

GUIDE TO COMPLAINTS BY CLIENTS POLICY TEMPLATE**ABOUT THIS POLICY AREA**

This policy guides how the organisation manages complaints from those who use its services and ensures their right to have complaints fairly assessed.

A written complaints by clients policy is required as part of meeting Standard 5 (Feedback and complaints).

Standard 5 — feedback and complaints

The organisation promotes the rights and responsibilities of people using its services by:

- *providing information to clients about internal and external mechanisms for making a complaint*
- *acting fairly and appropriately when a complaint is received.*

Policy checklist

The following checklist will help you check that an existing policy covers this area adequately.

The policy should:

- inform clients about their right to make a complaint and to appeal a decision
- inform clients about how to make a complaint and to appeal a decision, using either the internal or external mechanisms available to them
- inform clients about the support and advocacy available to assist them if they make a complaint or appeal a decision
- describe how complaints and appeals are raised, considered, decided upon and actioned in a timely and culturally appropriate manner
- explain procedural fairness and steps to make sure a client will not be disadvantaged by making a complaint or appealing a decision
- say how clients will be told of the outcomes of their complaint or appeal
- say how the outcomes of complaints and appeals will be used for continuous improvement
- contain clear procedures and actions
- indicate the timing of any actions
- show when it was approved
- show when it was last reviewed.

COMPLETING YOUR COMPLAINTS BY CLIENTS POLICY

Using the policy template

The template provides some example statements. You can adapt these statements and include them in your policy or write your own statements to better suit the operations and services of your organisation.

To customise the policy template, click on the shaded sections <<Insert text>> and insert the information that is specific to your organisation.

When you have completed the policy template, delete the shaded instruction sections such as: [Refer to the complaints by clients policy template guide for questions and/or examples to consider when customising this section.](#)

For further information on using the policy guides, refer to the information in *Using the policy templates and guides*.

Guidelines for each section of your policy

1. Purpose

When identifying the purpose of the policy, consider how it might apply to your client group/s and other agencies you work with. Do you need to make specific statements to ensure you are inclusive of particular groups, such as Aboriginal and Torres Strait Islander peoples, Australian South Sea Islanders, people from culturally and linguistically diverse backgrounds and people with a disability?

2. Scope

To determine the scope of the policy, consider the following questions:

- Has the organisation made a clear distinction between the right of a client to complain about the service and their right to appeal a decision they believe to be incorrect?
- Does this policy apply to all your organisation's services and all services users?
- What staff or volunteers will be involved in receiving or registering complaints? Are different people involved in receiving or registering appeals?
- Are there some service areas or client groups where clients may prefer to register complaints or appeals with an external person or body?

3. Policy statement

If you are adopting the policy statement in the template, consider whether there are any additional commitments your organisation wants to make.

In identifying the actions your organisation will take to implement this policy, you should include the following:

- informing clients about how to make a complaint, using either internal or external mechanisms
- ensuring support and advocacy is available to clients who make a complaint
- ensuring procedural fairness in your complaints procedure and that clients are not disadvantaged by making a complaint
- dealing with complaints in a timely and culturally appropriate way
- advising the client of the outcome of their complaint
- taking the outcomes of complaints into account in planning service improvements

- advising clients about their options for appealing a decision about the service they receive, taking into account all of the procedural issues required for complaints
- ensuring that your procedures comply with legislative requirements.

4. Procedures

The procedures describe how your organisation achieves the aims and goals you have outlined in your purpose, scope and policy statement.

4.1 Information about our complaints and appeals procedures

Describe the written and visual resources you have that tell clients of their right to make a complaint or appeal a decision, and the steps involved. This could be a section on complaints and appeals in a general information sheet for clients, or a specific leaflet or poster about making a complaint or appeal.

Describe how clients will be given information about the complaints and appeals procedures when they first voice a complaint or disagree with a decision.

You may also want to describe how each resource is reviewed and updated to ensure it:

- remains consistent with the Queensland Standards for Community Services or other relevant service standards
- is available in languages and formats appropriate to the range of communities and literacy level of clients with whom you work. In particular, consider those for whom written English is not the most useful option.

4.2 How clients can make a complaint or appeal a decision

In describing how clients can make a complaint or appeal to your organisation, consider the following:

- how you will make sure that the process is easy for people to use, that it protects their identity as far as possible, and that it is encouraging and supportive
- identifying a contact person: this could be one person who is a nominated 'complaints officer' for your organisation, one of a senior staff group (such as a service manager or coordinator), or a member of your board or management committee. The contact person should not be the staff person or volunteer who provides the service that the complaint or appeal is about
- whether a complaint or appeal will be made in writing, using a standard form, and how you will make sure that complaints or appeals received verbally or in another written format are properly registered. Alternative methods should be used for people from culturally and linguistically diverse backgrounds and where literacy in English may be a barrier.
- what internal and external complaint and appeals options are available to clients. Options for taking complaints or appeals outside the organisation include the Department of Communities.

4.3 How staff and management will respond to a complaint or appeal

This section should give precise directions to staff and management about the steps to be taken once a complaint or appeal is made. These steps should include:

- registering a complaint or appeal
- investigating the complaint the appeal
- informing the complainant about the outcome of the investigation
- determining and acting on the outcome of the complaint or appeal

- reviewing the outcome
- Formal external procedure.

Your organisation's procedures should address the following:

- **record keeping:** It is important to keep detailed records of complaints or appeals. These may include recording the complaint or appeal in an individual client's file, keeping a specific file or register for documenting and monitoring complaints and appeals, and keeping a statistical record of the types of complaint or appeal and the outcomes. The records should include the nature of the complaint or basis for the appeal, copies of correspondence, notes of meetings and consideration of issues, a record of the outcome (and, if relevant, any further review or external process) and the reasons for decisions.
- **timeframes:** The procedures should specify how long each stage of the process will take and when clients will be told of outcomes. The timeframes should be kept as short as possible (for example, four weeks from a complaint or appeal being formally received to an outcome being given).
- **responsibility:** Identify who will coordinate and manage the process and who else will be involved. The person responsible for managing the process and/or conducting an investigation should be as independent of the complaint or appeal as possible.
- **support:** Consider how the client will be best supported during the process, either from within the organisation or by referral to an advocacy service.
- **outcomes:** Describe how a client might be notified of the outcomes of their complaint or appeal. This may include that the complaint or appeal is:
 - upheld (and, if so, what will be done to resolve it)
 - resolved (and how this has been achieved) or
 - if no further action can be taken, the reasons for this.
- **options for resolving a complaint:** The cause and seriousness of a complaint or appeal will determine the best way of resolving it. Consider including the following options:
 - internal resolution through the complaints and appeals procedure for most complaints or appeals that involve allegations about breaches of policy
 - mediation by a neutral outsider, if this is requested by the person making the complaint or appeal or is considered the best way to manage the issue
 - arbitration by a designated external body for allegations of serious breaches of clients' rights, where these are covered by program guidelines or legislation. The client also has the right to take a complaint or appeal based on these allegations outside the organisation at any stage in the internal process
 - Where a breach of law may have occurred, police should also be informed.
- **review:** Describe what options a client may have to request a review of the outcome, and whether a review will always be available, or only in some circumstances. The review may be referred to an external organisation, including the department.
- **finalisation:** The matter is usually considered finalised if the client is satisfied with the response and/or all avenues of resolution have been fully explored. The final outcome may then be recorded in the individual file record and the statistical summary.

4.4 Using complaints and appeals for service improvement

To make effective use of information from complaints and appeals, the information should be kept in a summary form which is easily accessible for review. Consider keeping a complaints and appeals register which records the date of complaint or appeal, nature of

complaint or appeal, issues investigated and considered, outcome of the process, and date of resolution.

For most organisations, an annual review of the types of complaints and appeals received and the outcomes will assist in identifying any areas of service improvement required.

Information gathered from complaints and appeals can also feed into your decision-making and planning processes more regularly. For example:

- **for service planning** — including a review of complaints and appeals in all service planning, monitoring and evaluation activities
- **for decision making** — including a report on complaints and appeals as a standard item on staff and management meeting agendas.

5. Other related policies and documents

The complaints by clients policy should be linked to:

- a feedback policy that guides how the organisation encourages and manages feedback from those who use its services
- a confidentiality policy that outlines how the organisation protects client rights to confidentiality and privacy
- the organisation's client charter and service contract (if used).

6. Review processes

Consider how often the policy should be reviewed and the process for doing this:

- **frequency of review:** Most policies benefit from an annual review. The experience of implementing the policy is used to decide which changes are necessary. Consider reviewing your complaints by clients policy as part of an annual review of your organisation's client feedback related policies and at the same time as you review the effectiveness and outcomes of service provision. If your organisation is small you may consider reviewing all your policies over a three-year period. A critical incident may prompt you to review the policy ahead of schedule
- **responsibility for the review:** In most organisations, the person accountable for service delivery would be responsible for reviewing this policy. In small organisations, this may be a project coordinator or manager. In larger organisations, this may be a manager of client services or programs.
- **process for the review:** Decide which particular staff, volunteers, external people and organisations will provide input to the policy review. Ask clients about their experience of the complaints procedure.
- **decision-making process:** Who will review drafts changes to the policy and approve changes? What will be the timeframe for the review process?
- **documentation and communication:** What records of the policy review process are needed? How will changes to the policy be communicated to staff implementing the policy? In a small organisation, this may be as simple as noting the changes at a staff meeting. In a larger organisation, an email memo may be needed.
- **key questions for the review:** Is the policy being implemented? Are procedures being followed? Is the policy clear? What has changed that may prompt a change to the policy? Have particular stakeholders had difficulty with any aspect of the policy? Can their concerns be resolved? How does the policy compare with that of similar organisations?