

SECTION 1 - INTRODUCTION

1...BACKGROUND

The development of nationally consistent quality standards for the disability services sector has been a foundation reform for the National Disability Insurance Scheme. Implementing the NDIS Practice standards will ensure that NDIS-registered service providers in Australia will meet the National Standards and fulfil their obligations under the National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 when they apply the Standards. It is a guiding principle of the *National Disability Insurance Scheme Act 2013* (NDIS Act) that people with disability have the same right as other members of Australian society to pursue any grievance. The practice standards outcomes and quality indicators from NDIS Practice Standards Core Module will ensure that people with a disability are at the centre of decision-making and choice about the supports and services they receive.

This policy refers to NDIS Practice Standards Schedule 1 Core Module, Part 3 Provider Governance and Operational Management Outcome 13 Complaints management and resolution

1.1 PURPOSE

The purpose of this policy is to outline the complaints management scope, process and critical roles and responsibilities to ensure the effective handling of all complaints, investigations and reporting to relevant agencies. Fairfield City Council strives to create a positive complaint culture. It acknowledges that this process can identify areas that lead to improved service performance, delivering more positive outcomes for children with disabilities and their families. An efficient Feedback and Complaints procedure includes reflection and evaluation of practices and relationships to identify areas requiring a change at an individual or organisational level.

1.2 SCOPE

This policy should be read in conjunction with Fairfield City Council - Corporate Support Complaints Management Policy 0-014 (Located on Firstcall). It is specific to Fairfield City Council's employees, Fairstart clients, and Fairfield Leisure Centre NDIS clients and incorporates aspects of feedback and continuous improvement as features of the complaints process.

1.3 DEFINITIONS

Word/Term	Definition
Complaint	It is when a person indicates that they have an issue with the quality or delivery of their service and is seeking a resolution. A complaint can be formal or informal, in writing or verbally. A complaint expresses dissatisfaction with a support or service, including how a previous complaint was handled, for which a response or resolution is explicitly or implicitly expected.
Feedback	Positive or negative comments about how a person or organisation is doing something. The comments are intended to help the person or organisation do better.
Incident	This means acts, omissions, events or circumstances that are connected with providing support or services to a person with a disability; and that have, or could have, caused harm to a person with a disability.
Fairfield Leisure Centres	Fairfield City Council Leisure Centres -Active Recreation Rehabilitation

Client	Child, Parent, Family Member, Guardian or any other person receiving services from Fairstart Early Intervention or Active Recreation Rehabilitation
Worker	Includes Fairstart and Fairfield Leisure Centre employees, contractors and people otherwise engaged, for example, on a volunteer basis

1.4 LEGISLATIVE CONTEXT

This policy will assist Fairfield City Council workers working with NDIS participants and people with a disability to fulfil their obligations under the Disability Services Act 1993 No.3: “Persons with Disabilities have the right to pursue any grievance concerning services without fear of the services being discontinued or recrimination from service providers”, the National Disability Insurance Scheme Act 2013 (the Act) and to implement the outcomes and quality indicators associated with National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (the Rules).

1.5 STAKEHOLDERS

This policy will benefit clients with developmental delay and or disabilities and their families, and staff from Fairstart Early Intervention and Fairfield Leisure Centres.

SECTION 2 - POLICY

2.1 OBJECTIVE AND GOALS

- To ensure that each person is treated fairly when making a complaint
- To provide each person with information and support to make a complaint if they wish to
- To ensure that staff from Fairstart Early Intervention and Leisure Centres have the capacity and capability to handle and manage complaints

2.2 POLICY STATEMENT

It is a guiding principle of the National Disability Insurance Scheme 2013 (NDIS Act) that people with disability have the same right as other members of Australian society to pursue any grievance.

Fairfield City Council:

- Believes that each person has the right to give feedback about the quality or delivery of service and have the opportunity to participate fully in the consultative process of complaint resolution.
- Is committed to people being supported to speak up and provide feedback, and acknowledge when supports or services have or have not met the expectations or applicable standards.

2.3 APPLICATION & IMPLEMENTATION

What do we consider a complaint

A **complaint** is someone telling you that your service is not ‘hitting the mark’.

A person does not necessarily have to expressly state that they wish to make a complaint to have an issue or concern dealt with as a complaint. Regardless of whether it is a big or small issue, Fairfield City Council wishes to treat it seriously

The handling of a complaint will be sensitive to what is important to the client, their own views and experiences will inform this.

In relation to NDIS practice standards Fairfield City Council:

- Will maintain 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 procedural fairness and natural justice principles and complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.
- Will provide opportunities for service users to give feedback regularly;
 - Verbal discussions
 - Completion of our [Children and Family Service Feedback e-form](#) (linked in Service Level Agreements and on the web page)
 - *Annually sending out QMF-FS-02.4.- Client Feedback Survey.* This survey is available in key community languages [QMF-FS-02.4.1- Vietnamese](#), [QMF-FS-02.4.2 - Chinese](#).
 - Forms Feedback and suggestion boxes in the foyer of services
- will maintain the confidentiality of parties involved, keeping identifying information to those directly involved in the complaint and its resolution.
- We acknowledge that all parties may need to meet on more than one occasion until the issue is resolved. All parties will be informed of any new information and the progress of resolving the complaint, which may take up to five (5) working days.
- Will ensure that a complainant is not penalised in any way or prevented from the use of services during the progress of an issue, after completion of the process or for assisting the NDIS Commission in relation to a complaint.
- Will ensure 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.
- By providing all clients with comprehensive information about the service provided through the Orientation process, a Service Level Agreement as well as access to the Fairstart Family Handbook. All service users will have access to Fairstart’s Policies and Procedures through the Fairfield City Council website, which outlines the process of making a complaint, handling complaints.
- By encouraging clients to speak directly to their therapist or key worker regarding any feedback prior to contacting management. This is so that the worker can respond as quickly as possible to respond to the person’s input or request.
- By informing clients that they can forward their complaints to the NDIS commission. Families are informed of this through our Service Level Agreement and Fairstart Family Handbook
- Ensuring that the information delivered will consider the person’s individual and cultural needs. Families from culturally and linguistically diverse backgrounds will be given the opportunity to access an interpreter or community language aide if requested or required.
- By advising clients and/or employees that they can bring a support person or advocate to accompany them to any meetings to discuss their complaints.
- Acknowledges that all parties need to work collaboratively towards resolving the issue. Employees must maintain calm and supportive relationships with service users by actively listening to and accepting the complaint. Clear questions will be asked until all information is understood and the issue is clearly defined. Families can invite a support person or advocate all discussions.

- Where possible, we will deal with a complaint or feedback directly and quickly at the point of service unless the complaint requires further investigation or escalation. Matters will only be discussed with those who need to know about them as further discussion could be detrimental to the resolution of the complaint. All complaints will be documented on the following forms;
 - Fairstart -QMF-CS-052 Feedback and Complaints Record
 - Fairfield Leisure Centres-QMF-LC-024 [Customer Comment Form](#) or added to the Customer Suggestions log for the relevant centre.
- We acknowledge that clients can refer complaints to the Ombudsman about the provision of a service by a service provider under the Community Services (Complaints, Review and Monitoring) Act 1993 (NSW) should they feel the issue has not been resolved.
- Will use feedback and learnings from the child, family and other professionals to improve support delivery
- By treating the feedback and complaints process as a means of learning assists Fairfield City Council in continually improving practices and relationships. Reflection and evaluation of any complaints will be documented on QMF-CS-052 Feedback and Complaints Record to assist in the planning and delivering new services.
- Will demonstrate continuous improvement in complaints and feedback management by regular review of complaint and feedback policies and procedures, seeking of participant views on the accessibility of the complaints management and resolution system, and incorporation of feedback throughout the provider’s organisation
- By reviewing the Feedback and Complaints policy annually and encouraging families to give feedback on the Feedback and Complaints process
- Will ensure all workers are aware of, trained in, and comply with the required procedures in relation to complaints handling
- Will ensure that staff are given information about the complaints procedure as part of their induction and are aware of procedures for managing client feedback and complaints.
- Will require all workers to be familiar with and sign to acknowledge the ‘NDIS Code of Conduct, to ensure the delivery of safe and quality support and services to people with a disability.
- Staff will provide FCC Code of Conduct training every three years, and staff will acknowledge the Fairfield City Council policies: Appropriate Behaviour and Complaints Management each year.
- Will require all workers to engage in a review of and training in the Feedback and Complaints process at least annually

SECTION 3 - GOVERNANCE

3.1 RELATED POLICIES/PROCEDURES

Policy Number	QMP-FS-02.1 Fairstart Client Feedback and Complaints Procedure QMP-LC-002 Customer Feedback and Complaints Procedure QMP-LC-013 Customer Comments Procedure QMPOL- FS-01.1 Human Rights Policy QMP-FS-LC-02.3 Fairstart Incident Management Policy QMPOL- FS- 03.1 Client Service Provision Policy 0-017 FCC Information Management Policy QMI-FS-01.1 Privacy and Confidentiality Policy – Easy English
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3.2 RESPONSIBILITY

Policy Owner	Children and Family Services Manager
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3.3 RISK

Clients may not know how to make a complaint or the service be able to act in responsive ways to improve service delivery for client’s satisfaction and positive outcomes.

3.4 VERSION CONTROL AND CHANGE HISTORY

Version Number	Approval Date	Approved by	Amendment
Version 1	7 th November 2013	Children and Family Services Manager	Change in title to reflect updated standards. Links to forms included
Version 2	November 2015	Children and Family Services Manager	Inclusion of continuous improvement Templates revised and adapted
Version 4	April 2020	Children and Family Services Manager	Inclusion of QMF-FS-04.4 Face to Face Feedback Upgrade to NDIS Practice Standards and Guidelines
Version 5	November 2020	Children and Family Services Manager	Clearer links to NDIS practice standards
Version 6	September 2021	Children and Family Services Manager	Add CFS Feedback and Complaints e form link and Easy English how to make a complaint doc
Version 7	October 2022	Children and Family Services Manager	Separate Procedural information from policy and share policy with Leisure Centre NDIS Services

3.5 REVIEW DATE

This policy will be reviewed every year or when a change to governing legislation occurs, whichever occurs sooner.

SECTION 4 - PROCEDURES

4.1 PROCEDURE

[QMP-FS-02.1 Fairstart Client Feedback and Complaints Procedure](#)

[QMP-LC-002 Customer Feedback and Complaints Procedure](#)

4.2 FORMS AND RECORD MANAGEMENT

1.	Fairstart Service Level Agreement
2.	Fairstart Family Handbook
3.	QMI-FS-LC-01.2 How to make a complaint or provide feedback – Easy English
4.	Children and Family Services Electronic Feedback Form
5.	Fairstart Clinic Feedback and Suggestions Form
6.	Fairstart Feedback Register_Client Surveys_Suggestions and Comments_ongoing
7.	Fairstart Survey Monkey link
8.	QMF-FS-02.4 – Client Feedback Survey
9.	QMF-FS-02.4.V –Client Feedback Survey- Vietnamese
10.	QMF-FS-02.4.C - Client Feedback Survey – Chinese
11.	Fairstart Exit Survey
12.	Staff Learning Guide
13.	NDIS Code of Conduct Acknowledgement
14.	Active Recovery Service Agreement
15.	QMF-LC-024 Customer Comment Form
16.	QMF-LC-009 – Customer Suggestion Log Cabravale
17.	QMF-LC-010 – Customer Suggestion Log Fairfield
18.	QMF-LC-011 – Customer Suggestion Log Prairiewood
19.	NDIS Complaints Register
20.	QMF-CS-052 Feedback and Complaints Record
21.	Effective Complaint Handling Guidelines for NDIS Providers NDIS Quality and Safeguards Commission (ndiscommission.gov.au)
22.	Fairfield City Council – Policy NO. 0-014 Complaints Management