Complaint Handling Policy

Policy Name	Complaint Handling Policy		Policy No.	P3002	
Effective Date	20/12/2023	Date of last revision	21/04/2026	Version Number	2
Policy Owner	Chief Executive Officer		Responsible Executive Person		
Applies to	Meaningful Lives employees, volunteers, contractors, labour hire, suppliers and consultants and stakeholders				

Policy

1. Introduction

1.1 Meaningful Lives views all complaints as an opportunity for positive interaction with the people that it serves. It is deeply committed to resolving complaints fairly and efficiently.

1.2 Complaints are an important part of Meaningful Lives' continuous improvement framework and provide an opportunity to:

- correct mistakes
- improve products and services
- build better relationships with the people it serves
- improve the organisation's financial position; and
- empower staff to resolve issues fairly and efficiently.

2. Purpose

2.1 This policy's purpose is to outline the organisation's approach to complaints as well as procedures for staff to handle complaints fairly, efficiently and effectively.

2.2 This policy provides guidance on the key principles and concepts of our complaint management system.

3. Scope

3.1 This policy applies to employees, suppliers, contractors, consultants, labour hire and volunteers at Meaningful Lives receiving or managing complaints from the public and clients. A complaint can be made to or about the organisation, about its products services and staff, or its complaint handling process.

3.2 This policy applies to complaints that are made by external parties, including (but not limited to) people we serve, their families, donors and other stakeholders.

3.3 For complaints from staff members about organisational matters, please see the Staff Grievance and Dispute Resolution Policy.

3.4 For complaints from members of the association, refer to the Meaningful Lives Rules.

4. Definitions

4.1 Staff and staff members

4.1.1 For the purposes of this policy, employees, contractors, labour hire, consultants and volunteers will be referred to as ‘staff’ or ‘team members’.

4.2 Complaint

4.2.1 For the purposes of this policy, ‘complaint’ is defined as an expression of dissatisfaction made to or about Meaningful Lives, its services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

4.2.2 An expression of dissatisfaction is not required to be made in writing for it to be a complaint. A complaint can be made verbally as well as in writing. Meaningful Lives takes a clear view that any expression of dissatisfaction must be treated as a complaint and responded to accordingly.

4.2.3 As well as complaints being made directly to Meaningful Lives, it notes that some complaints (or at least negative comments) may be made on social media.

4.3 Complaint Handling Management System

4.3.1 All policies, procedures, practices, team member, hardware and software Meaningful Lives uses in complaint management.

4.4 Procedural Fairness

4.4.1 Key procedural fairness principles are:

- all people involved in the incident will be informed about what has happened or alleged to have happened
- they will have the opportunity to explain their view of the incident
- corrective action will be based on relevant facts and circumstances; and
- the investigator and decision maker will be impartial and even-handed.

4.5 Dispute

4.5.1 An unresolved complaint escalated either within or outside of Meaningful Lives.

4.6 Feedback

4.6.1 Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Meaningful Lives, about its services or complaint handling system where a response is not explicitly or implicitly expected or legally required.

5. Policy

5.1 Meaningful Lives provides a safe and effective service to those who wish to make a complaint, regardless of what that complaint is about.

5.2 Meaningful Lives aims to uphold a fair and effective complaint handling system modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture. Manage Step Facilitate Step Acknowledge & Step and resolve respond to 1 complaints 2 complaints 3 the complaint Guiding Principle 1: Facilitate Complaints

5.3 People Focus

5.3.1 Meaningful Lives is committed to seeking and receiving feedback and complaints about its services, systems, practices, procedures, products and complaint handling. Meaningful Lives acknowledges that mistakes can and do happen. The organisation seeks to correct these mistakes and feedback about what could be done differently helps do this.

5.3.2 As a result, Meaningful Lives encourages complaints, in particular from people using its services. Meaningful Lives will provide information to encourage the people it supports to make complaints. This will be provided as part of Meaningful Lives' welcome pack and reinforced throughout support. (See About Complaints Handout).

5.3.3 In addition to encouraging complaints, team members are expected to seek from the people Meaningful Lives serves their views on how supports are being delivered. This is done regularly through care team meetings and as part of plan reviews. As such, Meaningful Lives treats issues or concerns as complaints, even if the person raising them doesn't say they want to make a formal complaint.

5.3.4 Meaningful Lives recognises that the people use its services have a right to complain and have their complaint handled well.

5.3.5 As a result, people making complaints will be:

- provided with information about Meaningful Lives' complaint handling process and how to access it: o in particular, people Meaningful Lives supports will receive a Complaint Handout which explains how they can complain and what Meaningful Lives will do about their complaint
- listened to, treated with respect, dignity and equity; and actively involved in the complaint process where possible and appropriate
- managed using procedural fairness principles; and
- provided with reasons for Meaningful Lives' decision/s and any options for redress or review.

5.3.6 Any concerns raised in feedback or complaints will be dealt with within a reasonable timeframe (as in AS/NZ 10002).

5.4 No detriment to people making complaints

5.4.1 Meaningful Lives will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

5.4.2 This includes ensuring no repercussions through stopping services to people supported, because of the complaint.

5.5 Anonymous Complaints

5.5.1 Meaningful Lives accepts anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

5.6 Accessibility

5.6.1 Meaningful Lives will ensure that information about how and where complaints may be made to or about the organisation, is well publicised on its website and at its service sites. Meaningful Lives will ensure that its systems to manage complaints are easily understood and accessible to everyone, particularly people who may need assistance.

5.6.2 Complaints can be made verbally and in writing. Meaningful Lives is committed to supporting anyone who wants to make a complaint to do so in the best way for them. This includes helping people to develop and lodge their complaint; as well as clarifying what they want from their complaint.

5.6.3 If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, Meaningful Lives will communicate with them through their representative if this is their wish.

5.6.4 Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation). In particular, people Meaningful Lives supports will be encouraged and supported to access an advocate to assist with the process.

5.7 No Charge

5.7.1 Complaining to Meaningful Lives is free. Guiding Principle 2: Respond to Complaints

5.8 Early Resolution

5.8.1 Where possible, complaints will be resolved at first contact with Meaningful Lives.

5.8.2 When appropriate Meaningful Lives may offer an explanation or apology to the person making the complaint.

5.9 Responsiveness

5.9.1 Meaningful Lives will promptly acknowledge receipt of complaints.

5.9.2 Meaningful Lives will assess and prioritise complaints in line with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

5.9.3 Meaningful Lives is committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process (see What to do when you want to make a complaint handout)
- the expected timeframes for Meaningful Lives' actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process; and
- the possible or likely outcome of their complaint.

5.9.4 Meaningful Lives will advise as soon as possible when it is unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

5.9.5 Meaningful Lives will also advise people as soon as possible when it is unable to meet timeframes for responding to their complaint and the reason for the delay.

5.10 Objectivity and Fairness

5.10.1 Meaningful Lives will address each complaint with integrity and in an equitable, objective and unbiased manner.

5.10.2 Meaningful Lives will ensure that the person handling a complaint is different from any team member whose conduct or service is being complained about.

5.10.3 Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

5.11 Responding Flexibly

5.11.1 Meaningful Lives team members are empowered to resolve complaints promptly and with as little formality as possible. Meaningful Lives will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

5.11.2 Meaningful Lives will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

5.11.3 Meaningful Lives aims to resolve complaints to the complainant's satisfaction. However, this may not always be possible. For example, a complainant may dislike an organisational policy or direction. It is the organisation's obligation to assess the concerns raised and give due consideration to adjusting the policy or approach. However, this does not mean that the organisation must change its policy or approach. Meaningful Lives aims to develop policies and organisational directions which are evidence-informed and for the benefit of the people it serves. As such, it may be appropriate to continue with the original policy or approach even once the concerns and issues have been considered. In these cases, it is important to communicate the approach taken, and explain to the complainant why a decision has been made.

5.12 Confidentiality

5.12.1 Meaningful Lives will protect the identity of people making complaints where this is practical and appropriate.

5.12.2 Personal, identifying information will only be given to people who need to know it to deal with the issues.

5.12.3 Documents use in resolving complaints are also distributed on a need-to-know basis only. Guiding Principle 3 - Manage the Parties to Complaints

5.13 Complaints involving multiple organisations

5.13.1 Where a complaint involves multiple organisations, Meaningful Lives will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

5.13.2 Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

5.13.3 Where a complaint involves multiple areas within the organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

5.13.4 Where Meaningful Lives' services are contracted out, Meaningful Lives expects contracted service providers to have an accessible and comprehensive complaint management system. Meaningful Lives takes complaints not only about the actions of its staff but also the actions of its service providers.

5.14 Staff Empowerment

5.14.1 All team members managing complaints are empowered to implement the complaint management system as relevant to their role and responsibilities.

5.14.2 Specifically, any team member can take a complaint. In addition, any team member can make a complaint on behalf of a person that Meaningful Lives supports. This is important because complaints should be made to someone the complainant trusts.

5.14.3 As such, team members receive regular training on identifying complaints and complaint handling and this is standard part of Meaningful Lives' induction program for new team members.

5.14.4 Team members are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

5.15 Managing unreasonable conduct by people making complaints

5.15.1 Meaningful Lives is committed to being accessible and responsive to all people who approach it with feedback or complaints. At the same time success depends on:

- Meaningful Lives' ability to do its work and perform its functions in the most effective and efficient way possible
- the health, safety and security of its team; and
- its ability to allocate its resources fairly across all the complaints we receive.

5.15.2 When people behave unreasonably in their dealings with Meaningful Lives, their conduct can significantly affect the progress and efficiency of the organisation's work. As a result, Meaningful Lives will take proactive and decisive action to manage any conduct that negatively and unreasonably affects the organisation and will support staff to do the same in line with this policy.

5.16 Alternative avenues for dealing with complaints

5.16.1 Meaningful Lives will inform people who make complaints to or about the organisation about any internal or external review options available to them (including the National Disability Insurance Scheme (NDIS) Quality and Safeguarding Commission and any relevant Ombudsman or oversight regulatory bodies).

5.17 The Three Levels of Complaint Handling Level 3 - External review of complaints and/or complaint handling by organisations Level 2 - Internal review of complaints and/or complaint handling (may include further investigation of issues raised and use of Alternative Dispute Resolution options). Level 1 - Frontline complaint handling and early resolution of complaints

5.17.1 Level 1 - Meaningful Lives aims to resolve complaints at the first level, the frontline. Wherever possible team members will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

5.17.2 Level 2 - Where this is not possible, Meaningful Lives may decide to escalate the complaint to a more senior officer within the organisation. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made; and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

5.17.3 Note that all complaints about the Chief Executive Officer (CEO) must be referred to the Board Chair.

5.17.4 Level 3 - Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of the decision (by the NDIS Quality and Safeguarding Commission, relevant Ombudsman or Australian Charities and Not-for-Profits Commission (ASIC), for example). Guiding Principle 4 - Accountability and Learning

5.18 Analysis and Evaluation of Complaints

5.18.1 Meaningful Lives will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the Board of Governance.

5.18.2 Meaningful Lives will run regular reports on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified; and
- the number of requests we receive for internal and/or external review of our complaint handling.

5.18.3 Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

5.18.4 Both reports and their analysis will be provided to the Chief Executive Officer (CEO), the Executive, and the Quality and Practice Team on a monthly basis, and the Board of Governance for review, at least annually.

5.19 Monitoring the complaint management system

5.19.1 Meaningful Lives will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system; and
- monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

5.20 Continuous Improvement

5.20.1 Meaningful Lives is committed to improving the way the organisation operates, including our management of the effectiveness and efficiency of its complaint management system. To this end, Meaningful Lives will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by team members
- regularly review the complaint management system and complaint data; and
- implement appropriate system changes arising out of analysis of complaints data and continual monitoring of the system.

Procedures

1. Responsibilities

1.1 Meaningful Lives expects team members at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented. Who Commitment How Chief Executive Promote a culture Report to the Board of Governance on Meaningful Lives' complaint Officer that values handling. complaints and Provide adequate support and direction to key team their effective members responsible for handling complaints. resolution Regularly review reports about complaint trends and issues arising from complaints. Encourage all team members to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Encourage team members to make recommendations for system improvements. Support recommendations for service, team members and complaint handling improvements arising from the analysis of complaint data. Take responsibility as the final person responsible for complaints at Meaningful Lives service Director, Quality Oversee the Oversee complaints analysis and ensure that continuous and Practice complaints improvement actions are appropriately implemented handling policy and procedure Oversee team training on complaint-handling Liaise with the NDIS Quality and Safeguarding Commission and other external bodies as required Team members Demonstrate Treat all people with respect, including people who make whose duties exemplary complaints. include complaint complaint handling Assist people to make a complaint, if needed. handling practices Comply with our policy and associated procedures. Provide regular feedback to management on issues arising from complaints. Provide suggestions to management on ways to improve the complaints management system. Implement changes arising from individual complaints and from the analysis of complaint data as directed by management. Take responsibility for Level 2 complaints All team members Understand and Take responsibility for Level 1 complaints comply with Meaningful Lives' Treat all people with respect, including people who make complaint handling complaints. practices. Be aware of the Meaningful Lives complaint handling policies and procedures. Assist people who wish to make complaints access the Meaningful Lives complaints process. Participate in training on receiving, recording, managing and resolving complaints. Be alert to complaints and assist team members handling complaints resolve matters promptly. Recognise where complaints are also incidents and ensure that the organisation's Incident Management Policy isalso followed.

2. Process

2.1 The five key stages in the complaint management system are set out below: Close Assess and Determine complaint: Receive Acknowledge investigate outcome document and analyse data

2.2 Staff can refer to the easy-to-read flow chart at Appendix A and managers can refer to the easy-to-read flowchart at Appendix B for step-by-step instructions

2.3 Receive

2.3.1 All complaints must be recorded along with any relevant supporting information. Anyone receiving a complaint, must record it using the Accident and Incident Register (AIR) in Meaningful Lives' CRM - SupportAbility.

2.3.2 The record of the complaint will document:

- contact information of the person making a complaint and the date received
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information; and
- any additional support the person making a complaint needs.

2.3.3 The AIR report will be bookmarked to the team member's direct line manager for review. They will work with the team member to determine how best to respond in line with this policy. The direct line manager must ensure the complaint details are added to the AIR record in SupportAbility and a PDF version of this is saved in the Complaint folder of the Quality and Practice/Complaints SharePoint folder.

2.4 Acknowledge

2.4.1 Meaningful Lives will acknowledge receipt of each complaint promptly, and preferably within five working days. When appropriate it may offer an explanation or apology.

2.4.2 Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

2.5 Assess and Investigate

2.5.1 Initial Assessment

2.5.1.1 After acknowledging receipt of the complaint, Meaningful Lives will confirm whether the issue/s raised in the complaint is/are within its control. Meaningful Lives will also consider the outcome/s sought and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

2.5.1.2 When determining how a complaint will be managed, Meaningful Lives will consider:

- how serious, complicated or urgent the complaint is
- whether the complaint raises concerns about people's health and safety
- how the person making the complaint is being affected
- the risks involved if resolution of the complaint is delayed; and
- whether a resolution requires the involvement of other organisations.

2.5.2 Investigating the Complaint

2.5.2.1 After assessing the complaint, Meaningful Lives will consider how to manage it. It may:

- give the person making a complaint information or an explanation
- gather information about the issue, person or area that the complaint is about; or
- investigate the claims made in the complaint.

2.5.2.2 Meaningful Lives will keep the person making the complaint up-to-date on progress, particularly if there are any delays. Meaningful Lives will also communicate the outcome of the complaint using the most appropriate medium. Which actions Meaningful Lives decides to take will be tailored to each case and consider any statutory requirements.

2.5.2.3 All investigations must be conducted in line with the organisation's Conducting Investigations Policy.

2.5.3 Determine outcome and provide reasons for decision

2.5.3.1 Following consideration of the complaint and any investigation into the issues raised, Meaningful Lives will contact the person making the complaint and advise them:

- the outcome of the complaint and any actions taken
- the reason/s for the decision
- the remedy or resolution/s that are proposed or put in place; and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

2.5.4 Close the Complaint

2.5.4.1 Document

2.5.4.1.1 Meaningful Lives will keep records in the AIR record and the Complaint folder in the Quality and Practice/Complaints folder in SharePoint about:

- how it managed the complaint
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations); and
- any outstanding actions to be followed up, including analysing any underlying or root causes

2.5.4.2 Analyse Data The Director, Quality and Practice will oversee regular review of the AIR and will ensure that outcomes are properly implemented, monitored and reported to the Executive and/or the Chair of the Board of Governance, where appropriate. The monthly reports of the AIR are to be saved in the Complaints Reporting folder in SharePoint.

3. Related Documents

- Practice Guidance - Recording and Reporting Complaints.docx
- P1510 Staff Grievance and Dispute Resolution Policy
- P3005 Conducting Investigations Policy
- P0001 Meaningful Lives Rules
- P0024 Privacy and Confidentiality Policy

- Complaint Response Group Template
- Manager Complaint Assessment Process.png

4. NDIS Practice Standards

	NDIS Practice Standard	Application
2.5	Outcome: Each participant has knowledge of and access to the provider's complaints management and resolution system. Complaints and other feedback made by all parties are welcomed, acknowledged, respected and well-managed.	
2.5.1	A complaints management and resolution system is maintained that is relevant and proportionate to the scope and complexity of supports delivered and the size and scale of the organisation. The system follows principles of procedural fairness and natural justice and complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.	Complaints Register. Accident Incident Register in SupportAbility.
2.5.2	Each participant is provided with information on how to give feedback or make a complaint, including avenues external to the provider, and their right to access advocates. There is a supportive environment for any person who provides feedback and/or makes complaints.	Complaints Policy and Procedure and General Information provided when clients are on-boarded with Meaningful Lives. Provided in preferred accessible format.
2.5.3	Demonstrated continuous improvement in complaints and feedback management by regular review of findings and seeking of participant views on the accessibility of the complaints management and resolution system, and incorporation of feedback throughout the provider's organisation.	Complaint themes and investigation analysed and itemised in complaint and feedback policies and procedures, Continuous Improvement Register.
2.5.4	All workers are aware of, trained in, and comply with the required procedures in relation to complaints handling.	Complaints training for staff in their Induction when on boarded with Meaningful Lives. Refresher training provided when needed.

Authorisation

Drafted By	Chief Executive Officer		
Approved By	Meaningful Lives Executive		
Approved Date	20/12/2023	Review Date	21/04/2028

Appendix A – Instructions for staff receiving, recording and responding to complaints Note: there are active hyperlinks in the flowchart below. To access, double click to open a PDF document with links enabled

Appendix B – Instructions for direct line managers