

Policy

Policy Title	Complaint and Feedback Management Policy
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1. Purpose

ADEC recognises that complaints and feedback provide a valuable opportunity to improve our care and services.

This policy outlines ADEC's commitment to an effective complaint management system and the principles which underpin the complaints management process.

2. Scope

The information contained in this policy is for Board members, employees, volunteers and contractors as well as clients and their representatives.

3. Policy Statement

ADEC is committed to having a complaint and feedback management system that is transparent, easy to use and is based on best practice and a continuous improvement focus.

ADEC's complaint management system starts with a commitment to providing quality care and support as part of a person-centred approach which includes open disclosure. As such complaints and feedback are managed with no reprisal to individuals who make a complaint or give feedback.

ADEC recognises that feedback, including complaints, provides a valuable opportunity to improve our care and services. As such we welcome all forms of feedback and actively seek it through a range of engagement opportunities.

ADEC will provide regular communication to clients, their representatives as well as staff and members of the board that complaints and feedback are welcome. This will occur at least monthly.

ADEC encourages and supports clients, or their representatives, to share feedback, raise concerns or make complaints:

- Complaints can be raised orally or in writing
- Clients can raise complaints anonymously
- Complaints may be withdrawn at any time by the complainant orally or in writing

ADEC recognises a client's right to access appropriate advocacy support and language services and work with these services in the management of complaints. These details are provided on ADEC's website and in the client handbook. If required ADEC will support clients to access these services.

ADEC will involve the complainant, and any client directly affected by an issue raised in the complaint, in the resolution of the complaint as well as keeping them informed of the

progress and outcome of the complaint. This does not include complaints raised anonymously.

When responding to a complaint or feedback, ADEC will apply procedural fairness to the complainant, any client directly affected by an issue raised in the complaint and anyone else related to the complaint.

Information provided in a complaint or feedback is kept confidential and only disclosed if required by law.

ADEC recognises that our employees are an important aspect of an effective complaints management system we provide information and training on customer service and complaint management as well as empowering staff to manage and resolve minor complaints as they arise.

Complex complaints are referred to a senior manager and investigated with support from the Quality team.

Complaints are notified to the appropriate agencies as required under relevant law.

ADEC has in place an Aged Care Whistleblower Policy for concerns raised that qualify as a protected disclosure.

ADEC will review its complaints management processes at least annually.

4. Definitions

Client: Any individual who ADEC provides services to.

Complaint: An implied or express statement of dissatisfaction where a response is sought, reasonable to expect, or legally required.

Complainant: person raising a complaint. This could be a client or someone raising a complaint on their behalf.

Continuous improvement approach to complaints:

- encourages feedback from clients and their representatives about the quality of services
- works with people who make a complaint to find solutions
- learns from complaints and considers them when developing risk management, service delivery and staff development systems

Feedback: A compliment, criticism, comment or suggestion where a response is not sought, or not reasonable to expect, however, may be provided.

Open Disclosure: refers to the practice of communicating with a client when things go wrong, addressing any immediate needs or concerns and providing support, apologising and explaining the steps the provider has taken to prevent it happening again.

Procedural fairness (ACQSC): The process followed by decision-makers to ensure decisions are fair by providing all interested parties to a complaint or a decision:

- the right to be heard
- the right to be treated without bias
- the right to be informed of and respond to allegations, and
- the right to information regarding the status of the complaint.

5. Policy Application

5.1 How to make a complaint or provide feedback

Complaints and feedback can be provided to any ADEC staff member in the following ways:

- In person
- Via the feedback page on ADEC's website: adec.org.au/feedback/
- By phone: (03) 9480 7000 or staff mobile
- By post: PO Box 40, South Morang, 3725
- By email: info@adec.org.au or staff email
- During ongoing activities and conversations

Clients and their representatives will be provided with the email address and mobile number of the staff member who is their main contact at ADEC (e.g. Case Manager, Advocate).

Advocacy and language services can be accessed to support a client raise a complaint.

Complaints can be raised anonymously via phone, by post or via email. Where a phone number or email is identifiable the person can still request the complaint be treated anonymously.

Complaints can be withdrawn at any time by the methods described above.

In addition to this policy, a brochure will be provided in multiple languages and easy read on how to make a complaint.

5.2 Open Disclosure and Restorative Outcomes

When handling complaints ADEC will use open disclosure. This means:

- talking with a client when things go wrong
- listening to a client's experiences (what happened and how it affects them)
- acknowledging what went wrong and apologising
- finding out and explaining what happened
- explaining what ADEC will do to stop it from happening again

Restoring a client's trust in ADEC's services is a priority. A restorative outcome may be achieved through:

- Open disclosure
- Fixing the problem
- Improving communication with the client
- Keeping the client informed of the progress of their complaint
- Improving services to clients
- Asking the client how trust can be restored

5.3 Acknowledging complaints

Complaints will be acknowledged within 2 business days of receipt either verbally or in writing wherever possible.

5.4 Recording complaints

The staff member receiving the complaint records it on the complaints form in the client's electronic file. This sends an automatic alert to the Quality team who will record the complaint on ADEC's feedback register.

If the complaint is anonymous the staff member receiving the complaint sends an email to the Quality team detailing the information. The Quality team will record the complaints on ADEC's feedback register.

All complaints and feedback are given an ID number for reference.

5.5 Assessing complaints

When a complaint is received, as much detail as possible is obtained to understand the complaint and the outcome being sought.

Complaints are assessed and managed using the following rating system:

LOW

- These are complaints that can be resolved during initial contact or are simple to address.
- The complaint record is received by the relevant program manager who monitors the complaint and resolution.

MEDIUM

- These are complaints that cannot be immediately resolved or require more attention to address.
- The complaint record is received by the relevant program manager who takes on oversight and/or management of the complaint, including any investigation and resolution.

HIGH

- These are complaints that involve a client being harmed or are complex and require additional senior support to resolve.
- They also include complaints that are required to be notified to an external agency.
- The complaint record is received by the General Manager Operations and the General Manager Quality and Clinical Governance who take on management of the complaint, including any investigation, and resolution.

To assist in the resolution of a complaint a complaint management plan may be required.

5.6 Investigating Complaints

Medium and high level complaints will be investigated to gather information about the causes of the complaint and to assist in identifying solutions prevent the circumstances of the complaint happening again. Investigations will be impartial, confidential, transparent, timely and allow for procedure fairness.

5.7 Responding to a complaint

Responding to a complaint is done by talking to the complainant and may also include information being provided in writing if the matter is complex or disputed. Open disclosure is followed when responding to a complaint.

When the complainant requests an outcome that is unreasonable. The person managing the complaint will explain why it is not possible and wherever possible offer an alternative solution.

When responding to a complaint staff will take a culturally safe, trauma aware, and healing informed approach.

5.8 Reporting on complaints

Trending and analysis of feedback and complaints is undertaken to highlight themes and areas for improvement in how ADEC provides services.

Complaints are reported monthly at an operational level. Aggregated complaints and complaint themes are reported quarterly to the board quality subcommittee and client advisory forum.

Where relevant individual complaints or themes identified from aggregated complaints inform continuous improvement initiatives which are recorded on ADEC's continuous improvement plan.

5.9 Staff awareness

This policy is made available to staff at commencement and is also available on ADEC's intranet and on request.

Staff are reminded of ADEC's complaint management process at least monthly through the staff newsletter and at meetings.

Staff are provided annual training on complaint management, customer service as well as culturally safe, trauma aware and healing informed care and support.

5.10 Feedback on Complaint Management

Once a complaint has been resolved or closed the complaint will be given an opportunity to provide feedback on the process. This information is used to make improvements to the way ADEC handles complaints.

6. Responsibilities

6.1 ADEC Board

ADEC's board is responsible for:

- Ensuring there is a fair, transparent, accessible, safe, culturally safe and timely complaints management process
- Reviewing aggregate complaint information and relevant continuous improvement activities

6.2 Executive Team

ADEC's executive team is responsible for:

- Implementing complaints management processes
- Making training available to all staff on complaints management
- Management of high level complaints
- Reviewing individual complaints and aggregated complaint information
- Ensuring complaints feed into the continuous improvement system
- Review of the complaints management process

6.3 Program Managers

Program Managers are responsible for:

- Implementing complaints management processes
- Oversight, management and timely resolution of complaints
- Supporting staff to resolve low level complaints

6.4 All staff

All ADEC staff are responsible for:

- Place the client at the centre of all complaint management processes
- When responding to a complaint take a culturally safe, trauma aware, and healing informed approach.
- Be aware of, and understand their role in complaints management
- Comply with this policy and associated procedures
- Complete any related training
- Resolve complaints following ADEC processes
- Seek support in complaint management when needed

7. Related Documents & Instruments

Internal policy, procedure, and guidance:

- Quality Management Framework
- Aged Care Whistleblower Policy
- Open Disclosure Procedure

Laws and Standards:

- Aged Care Act 2024 (Cwlth)
- Aged Care Rules 2025
- Aged Care Strengthened Standards
- National Disability Insurance Scheme Act 2013 (Cwlth)
- National Disability Insurance Scheme (Complaints and Resolution) Rules 2018
- NDIS Practice Standards
- Disability Act 2006 (Vic)
- Disability Discrimination Act 1992 (Cwlth)

External resources:

- Better practice guide to complaints handling in aged care services (Aged Care Quality Safety Commission, July 2025)
- Effective Complaint Handling Guidelines for NDIS Providers (NDIS Quality and Safeguards Commission, 2015)
- Better Practice Complaint Handling Guide (Commonwealth Ombudsman, 2023)

8. Administration

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