

# COMPLAINTS MANAGEMENT POLICY

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<b>Endorsed by Board:</b>	25 August 2022	<b>Review Date:</b>	August 2025
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## 1. Introduction and Purpose

The purpose of the Complaints Management Policy (**Policy**) is to ensure that Complaints made by Members, Affiliates and other stakeholders about Aged & Community Care Providers Association Ltd (**ACCPA**) are dealt with fairly, efficiently and effectively. Such Complaints may be about particular services provided, the conduct of staff or any other matter.

ACCPA understands that Complaints (and their resolution) are a form of feedback and provide valuable opportunities for learnings and to improve service delivery. The collection of Complaints data provides a useful benchmark against which ACCPA can assess its performance compared to its objectives over time and informs future strategic decision-making.

This Policy serves to inform ACCPA's staff and stakeholders of the procedures to follow in making, receiving and responding to Complaints.

## 2. Scope

This Policy applies to ACCPA Directors, employees, contractors and volunteers who may receive Complaints about ACCPA and its services. It also applies to ACCPA stakeholders (including Members, Affiliates and members of the public) and ensures they are fully aware of the process to follow in raising Complaints about ACCPA and its services and the procedures that will be undertaken should a Complaint be made.

This Policy is not intended to cover employee grievances or employee complaints about other employees.

In addition, feedback sought from Members or event attendees by questionnaire (for example through event evaluation exercises or through feedback during customer satisfaction surveys) is not considered to represent a Complaint requiring investigation under this Policy.

This Policy should be read in conjunction with ACCPA's Whistleblower Policy.

## 3. Definitions:

**Complaint:** An expression of dissatisfaction made to ACCPA by a Member, an individual, organisation, group or member of the public, related to any aspect of ACCPA's products, services (including advocacy) or operations, including conduct of employees or Directors.

**Complaint Form:** A form accessible on ACCPA's website which may be used by complainants to lodge a Complaint related to any aspects of ACCPA's services or operations.

**Complaint Management Record (CMR)** For internal use only, the CMR is used by the person investigating the Complaint to record all relevant details relating to the Complaint, the steps in the investigation process undertaken and the outcome of the Complaint.

At the end of the process, the finalised CMR is filed on the electronic Complaints File on the ACCPA file server as a standing record.

**Complaints Register:** The Complaints Register is a simple table maintained by the Office of the CEO recording overview information related to Complaints made and their outcomes. The Complaints Register will be provided to the Board for review on an annual basis.

**Vexatious Complaint:** A Complaint received without sufficient grounds with the purpose of annoying or harming the subject of the Complaint.

#### 4. Policy Principles

ACCPA is committed to ensuring that any Member, person or organisation using services provided by ACCPA or affected by its operations has the right to lodge a Complaint and to have their concerns addressed in a manner that ensures access and equity, fairness, accountability, impartiality, confidentiality and transparency.

#### 5. Making a Complaint

A person wishing to make a Complaint should do so in writing, providing specific details of the incident or conduct which gives rise to the Complaint, including any relevant names. The Complaint can be made in writing (email or correspondence) or via the ACCPA Complaint Form (located on the ACCPA website).

Complaints should be made to:

The Chief Executive Officer (marked private and confidential)  
Aged & Community Care Providers Association Ltd

By post: First Floor, Andrew Arcade  
42 Giles Street  
KINGSTON ACT 2604

By email: [Complaints@accpa.asn.au](mailto:Complaints@accpa.asn.au)

If the Complaint is about the Chief Executive Officer (**CEO**), the Complaint should be made directly to ACCPA's Chairperson via email to [Chairman@accpa.asn.au](mailto:Chairman@accpa.asn.au)

While this Policy requires Complaints to be made in writing, the CEO or Chairperson has the discretion to initiate a Complaint investigation process arising from a verbal Complaint if the complainant does not wish to make a formal documented Complaint. In this case, the report will be documented and returned to the complainant to confirm that the content and issues of concern have been appropriately recorded.

A Complaint may be made anonymously, however complainants should be aware that if ACCPA is unable to validate a Complaint or seek further and better information to progress a Complaint, the Complaint may not be able to be fully investigated nor a response given when the complainant's correspondence details are omitted.

#### 6. ACCPA Complaints Management Process

##### 6.1. Receipt of Complaint

If a verbal Complaint is made to a staff member, the staff member receiving the Complaint must request that the Complaint be submitted in writing in accordance with this Policy, and provide a copy of the Policy, along with the Complaint Form to the person making the Complaint. This process ensures that there is no miscommunication or misunderstanding of the Complaint.

When a written Complaint is received by the CEO (or Chairperson), a note of acknowledgement is sent to the complainant within five (5) working days. Complaints

received via the [Complaints@ACCPA.asn.au](mailto:Complaints@ACCPA.asn.au) email address will be forwarded to the CEO immediately on receipt (or to the Chairperson if the complaint is about the CEO).

The CEO or the Chairperson may delegate the assessment, investigation and administration of the Complaint to the ACCPA Complaints Officer or a member of the Executive Management Team.

All written complaints received are recorded on the Complaints Register, and progress monitored via a Complaint Management Record (**CMR**), held by the Office of the CEO. (see Section 6.3 'Record Keeping' below).

## 6.2. *Assessment and investigation*

Before investigating, the CEO, Chairperson (or delegate) will assess the Complaint to determine whether an investigation is necessary. For example, it may be determined that the Complaint is the result of a misunderstanding which could be managed by direct response to the complainant. Alternatively, it may be determined that the Complaint is a Vexatious Complaint and not made in good faith. ACCPA does not investigate Vexatious Complaints. In such cases, an appropriate written response will be provided to the complainant advising that the Complaint is not being investigated in accordance with the provisions of this Policy.

Where an investigation is required, it will be planned with a timeline established and carried out in an objective, impartial and confidential manner. The CEO (or delegate) or the Chairperson (or delegate) if the Complaint is about the CEO, will commence investigating the Complaint within five (5) working days of receipt of the Complaint. In all instances, complainants will be advised of the name of the officer who is addressing their Complaint should this not be the CEO (or the Chairperson if the complaint is about the CEO). In investigating the Complaint, no assumptions will be made nor any action taken until all relevant information has been collected and considered.

Ideally, all Complaint investigations will be concluded within 30 days of lodgement of the Complaint. More complex Complaints may require more time to investigate and, in such cases, ACCPA will communicate its expectations to the complainant where a longer period is anticipated.

The investigation process may include:

- Discussion with the complainant to obtain further and better information;
- A review of the circumstances leading up to any event or situation related to the Complaint;
- Discussion with other parties involved in the Complaint (for example, witnesses to the incident, ACCPA staff or Directors);
- Discussions with all parties to resolve factual issues and consider options for Complaint resolution and future improvements; and
- An examination or review of any policy or documents related to the issue and consideration of whether amendments are necessary.

In the case of the Chairperson investigating a Complaint against the CEO, the Chairperson may call on appropriate resources, including external advice if necessary, to assist in the investigation process and in resolving the Complaint.

Progress of the investigation, including the investigation outcome must be recorded on the internal CMR which details the investigation process, the outcome of the Complaint and the action to be taken (if any).

## 6.3. *Record Keeping*

All Complaints will be recorded on the Complaints Register, and for each Complaint, an ACCPA CMR will be completed by the CEO (or delegate) or Chairperson (or delegate) in the case of a Complaint about the CEO. The CMR is for internal use only. It acts as the

Complaint tracker incorporating the details relating to the Complaint, the investigation process and outcome of the Complaint. At the end of the process, the finalised CMR is filed on the electronic Complaints File on the ACCPA file server as a standing record.

**6.4. *Post Investigation Communication to the Complainant***

On completion of the investigation process, the CEO (or Chairperson if the Complaint is about the CEO) will provide a full written response to the complainant, detailing the outcome of the investigation, the process undertaken and any action taken (or to be taken) as a result.

If the complainant is not satisfied with the response, an internal review of the decision will be offered and external review options may also be considered.

**7. Board Reporting**

All Complaints will be reported to the ACCPA Board of Directors at the next meeting of the Board (or earlier if the Complaint is deemed to have serious implications), and the investigation progress and outcomes will also be reported. This is to allow the Board to monitor the organisation's response, keep apprised of service delivery and quality issues and minimise the risk to the organisation.

On an annual basis, the Board will view the Complaints Register for oversight of the Complaints received over a twelve month period.

**8. Policy Review**

This Policy will be reviewed by the Board of Directors every three years or at any other time as required or as determined by the Board.