Gaps and Improvements** section 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

The 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 Statements

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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We include people with disability and their support network in the development and review of our organisation’s complaints policy and procedures. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Information is available in a variety of formats to meet the communication needs of people with disability, such as plain English, Braille and Auslan. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Where required, access to translating and interpreting services are provided. How to do this is clear in our procedures. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Complaints and feedback are accepted using a range of different methods, such as in-person, in-writing (email, fax, letter, via website), by telephone. Yes/No**?**

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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. 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. Yes/No**?**

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We provide information on the right to review and redress, including details of independent agencies who can be contacted, such as the WA Ombudsmen. Yes/No

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We provide information on how to contact the NDIS Commission directly. Yes/No**?**

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

There is no impact to a person’s funding, and no charges are applied to a person, for making a complaint. 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. Yes/No**?**

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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](http://www.nds.org.au/images/resources/quality_and_safeguards/complaints/3C-It-is-ok-to-complain.pdf) can help to reinforce that complaints are welcomed.
* NDIS Quality and Safeguards Commission resources have been produced to encourage people to [‘Speak up’](https://www.ndiscommission.gov.au/speakup) and [‘Make it known to make it make it better’](https://www.ndiscommission.gov.au/makeitknown).
* [Queensland Ombudsman - Website complaints visibility and accessibility](https://www.ombudsman.qld.gov.au/improve-public-administration/public-administration-resources/complaints-management/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 Statements

We actively promote our feedback and complaints process – for example through:

* Welcome pack Yes/No?
* Service Agreement Yes/No?
* Webpage Yes/No?
* Email signatures Yes/No?
* Newsletters for people with disability and their networks Yes/No?
* Via social media Yes/No?
* In brochures Yes/No?
* Posters in our offices Yes/No?

All our workers promote the feedback and complaints processes to people accessing the service. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We acknowledge the value, input, and feedback from people with disability every time we respond to feedback or a complaint. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We regularly identify the importance of responding to all feedback and complaints with our workers. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We regularly communicate the value of the complaints and feedback processes with all our workers and people with disability. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We respond positively, when workers report an issue, concern or complaint and acknowledge the contribution. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

All our workers understand and embrace their role and responsibilities in the complaints management process. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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](https://vimeo.com/582741445/45b32da989)
* [NDS Complaint Handling for Staff training resource](https://www.nds.org.au/images/resources/quality_and_safeguards/complaints/4C-Complaint-Handling-for-Staff.pdf)

# 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 Statements

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.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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We document the initial complaint, any follow-up communications with the people involved, including desired outcomes and agreed timelines. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We identify any risks for the person making the complaint, worker or organisation and record this as part of our risk management processes. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We document discussions and communications regarding the outcomes of the process with all parties concerned. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

If an investigation is completed, we keep comprehensive notes and an investigation report. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We maintain a complaints register for tracking complaints and outcomes. This register is linked to our continuous improvement register. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

All records related to the complaint are kept for seven years. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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. **Yes/No?**

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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?

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

* [NDS Complaints management in disability services](https://www.nds.org.au/resources/all-resources/complaints-management-in-disability-services)
* [NDIS Commission - Managing Complaints](https://www.ndiscommission.gov.au/providers/complaints-and-incidents/managing-complaints#paragraph-id-2764)
* [OAIC - Privacy management framework: enabling compliance and encouraging good practice](https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/more-guidance/privacy-management-framework-enabling-compliance-and-encouraging-good-practice)
* [NDS Risk Incidents and Complaint pdf](https://www.nds.org.au/images/resources/quality_and_safeguards/NDS_RICM_20210819.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 Statements

Our complaints procedure includes timelines for acknowledgment, follow-up and resolution. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Workers responsible for handling complaints are trained in complaints management and investigations. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We always ask people what their preferred resolution or outcome is. The organisation seeks to meet this outcome wherever possible. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

If the preferred outcome is unable to be met, the person making the complaint is provided with the reasons. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Workers are aware of how to escalate serious complaints which need immediate response from senior management. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Where appropriate, we discuss the outcomes of feedback and complaints with our workers. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

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 Statements

We acknowledge that mistakes will happen. When they do we respond quickly and support all the people involved. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We provide information about external bodies to raise the complaint with, for example the NDIS Commission, if the outcome is not satisfactory. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We have processes and documented strategies in place for declaring and managing conflict of interest. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We manage complaints in an objective and unbiased manner. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

We have whistle-blower policy and procedures in place for workers who want to raise an issue anonymously. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Our process for complaints from people outside the organisation, includes the option to make complaints anonymously. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence:** Where can this be found?

**Gaps:** Improvements?

Supporting the person making the complaint

* We ensure the person has the opportunity to provide information relating to the complaint. Yes/No?
* The person is involved and kept informed throughout the process. Yes/No?
* 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. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

Supporting people who are subject to complaint

* We ensure the person who is the subject of a complaint has the opportunity to respond to the complaint and any adverse findings. Yes/No?
* We make people aware they can have a support person present at meetings. Yes/No?
* The person is provided with the reasons and any outcomes of investigations. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

We have supports in place such as mechanisms for debrief, supervision or Employee Assistance Programs for workers who are subject to complaints. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

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 to 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?

Other Resources: 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 Statements

We view feedback and complaints as crucial to delivering quality services to people with disability.

**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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

Feedback and complaints received are discussed at all levels of our organisation, including Board and senior leadership level. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

A summary of the complaints and feedback received is provided to the governing body every 3 – 6 months. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

Information about each complaint is entered into the complaints register.

A member of the senior leadership team analyses the data for systemic issues and opportunities for continuous improvement. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

Our complaints system is reviewed for effectiveness as part of our internal audit schedule. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

Our service files are reviewed for feedback and complaints which have not been captured through the system. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

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. 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. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

We conduct internal reviews of our process, to identify improvements to the process. Yes/No?

**Actions / Behaviours:** How I / We do this?

**Evidence**: Where can this be found?

**Gaps:** Improvements?

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?

Other Resources: For resources about complaints registers

* [NDS Complaint and Feedback Register Manual](https://www.nds.org.au/images/resources/quality_and_safeguards/excel_register_manuals/Complaint-and-Feedback-Register-Manual.pdf#:~:text=The%20Complaint%20and%20Feedback%20Register%20is%20a%20working,a%20reporting%20tool%20for%20management%20to%20review%20trends.)

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.

End of document.