

# Compliment and complaint management policy

## Policy statement

Compliments, complaints and other forms of feedback provide valuable information on levels of client satisfaction and provide an organisation with an opportunity to improve upon all aspects of service. Feedback is to be taken seriously and to be seen as an opportunity for improvement.

Feedback that is recorded and handled effectively will provide valuable information in identifying areas for improvement, coordinating a consistent approach for resolution, reducing the potential for future complaints and allow for reporting and efficient allocation of resources.

Resolving complaints at the earliest opportunity in a way that respects and values the person's feedback, can be one of the most important factors in recovering the person's confidence about a service. It can also help prevent further escalation of the complaint. A responsive, efficient, effective and fair complaint management system can assist an organisation to achieve this.

## What does this organisation do?

Kekeco Childcare Pty. Ltd. ATF Kilmore Kids Trust operates three Long Day Care Services and three Out of School Hours Care services, in Kilmore and Wandong Victoria.

## Definitions

*Complaint* – Australian Standard AS/NZS ISO 10002:2014 Guidelines for Complaints Management in Organisations defines a complaint as an 'expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required'.

*Compliment* – a compliment is an expression of praise, encouragement or gratitude about a service that is funded, regulated or provided. It may be about an individual staff member, a team or a service.

## Guiding principles

An effective feedback, compliment and complaint handling system addresses the principles of visibility and accessibility, responsiveness, assessment and investigation, feedback, improvement focused and service excellence.

An approach to compliments and complaints management supports:

- people<sup>1</sup> understanding their rights and responsibilities
- information on the compliment and complaint management process being easily accessible
- increased satisfaction of clients in the management of their compliments and complaints
- the recording of data to identify emerging and existing trends or systemic issues
- staff to demonstrate an awareness of feedback, compliment and complaint management processes
- staff to develop the range of skills and capabilities required to manage compliments, complaints and feedback
- an organisational culture that is focused on effective, person-centred complaints resolution and utilising feedback for continuous improvement.

## Visibility and accessibility

The compliments and complaints management process will be visible and accessible to individuals and:

- explain how and where to make a compliment or complaint, including an anonymous complaint
- ensure the website and service sites have information on how to lodge a compliment or complaint
- consider specific needs of the individual or barriers they may experience
- explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed
- explain how the organisation will manage a complaint and the expected timeframe for resolution
- support individuals to identify and seek their preferred outcome.

## Responsiveness

The compliments and complaints management process will be responsive and provide mechanisms and strategies to:

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<sup>1</sup> The term 'people' is used to refer to staff and service users or clients who receive a service from the funded organisation.

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

### Assessment and investigation

The compliments and complaints management process will have mechanisms to:

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

### Feedback

The compliments and complaints management process will provide mechanisms and strategies to:

- explain what happened and why, what will be done to fix the issue, and who will do it, how we will communicate our progress and how we will check things are on track
- explain the reasons for the decision
- provide an apology where the organisation has failed to meet its service obligations<sup>2</sup>
- where an apology is provided, ensure it is sincere, and accepts responsibility for what occurred and the impact
- explain the circumstances without making excuses, and summarise the key actions that will be taken
- provide regular updates to the complainant if the resolution is delayed
- notify the complainant of alternative complaint resolution pathways and review mechanisms
- follow up with complainants to determine the effectiveness of the outcome, where appropriate.

### Improvement focussed

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

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

### Service excellence

The compliment and complaint management system and resolution process is a part of a quality culture where compliments and complaints are an opportunity for improvement through:

- positive attitudes towards dealing with feedback, compliments and complaints and respect for the person who has raised the matters
- values that reinforce the commitment of the organisation to quality service delivery and encouragement for provision of feedback on what is and what isn't working
- a clear statement that no one will be adversely affected as a result of making a complaint or a complaint being made on their behalf
- a policy that enables the compliment and complaint management system to address and investigate issues relating to all employees, including senior management.
- data analysis to identify and explore trends that highlight opportunities to improve service delivery and complaint handling

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<sup>2</sup> *Wrongs Act 1958* – section 14J provides that in the case of civil proceedings where the death or injury of a person is an issue, or is relevant, an apology does not constitute either an admission or liability, or an admission of unprofessional conduct, carelessness, incompetence or unsatisfactory professional performance.

- a commitment to continued training and development of the capabilities of compliment and complaint management staff
- a commitment by the organisation's leadership to an effective compliments and complaints management process as part of a robust quality improvement framework.

Note: For the purpose of this document, a privacy incident / complaint / breach that relates to a client, whether substantiated or unsubstantiated is managed according to existing departments instructions.

### Notifiable complaint:

A complaint that alleges a breach of the Regulation and Law, National Quality Standards or alleges that the health, safety or wellbeing of a child at the service may have been compromised. Any complaint of this nature must be reported by the Approved Provider or Nominated Supervisor and to the Department of Early Childhood Education and Care within 24 hours of the complaint being made (Section 174(2)(b), Regulation 176(2)(b)).

If the Director is unsure whether the matter is a notifiable complaint, it is good practice to contact The Department of Early Childhood Education and Care for confirmation.

Written reports must include:

- details of the event or incident
  - the name of the person who initially made the complaint
  - if appropriate, the name of the child concerned and the condition of the child, including a medical or incident report (where relevant)
  - contact details of a nominated member of the Grievances Subcommittee (or Nominated Supervisor)
  - any other relevant information.
- Written notification of complaints must be submitted using the appropriate forms, which can be found on the ACECQA website: [www.acecqa.gov.au](http://www.acecqa.gov.au) and logged using NQA ITS (National Quality Agenda IT System).

## Compliment and complaint management process

The compliment and complaint management process can be simplified into five steps:

1. Receive
2. Record
3. Acknowledge
4. Advise Authority (if applicable)
5. Resolve
6. Communicate resolution.

### 1. Receive

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

### 2. Record

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

### 3. Acknowledge

- Acknowledge – receipt of the complaint early to build a relationship of trust and confidence with the person who raised the complaint.

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

#### 4. Advise Authority ( if applicable)

Written reports must include:

- details of the event or incident
- the name of the person who initially made the complaint
- if appropriate, the name of the child concerned and the condition of the child, including a medical or incident report (where relevant)
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- any other relevant information.

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#### 5. Resolve

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

#### 6. Communicate resolution

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