

## Policy 4.19 Participant and Carer Feedback and Complaints

### Reference Documents

- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS (Quality Indicators) Guidelines 2018
- National Disability Insurance Scheme Amendment (Quality and Safeguards Commission and other Measures) Act 2017.
- National Disability Insurance Scheme Act 2013.
- National Standards for Disability Services 2013
- Disability Discrimination Act 1992
- United Nations Convention on the Rights of Persons with Disabilities 2007
- National Disability Insurance Scheme (Specialist Disability Accommodation Conditions) Rule 2018
- NDIS Practice Standards and Quality Indicators 2021

**Date of CEO Endorsement: 24/10/2023**

**Last Review Date: 24/10/2023**

**Next Review Date: 23/10/2025**

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### Policy Statement

Participants and their carers, guardians or advocates are encouraged to provide feedback to Thrive365 at any time. Sometimes this may constitute a concern or a complaint. Thrive365 provides a number of mechanisms and opportunities for participants to provide feedback or raise a complaint. When a Participant (and/or carer) raises a concern or complaint, Thrive365 will manage this promptly and fairly, according to principles of natural justice and with due regard to the Participant's (and/or carer's) rights and without fear of retribution.

Thrive365 considers feedback, concerns and complaints as an opportunity to review our policies, procedures and processes and to facilitate continuous improvement of our services.

### Your Rights and Expectations in Using Thrive365 as a Service Provider

As a participant using services provided by Thrive365 you:-

- Will be provided with NDIS services that are in accordance with your approved NDIS and a documented service agreement between yourself and Thrive365.

- Will be consulted with and must agree to any changes in service provision and your service agreement amended accordingly
- Will be treated with courtesy and respect at all times
- Can expect that services delivered to you are provided in a safe and competent manner by appropriately trained staff.
- Will have your personal information treated confidentially and stored safely
- Can provide feedback or raise a complaint about your service, a staff member, another participant or Thrive365 generally, at any time, without fear of retribution or withdrawal of service
- Can receive the support of another person external to Thrive365 such as an advocate, family member or friend to provide feedback or raise a complaint

If at any time a participant or a person associated with a participant believes that these expectations are not being met, they are encouraged to provide feedback using any of the mechanisms described in this policy.

### Making a Complaint to Thrive365

Thrive365 provides a number of ways for participants, their carers or advocates to raise complaints and feedback including:-

- Via our website
- Directly to the accommodation manager or CEO via email, phone or face to face
- Via a third party such as support co-ordinator or other significant person
- Via participant survey or annual family meeting
- Through weekly participant house meetings
- Anonymously using any of these mechanisms

### What if I don't want to complain directly to Thrive365 ?

We understand that people sometimes wish to provide feedback directly to a third party instead of their provider. Participants, their carers, advocates and members of the general public can raise a complaint directly with the NDIS Quality and Safeguards Commission by phoning 1800 035 544 or visiting their website <https://www.ndiscommission.gov.au> and hitting These details are also contained in your service agreement.

### The role of Advocates and other Support People

Thrive365 recognises the importance of advocates or other significant supports in enabling people to feel more comfortable in both making a complaint and participating in the resolution process of such a complaint. Thrive365 will ascertain from the participant if they would like

additional supports in place to initiate and navigate a feedback process. This may include a senior staff member contacting the participant's support co-ordinator or family member or an external advocacy agency.

### Confidentiality of Complaints

Thrive365 treats all complaints confidentially. This includes limiting access to stored data about complaints and their investigation.

Some complaints may require Thrive365 to notify a relevant government body as part of our legislated reporting requirements. These include:-

- Suspected criminal behaviour
- A matter that constitutes a reportable incident to Quality and Safeguards Commission.
- A situation that presents a significant risk to the complainant or to another person.

In these circumstances Thrive365 will inform the participant and/or their support person of any requirements to notify a complaint to a third party and offer additional assistance to ensure adequate support is in place.

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### Procedures

- Thrive365 provides information on providing feedback and making a complaint as part of our participant onboarding process. This information is also available on our website and in our service agreements. This information includes how to escalate a concern or complaint beyond Thrive365 to the NDIA and Ombudsman.
- All staff receive training on feedback and complaints handling as part of their orientation procedure.

### Management of Simple Complaints

Some concerns or complaints received may be simple in nature and addressed quickly and easily either by the person receiving the complaint or their line manager.

Such complaints may include but are not limited to:-

- Building maintenance concerns
- Complaints about noise
- Complaints about a meal or food
- Complaints about an activity or outing
- Complaints about another resident (providing this doesn't include an instance of harm)

These matters can generally be resolved quickly by the disability support worker who receives the concern/complaint or with input from their line manager.

Simple complaints are to be logged as incident reports in Thrive365's incident reporting system and the resolution to be documented. Incident reports are then reviewed and closed out by the line manager who will review the resolution implemented and determine if this is sufficient or further steps need to be taken.

### Management of a Complex or Serious Complaint

Thrive365 Staff	Thrive365 Actions	When	Participant/advocate
Staff member receiving a complaint	<ul style="list-style-type: none"> <li>Listen respectfully and non-judgementally to the complaint</li> <li>Thank the complainant for providing their feedback</li> <li>Reassure the person that the matter will be investigated</li> <li>Reassure the person that a Thrive365 rep will be in touch</li> <li>Ask the person if they would like support or assistance from an external person</li> </ul>	On receipt of a complaint or feedback	<ul style="list-style-type: none"> <li>Complaint is acknowledged</li> <li>External supports are offered</li> </ul>
Staff member receiving a complaint	Provide a written summary of the feedback/complaint and forward to the relevant line manager via Thrive365 email cc'ing the CEO	As soon as practical and before end of shift.	
Line Manager	<p>Assesses information to determine if the matter is:-</p> <ul style="list-style-type: none"> <li>Notifiable to Quality and Safeguards</li> <li>Requires response of police or other external services and refer to the appropriate bodies.</li> </ul>	On receipt of complaint and within 24 hours	<ul style="list-style-type: none"> <li>Participant is informed that their complaint has been referred to an external body.</li> <li>Advocate/guardian or significant person is</li> </ul>

	<p>Matters lodged with appropriate bodies if needed</p> <p>Participant and support people are informed</p> <p><b>Note:- Thrive365 will not undertake any internal investigation of matters referred to the police unless approved by police to do so</b></p>		<p>informed that matter has been referred to external body</p>
Line Manager	<p>Makes contact with the participant and/or their representative to:-</p> <ul style="list-style-type: none"> <li>• Confirm acknowledgment of the complaint or feedback</li> <li>• Explore how the complainant would like the matter resolved.</li> <li>• Ensure that the complainant and or their representative is aware of advocacy services and mechanisms to escalate the complaint beyond Thrive365.</li> <li>• Provide reassurance that the matter will be investigated and outcomes provided</li> </ul>	<p>Within 24 hours of receipt of complaint</p>	<p>Participant and support person is invited to meet with Line Manager to:</p> <ul style="list-style-type: none"> <li>• Confirm the content of the complaint</li> <li>• Ensure that the participant and advocate have adequate supports in place at the current time.</li> <li>• Explain the investigatory process</li> <li>• Explore any concerns the participant or support person may have as part of the</li> </ul>

			<p>investigatory process.</p> <ul style="list-style-type: none"> <li>• Preliminary discussion about how the participant and/or support person would like the matter resolved.</li> <li>• Participant and support person are reminded of additional external complaint options as per their service agreement</li> </ul>
Line Manager	Conducts an investigation into the concerns/complaints. Documents all evidence	Commences investigation within 24 hours of receipt of complaint	
Line Manager	Provides a final report and recommendations for remedial action to address the complaint	Within 7 days of receipt of the complaint	Line Manager meets with the participant and advocate to discuss the outcome of the investigatory outcome and explore their preferred options for resolution

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CEO	Reviews final report and suggested remedial actions and approves or makes further recommendations	On receipt of 7 day report	
Line Manager	<p>Provides a written response to the complainant which outlines the investigatory steps taken, any referrals to external bodies, the findings and remedial actions to be taken by Thrive365.</p> <p>Provide the complainant with further steps they can take if they are dissatisfied with Thrive365's response</p>	Within 7 days of receiving the initial complaint	<p>Line Manager meets with participant and their support person to walk through:-</p> <ul style="list-style-type: none"> <li>• The outcome of the investigation</li> <li>• Thrive365's response and any proposed remedial actions</li> <li>• Options and resources to make an external complaint if needed for the participant. This may include support to ring Quality and Safeguards Commission or lodge a complaint via website or facilitated contact with an external</li> </ul>

			advocacy service
Operations Manager	<p>Oversee any remedial action required as a result of the complaint outcome with a final written summary provided to the CEO for report to the Director</p> <p>Ensure that any remedial actions are reflected in Thrive365's continuous improvement plan</p>	Within 1 month of receiving complaint	

### Storage and Internal Reporting of Complaints

Simple complaints will be logged and tracked via Thrive365 incident reporting system.

The CEO will maintain a complaints register and all associated documents for matters requiring investigation including matters involving another service provider or staff member .

The CEO provides the Director with a record of serious/complex complaints, their resolution and continuous improvement recommendations as part of regular monthly reporting.

### Investigation of matters involving Staff or Criminal matters

If the complaint involves a senior staff member the CEO in conjunction with HR will conduct any investigations and direct liaison with the participant and their representative.

If the complaint involves the CEO, the matter will be referred to the Director for investigation and resolution

Thrive365 will not undertake any internal investigation process of potentially criminal matters until provided with consent to do so by police. Any internal investigation process that runs concurrently with a criminal investigation can adversely impact evidence.



### **System Implementation and Staff Training**

Thrive365's complaint management system forms part of the organization's documented staff induction process.

Policies and procedures are available for staff reference via our HR system Deputy for staff reference at any time.