



# Client Feedback and Complaints Policy

POL-0092

## Purpose

The purpose of this policy is to ensure:

- Effective management of client complaints, compliments and feedback received both formally and informally, in accordance with relevant legislation and standards, as listed in the relevant legislation section of this document.
- Complaints and feedback are handled in a fair, transparent and timely manner
- Wanslea's openness and responsiveness to complaints and feedback from clients, families, carers and members of the community
- Complaints and feedback are used to support continuous improvement.

This policy has been developed after consideration of Wanslea values and is applicable to all Wanslea Limited (Wanslea) personnel, clients of Wanslea services and members of the broader community. This policy provides guidance to Wanslea personnel and is supported by the policies, procedures and resources listed in the Supporting Documentation table. Further information supporting the implementation of this policy is contained within the *Complaints and Feedback Procedure*.

For concerns or allegations relating to the safety of children and young people, reference should also be made to the *Safeguarding Children and Young People Policy*, the *Safeguarding Children and Young People Reporting Policy* and *Procedure*.

## Definitions

### Client Feedback and Complaints Register

- A document used to capture all formal and informal feedback/complaints made and is held in DoneSafe and overseen by the Work Health Safety and Risk Manager.

### Complaint

- A complaint is an expression of dissatisfaction, a concern or an offence that has been raised by a client in which they:
  - feel their rights have been violated
  - believe National Law has been contravened,
  - consider their child's health, safety and wellbeing has been put at risk
  - believe a serious incident has occurred
  - are unhappy about a decision made on their behalf, or
  - have been subjected to unfair or discriminatory behaviour.

### Complaint Appeal

- A Complainant may dispute the result of the complaints process if they are not satisfied with the outcome.

### Complaint Handling System

- All policies, procedures, practices, staff, hardware and software used by Wanslea in the management of complaints.

### Compliment

- Positive feedback provided in the form of praise, commendation or appreciation, relating to an individual, service or an organisation.

### Feedback

- A process in which we make sense of information about our performance and use it to enhance the quality of our work.

### Formal Complaint

- A formal complaint is a complaint, in which successful resolution cannot be reached informally, and further action is required through written documentation or review, and resolution is reached through a third party.

### Informal Complaint

- An informal complaint differs from a formal complaint in the way it is processed but both contribute to the overall complaints process. An informal complaint can be where a client shares a reflection of their experience. It is usually made through discussion (written or verbal) and should always be attempted before moving into the formal complaint process.

## Policy

Wanslea is committed to providing quality services and programs to clients, and recognises the value of feedback as an important tool in responding to and improving its services. Wanslea respects the rights of clients to evaluate and offer feedback/complaints about the standard of services provided.

## Guiding Principles

Wanslea's Complaints and Feedback process is guided by:

- Client focused – assisting individuals to make complaints or provide compliments or feedback
- Child and young person focused – recognising the support they may need to make a complaint
- Complaints as an opportunity – to better understand and improve our services
- Client's right to participate in decision making – be fully informed and a part of decisions
- Fair process – procedural fairness ensures rights are upheld and outcomes, fair
- Privacy and confidentiality – rights are respected.

## Handling Complaints, Compliments and Feedback

There are 4 steps to the effective management of Complaints and Feedback at Wanslea:

### 1. Facilitate Complaints and Feedback

Wanslea is committed to seeking feedback and are open to receiving complaints, compliments and feedback about our services, systems, practices, procedures, products, and complaint handling. To facilitate complaints and feedback personnel are to ensure:

- Clients are aware they can request the use of an interpreter to make a complaint.
- Information about how to make complaints or provide compliments or is accessible to clients
- Complainants are informed about the timelines associated with responding to their complaint

## **2. Acknowledge, Assess and Respond**

Feedback or complaints should be responded to verbally or in writing within 2 working days of being received and resolved within 21 days where possible.

All Complaints must be entered into Wanslea's Risk Management System, DoneSafe. This ensures the complaint is recorded on the *Client Feedback and Complaints Register*. Further information on the process of recording complaints, compliments and feedback is contained within the *Complaints and Feedback Procedure*.

If an immediate risk to safety or security is identified, the response must be immediate and must be escalated appropriately.

### **Informal Complaints**

Where possible, the client should use their direct contact worker to voice their concern or complaint (if the concern or complaint is directly related to that person and/or the client is not comfortable with speaking with them directly, the client may contact the worker's Manager).

### **Formal Complaints**

Formal complaints will be reviewed by the relevant Head of service. All parties to the complaint will be consulted, and the complainant empowered to participate fully in the process and be kept informed of discussions and outcomes. The complainant will also have the right to bring an advocate to all meetings.

### **Anonymous Complaints**

Wanslea may not be able to fully respond to anonymous complaints. Anonymous complaints, compliments and feedback are accepted, and Wanslea will carry out an investigation of the issues raised where there is enough information provided.

### **Objectivity and Fairness**

Staff must address each complaint or feedback with integrity and in an equitable, objective, and unbiased manner. Any individual or cultural needs of the complainant will be considered and the complaint or feedback dealt with in a manner reflecting these.

Where a staff member's conduct or service is being complained about Wanslea must ensure a different staff member handles the complaint or feedback. Conflicts of interest, whether actual or perceived, will be dealt with in accordance with Wanslea policy.

## **3. Manage and Resolve the Complaint**

At all times, clients, their representatives, or other stakeholders should receive feedback on their complaint and full explanation for the decision made/resolution offered, including, where necessary, explanation of legal or other non-negotiable boundaries where these exist.

Where timelines for resolution cannot be met, the reasons are to be documented on DoneSafe and the complainant advised.

## **4. Review and Improve**

Following the resolution of the complaint or assessment of feedback, the Head of service and/or relevant Manager will review all documents and ensure appropriate processes have been followed and regulatory and/or funding bodies are advised as per contractual requirements.

## Complaints made by Children and Young People

As an organisation working with children and young people, Wanslea has an obligation to respond effectively to complaints from children and young people or complaints relating to matters affecting children and young people.

Wanslea adheres to the National Principles for Child Safe Organisations. Principle 6 states “organisations should have processes to respond to complaints and concerns that are child-focused and uphold the rights of children and young people”.

When considering complaints from children and young people, Wanslea will be guided by the *National Office for Child Safety’s Complaint Handling Guide*. Further details of the process and responsibilities are outlined in Appendix 4 of the Wanslea *Complaints & Feedback Procedure*.

### Safeguarding Children and Young People

Where a complaint relates to Reportable Conduct by Wanslea personnel, the complaint must be dealt with in accordance with *Safeguarding Children and Young People Reporting Policy and Procedure*.

### ECEC Services

All formal complaints meeting the *notifiable requirements* must also be reported to ACECQA through the NQA IT System secure portal. Where a complaint relates to a child exhibiting harmful sexual behaviours, it will be managed with reference to Wanslea’s *Client Incident Management and Reporting Procedure* and *Managing Harmful Sexual Behaviours Guideline*. In this instance, Regulation 168 of the Education and Care Services National Regulations 2012 also applies.

### Foster Care

For feedback and complaints from foster children, staff should refer to the WA Department of Communities [Children in care complaints and feedback website](#).

### Early Childhood Approach

For clients engaged in the Early Childhood Approach program funded by the NDIS, clients may also lodge feedback/complaints about their service directly to the Health and Disability Services Complaints Office (HaDSCO), an independent statutory authority providing an impartial resolution service for complaints relating to health or disability services provided in Western Australia.

The National Disability Insurance Agency (NDIA) asks clients receiving funding to provide feedback by contacting their local NDIA office, emailing [feedback@ndis.gov.au](mailto:feedback@ndis.gov.au) calling 1800 800 110, or completing an online complaint form.

## Additional Information/legislation to be Viewed with this Policy

- Education and Care Services National Law (WA) Act (2012)
- Education and Care Services National Regulations (2012)
- National Quality Standards for Early Childhood Education and Care and School Age Care (2018)
- Disability Services Act 1993
- Disability Services Regulations 2004
- National Quality & Safeguarding Framework
- Carers Recognition Act 2004

- Health and Disability Services (Complaints) Act 1995
- National Standards for Disability Services 2013
- National Principles for Child Safe Organisations
- Complaint Handling Guide: Upholding the rights of children and young people. National Office for Child Safety
- Speak Up – For children and young people. National Office of Child Safety
- Specialist investigations: child safety, disability and aged care – Wise Workplace Training (Private Training Providers)
- [WA Government Department of Communities – Complaints and feedback](#)

## Supporting Documentation

| Related Frameworks                             | Related Policies                                      | Related Documents   |
|--|---|---|
| Safeguarding Children & Young People Framework | Privacy Policy  | Complaints & Feedback Procedure   |
|  | Safeguarding Children & Young People Reporting Policy | Managing Harmful Sexual Behaviours Guideline  |
|  | Client Rights & Responsibilities Policy               | Complaints & Feedback Procedure   |
|  |   | Complaints & Feedback Brochure  |
|  |   | Children Providing Feedback Brochure  |
|  |   | Client Feedback Form  |
|  |   | Charter of Rights & Responsibilities, Children and Young People and Wanslea Personnel |
|  |   | Use of Interpreters   |
|  |   | Wanslea Parent Handbook   |
|  |   | Rights and Responsibilities for Parents/Guardians                                     |
|  |   | MH – Rights and Responsibilities for Children/Young People                            |