

# SAFEGUARDING POLICY



## SAFE02 Client Feedback and Complaint Policy

### 1. PURPOSE

This Policy outlines Bedford's management and resolution of Client Feedback and Complaints.

### 2. SCOPE

This Policy covers all Feedback or Complaints raised by, or on behalf of Clients as they relate to Bedford Client Service Delivery including:

- Supported Employment Services
- Supported Independent Living Services
- Day Options Services
- Community Access & Lifestyle Services
- Service billing
- Liaison/co-ordination with external support providers
- Compliance with NDIS Quality & Safeguards Commission
- Compliance with Privacy Law

Except:

- Customer Product Complaints
- Staff Grievances

This Policy is to be read in conjunction with:

- Client Feedback and Complaint Procedure [SAFE02.1]
- Client Incident Management Policy [SAFE01] and Procedure [SAFE01.1]
- Critical Incident Policy [SAFE03] and Procedure [SAFE03.1]

### 3. POLICY

Bedford supports the rights of Clients, their Families, Carers, Guardians or Advocates, to have a say in how supports and services provided by Bedford are designed and delivered. Bedford encourages all Clients and stakeholders to exercise their right of choice and control and to provide a safe environment where Clients (and/or their Advocates) can provide Feedback or raise a Complaint with the knowledge that that any concerns or feedback are addressed in a manner that is transparent, fair and ensures confidentiality.

Bedford has established a robust Feedback and Complaints Management System that will ensure all Client Feedback and Complaints are effectively managed and resolved in a timely manner and complies with Bedford's legislative requirements and obligations under the NDIS Quality and Safeguards Commission, NDIS Code of Conduct and the NDIS Practice Standards.

Bedford will ensure that Clients are well informed of Bedford's Feedback and Complaint Policy and Procedure through regular communication and documentation including, but not limited to, Service Agreements, Client Handbooks, yearly reviews, displays of visual material such as posters and discussions at Client engagement meetings and by ensuring all Staff Members are adequately trained in Bedford's Feedback and Complaint procedures.

Bedford's Feedback and Complaint System ensures:

- Clients (and/or their Advocates) of all ability can access information in relation to providing Feedback or lodging a Complaint
- Feedback and Complaints are addressed and resolved in a timely manner
- Formal Complaints are managed by Bedford's Safeguarding Team to ensure impartiality and procedural fairness
- Bedford complies with legislative requirements and obligations under the NDIS Quality and Safeguards Commission, NDIS Code of Conduct and the NDIS Practice Standards
- Clients (and/or their Advocates) are informed of other external resources in which they can escalate their Complaint, such as the NDIS Quality and Safeguards Commission
- The Feedback and Complaints system is reviewed annually, as part of Risk and Compliance internal auditing processes
- Bedford has effective recording, reporting and monitoring processes in place and that individual and systemic issues are managed and monitored to drive continuous improvement of services and supports
- Bedford will provide statistical and other information about Feedback and Complaints to Bedford Executive, Service Governance Committee and the Board on a regular basis and the NDIS Commissioner on request. All documentation relating to Feedback and Complaints will be held for a period of seven years from the date the record is made
- If a Complaint is made about the Chief Executive Officer, the Board will appoint an external body to manage the Feedback or Complaint

When a Client (and/or their Advocate) wants to provide Feedback or make a Complaint, Bedford will ensure:

- That they feel acknowledged, are being taken seriously and treated with dignity and respect
- Adequate support is provided to the Client which may include contacting a Support Person
- The Client (and/or their Advocate) are given the opportunity to express what outcome they desire
- The Client (and/or their Advocate) is provided with an explanation of the Feedback and Complaint process and what actions they can expect next, either verbally and/or provided with relevant material such as the Easy Read Feedback and Complaint Handout
- The Client (and/or their or Advocate) receives regular communication and updates of the status of any investigation into the Complaint
- That the privacy of Client (and/or their Advocate) is protected and the matter handled in confidence, unless legal obligations override the Client's right to have information kept confidential.

#### **4. DEFINITIONS**

**Advocate/Support Person** – a person that can assist a Client in making a Complaint and support them during the Complaint investigation process.

**Bedford Client/Client** - a person with disability receiving a Bedford Service. This can include a former Client, Supported Employees, supported students, residents, and persons accessing Day Options and/or Community Access & Lifestyle Services from Bedford.

**Bedford Service** - any disability support service provided by Bedford to a Bedford Client and the Bedford Business Unit that provides this service.

**Complaint** – is an expression of dissatisfaction with circumstances or event(s) arising during or in connection with the provision of a Bedford Service/Operation.

**Feedback** - Feedback is a compliment, criticism, comment or suggestion where a response is not sought, or not reasonable to expect.

**NDIS** – National Disability Insurance Scheme.

**NDIS Quality and Safeguards Commission** – external regulator for registered NDIS providers

**NDIS Code of Conduct** - The NDIS Code of Conduct promotes safe and ethical service delivery by setting out expectations for the conduct of both NDIS providers and workers

**Service Agreement** – is a written agreement between a registered NDIS Provider and a person with disability that outlines the disability supports/services to be provided and the payment for the supports/services.

**Staff** –any person engaged by Bedford to provide services or support the provision of such services; whether they be paid or unpaid workers; including members of the Board and its sub-committees, volunteers, relief Staff, or labour hire workers. This also includes adult mainstream student placements, or people attending a Bedford site to support Clients, but who are not employed by Bedford.

### **5. ASSOCIATED FORMS, POLICIES & PROCEDURES**

Choice & Advocacy Policy

Client Feedback and Complaint Management Procedure

Client Incident Management System Policy & Procedure

Privacy, Dignity, Confidentiality & Data Integrity Policy /Procedure

Bedford Easy Read Feedback and Complaints Procedure

Feedback Form

Feedback and Complaint Poster

### **6. RELEVANT LEGISLATION AND RESOURCE MATERIAL**

*National Disability Insurance Scheme Act 2013*

National Disability Insurance Scheme (Complaints Management & Resolution) Rules 2018

National Disability Insurance Scheme (Code of Conduct) Rules 2018

National Disability Insurance Scheme (Provider Registration & Practice Standards) Rules 2018

National Disability Insurance Scheme Commission Complaints and Feedback Policy

NDIS Quality & Safeguards Commission Complaints Management & Resolution Guidance- Version 2.1- September 2019

NDIS Quality & Safeguards Commission Practice Reviews – a Framework for NDIS Providers  
December 2020

Effective Complaint Handling Guidelines for NDIS Providers

*Privacy Act 1981*