

Feedback and Complaints Management Policy

Record of Procedure Development

Version	Date approved	Date of last review	Date for next review
2.0	March 2026	February 2026	February 2029

Policy Context – this policy relates to:

Organisation related policy	• Person Centered Supports • Provision of Supports
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PURPOSE

To develop a proactive strategy for handling employee and client complaints and feedback that would serve as a conduit between CCWA and the people it serves. Effective organizations perceive complaints as useful information for improvement rather than as annoyances.

SCOPE AND LIMITATION

The feedback and complaints policy is an essential document that describes how CCWA accepts, handles, and learns from input from clients, clients, or the public. For this policy to be effective, its scope (what it covers) and restrictions (what it does not cover or where it might not apply) must be clearly specified.

The **scope** outlines the parameters of the policy, including who is subject to it and what kinds of input it regulates.

- Who it applies to: It usually includes all employees (permanent, temporary, contractors, and volunteers) and their relationships with external stakeholders, consumers, pupils, or members of the public.
- What it includes:
 - Complaints: Expressions of discontent with staff behavior, administrative choices, or service delivery that call for a reaction or resolution.
 - Feedback: remarks, praise, or recommendations that can be used to enhance business but may not demand a formal response.
 - Service Delivery: Actions, faults, or omissions in the organization's normal service.
- **Limitations** make clear situations in which the typical feedback/complaints procedure is unsuitable, subject to legal restrictions, or superseded by other particular policies. Typical exclusions consist of the following:

- Matters Regulated by Other Laws: Specialized internal investigation units or external oversight bodies are frequently referred to complaints involving suspected criminal activity, official misconduct, or serious violations of particular laws (such as privacy violations or child safety).
- Internal Staff Grievances: Instead of using the client-facing complaint system, HR rules (such as workplace behavior or grievance rules) typically address disputes between workers or internal workplace bullying/harassment.
- Contractual/Legal Disputes: To avoid jeopardizing legal positions, complaints that are solely contractual in character or that are the subject of existing legal processes may be removed.
- Vexatious or Frivolous Complaints: Many policies specifically prohibit complaints that have already been settled, are obviously unfounded, or are filed in a way that is meant to cause the organization undue hardship or harassment.
- Minor Operational Issues: As part of daily service delivery, routine issues that can be promptly rectified by frontline workers during a typical interaction are frequently deemed outside the scope of "formal" complaints.

Key Summary Table

Feature	Scope (Inclusions)	Limitations (Exclusions/Exceptions)
Purpose	To resolve dissatisfaction and improve service.	Not meant to replace legal/HR investigative processes.
Input Type	Complaints, feedback, compliments.	Vexatious, repeat, or frivolous claims.
Audience	External stakeholders and the public.	Internal staff-on-staff grievances.
Pathways	Standard feedback forms, email, phone.	Specific legislative/legal appeal processes.

POLICY STATEMENT

Bluebird Homecare Pty Ltd. is dedicated to offering top-notch services and upholding excellence in all of our dealings. We understand that both positive and negative feedback are critical to our development. This policy guarantees that all parties involved have an easy, transparent, and accessible way to express their concerns, and that those concerns

DEFINITION OF TERMS

The Feedback and Complaint Policy document should contain the following standard definitions.

Terms	Definition
Feedback	Any details, recommendations, praise, or remarks on [Organization Name]'s performance, behavior, or service quality. Although it does not always call for a formal investigation or corrective action, it is meant to help us get better.

Terms	Definition
Complaint	An oral or written statement of discontent with CCWA personnel, services, or handling of a previous complaint in which a response or resolution is either explicitly or implicitly anticipated.
Complainant	Any person, group, or organization that sends a complaint or feedback to CCWA is considered
Stakeholder	Any individual or group that has an interest in our business, such as clients, clients, partners, staff, and the general public.
Resolution	The ultimate result of a complaint procedure. This could involve CCWA offering an explanation, an apology, a policy change, monetary compensation, or taking corrective action.
Escalation	Is the process of transferring a complaint from a frontline employee to a higher level of management or authority when the first settlement is either inadequate for the complainant or outside the frontline staff's purview.
Good-Faith Complaint	Is one that is submitted with the sincere belief that the information supplied is accurate, regardless of whether the inquiry eventually supports the claim.
Root Cause Analysis	The methodical process of determining the primary cause of an error or a client's dissatisfaction to stop it from happening again.
Data Protection/Privacy	CCWA is required to handle any personal information pertaining to a complaint in compliance with the Privacy and Responsible Information Sharing Act 2024 (PRIS Act) and Information Commissioner Act 2024, passed in December 2024, as a new statutory privacy framework for Western Australia.

RESPONSIBILITIES

The following are the breakdown of the key players and their responsibilities in the visitor scheduling and management:

Position	Responsibility
Support Staff	Resolve simple queries, log the interaction, and provide an initial response.
Team Leader	Handle unresolved issues, investigate root causes, and offer formal solutions.
Head of Operations/COO	Review high-impact complaints or legal/compliance risks. Final organizational decision
Regulatory Body/External Agency	If the complainant is unsatisfied with the final internal decision, they are referred to a third party

GOVERNANCE

To comply with NDIS standards this outcome, the following indicators should be demonstrated:

- 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 principles of procedural fairness and natural justice and complies with the requirements under the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018.
- 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.
- Demonstrated 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.
- All workers are aware of, trained in, and comply with the required procedures in relation to complaints handling.

CORE PRINCIPLES

The following principles are to ensure fairness and transparency:

- **Visibility and Accessibility:** Make information about how to provide feedback or make a complaint easy to find (e.g., website, reception, brochures).
- **Responsiveness:** Acknowledge receipt promptly and provide clear timeframes for resolution.
- **Objectivity and Fairness:** Treat all complaints on their merits, ensuring the process is unbiased and confidential.
- **Accountability:** Clearly define roles and responsibilities. Ensure that staff know what they can resolve at a "frontline" level and when to escalate.
- **Continuous Improvement:** View complaints as opportunities to identify systemic issues and improve your services.

Service improvement (The Feedback Loop) to identify systemic issues.

- **Root Cause Analysis:** It helps move from fixing symptoms to solving underlying problems.
- **Product Development:** It provides direct insights into what features clients actually need versus what they don't use.

The **3-Level Escalation Model**: adopt a tiered approach to ensure complaints are resolved at the lowest appropriate level:

- Level 1 (Frontline): Staff resolve the issue immediately, if possible.
- Level 2 (Internal Review): Escalation to a team leader or designated complaints officer for investigation if the matter is complex or unresolved at Level 1.
- Level 3 (External Review): If still unresolved, the complainant is provided information on independent bodies (such as an industry ombudsman) that can mediate.

Optimal Methods for Execution

- Staff Training: Make sure frontline employees (support workers) receive training in dispute resolution, active listening, and the particular procedures outlined in your policy.
- Keeping Records: Keep track of all comments and grievances using a single register. For reporting on performance patterns and spotting systemic flaws, this data is priceless.
- Language and Tone: Make sure the policy statement is understandable, devoid of technical terms, and encouraging. It should be clear from the tone that you appreciate the criticism.
- Regular Review: Make that the policy is still effective for your users and consistent with rules by reviewing it on a regular basis (every one to two years, for example).

Relationship recovery and retention. A complaint is often an opportunity to "save" a client relationship.

- The Service Recovery Paradox: Research suggests that a client who has a complaint resolved quickly and effectively is often more loyal than a client who never had a problem at all.
- Trust Building: A transparent policy shows that you value the client's voice, which builds credibility even when things go wrong.

Organizational accountability and standards set clear expectations for both staff and the public.

- Consistency: It ensures that every complaint is handled with the same level of seriousness, preventing arbitrary responses.
- Benchmarks: By tracking resolution times and outcomes, management can set KPIs for client service teams.

Compliance and risk mitigation to have a formal grievance procedure is a regulatory or legal requirement.

- Preventing Escalation: A well-managed policy handles issues internally before they turn into public relations crises, legal action, or negative viral sentiment on social media.
- Risk Management: Patterns in complaints can act as an "early warning system" for potential safety, financial, or ethical risks.

Reactive versus Proactive

Perspective	Without a Policy	With a Policy
View of Complaints	A nuisance to be ignored.	A free "consultation" on how to improve.

Staff Action	Defensive or inconsistent.	Empowered, guided, and consistent.
Data Usage	Lost opportunities.	Actionable insights for future strategy.
Client Sentiment	Frustrated and unheard.	Respected and valued.

RELATED PROCEDURES

Feedback and Complaints Management Procedure BH-PR-CC-004-01-01-01

RELATED FORMS:

- Complaint Contact Form <https://www.ndiscommission.gov.au/about/complaints>
- Feedback and Complaints Form BH-F-CC-003-03
- Feedback and Complaints Register BH-R-CC-001-04

8. REFERENCES:

Resources for Employers - Worksafe

9. APPENDIX: