



Coast
Shelter

Complaint Management Policy

Complaint Management Policy

Applies to:	Staff, Volunteers, Board and Clients
Specific Responsibility:	Chief Executive Officer

Policy Context - This policy relates to:	
ASES Standard:	Standard 8: Consumer Outcomes <ul style="list-style-type: none"> Requirement 8.1 Consumer and Community Engagement Standard Requirement 8.2 Consumer Feedback and Complaints Standard
ACNC Governance Standard	Governance Standard 2
Regulatory requirements	Registrar of Community Housing ASES Standard 2 - Governance
Legislation or other requirements:	<p>Australian Charities and Not-for-profits Commission Act 2012 (Cth)</p> <p>Australian Charities and Not-for-profits Commission Regulations 2022 (Cth)</p> <p>Australian Human Rights Commission Act 1986 (Cth)</p> <p>https://www.legislation.gov.au/Details/C2017C00143</p> <p>Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)</p> <p>https://www.legislation.gov.au/Details/C2012A00197</p> <p>Privacy Act 1988 (Cth)</p> <p>https://www.legislation.gov.au/Details/C2018C00034</p> <p>NSW Ombudsman</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/act-1974-068</p>

Scope

This policy applies to all staff, volunteers, Board and Clients. **This policy must be read in conjunction with the Whistleblower Policy.**

Purpose

The purpose of this is to outline the policy and procedures for managing complaints against Coast Shelter by external stakeholders including clients.

Coast Shelter's priority, whenever possible, is to seek a positive resolution to complaints early in the process and is a foundational underpinning of our complaints management Policy.

Policy Statement

Coast Shelter considers complaints as an opportunity to strengthen services, review the organisation's systems, processes and practices, and enable Coast Shelter to provide a responsive, high-quality service to clients.

The principles that underpin Coast Shelter's complaints management system are:

- Coast Shelter aims to address complaints at the lowest level.
- Easy to understand and on the principle that information will be kept confidential unless unable due to particular circumstances of complaint i.e. only the complainant and specific member of staff know about the issue subject to complaint.
- Communicated to all clients and stakeholders through a fact sheet
- Complaints are assessed fairly and in a timely manner.
- Procedural fairness and natural justice principles are followed
- Complies with legislative requirements.

When Coast Shelter receives a complaint, the complaint will be documented in the Complaints Register. This information will be used to track the complaint's processing and inform the strategic planning and continuous quality improvement processes of the organisation.

Coast Shelter's complaints management system is informed by the NSW Ombudsman's, *Effective Complaint Handling Guideline*.¹

When a complaint is received, the following steps are undertaken:

- Complaint assessed, verified and categorised in accordance with this policy (NOTE: If this is a whistleblowing complaint the Whistleblower Policy must be followed)
- Register in the Complaints Management Register
- Acknowledgement of complaint within the timeframes established by the complaint categories i.e. 72 hours Low, 48 hours medium and 24 hours high
- Review of complaint details
- Inquiry or Investigation as per complaint category
- Response and outcomes update to complainant
- Provision of advise on appeals and reviews
- Practice review.

Complaints

All permanent and part-time employees will receive complaints management training during the induction process, and anytime after that when Coast Shelter considers it a requirement.

Complaints are able to be made internally in the following manner:

1. In writing to the CEO Coast Shelter
2. By email to complaints@coastshelter.org.au
3. Verbally to any employee within Coast Shelter or by telephone on (02) 4325 3540

As we are a NSW Government funded community service provider complaints can be made externally to the NSW Ombudsman at <https://www.ombo.nsw.gov.au/Making-a-complaint>.

Complaints about housing matters can be made to parties external to Coast Shelter. These are:

- NSW Civil and Administrative Tribunal (NCAT)
<https://ncat.nsw.gov.au/how-ncat-works/how-to-apply.html>
- Registrar of Community Housing
<https://www.rch.nsw.gov.au/contact-us>

Complaint Management Team (CMT)

A complaint management team (CMT) is established at Coast Shelter.

The CMT will meet on a fortnightly basis or on a need's basis in between the scheduled meetings.

The CMT will consist of the Manager People and Culture, the Operations Manager and the Manager Finance. The Manager People and Culture is the Chair of the CMT meetings.

The CEO may change the composition of any CMT on a needs basis including changing the Chair of the CMT meeting. Any changes to the CMT is at the complete discretion of the CEO.

The CMT will oversight all complaint management at Coast Shelter and provide a monthly report to the CEO including complaints received in the past month, resolution of complaints in the preceding month and any trends identified for business improvements to service delivery.






Complaint Register

A confidential complaint register will be maintained by the Manager People and Culture.

Access to the register will be restricted to the Board, CEO and the Manager People and Culture.

Complaint Categories

The following complaint categories will be used for our complaint management procedure.

Category	Criteria	Initial Response Time	Responsible person
LOW		72hrs	
	Minimal impact on or risk to individual or service with no lasting detriment May be resolved by informal intervention at service level		Senior Case Worker or above
MEDIUM		48hrs	
	Broader implications for individual or service Issues involving standards, quality of service or denial of rights Requires formal intervention & investigation		Service Manager or Operations Manager
HIGH		24hrs	
	Significant impact on individual or service such as serious adverse events, long term damage, professional misconduct that requires investigation Related to criminal, fraudulent or negligent conduct May be the subject of litigation Requires external reporting to another authority: <ul style="list-style-type: none"> • DCJ • Safework • NSW Ombudsman • Office of the Children's Guardian • Other Government body 		Operations Manager and CEO

Management responsibility

Managers are responsible for:

- Understanding, complying with and managing individual complaints in terms of Coast Shelter Complaint Management Policy and Procedures.
- Supporting and empowering employees to resolve complaints promptly and in accordance with the complain management procedures; to minimize the need for escalation.
- Ensuring complaints are effectively addressed in accordance with this Policy and Procedures.
- Ensuring appropriate records are kept.

Employee responsibilities

Employees are responsible for:

- Understanding and complying with Coast Shelter Complaint Management Policy and Procedures
- Dealing professionally, promptly and courteously with complaints and, where appropriate, providing assistance and information to people looking to make a complaint in accordance with this Policy.
- If subject to a complaint participating in the early resolution of the complaint this may involve an informal discussion, an informal discussion with a team member, Case Manager, Senior Case Manager, Service Manager or independent person present or mediation.

Employee Complainants

Employee complainants are responsible for:

- Attempting to resolve the matter early by contacting the relevant employee directly to try to settle the issue or concern informally this may involve an informal discussion, an informal discussion with a team member, Case Manager, Senior Case Manager, Service Manager or independent person present or mediation.
- If unable to resolve the matter informally, following Coast Shelter Complaint Management Policy and Procedures to lodge a formal complaint.



Anonymous Complaints

Anonymous complaints are uncommon, however given we view complaints as an opportunity to strengthen our services, review our system's, processes and practices and enables Coast Shelter to provide a responsive, high-quality service to our clients we will treat anonymous complaints, where possible, in the same way as all other complaints.

Anonymous complaints must be recorded, categorised and investigated, if details provided are sufficient, as though the complainant is known.

Escalation Process

Coast Shelter has a clear categorisation process including criteria, the person/s responsible and response timeline.

Coast Shelter's priority, whenever possible, is to seek a positive resolution to complaints early in the process and is a foundational underpinning of our complaints management Policy. We aim to resolve complaints at the lowest level of responses available.

Complaints will be referred to the next level of management when a matter is unable to be resolved or during the inquiry or investigation it is apparent the complaint is of a more serious nature (that wasn't evident at the initial assessment).

Complainants will be advised of the escalation process at Coast Shelter.

Review

Reviewing and approving this policy		
Frequency:	Person Responsible	Approval
Biennially	CEO	Board

Authorisation

Version	Approval	Review Date
V03	15 February 2024 Board	February 2026