

2. Service Standards

2.5 Complaints and Feedback Policy

2.5.1 Policy Statement

EverAbility Group (EverAbility) is committed to ensuring that its stakeholders, without prejudice, are able to provide feedback, discuss their concerns and lodge complaints, if they consider that their rights have been adversely affected, or the standards of a service have not been fulfilled, or for any reason they are unsatisfied with their interaction with the organisation and/or a matter related to its operations.

A culture in which people feel safe to discuss their concerns and complaints supports the continuing improvement of our service. Where appropriate, workers are empowered to respond to complaints with the least formality possible and to seek a resolution at first contact which, if achieved, are considered low-level complaints.

Workers must provide our clients and their supporters with information about EverAbility Group feedback and complaints processes when they first access the service. Throughout service delivery, workers must remind clients and their supporters of their right to make a complaint without fear of it affecting their service. Any other person wishing to lodge feedback, or a complaint must also be provided with this information.

To ensure consumers understand their right to make a complaint and how to make a complaint, workers must provide information to them and their supporters in ways that suit their individual communication needs.

2.5.2 Complaint Lodgement

Methods of lodgement, which attract no charge, include:

- face to face communication;
- telephone to:
 - main switchboard (08 9311 8202); or
 - feedback/comment telephone line (08 9311 8219)
- print;

- Braille;
- audio; or
- electronic formats, including:
- Email
 - EverAbility:
 - Feedback@everabilitygroup.org.au
 - Kites Therapy Tasmania:
 - Feedback@kitestherapytas.org.au
 - Kites Therapy WA:
 - Feedback@kitestherapy.org.au
 - Guide Dogs WA
 - Feedback@guidedogswa.com.au
 - Guide Dogs Tasmania
 - Feedback@guidedogstas.com.au
 - VisAbility
 - Feedback@visability.com.au
- Online from our websites:
 - VisAbility website:
 - [Feedback and Complaints: https://www.visability.com.au/about-visability/feedback-and-complaints/](https://www.visability.com.au/about-visability/feedback-and-complaints/), <https://www.visabilitytas.com.au/about-visability/feedback-and-complaints/>,
 - Guide Dogs website
 - <https://guidedogstas.com.au/aboutus/feedback-and-complaints/>, <https://www.everabilitygroup.org.au/feedback-complaints/>,
 - <https://www.guidedogswa.com.au/aboutus/complaints-process/>,
 - Kites Therapy website
 - <https://www.kitestherapy.org.au/about-kites/complaints-process/>,

- <https://www.kitestherapytas.org.au/about-kites/complaints-and-feedback/>.

2.5.3 Feedback Lodgement

Additional to the methods above, EverAbility further encourages its stakeholders to provide feedback, comments and suggestions about its services and operations via the following unsolicited and solicited means:

- suggestion boxes at its offices in Victoria Park, Hobart, Bellerive, and Launceston;
- client consultations and surveys;
- routine service delivery evaluations; and
- during external assessment audits.

2.5.5 Reporting and Monitoring

EverAbility will maintain a central and secured register, which for confidentiality purposes is separate from the Client Management Database. All feedback, comments and complaints are recorded in the register.

Regular reports of complaints are produced from the register. Report details to include the overall number of complaints within each designated period and for each complaint; a summarised version, the number of days to resolve and any responding quality improvement measures introduced.

These reports will be reviewed by the Executive Management Team and regularly submitted to the Board Audit and Risk Committee of the Board.

2.5.6 Responsibilities

Effective complaint and feedback management requires a whole of organisation approach with accountability for reporting and feedback at all levels. EverAbility seeks to ensure that complaints and feedback are appropriately recorded, reported, and managed.

Workers are expected to contribute to a culture that:

- welcomes complaints and feedback;

- manages complaints and feedback in a timely, respectful, consistent, and transparent manner;
- supports persons throughout the feedback and complaints process;
- ensures that complaints and feedback are managed with procedural fairness.

2.5.7 Principles

To protect the rights of both the complainant and respondent, the complaints process will:

- require mutual respect and courtesy from all parties;
- be applied with flexibility and accessibility required to meet the diverse needs and preferences of people with a disability. This includes consideration of any sensitivities, beliefs, or practices of people from culturally and linguistically diverse backgrounds (including First Nations) and/or diverse sexual orientation and gender identity.
- support stakeholders and, if needed, assist them to provide their complaint or feedback;
- provide complainants the opportunity to have others present or advocates for support. This could be parent, guardian, advocate, or other support person (there must be a representative present if the person providing feedback is a child)
- assure complainants that as a consequence of making a complaint, they will not be disadvantaged from receiving ongoing or future requested services;
- be managed independently and with procedural fairness;
- be managed confidentially;
- respond promptly with first contact within two business days; and
- until the complaints process is closed out, keep the complainant informed of its progress, at regular intervals of at least ten business days.

2.5.8 Unreasonable Complainant Conduct

EverAbility encourages all feedback and promotes complaints as a valuable way of continuously improving its services. In most cases, complaints and feedback are

handled in a respectful, cooperative, and positive manner, where both parties abide by the principles and process to achieve a satisfactory resolution.

In the unlikely instance where the conduct of a complainant is assessed by the CEO, or their delegate, to be unreasonable and/or detrimental to the health, safety, and wellbeing of its workers, EverAbility's range of responses may include:

- limiting a complainant's access to EverAbility and its workers;
- declining to accept a complaint;
- closing a complaint and taking no further action;
- suspending a complainant's relationship With EverAbility;
- permanently disengaging with the complainant; and
- reporting the complainant to a relevant external agency or company

In such circumstances, EverAbility will offer to facilitate the complainant's contact with an independent regulatory complaints authority and/or an advocacy organisation.

2.5.9 Internal Escalation

Complaints will be assessed by EverAbility and managed at the most appropriate organisational level. Any complainant unsatisfied with the outcome of an investigation conducted by EverAbility, may request the complaint's escalation to the CEO for review to ensure the correct process was followed and outcome suitable. Following the CEO's review, any complainant who remains unsatisfied with EverAbility's response and outcome, may request a review by the Board of Directors.

2.5.10 External Agency or Mediator

If the complainant:

- prefers not to complain to EverAbility directly or,
- if the complainant has escalated the complaint within EverAbility to its highest internal level (which may result in EverAbility funded mediation) and remains dissatisfied with the outcome;

EverAbility will provide contact details for relevant external authorities or organisations and encourage the complainant to seek their support.

These include:

- All -
 - **Australian Human Rights Commission**
Complaints regarding discrimination and breaches of human rights can be lodged with the Australian Human Rights Commission by:

Phone: 1300 656 419 (National Information Service).
Email: infoservice@humanrights.gov.au
Online: <https://humanrights.gov.au/>.
 - **The Australian Health Practitioner Regulation Agency (AHPRA)**
AHPRA deals with complaints and concerns about health practitioners and students. This includes complaints made under the National Code of Conduct for Healthcare Workers. More information is available at <https://www.ahpra.gov.au/Notifications/How-to-submit-a-concern.aspx>.
 - **Health and Disability Services Complaints Office (HaDSCO)**
Western Australia on Complaints and enquiries line: (08) 6551 7600 or Free call from landlines: 1800 813 583 or email mail@hadsco.wa.gov.au
 - **Health Complaints Commissioner Tasmania** on 1800 001 170 (Free call from a landline nationally, but call charges may apply from a mobile phone or a pay phone) or email health.complaints@ombudsman.tas.gov.au
 - **Blind Citizens WA** on 08 6180 8938 or email admin@bcwa.org.au
 - **Blind Citizens Australia** on 1800 033 660 or email bca@bca.org.au.
 - Children Early Childhood Early Intervention Partner or Local Area Coordinator
 - **Association for Children with Disability Tas** on 03 6231 2466 or email admin@acdtas.com.au
 - **Developmental Disability WA** on 08 9420 7203 or email ddwa@ddwa.org.au.
- People over 65 and/or in receipt of My Aged Care funding –
 - The **Older Persons Advocacy Network (OPAN)** on 1800 237 981
 - The **Aged Care Quality and Safety Commission** on 1800 951 822 or email info@agedcarequality.gov.au

- People under 65 years of age and/or in receipt of NDIS funding -
 - the Local Area Coordinator or Coordinator of Supports
 - **National Disability Insurance Agency** on 1800 800 110, visiting one of its offices, or visiting [NDIS website: www.ndis.gov.au](http://www.ndis.gov.au) for further information.
 - **NDIS Quality and Safeguarding Commission** on 1800 035 544 or by completing the online complaints form at [NDIS Commission website: www.ndiscommission.gov.au](http://www.ndiscommission.gov.au).

2.5.11 Promotion and Provision

The Complaints and Feedback Policy, which describes how a complaint may be lodged, will be:

- available via the organisation's website,
- included in any documents or information provided to new clients;
- promoted within EverAbility's client newsletter on an annual basis; and
- provided in alternative formats on request.

2.5.12 Reviewing

The Complaints and Feedback Policy will be reviewed annually.

Any identified changes to the Complaints Management Process will be implemented as required.

2.5.13 Continuous Improvement Practice

Feedback and complaint review includes identifying, monitoring, and acting upon trends and systemic issues identified through the analysis of feedback and complaint information.

The purpose of analysing feedback and complaint data is to learn from patterns, to safeguard the safety and wellbeing of individual clients, as well as improve the quality of supports.

Complaints and feedback will be used to inform the ways in which EverAbility can implement improvements and these actions will be recorded and monitored in the Continuous Improvement Register.

2.5.14 Compliance

EverAbility will ensure that its complaints management and resolution system is compliant with applicable instruments, including (at the time of writing) the NDIS (Complaints Management and Resolution) Rules 2018; Aged Care Quality Standard 2019, Standard 6; National Standards for Mental Health Services 2010, Standard 1; International Guide Dog Federation Standards 2020 - Client Service Principles; Assistance Dogs International 2021 - Standards of Administration s.1.13.

Requirements include an easy, available, accessible, enabling, and supportive (inclusive of advocates), system in which workers are engaged. That acknowledges, assesses, and responds to complaints in a timely manner. Where natural justice, procedural fairness and no adverse reaction applies, complainants are involved and kept informed, complaints are appropriately documented and kept confidential, and complainants are provided with information to refer their complaint to a relevant external body. Where a matter can't be resolved at a lower organisational level, a complainant may request its review by the Board of Directors. Complainants will be assured that as a consequence of making a complaint, they will not be disadvantaged from receiving ongoing or future requested services.

This system must encourage open disclosure and be regularly reviewed for improvement, informed by complaint analysis and key stakeholder feedback including open discussions and communication with each client/their representative when something goes wrong within the service that has caused harm or may potentially cause harm. This harm may be physical, psychological, or social, resulting in loss of quality of life, impairment, suffering, injury, disability, or death. Further information can be found in the Aged Care Open Disclosure Framework and Guidance at <https://www.agedcarequality.gov.au/resources/open-disclosure>.

2.5.15 Relevant Resources

This Policy should be read in conjunction with all related policies and protocols, including the:

2.2 Service Delivery Policy

2.4 Privacy, Dignity and Confidentiality Policy

[Log an External Complaint Process \(Promapp Link\)](#)

<https://au.promapp.com/visability/Process/a379256e-8b8a-43dc-968a-4d117531b1e0?Area=Process>

[Complaints Escalated Reporting Guide \(Promapp Link\)](#)

<https://au.promapp.com/visability/Documents/View/Open?displayType=document&documentId=d058aa21-ee0d-46a5-b5eb-02e4f19a15e8>

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