

Complaints and Feedback

Client Services Policy #007.5

References:

- Information Management Systems Policy #006.4 Client Information Systems.
- Information Management Systems Policy #006.9 Data Collection and Analysis.
- Client Services Policy #007.11 Abuse, Neglect, Exploitation and Harm.
- Corporate Governance Policy #001.15 Requirements for Registered Providers.
- Workplace Health and Safety Policy #005.10 Incident Management.
- Continuous Improvement Register.
- Client Information Book – V5 December 2021.
- Client Consent and Information Provision Form.
- Client Satisfaction Survey.
- SBcare Feedback Form.
- Continuous Improvement Action Request (CIAR).
- QMS Registers Instruction Guide.
- Induction Checklist.
- Contractor Information Handbook.

1. Policy Statement

The purpose of this policy is to establish an effective and consistently applied framework for the management of complaints and feedback so that SBcare services, activities, systems, and processes can be continuously improved. SBcare aims to develop a culture within the organisation that regularly seeks and welcomes feedback and complaints, acknowledges mistakes, learns from them, and implements improvements.

Underpinning our *Complaints and Feedback Policy* and our procedures for resolution are principles of natural justice and procedural fairness, and we support the right of all clients and stakeholders to raise their concerns in an accessible, constructive, and safe way, equal and fair treatment, to protection of confidentiality, to promptness of response, to have complaints investigated fairly and to have appropriate steps taken to resolve issues of concern and access to advocacy support.

This policy sets out our approach to managing any complaints we receive and comprises the systems and internal procedures supporting the implementation of the policy.

2. Philosophy

Our organisational values confirm our commitment to quality in client services. Quality is ultimately determined by the client, and it is therefore critical that we encourage regular feedback from clients, and that the information received is linked into action planning cycles for continuous improvement.

Any complaints, concerns or suggestions regarding the planning and operation of our service will therefore be welcomed as opportunities for improvement.

3. Scope

SBcare considers a complaint to be:

An expression of dissatisfaction made to SBcare related to our services, decisions, actions or the actions of our people, or the complaint management process itself, which SBcare has been unable to resolve in the first instance, where a response is expected.

This is distinct from a request for service. However, a request for service may develop into a complaint where the complainant considers the provision or timeliness of the service to be unsatisfactory.

This policy does not extend to requests for a review of an SBcare decision or action where the right to do so is granted by law. These reviews will be conducted in accordance with the applicable legislation.

This policy does not extend to complaints or allegations about third parties unrelated to SBcare.

This policy is to be followed by employees, volunteers, contractors and Board of Management Members for all feedback, complaints or concerns received in relation to SBcare

4. Principles

SBcare will ensure best practice in complaint handling and resolution systems that facilitate and support clients to make complaints. The complaints handling and dispute resolution processes at SBcare will be in accordance with the Australian/New Zealand Standard *AS/NZS 10002:2014 Guidelines for Complaint Management in Organisations*, and the *NDIS (Complaints Management and Resolution) Rules 2018*.

This policy is based on seven principles:

Commitment

We are committed to resolving complaints and have a culture that recognises an individual's right to complain. We value complaints and feedback and recognise them as being part of our business of serving our communities and improving service delivery.

Accessibility

People with a range of needs can easily complain and staff actively assist them to navigate the complaints process. Information is in plain language.

Transparency

We make it clear how to complain, where to complain and how the complaint will be handled. The steps taken to respond to a complaint are recorded and will stand up to scrutiny. We ensure that any person who may be directly and adversely affected by a complaint process is given the opportunity to have their views heard and considered in a fair and impartial manner.

Objectivity and Fairness

Complaints are dealt with courteously, fairly, and impartially, within established timeframes and are assessed on merit. The principles of natural justice will apply.

Privacy

Complaint information is handled according to privacy laws and other relevant legislation. We provide clear information about how we handle personal information. Complaint data is de-identified if reported on more widely.

Accountability

We are accountable internally and externally for our decision making and complaint handling performance. We provide explanations and reasons for decisions and ensure that our decisions are subject to appropriate review processes.

Continuous Improvement

Acting on, learning from, and using complaint data helps us identify problems and improve services.

5. Approach to Complaints/Feedback

Stages of the complaint management process:

SBcare handles most complaints in accordance with the model in Figure 1.

Figure 1: Complaint Management Model

The aim of the SBcare approach to complaint management is to resolve the majority of complaints at the first stage. At stage 1, employees are encouraged and empowered to resolve issues wherever possible when a complainant first raises them.

Complainants are encouraged to:

- a) try to resolve their issue with the SBcare contact for their service that they have been dealing with.
- b) if they are not satisfied, talk to that person's manager.
- c) if they are still not satisfied, consider lodging a formal complaint through SBcare's complaint channels which may include escalation to the Board of Management.

Once a complaint reaches stage 2, a complaint can be actioned through:

- a) a complaint investigation.
- b) an internal review of a decision or action, where SBcare will conduct an internal review.

In a complaint investigation, the focus is:

- a) an assessment of the complaint to determine if organisational policies and procedures have been applied correctly and that fairness in the process has been observed.
- b) determining what resolution (if any) may be appropriate, including whether further information should be provided to the complainant about SBcare's position.
- c) determining whether there are any opportunities for services and system improvement.

Where SBcare has determined that an internal review should be conducted for, or in relation to, an SBcare decision or action, only people directly affected by the decision can request such a review.

SBcare will inform those people of their rights in the review.

In these circumstances, the reviewers:

- a) are independent of, and no less senior than, the original officer.
- b) have the necessary expertise to review particular matters.
- c) have access to all relevant material and the full cooperation of the organisation at all levels.

Stage 3 is a reiteration of the rights and responsibilities of both parties and the provision of information of the appropriate external complaint mechanism.

5.1 Visibility and Access

Complainants may make complaints by telephone, fax, mail, email or online. SBcare will assist complainants with specific needs to make complaints, including the provision of an interpreter or hearing-impaired services.

While we accept anonymous complaints, we will be limited in the extent to which we can address these without the ability to obtain further information or make further inquiries of the complainant.

Information on the complaint management process appears on SBcare's website and is available in print form. SBcare officers handling complaints over the telephone will explain the process and direct potential complainants to where they can access further information.

5.2 Responsiveness

We will:

- a) acknowledge complaints promptly; generally, within 24 hours of receipt.
- b) inform complainants of the progress of their complaint.
- c) assess and finalise each complaint as quickly as possible; generally, within 10 working days of receipt.
- d) resolve complaints at the first point of contact wherever possible.

5.3 Categories of Complaint

We will:

- a) categorise and prioritise complaints in accordance with their urgency, seriousness, and complexity.
- b) address each complaint in a sensitive, equitable, objective, unbiased and professional manner throughout the complaint management process.
- c) where appropriate, refer complaints and/or complainants to external agencies on receipt of the complaints.

Complaints are categorised into four types:

1. **Service Related**

In the context of this work, clients, carers, employees, volunteers, contractors, and members of the public at times may raise concerns about delivery of services. In determining what is a complaint, SBcare will be mindful, among other things, of whether we have met our service charter of rights and responsibilities and the individual agreements in place. In the first instance, we will attempt resolution of service-related complaints at the local level or at the first point of contact. However, if we are unable to resolve the complaint at this level, we will escalate it to a more senior employee for review.

2. **Regulatory**

SBcare considers regulatory complaints to include complaints relating to decisions or actions made in the context of our regulatory/contractual role and responsibilities. Whatever the available course of action, SBcare officers receiving regulatory complaints will explain to complainants their rights and responsibilities and direct them to the relevant escalation point(s).

3. **Conduct and Performance**

Complaints about conduct involve any allegations of unacceptable conduct against an SBcare employee, volunteer, contractor, or Board of Management member. We divide conduct complaints into two categories: 'serious' and 'less serious'.

Serious complaints relate to conduct that may materially affect SBcare's regulatory, ethical and rights and responsibilities obligations, our reputation, or the safety or security of our clients or information.

Less serious complaints are those that are not considered to fall within the 'serious' category. They include (but are not limited to) rudeness, poor or inappropriate service, and discourtesy.

4. **Other**

There are some complaint types that do not fit within the categories above or, under the requirements of the law, must be handled outside SBcare's usual complaint management procedures.

The categorisation of each complaint determines how SBcare will handle the complaint.

5.4 Monitoring Effectiveness and Continuous Improvement

SBcare is committed to continually improving our services and actively monitoring the quality and effectiveness of our complaint management framework.

We communicate any internal problem or opportunity for improvement revealed by a complaint to the area responsible for possible systemic improvement.

We assess complaint management processes to evaluate:

- a) time taken to finalise complaints.
- b) complaint trends and outcomes.
- c) any systemic issues.

We use the reports to identify opportunities to improve our programs and services.

We undertake quality assurance on the complaint management framework to evaluate our performance, and to provide information on:

- a) process conformity to complaint management procedures.
- b) process suitability to achieve complaint management objectives.

As an ongoing part of the complaint management process, we actively seek feedback from complainants to determine the level of satisfaction with the complaint management process, which may be achieved through the satisfaction recorded in the feedback process, surveys, and other means.

5.5 Roles and responsibilities

SBcare has an ethical and contractual responsibility for ensuring that SBcare has a complaint management framework that:

- a) deals effectively with complaints.
- b) uses complaint information to identify issues and drive improvements.
- c) refers complainants to the appropriate external agency if they remain aggrieved at the conclusion of SBcare's internal complaint management process.
- d) drive continuous improvement through the tracking and monitoring of recommendations arising through the conduct of complaints and internal reviews.

All SBcare employees involved in the complaint management process, as applicable within their area of responsibility, are responsible for:

- a) ensuring that the complaint management policy is implemented.
- b) liaising with their supervisor.
- c) ensuring that the monitoring of the complaint management process is undertaken and recorded.
- d) ensuring continuous improvement occurs as a result of feedback from complaints.

All SBcare employees are responsible for responding to complaints in accordance with the complaint management policy.

As part of induction to the organisation, all staff are trained in the use of and compliance with the complaints management system.

6. Procedures

6.1 Informing Clients

On entry to the service, all clients are presented with an information package that includes a copy of the *SBcare Feedback Form*. Clients and their representatives are advised that if they should need assistance or information to complete the form, SBcare can support this process.

Clients are informed of their right to comment and complain as detailed in the appropriate *Charter of Rights*, and vulnerable, aged, and frail people are provided with a copy in their *Client Information Book*.

The processes for raising a complaint, and those for accessing external complaints resolution support mechanisms or advocates, are explained in the *Client Information Book*. Clients are made aware of both Federal and State external complaints processes, which are available to anyone at any time who has a

complaint or concern about an SBcare service. Clients are informed of their right to access and be supported by an independent advocate of their choice to assist them through the complaints process. SBcare will provide information and support for all people accessing services including those from diverse stakeholder groups (cultures, age, language, and special needs etc) to ensure they are able to access information and processes about complaints, disputes, and feedback appropriate to their needs.

Reminders of our complaints process are given at each formal review meeting, in our newsletters, through the suggestion box and via posters around our centre.

The process for feedback and complaints is included on our website, with the public readily able to access our *Complaints and Feedback Policy*. SBcare will ensure that our website is accessible to people using screen readers.

Clients are required to sign and date the *Client Consent and Information Provision Form* to confirm their understanding and acceptance of the information provided on their rights and responsibilities, including the right to make a complaint without fear of retribution, and to expect a fair and just resolution to their problem.

6.2 Encouraging Feedback

All input from clients and stakeholders is valued, welcomed, and actively encouraged, and we aim to remain open to positive change and development. Clients and families/carers are encouraged to provide feedback about the services they receive, with a range of different channels available as outlined in the *Information Management Systems Policy #006.4 Client Information Systems*.

Our quality commitment is verbally explained to clients on entry to any SBcare service and is reinforced in writing in the *Client Information Book*. Clients, their family, friends, carers, and others are to be encouraged to raise any concerns or complaints if they are dissatisfied with any areas of service delivery.

Clients are continually reassured that all complaints or concerns raised will be dealt with in a fair, prompt, and confidential manner (as far as is practicable) and will not result in discriminatory treatment or retributive action toward them or their service delivery. SBcare will ensure that it does not discontinue or reduce services or take any recriminatory action in relation to a client who makes a complaint about service delivery or who has a complaint made on their behalf.

Clients are to be assured that by raising their concerns or complaints they will be making a positive contribution towards assisting us improve services for themselves and others.

SBcare aims to foster a culture where all stakeholders, including staff, feel supported and encouraged to identify and report any negative events or service delivery that is not best practice in an attempt to reduce harm to clients. Staff are encouraged to acknowledge mistakes without being afraid of the consequences. This environment will provide SBcare an opportunity to find and act on things that can improve all systems and processes.

6.3 Processes for Raising a Complaint or Concern

Our standard procedure for raising a complaint or concern is through completion of an *SBcare Feedback Form*. It has been our experience that some clients have been reluctant to issue formal, written complaints. The *Feedback Form* has been designed to encourage people to voice their opinions on any aspect of service provision, including compliments, concerns, complaints, or suggestions. While feedback may be submitted anonymously, where concerns or complaints are being raised, clients are advised and encouraged to include their name and contact details so that they can be informed of actions taken to resolve the issue.

A *Feedback Form* can be left in the SBcare Post Box at the front of the building, and all feedback will be welcomed as an opportunity for quality improvement. A supply of feedback forms is available in reception. It is the responsibility of the Chief Executive Officer to ensure that all *Feedback Forms* are retrieved from the box at the end of each week. For clients receiving home-based care, the *Feedback Form* may be delivered through their community service worker or posted directly to SBcare, addressed to the Chief Executive Officer.

Clients, their families, representatives, or support people are able to make a complaint to SBcare through submission of an electronic *Feedback Form* available on the website.

SBcare will accept complaints or feedback in a variety of formats to meet the communication needs of a diverse range of clients. In recognition of the special needs of some clients (e.g., those from culturally and linguistically diverse backgrounds, those who have a physical disability or cognitive impairment or those with mental health issues), concerns or complaints may be raised on their behalf by their nominated advocate or support adult. All clients have the right to call on an advocate of their choice to present their complaint and assist them through the resolution process.

SBcare can provide information or a referral to an advocacy service. Contact information for Advocacy Services is provided in the *Client Information Book* and in the ADA Australia Fact Sheet.

As part of our training, staff will be alert to the needs of vulnerable clients who may have greater difficulty in expressing a grievance or making a complaint and provide assistance, information or referral as required. Clients from non-English speaking backgrounds are offered the assistance of an interpreter if necessary and clients with a hearing impairment offered TTY facilities. Clients who have a visual impairment may be offered information in larger print or access to online information in text rather than document format. Staff will explain the complaints process verbally to clients who have difficulty understanding written information.

In addition, clients may raise concerns or complaints verbally, directly to one of our community services workers or through a phone call to their applicable Manager, or the Chief Executive Officer. Employees receiving a verbal complaint are to document the issue on an *SBcare Feedback Form* so that a written record is maintained and document it in the *Continuous Improvement Register* as per the process outlined below ([Section 6.4 Registering Complaints](#)).

Clients are always encouraged to raise issues or complaints with SBcare in the first instance, however complainants will not be required to raise a complaint with us before raising it with an external complaints support mechanism.

The written record of the complaint is referred to as the “source file”. Once registered, the record is to be filed in the respective client file, with the associated complaint registration number (CI number) and entered in the *Continuous Improvement Register*.

6.4 Registering Complaints

All complaints received are to be documented in the *Continuous Improvement Register*. Employees are to follow the *QMS Registers Instruction Guide* when recording entries. The employee’s supervisor receiving the complaint is responsible for ensuring the initial entry has been made. This registration system will ensure that complaints are followed up and appropriate action taken. Records related to complaints are to be maintained by SBcare for at least 5 years or otherwise as required by law. Under the NDIS legislation, complaints records must be kept for 7 years from the day the record is made.

Each entry recorded in the *Continuous Improvement Register* is to be given an Identification Number (CI Number) to enable tracking to the source file and program area, which should be maintained in the respective client record. This traceability is an important element for trend analysis. When recording complaints, ensure the complaint is registered as a complaint and this identification will support segregation of complaints by running a report from the database.

If a system improvement (or preventive action to reduce the likelihood of recurrence of the problem) is initiated in response to a complaint received, this is to be recorded in the *Continuous Improvement Register* and initiation of a *Continuous Improvement Action Request (CIAR)* that will capture the resulting actions and outcomes. Where the nature of the complaint is such that an effective corrective action resolves the issue without the need for further process or system improvements, the completion of the entry in the *Continuous Improvement Register* is all the documentation required.

6.5 Internal Complaints Resolution Process

SBcare has in place sound processes for complaint handling that embody our fundamental principles for complaint handling of commitment, accessibility, transparency, objectivity and fairness, privacy, accountability, and continuous improvement. Our aim is to ensure that complaints are dealt with efficiently and effectively and that clients have confidence in our complaint system.

The steps involved in the SBcare complaint handling process include:

1. Acknowledge all complaints promptly.
2. Assess the complaint and give it priority.
3. Plan the investigation.
4. Investigate the complaint.
5. Respond to the complainant with a clear decision.
6. Follow up any customer service concerns.
7. Consider if there are any systemic issues.

** Straightforward complaints will often be resolved without going through steps 3 and 4.*

Investigations are to be conducted in a manner that protects basic rights, confidentiality, fairness, and equity. SBcare will involve the person making the complaint and the person affected by an issue raised in the complaint (as is appropriate) in the resolution of the complaint, making sure they are given an opportunity to have their views heard and considered in a fair and impartial manner.

Where the complaint relates to employees or service issues, the issue is to be raised directly with the individual concerned in the first instance. The matter may be able to be resolved at this point through an intervention such as roster change, employee's education, or activity re-scheduling. Should the complaint remain unresolved, the Manager will refer the matter to the Leadership Team, who will delegate authority to a senior manager to attempt to resolve the issue with the complainant.

All complainants and the person affected by an issue raised in the complaint will be kept appropriately informed of the progress and any investigation resulting from the complaint, including actions taken to resolve the issue, the reasons for any decisions made and options for review of decisions in relation to the complaint. SBcare will ensure that any communication with people involved in a complaint are in an appropriate way that meets their needs.

Should the complainant feel that the issue has not been resolved to his/her satisfaction, he or she may exercise the right to appeal through raising the complaint directly with the Chief Executive Officer. If the Chief Executive Officer is the subject of the complaint the complaint should be referred to the Board of Management Chairperson for decision making.

6.5.1 Response to Complaints about an Incident and Open Disclosure

SBcare will ensure appropriate action is taken in response to complaints about an incident and an open disclosure process is used when things go wrong that could harm or has harmed a client (incident).

In response to managing an incident or adverse event, SBcare will follow the process outlined in the *Workplace Health and Safety Policy #005.10 Incident Management*.

6.5.2 Procedural Fairness

SBcare will handle and resolve complaints fairly, impartially and efficiently, having proper regard to procedural fairness in managing complaints.

SBcare will afford procedural fairness to:

- A person making a complaint, with the complainant having a reasonable opportunity to present their complaint and have the substance of their complaint understood.
- Any staff member who is the specific subject of a complaint.

When handling a complaint, SBcare will ensure procedural fairness is afforded to a person if their rights or interests may be adversely or detrimentally affected in a direct and specific way. In such circumstances:

- The person will be given notice of each prejudicial matter that may be considered against them.

- The person must be given a reasonable opportunity to have their views heard on those matters before adverse action is taken, and to put forward information and submissions in support of an outcome that is favourable to their interests.
- The decision to take adverse action should be soundly based on the facts and issues that were raised during that process, and this should be apparent in the record of the decision.
- The decision maker should be impartial and unbiased and maintain an unbiased appearance.

Information provided in a complaint will be kept confidential and will only be disclosed if the disclosure is required by law or is otherwise appropriate in the circumstance. Protection of identity and confidentiality must be balanced against the obligation to provide procedural fairness to effectively safeguard the interests of all parties. Depending on the circumstances, the obligation to provide procedural fairness may override the obligation to maintain confidentiality. Generally, disclosure will occur to a level necessary to avoid any practical injustice to a person to whom procedural fairness is owed.

6.6 Reporting and Analysis

The respective Manager is to be informed of all complaints relating to that program area. Managers are responsible for reporting all complaints and actions taken for resolution to the Leadership Team.

The Leadership Team is responsible for analysing entries in the *Continuous Improvement Register (Complaints)* to identify and manage trends, and to plan system improvements. The Leadership Team through the Chief Executive Officer provides a written report to the Board of Management, which includes recommended changes or modifications to service delivery arising from actions taken in response to complaints and other quality monitoring activities (refer to *Information Management Systems Policy #006.9 Data Collection and Analysis* for further information).

Staff and clients are also provided with information in response to improvements or changes in service delivery in response to feedback. This will be provided through newsletters and the Annual Report.

The Leadership Team is responsible for regularly monitoring the effectiveness of the complaints system. The type, number and outcome of complaints will be reviewed to inform the fair, transparent and responsive delivery of the complaints system.

6.7 External Complaints Resolution

SBcare acknowledges that complainants are not required to raise a complaint with the organisation before raising it with an external complaints support mechanism. SBcare will ensure appropriate support and assistance is provided to clients in contacting an external complaints organisation.

If the complainant remains dissatisfied with the outcomes from both the initial investigation and resolution processes, and the issue has also been unable to be satisfactorily resolved by escalation to the Board of Management, the complainant is to be supported in accessing relevant external bodies to assist in mediation and resolution processes.

If, after approaching SBcare in the first instance, a client or carer is dissatisfied with the management of their complaint or the outcome, or they do not wish to raise the complaint with SBcare directly:

Aged Care Clients are also able to raise a complaint in the following ways:

- With the Aged Care Quality and Safety Commission by telephoning 1800 951 822 or via the website <https://www.agedcarequality.gov.au/>. This service provides a free service for anyone to raise their concerns about the quality of care or services being delivered to people receiving aged care services subsidised by the Australian Government.
- With the Department (www.dss.gov.au) through the online [feedback form](#), by telephoning 1800 634 035 or by email to complaints@dss.gov.au.
- With the Older Persons Advocacy Network (OPAN) by telephoning 1800 700 600 or via the website [Contact Us - Older Persons Advocacy Network \(opan.com.au\)](http://Contact Us - Older Persons Advocacy Network (opan.com.au)). This service provides free, independent and confidential advocacy support and information and can help a client or representative raise concerns about services.

Queensland Community Care Clients are able to raise a complaint:

- With the Communities and Disability Complaints Unit on 1800 080 464 or via email to feedback@communities.qld.gov.au.

Queensland Health clients (Dementia Program) are also able to raise a complaint in the following ways:

- With the Office of the Health Ombudsman on 133 646 or via the website <https://portal.oho.qld.gov.au/healthcomplaintform/>.
- With the Office of the Public Guardian on 1300 653 187 or email to adult@publicguardian.qld.gov.au.

NDIS and Continuity of Support Programme Clients:

- With the NDIS Commission on:
- 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged; or via <https://www.ndiscommission.gov.au/about/complaints> or through completion of an online [complaint form](#).
- The Commission can take complaints about services or supports that were not provided in a safe and respectful way; or services and supports that were not delivered to an appropriate standard.
- With the [Commonwealth Ombudsman](#) if a complaint relates to government staff or the client is not happy with the outcome of the NDIS Commission. Telephone 1300 362 072 or complete an [online complaint form](#).

Clients receiving health services, are able to complain about any health service provided at any place, by any health service provider, including both registered and unregistered health practitioners. This may include clients receiving nursing services, OT, physiotherapy, podiatry, nutritionist, massage, dietician, social work, speech pathology etc. Refer to [How we can help - Office of the Health Ombudsman \(oho.qld.gov.au\)](#) for further information.

Complaints can be raised:

- With the Office of the Health Ombudsman on 133 646 or via the website <https://portal.oho.qld.gov.au/healthcomplaintform/>.

Housing Clients can apply firstly to the RTA, or in urgent situation directly to QCAT:

- The Residential Tenancies Authority (RTA) provide a free, confidential dispute resolution service, through the completion of a Dispute Resolution Request Form available online at <https://www.rta.qld.gov.au/Forms-and-publications/Forms/Forms-for-general-tenancies/Dispute-resolution-request-Form-16>.
- When a problem cannot be resolved through dispute resolution, or the matter is urgent, clients may take the matter to the Queensland Civil and Administrative Tribunal (QCAT) through the completion of an application form, available at [Applying to QCAT | Residential Tenancies Authority \(rta.qld.gov.au\)](#).

All Clients:

- For privacy complaints, individuals can lodge a complaint in writing with the Office of the Australian Information Commissioner. Telephone 1300 363 992. Details available at www.oaic.gov.au.
- For complaints relating to unlawful discrimination, clients may contact the Anti-Discrimination Commission Queensland on 1300 130 670.
- For complaints relating to criminal activity (i.e. harm, abuse, neglect, exploitation etc.), SBcare will, with the consent of the client, guardian or authorised representative, refer the matter to the Queensland Police and/or other appropriate external agencies.

Clients are provided with these additional complaint mechanisms in the *Client Information Book* and with additional resources such as Agency/Department brochures where available.

Other agencies to assist in mediation and resolution processes may include Advocacy Services, Program Funding bodies, or other agencies like the Health Rights Commission, the Human Rights and Equal Opportunities Commission or the Older Persons Advocacy Network (OPAN), as explained in the *Client Information Book*. Where information is readily available it will be provided as a part of the *Client Information Book*.

SBcare will ensure that complaints relating to incidents are referred or notified to other bodies as required by law. Refer to *Corporate Governance Policy #001.15 Requirements for Registered Providers* and *Workplace Health and Safety Policy #005.10 Incident Management*.

6.8 Carer/Client Conflict

All employees/community service workers in direct contact with clients have a responsibility to report any client concerns to their Manager. These reporting obligations include any concerns relating to conflict between a client and their principal carer.

SBcare acknowledges our obligations for the care and wellbeing of both parties and recommends both parties be provided with information on how to access advocacy and mediation services in an endeavour to resolve the conflict situation. Where carer stress is assessed as a likely causative factor in the conflict, the Manager may be able to alleviate the situation by consulting both parties and negotiating additional carer support and/or respite.

In the event that a conflict between a client and their principal carer is related to suspected elder abuse, the protocols documented in the *Client Services Policy #007.11 Abuse, Neglect, Exploitation and Harm* are to be followed.

6.9 Complaints About Contractors

SBcare is responsible for the services provided by contractors, including resolving any complaints made about that organisation. Should a complaint regarding a contractor be made to any Department or Agency, SBcare will retain responsibility for liaison with the Department or Agency. We will ensure the contractor complies with all reasonable requests, directions and monitoring requirements requested by the Department or Agency.

6.10 Employee Awareness and Training

During their initial induction to the service, all employees/volunteers must attend training on client rights and responsibilities. This includes compulsory training on client complaints processes and employee's responsibilities in relation to resolving/reporting complaints and disputes. Contractors are informed of client rights and responsibilities including complaints through the *Contractor Information Handbook*.

The induction program includes familiarisation and access to policies, procedures and guidelines and it is each employee's responsibility to understand and comply with documented procedures. All employees are required to sign an *Induction Checklist* on completion of their induction period to verify completion of the induction program and their acceptance and understanding of the information provided.

Employees are reminded periodically about the complaints process and client rights and responsibilities regarding complaints and feedback. This occurs during subsequent training, informally and through staff meetings.

Cross-cultural training provided to staff will include information regarding cultural barriers that can hamper a clients' use of complaint processes.

SBcare will make available appropriate technological and other resources to ensure the maximum effectiveness of the complaint management framework.