



FEEDBACK AND COMPLAINTS MANAGEMENT PROCEDURE

1.0. Purpose

The purpose of this procedure is to ensure that

- All feedback and complaints and resulting corrective action and improvements are reported, recorded and handled appropriately.
- The organisation communicates to relevant stakeholders how to give feedback, make a complaint and how complaints are handled.
- The feedback and complaints process is made available and accessible to all stakeholders.
- Staff act fairly, justly and transparently when responding and resolving all complaints.
- The organisation provides a confidential, safe and culturally sensitive environment for stakeholders to raise and have their feedback and complaints heard and resolved.
- The process supports those who choose to seek additional supports and services when making a complaint.
- All stakeholders are listened to and treated with respect.
- The complaints are resolved within the time frames outlined in this Procedure.

2.0 Scope

This procedure applies to all staff at the organisation, as outlined in the Responsibilities section below. It covers all complaints raised by

- Clients / participants
- Students of the Registered Training Organisation (RTO) as well as those attending non-accredited training.

As of October 1, 2020, The Deaf Society and Deaf Services Ltd have become one organisation. As a consequence, students' enrolments and subsequent qualification will be received through Deaf Services Ltd, trading as Access Training & Education (RTO #41192).

- External service providers
- Other external interested parties or stakeholders

NOTE: Issues or negative feedback raised by an internal stakeholder (i.e. employee, volunteer, contractor, or Board member) shall be considered under the [Grievance and Dispute Management](#) procedure.

3.0 Definitions

Term	Meaning
3.1 Feedback	A compliment, suggestion or complaint that is provided to the organisation.
3.2 Complaint	<p>An issue or problem raised by a client or other external stakeholder about a staff member, policy or procedure, another client / stakeholder / student, or the quality of service provided.</p> <p>A complaint may be made because of:</p> <ul style="list-style-type: none"> • Poor service provision • Discrimination / harassment • Incorrect or unsatisfactory work practices
3.3 Client	A person who receives services from The organisation. 'Client' also refers to consumers, participants, service users and stakeholders.
3.4 Stakeholder	<p>Stakeholder means any person who has an interest in the organisation.</p> <p>Stakeholders include (but are not limited to) clients, family members, carers, advocates, those acting on behalf of the client, students of the RTO as well as those attending non-accredited training, contractors, service providers, etc.</p>
3.5 Complaints Agency	<p>Clients with an NDIS Plan can make a complaint through the NDIS Quality and Safeguards Commission.</p> <p>Clients with a Home Care Package or receiving services through the Commonwealth Home Support Program (CHSP) can make a complaint through the Aged Care Quality and Safety Commission.</p> <p>Students of the RTO can make a complaint to Australian Skills Quality Authority (ASQA), but only after completing the internal complaints process outlined in this procedure.</p> <p>Other external Complaints Agencies are listed in the Options to take the complaint to external agencies section below.</p>

4.0 Guidelines

- Clients and other stakeholders have the right and are free to raise, have investigated and resolved, any feedback or complaint he or she may have regarding the organisation or one of its services.
- The organisation proactively encourages feedback on its service provision and advises how to make a complaint.
- All complaints are treated as confidential, recorded in writing and processed in accordance with a structured procedure.
- The organisation ensures that stakeholders receive support when giving feedback or lodging a complaint and are encouraged to raise any problems or complaints they have without fear of

punishment or retribution.

- Clients and other stakeholders have the right to make a complaint without fear of services not continuing and without fear of punishment.
- Clients and other stakeholders have the right to be informed about the internal and external avenues open to them to raise their concerns, and how their complaint will be handled by the organisation.
- A client or stakeholder may involve the support of an independent advocate when making a complaint and shall not be disadvantaged in any way for exercising this right.
- Support is provided to staff members involved, as needed, when a complaint has been reported.
- Services are designed and implemented with appropriate ways for complaints to be made, including how to make a complaint in Auslan.
- Clients and other stakeholders are listened to, treated with respect and have their complaint resolved within a timely manner.
- Information is made available to clients and other stakeholders about relevant independent services that deal with complaints and are advised of this complaints procedure.
- The organisation' [Feedback Flyer and Form](#) and surveys regarding service satisfaction provide staff and clients with a way to record complaints.
- Staff shall not use the [Feedback Flyer and Form](#) as a means of criticising or attacking their Managers or peers.

5.0 Responsibilities

5.1 All staff	<ul style="list-style-type: none">• Informal issues can be handled by a staff member directly with the person raising the issue, if appropriate. They are to be shared with the relevant Manager.• If the complaint is of a serious nature, the Manager and the Human Resources (HR) Manager is to be advised immediately.• Details of the any feedback or complaints received must also be provided to the Quality Management Coordinator who will feed them into the Continuous Improvement process.• Where a person is not satisfied with the result of the informal discussions, or it requires more action than what can be dealt with on the spot, then they are to be encouraged (and assisted, where necessary) to make a formal complaint. Suggested ways of doing this are outlined in the Feedback Flyer and Form. <p>If a Feedback Flyer and Form is not able to be completed, the staff member is to send an email to feedback@deafservices.org.au</p> <p>Note that the person making the complaint may remain anonymous.</p> <ul style="list-style-type: none">• Pass the completed Feedback form (if being used) to the HR Manager no later than close of business on the following working day. If this is not possible, a copy should be forwarded to feedback@deafservices.org.au
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	<p>until the original form can be passed on.</p> <ul style="list-style-type: none"> • If the complaint involves the HR Manager, then it should be passed to the Chief Operating Officer (COO). • If a client wishes to complain to the Board, it is first to be passed to the HR Manager. • If the person decides not to submit a formal complaint, the staff member is to make notes regarding the conversation with the person and file appropriately.
<p>5.2 Managers</p>	<ul style="list-style-type: none"> • Review the complaint with relevant staff to assess, and decide on short-term corrective action(s). • Contact the person who made the complaint to acknowledge receipt of it as soon as possible (preferably within one working day). • Notify the staff member(s) responsible for undertaking the short-term corrective action. • Ensure that short-term corrective action is put into place. • Maintain contact with the person who made the complaint at least once a week until it is resolved. • After ensuring that the appropriate short-term corrective action has been undertaken, forward the complaint to the HR Manager. • Ensure that debriefing is offered if appropriate, and in circumstances where the staff member may have temporarily left the worksite, ensure that support and engagement occurs. • Complete an Incident Report Form where necessary. • Advise the Chief Executive Officer (CEO) or their delegate if the complaint involves an alleged criminal action or could result in adverse public relations.
<p>5.3 Complaints Manager (HR Manager)</p>	<ul style="list-style-type: none"> • Forward the complaint to the relevant Manager to action • Log and file the complaint on the Complaints Register • Follow up on activities and timelines identified for the Manager • When the complaint is closed, follow up with the relevant Manager regarding any need for long-term corrective action and add to the Continuous Improvement Plan. • Ensure complaints that require investigation of alleged detrimental behaviour by other staff (e.g. bullying and harassment, discrimination, etc.), are addressed using acceptable HR protocols. • Ensure that debriefing is offered, if appropriate, and in circumstances where the staff member may have temporarily left the worksite, ensure that support and engagement occurs.

	<ul style="list-style-type: none"> ● Assess the type of problems encountered <ul style="list-style-type: none"> ○ internal and external problems ○ individual and universal problems ● Ensure all reported complaints are finalised and that the person who lodged the complaint is notified of outcomes. ● Investigation and resolution of complaints requiring investigations should occur in the timeframe stipulated in this procedure. There should be the aim to ensure that resolution and any accompanying stress is alleviated for all parties as soon as possible.
5.4 CEO	<ul style="list-style-type: none"> ● Hears any appeals, where they have not be involved in the complaint at any stage. ● Advises the Board of any complaints: <ul style="list-style-type: none"> ○ of a serious nature ○ involving the CEO ○ which are being appealed and where the CEO has been involved in the investigation or resolution of the complaint. ● Acts as the Consumer Protection Officer for students studying under Smart and Skilled through the RTO.
5.5 The Board	<p>Hears appeals and makes decision on these appeals. These decisions are limited to:</p> <ul style="list-style-type: none"> ● Uphold original decision ● Send the appeal back to the CEO with recommendation(s) for resolution
5.6 Quality Management Coordinator	<p>Utilise themes and trends within feedback and complaints received to trigger improvement actions.</p> <p>Ensure periodic feedback is sought from a cross-section of clients and representatives about their satisfaction with the complaints management system through meetings, focus groups, surveys, etc.</p>

6.0 Procedures

People can choose to give feedback first or to make a formal complaint straight away. They are free to do either.

Every staff member has a right to be advised immediately of a complaint against him or her by a client or other person. Staff members have the right to expect that the complaint will be dealt with promptly, confidentially and in a respectful manner. Staff members will be offered appropriate support, when requested, in the event of a complaint made against them.

Staff and members of the Board will conduct themselves in a courteous and professional manner at all times when dealing with people who may have lodged a complaint.

The following principles and actions will be followed when a complaint is received:

Summary	Details
<p>All stakeholders are informed of the feedback and complaints process</p>	<p>All clients and other stakeholders will be informed about how to make a complaint about the services they receive upon commencement of services (through the relevant Client Pack, or similar) and at any time during service provision.</p> <p>All other persons who wish to make a complaint are also informed of this process in a relevant manner.</p>
<p>All complaints received by the organisation are to be documented</p>	<p>Clients and other stakeholders may register a complaint in a variety of ways, for example: In person, via the organisation’s website, email, by video (recorded Skype call), over the telephone, in writing, or through the Feedback Flyer and Form.</p> <p>When the person chooses not to register the complaint and it can be resolved informally, the person receiving the complaint shall either record the details of the complaint on the relevant client database (if the complainant is a client and there is not sensitive information involved) or on the Feedback Flyer and Form (for non-client complaints or client complaints involving sensitive information). This allows the organisation to track systemic issues and respond accordingly.</p> <p>All complaints shall be communicated to the HR Manager who is responsible for logging the details on the Complaints Register and communicating with the relevant Manager to resolve the complaint.</p>
<p>Access</p>	<p>People who wish to complain are encouraged to involve a support person if they want to.</p> <p>If an interpreter is necessary for a meeting with the person making the complaint and they would like to book an interpreter from another agency, the organisation will pay the interpreting cost.</p> <p>If the person making a complaint uses a language other than English or Auslan, they may use the Telephone Interpreting Service (TIS) during meetings regarding their complaint. The organisation will pay the TIS fee.</p> <p>In some circumstances, the organisation will allow an outside contact person of the person’s choosing to access information about the complaint on their behalf during the complaint process. Examples of possible contact people might be a Power of Attorney or another family member authorised to act on the person’s behalf.</p>
<p>Receiving a complaint</p>	<p>The resolution of complaints should involve open negotiation and discussion between the person making the complaint and the person against whom the complaint has been made. Where such negotiations are possible, the organisation will facilitate this process in all resolution of complaints.</p> <p>Complaints are often made by family or representatives of people receiving services. It is important to involve the client as well as the complainant in the</p>

Summary	Details
	resolution process if this occurs.
Handling the complaint	<p>When an employee, volunteer or contracted service receives a complaint that is not able to be resolved at their level, it shall be immediately referred to the HR Manager.</p> <p>In instances where it is deemed that the nature of complaint is outside the expertise of the HR Manager and / or other member of the Executive Team, the CEO shall investigate / manage resolution of the complaint, including consideration of an external investigator.</p> <p>The CEO should only be utilised as a last resort as they are part of the appeals process so should not be involved at this stage in the complaint. If the CEO is involved or needs to be, any appeal will be heard by the Board.</p> <p>If the complaint is of a serious nature or is about the CEO, they will inform the Chairperson of the Board immediately.</p>
Inform the complainant of their rights when making a complaint	<p>Reassure the complainant that all complaints are treated confidentially and they will not be vilified or disadvantaged because they have made a complaint. Explain the complaints procedure.</p> <p>Clients have the right to support in resolving a complaint and can:</p> <ul style="list-style-type: none"> • Involve a family member or representative to assist in resolving the complaint • Choose to use an advocate of their choice (refer them to appropriate client advocacy services such as those listed below). <p>Clients will also be provided with information regarding translator and / or interpreter services which can assist them in making their complaint.</p>
Confidentiality and seeking information from other parties	<p>The details of a complaint will be kept confidential amongst the people directly concerned with its resolution.</p> <p>Where there is a requirement to share information with other parties in order to resolve the complaint, the complainant's permission must be obtained before proceeding.</p>
Complaints of a criminal nature	<p>If at any time it becomes apparent complaints are of a criminal nature, the complaint shall be immediately referred to the police. This shall be done through the relevant Manager or the CEO, if the Manager is not available.</p>
Complaints of discrimination or sexual harassment	<p>If the complainant alleges serious discrimination or sexual harassment by an employee, volunteer or Board, the person handling the complaint will advise the complainant that they have the right to lodge a complaint with the relevant State / Territory discrimination tribunal or the Human Rights Commission National Information Service (1300 656 419).</p>

Summary	Details
When staff or volunteer disciplinary action is required	If a complaint against a staff member or volunteer requires disciplinary action, the relevant human resource (HR) procedures will be followed.
Complaints about contracted or brokered services	If a complaint is in relation to a contractor's work performance, refer to the Brokerage / Sub-contracting Agreement. Contact the service provider, advise them of complaint and attempt to achieve resolution.
Acknowledge receipt of written complaints	Step 1: When a complaint is received in writing the person responsible for investigating and resolving the complaint will acknowledge receipt of the complaint <i>within one business day (TDS has 5 business days)</i> .
Options to take the complaint to external agencies	<p>Step 1(a): Complainants should be advised at the outset that, if they choose to, they may take their complaint directly to an external agency. Some external agencies, such as the Australian Skills Quality Authority (ASQA), require the organisation's complaints procedure to be followed prior to raising any complaints with them about an RTO.</p> <p>Information about the following external agencies should be provided:</p> <ul style="list-style-type: none"> • NDIS Quality and Safeguards Commission for NDIS participants • Aged Care Quality and Safety Commission for Ageing Well consumers • Australian Human Rights Commission • NSW Ombudsman • ACT Human Rights Commission • Queensland Human Rights Commission <p>For complaints relating to the RTO</p> <p>Queensland students may take their complaint to</p> <ul style="list-style-type: none"> • Queensland Dept. of Employment, Small Business and Training • The Queensland Training Ombudsman <p>NSW RTO students may contact</p> <ul style="list-style-type: none"> • Smart and Skilled (phone – 1300 772 104) • The Smart and Skilled Consumer Protection Strategy will be made available to students to support them in making a complaint about the RTO in NSW. <p>ACT RTO students may contact</p> <ul style="list-style-type: none"> • Skilled Capital <p>South Australian RTO students may contact the Australian Skills Quality Authority (ASQA).</p> <p>For complaints relating to products and services (e.g. Interpreting):</p> <ul style="list-style-type: none"> • NSW Office of Fair Trading

Summary	Details
	<ul style="list-style-type: none"> • Qld Office of Fair Trading <p>For complaints relating to privacy:</p> <ul style="list-style-type: none"> • The Office of the Information Privacy Commissioner <p>For complaints about discrimination:</p> <ul style="list-style-type: none"> • The Australian Human Rights Commission <p>For reporting claims of abuse and neglect in government funded services:</p> <ul style="list-style-type: none"> • The National Disability Abuse and Neglect Hotline <p>This list is not exhaustive, but covers the main organisations that could take complaints about the organisation.</p> <p>Advocacy services such as Aged and Disability Advocacy Australia (ADA Australia) can also provide support to people wishing to make complaints.</p>
<p>Investigating and resolving a complaint</p>	<p>Step 2: The HR Manager is responsible for managing all complaints. If necessary, they may appoint an Investigating Officer (<i>within 2 working days</i>). The HR Manager will consider appointing an external investigator if the complaint involves a minor, includes allegations of sexual impropriety, or is about more than one staff member. Police matters will be reported to the Police.</p> <p>The Investigating Officer will contact the person who complained <i>within 5 workings days</i> to inform them:</p> <ul style="list-style-type: none"> • that the complaint has been received • that they may involve a support person at any stage of the complaint process • the name of the Investigating Officer • what to expect during the investigation (including inviting them to a meeting if required) • how long it will take (with an explanation of the expected delay if this is longer than 14 days) • how the complaint will be documented. <p>When investigating a complaint the person handling the complaint should consider the following questions when deciding what actions are to be taken:</p> <ul style="list-style-type: none"> • What is the nature of the complaint? • Who is involved? • Is there sufficient information to make a fair judgement about what happened? <p>Step 3: If the person handling the complaint needs additional information beyond what is provided, further clarification is to be sought from the complainant or their representative. This additional information shall also be</p>

Summary	Details
	<p>recorded or attached as supporting information.</p> <p>The person handling the complaint will decide the course of action based on the information provided.</p> <p>Step 4: The complainant shall be contacted by the person handling the complaint <i>within ten business days (TDS has 14 days)</i> to discuss what action is proposed/has been taken, and will seek feedback on the complainant's satisfaction with the action. Maintain regular contact with the complainant even if it to report that there is nothing to report.</p> <p>Step 5: If the complaint is not resolved to the complainant's satisfaction, the complainant may request a review of the complaint or appeal the decision. This will be the responsibility of the CEO or Board. The CEO or Board will take all steps possible to address the complaint. The complainant will be kept fully informed of the process towards resolution.</p> <p>If, after following the above process, the complaint remains unresolved, the person is to be advised that they may take the complaint to an external authority such as those listed above.</p> <p>Some external agencies, such as the Australian Skills Quality Authority (ASQA), require the organisation's complaints procedure to be followed prior to raising any complaints with them about an RTO.</p>
Withdrawal of a complaint	<p>The complainant may withdraw the complaint in writing to the CEO at any time. The relevant Manager or the CEO will seek to ensure that the complainant is satisfied with the decision to withdraw the complaint.</p>
RTO students	<p>If the process fails to resolve the complaint or appeal, students of the RTO have the right to request that their complaint be reviewed by an appropriate party independent of the RTO and the complainant, at the request of the individual making the complaint.</p>
Records management	<p>All details of the complaint including investigations, actions taken by the organisation to respond to the complaint and the outcomes must be recorded and stored securely in the Complaints file (maintained by the HR Manager).</p>
Lessons learned and continuous improvement	<p>Knowledge gained through handling of complaints will be used to improve service delivery processes within the organisation through the Management Review process.</p>

Complaints / Appeals Training

The organisation will encourage staff to update mediation and conflict resolution skills and participate in training when available by qualified training organisations.

Document Retention

Files relating to complaints are to be stored securely for seven years; then destroyed in a confidential manner.

7.0 Related Policies, Procedures, or Work Instructions

- [Service Delivery Policy and Guidelines](#)
- [Service Access Procedure](#)
- [Grievances and Dispute Management](#)
- [Management Review Procedure](#)
- RTO Appeals Policy

8.0 Relevant forms / documented records

- [Feedback Flyer and form](#)
- Complaints Register (see HR Manager)
- [Hazard and Incident Report form](#)
- [Brokerage / Sub-contracting Agreement](#)

9.0 Relevant Legislation and Government Guidelines

- [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#)
- [NDIS Quality and Safeguards Commission – Effective Complaint Handling Guidelines for NDIS Providers](#)
- [Aged Care Act 1997 - Complaints Principles 2015](#)
- [National Vocational Education and Training Regulator Act 2011](#)
- [Community Services \(Complaints, Review and Monitoring\) Act 1993](#) (NSW)

10.0 Relevant International, Commonwealth or State Standards

Name of Standard	Relevant Clause, Indicator or Expected Outcome
AS/NZS ISO 9001:2016	Clause 9 Performance evaluation – 9.1 Monitoring, measurement, analysis and evaluation (9.1.2 Customer satisfaction)
NDIS Practice Standards and Quality Indicators	2. Provider Governance and Operational Management; Feedback and Complaints Management
Aged Care Quality Standards	Standard 6 Feedback and Complaints; 6.1 – 6.4
Standards for RTOs 2015	Standard 6; Clauses 6.1 – 6.6