Feedback and Complaints Management Policy

Document Number: M-NAT-CC-01.14
Related Policy: Feedback and Complaints Procedure (M-NAT-CC-01.14.1)
Responsible Position: National Compliance, Audit and Risk Manager
Review Frequency: Annually

1. Introduction

McArthur Community Care (MCC) is committed to providing safe, high-quality, participant/client-centred services. We value feedback and are committed to listening and responding to feedback and complaints in a fair, accessible and timely manner.

We welcome feedback from participants/clients, families, carers, advocates, workers and the wider community. Feedback helps us recognise what we do well, identify areas for improvement and continually improve the quality and safety of our services.

This Policy outlines how MCC receives, manages, resolves and learns from feedback and complaints about the services we provide. It aligns with the NDIS Quality and Safeguards Commission (NDIS Commission) Practice Standards, the NDIS Code of Conduct and the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018, where applicable.

This Policy applies to feedback and complaints about MCC's services and service delivery. It does not limit a person's right to make a complaint directly to the NDIS Commission or another relevant external body at any time.

2. Definitions

Complaint: An expression of dissatisfaction about MCC, its services, supports, workers or the handling of a previous complaint, where a response or resolution is sought or reasonably expected.

Feedback: Comments, suggestions, compliments or concerns about MCC's services, whether or not a formal response is requested.

NDIS: National Disability Insurance Scheme.

NDIS Commission: NDIS Quality and Safeguards Commission.

Participant/Client: A person receiving support or services from MCC.

3. Scope

This Policy applies to:

- All feedback and complaints relating to MCC's services, including anonymous complaints.
- All MCC representatives involved in receiving, managing or responding to feedback and complaints, including permanent and temporary employees, contractors and key management personnel.
- All service delivery settings and activities.

Complaints relating to employment matters or other non-participant/client matters are managed in accordance with the McArthur Grievance and Complaints Policy, where applicable.

4. Policy Statement

MCC will:

- Encourage feedback and complaints as opportunities for learning and continuous improvement.
- Provide accessible ways for people to raise concerns and make complaints.
- Respect a person's right to make a complaint confidentially or anonymously, where they choose.
- Ensure people can raise concerns without fear of reprisal, discrimination or adverse treatment.
- Manage complaints fairly, impartially, transparently and within MCC's established timeframes.
- Provide appropriate assistance to people who need support to make or participate in a complaint.
- Protect privacy and confidentiality while meeting legal and regulatory reporting obligations.
- Take appropriate action to address concerns and prevent issues from recurring.
- Use feedback and complaint information to improve service quality, safety and participant/client outcomes.

Making a complaint will not, in itself, adversely affect a participant/client's access to MCC services or the way they are treated.

5. Who Can Provide Feedback or Make a Complaint?

Feedback and complaints may be provided by:

- Participants/clients.
- Participants'/clients' family members, carers or guardians.
- Participants'/clients' nominees or representatives.
- Advocates and community visitors.
- Employees and volunteers.
- Health professionals and other service providers.
- Members of the public.

A person does not need to be directly receiving services from MCC to raise a concern about our services or conduct.

MCC will respect the rights of participants/clients to involve an advocate or another support person of their choice throughout the complaints process.

6. Methods of Providing Feedback or Making a Complaint

Feedback and complaints can be provided to the relevant MCC regional office through any of the following methods:

- In person.
- By telephone.
- By email.
- In writing.
- Via the MCC website.
- Anonymously, where the person chooses not to provide identifying details.

State office contact details are provided at the end of this Policy.

MCC will provide reasonable assistance to anyone who requires support to communicate their feedback or make a complaint.

A person does not need to use a particular form or follow a formal process to raise a concern.

7. Anonymous Complaints

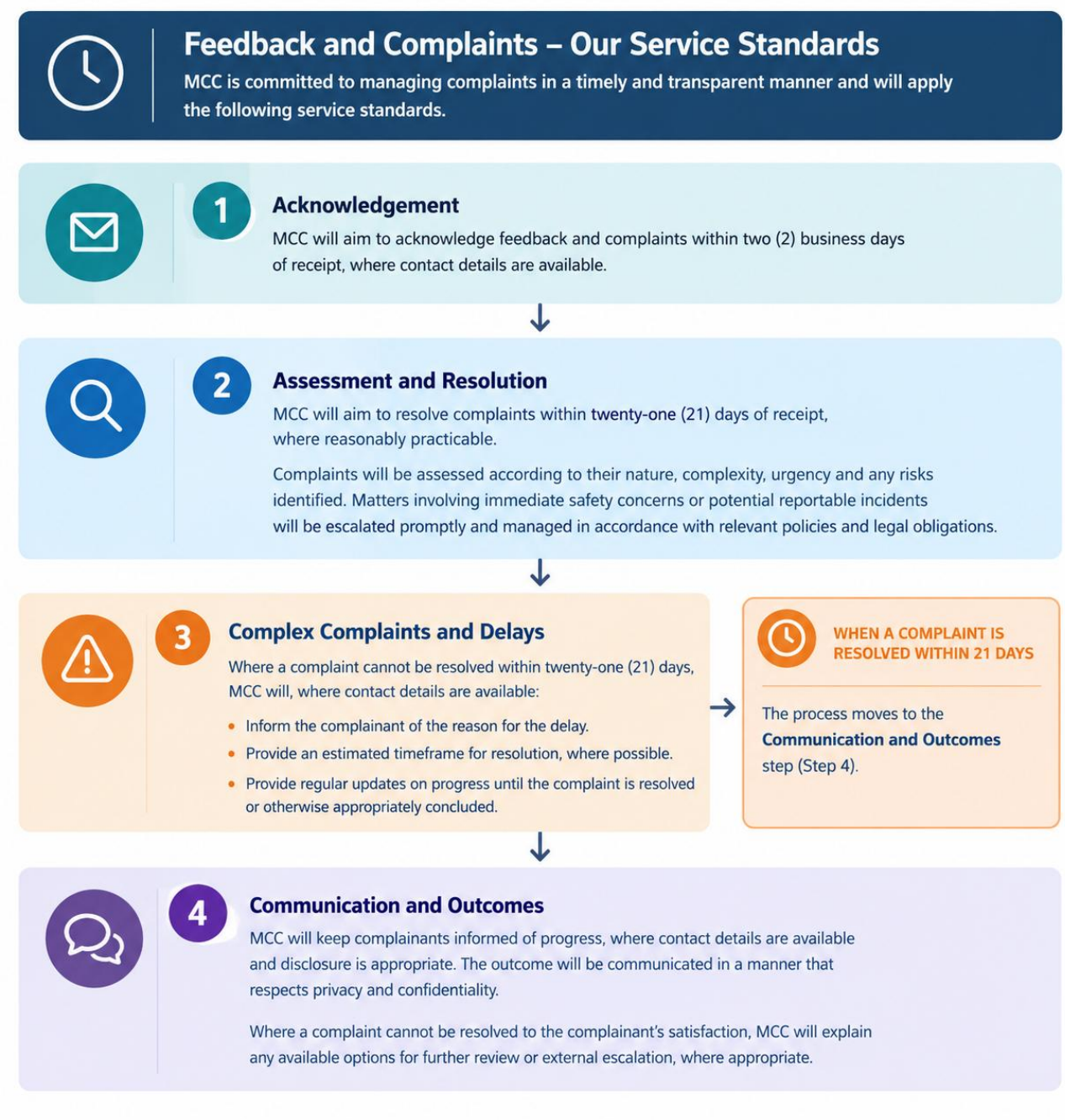
MCC accepts anonymous complaints.

Anonymous complaints will be recorded, assessed and investigated to the extent possible based on the information provided. Appropriate action will be taken where warranted.

While anonymity may limit MCC's ability to seek further information, provide updates or communicate an outcome, anonymous complaints will be taken seriously and assessed on their merits.

8. Timeframes for Complaint Handling

MCC is committed to managing complaints in a timely and transparent manner and will apply the following service standards.



9. Subjects of Complaints

Complaints may relate to, but are not limited to:

- The quality, safety or delivery of supports and services.
- Access to services, service arrangements or decision-making processes.
- Worker conduct, behaviour or professionalism.
- Respect, dignity, choice, control and participant/client rights.
- Privacy, confidentiality or the handling of personal information.
- Communication, responsiveness or the provision of information.
- Safety, risk, abuse, neglect, exploitation or other safeguarding concerns.
- The handling or outcome of a previous complaint.

All complaints will be assessed to determine the appropriate response, including whether the matter requires immediate action, investigation, referral or escalation under another MCC policy or procedure.

10. Procedural Fairness

MCC will manage complaints in accordance with the principles of procedural fairness. This includes:

- Ensuring complaints are handled impartially and without bias.
- Providing clear information about the complaints process.
- Giving relevant parties a reasonable opportunity to be heard.
- Providing people who are the subject of allegations with an appropriate opportunity to respond.
- Considering relevant information and evidence before reaching a decision.
- Making decisions that are fair, reasonable and supported by available information.
- Maintaining appropriate confidentiality throughout the process.
- Communicating decisions and outcomes appropriately.

Where a complaint involves a worker, manager or another person who would ordinarily be responsible for handling the matter, an alternative person with appropriate authority and independence will be appointed to manage the complaint.

Procedural fairness must be applied in a way that does not delay urgent action required to protect a participant/client or another person from harm.

11. Privacy, Confidentiality and Mandatory Reporting

MCC respects the privacy and confidentiality of complainants and all other parties involved in a complaint.

Information will be collected, recorded, stored and shared only as necessary to manage the complaint, protect people from harm, meet legal obligations or otherwise comply with applicable privacy requirements.

Access to complaint information will be restricted to authorised personnel who require the information to fulfil their responsibilities.

Some feedback or complaints may identify matters that MCC is legally required to report to the NDIS Quality and Safeguards Commission or another relevant authority. This may include reportable incidents or concerns about potential breaches of the NDIS Code of Conduct.

MCC will make mandatory notifications within the applicable timeframes and refer other matters to relevant authorities or organisations where required by law or appropriate to address the concerns raised.

Where possible and appropriate, complainants will be informed if their complaint is referred or reported externally. This will be subject to legal requirements, privacy obligations and any restrictions on disclosure.

12. Feedback and Complaint Monitoring and Records

MCC will maintain accurate and secure records of feedback and complaints in its designated complaints register and associated records management systems.

Records will include, where applicable:

- The date the feedback or complaint was received.
- The nature of the concern and issues raised.
- The actions taken, including any immediate risk management measures.
- Relevant communications and investigation findings.
- Decisions made, outcomes and any actions required.
- The date the complaint was resolved or otherwise concluded.

Records will be retained for a minimum of seven (7) years, or longer where required by applicable legislation, regulatory requirements or MCC's records management requirements.

Complaint records will be stored securely and accessed only by authorised personnel. Records may be reviewed by external auditors or regulators where authorised or required.

MCC management will regularly review feedback and complaint information to identify trends, recurring issues, risks and opportunities for improvement. The findings will inform service improvements, staff training, risk management and quality and safeguarding activities.

13. External Escalation and Referrals

MCC recognises and respects a person's right to raise concerns with an external body at any time.

Depending on the nature of the complaint, relevant external bodies may include:

- The NDIS Quality and Safeguards Commission.
- Police or emergency services.
- Relevant state or territory safeguarding, regulatory or oversight agencies.
- Other relevant authorities or organisations.

MCC will provide reasonable information and assistance to help participants/clients understand their options for external escalation, including access to independent advocacy where appropriate.

Participants/clients do not need to complete MCC's internal complaints process before contacting the NDIS Commission or another relevant external body.

Where a complaint requires an external referral or notification, MCC will take appropriate action in accordance with applicable legal and regulatory requirements.

Whistleblower Disclosures

Where feedback or a complaint involves suspected serious misconduct, fraud, corruption, unlawful conduct or other wrongdoing that may fall within the scope of MCC's Whistleblower Policy, the matter will be managed or referred in accordance with that Policy.

MCC will ensure that disclosures are directed to an appropriate person or reporting channel and handled confidentially, with protection against retaliation in accordance with applicable legislation and organisational requirements.

The use of the Whistleblower Policy does not remove MCC's obligations to manage complaints, address safeguarding concerns or make any mandatory incident notifications or external reports required by law.

Non-participant/client complaints relating to employment matters or other organisational grievances are managed in accordance with the McArthur Grievance and Complaints Policy, where applicable.

14. Protection from Reprisal

MCC strictly prohibits retaliation, discrimination, intimidation or adverse treatment against any person who provides feedback, makes a complaint or assists with a complaint in good faith.

No person will be disadvantaged in their access to services, employment or other dealings with MCC because they have raised a concern.

Any allegation of reprisal will be treated seriously, assessed promptly and managed in accordance with relevant MCC policies and procedures.

15. Staff Training and Awareness

MCC is committed to ensuring that workers understand their responsibilities in relation to feedback and complaints management.

MCC will ensure that:

- Workers receive appropriate training on participant/client rights, the NDIS Code of Conduct where applicable, and MCC's feedback and complaints processes.
- Workers understand how to recognise, receive, record and escalate feedback or complaints.
- Workers understand their responsibilities for identifying safeguarding concerns and escalating matters that may require incident reporting or external notification.
- Refresher training is provided regularly and when required due to changes in policy, legislation, practice or identified training needs.

16. Continuous Improvement and Review

MCC uses feedback and complaints to:

- Improve service delivery and participant/client outcomes.
- Identify systemic issues, recurring concerns and risks.
- Inform workforce development and training.
- Strengthen governance, safeguarding and quality systems.
- Monitor the effectiveness of actions taken to address complaints and prevent recurrence.

MCC management is responsible for overseeing the implementation of this Policy and ensuring that identified improvement actions are appropriately considered and addressed.

This Policy will be reviewed at least annually, or sooner where required due to legislative or regulatory changes, audit findings, significant incidents or identified improvement opportunities.

17. MCC Offices and Contact Details

McArthur CC	Address	Contact Email	Contact Number
New South Wales	Level 4, 76 Berry Street, North Sydney, NSW 2060	communitycare.nsw@mcarthur.com.au	02 9277 7077
Queensland	Level 15 127 Creek Street, Brisbane QLD	communitycare.qld@mcarthur.com.au	07 3211 9700
South Australia	Level 12, 101 Grenfell Street Adelaide 5000	communitycare.SA@mcarthur.com.au	08 8100 7000
Victoria	Level 3, West Tower, Botanicca Building 3, 570 Swan St, Burnley VIC 3121	communitycare.vic@mcarthur.com.au	03 9828 6565

18. Related Documents

- MCC Easy Read Feedback and Complaint Policy.
- MCC Feedback and Complaints Management Process.
- MCC Incident Management Policy.
- MCC Incident Management Process.
- MCC Grievance and Complaints Policy.
- MCC Continuous Improvement Policy
- McArthur Whistleblower Policy
- NDIS Quality and Safeguards Commission (NDIS Commission) Practice Standards
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.
- NDIS Code of Conduct
- National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018.