**VISABILITY LTD**

**EXTERNAL STAKEHOLDER COMPLAINT MANAGEMENT POLICY**

1. **INTRODUCTION AND SCOPE**

The purpose of this policy is to ensure that VisAbility (Ltd.) (“the company”) provides a means for external stakeholders to lodge complaints and to have these addressed and appropriately resolved if at all possible. Complaints are seen to play an important role in contributing to the company’s improved operations.

This policy has been framed around natural justice principles and individuals’ rights as they are specified within the context of VisAbility’s Mission and Values Statements and all relevant State and Federal legislative and regulatory requirements.

As part of VisAbility’s quality service improvement practice, a separate mechanism exists for external stakeholders to offer comments and feedback distinct from complaints.

1. **DEFINITIONS**

**2.1 *External Stakeholder / Complainant:*** Any person who has had some interaction with the company’s service provision, business and / or fund-raising operations; e.g. a client, client’s carer/family, customer, donor, sponsor, visitor.

**2.2 *Worker:*** any person who is engaged in any VisAbility-related business, including: employees, volunteers, students on formal work placement, contractors, and committee members.

**2.3 *Complaint:*** Any claim made where a person’s rights have been adversely affected or the standards of a service have not been fulfilled or for any reason the complainant has expressed dissatisfaction with his/her interaction with the company and/or a matter related to the company’s operations.

**3.0 RESPONSIBILITIES**

Effective complaint management requires a whole of company approach with accountability for reporting and feedback at all levels. VisAbility seeks to ensure that complaints are appropriately recorded, reported and managed.

**3.1** ***Management*** is expected to contribute to a culture that:

* welcomes complaints;
* manages complaints in a timely, respectful, consistent and transparent manner;
* actively responds to complaints;
* supports complainants through the complaints process; and
* ensures that the principles of natural justice are applied when managing and responding to complaints.

**3.2** ***Workers*** are expected to:

* support complainants during the process; and
* report complaints in a timely, respectful, consistent and transparent manner.

**4.0 STATEMENT**

The company is committed to ensuring that its stakeholders, without prejudice, are able to discuss their concerns and lodge complaints if they consider that their rights have been adversely affected or the standards of a service have not been fulfilled or for any reason they are unsatisfied with their interaction with the company and/or a matter related to the company’s operations.

VisAbility welcomes feedback and advice whether it is complimentary or a complaint because it provides a means by which the company can continually improve its service and quality levels. It will respond to complaints in a fair, efficient and positive manner for the effective achievement of a resolution wherever possible.

Staff are empowered to respond to complaints with the least formality possible and to seek, if achievable, a resolution at first contact.

**4.1 Principles**

To protect the rights of both the complainant and respondent, the following important principles and intentions will be observed.

1. Complaints must clearly identify the issue and provide the available related information
2. The person-centred approach to complaint management supports individuals and meets their needs, thus enabling both parties to work cooperatively within the process
3. All complaints will be handled with absolute fairness and in accordance with the principles and intentions of natural justice:

* the decision making process is free from bias
* all parties have the right to be heard
* the respondent has a right to know the details of the complaint
* all parties are informed of the basis on which a decision is made.

1. If required, complainants will be provided with assistance to lodge their complaint.
2. The complaints process will be fully accessible to people with a disability and/or people from cultural and linguistically diverse backgrounds. If required, translators or interpreters will participate in the complaints process.
3. The rights of all parties to have others present or act on their behalf is acknowledged, supported and encouraged.
4. The process will ensure complaints are handled fairly, reflecting the rights of both the complainant and the respondent(s) and undertaken:

* in an open and consistent manner, with no retribution for people expressing their views
* promptly and courteously
* in a manner that ensures the rights of all people are acknowledged,

honoured and protected

* + in a manner that presents no risk (actual or potential) to the health, safety and security of any party.

1. The details of the complaint (both discussions and records) shall be kept confidential from anyone who is not required to be involved in its resolution. Permission will be obtained from the relevant party/ies before any sensitive information is released to help resolve a dispute.
2. During an investigation of a serious nature, it might be necessary to apply actions in accordance with the company’s Misconduct and Disciplinary Policy and Procedure.
3. Complaints will be considered within the context of a continuous improvement framework.

**4.2 Complaint Lodgement**

Methods of lodgement, which attract no charge, include –

1. face to face communication;
2. telephone to:
   * main switchboard (08 9311 8202); or
   * feedback/comment telephone line (08 9311 8219); or
   * Executive Manager: Client Services (08 9311 8287)
3. print;
4. Braille;
5. audio; or
6. electronic formats (including the website’s online feedback form or the company’s generic email address: [info@visability.com.au](mailto:info@visability.com.au) or to the Executive Manager: Client Services: Kary.Macliver@visability.com.au).

**4.3 Contact with Complainant**

The person managing the complaint, who will not be the subject of the complaint, must contact the complainant within two business days to:

1. acknowledge its receipt; and
2. provide his/her name, title and contact details; and
3. obtain further information, if required, in order to help assess the manner in which the complaint will be addressed; and
4. provide an estimated timeframe until resolution; and
5. if the matter is not resolved within the estimated timeframe, provide a status report with revised timeframe, and repeat each ten business days if necessary until the matter is closed.

**4.4 Unreasonable Complainant Conduct**

In most cases, complaints are handled in a respectful, cooperative and positive manner, where both parties abide by the principles and process to achieve a satisfactory resolution.

In instances where this doesn’t occur, VisAbility will not engage with complainants whose conduct does not align with the principles and intentions outlined in 4.1.

Depending upon the circumstance, the company’s range of responses may include:

1. Limiting a complainant’s access to the company and its staff
2. Declining to accept a complaint
3. Closing a complaint and taking no further action
4. Suspending a complainant’s relationship with the company
5. Permanently disengaging with the complainant
6. Reporting the complainant to a relevant external agency or company

**4.5 External Agency or Mediator**

The complainant may choose to pursue his/her complaint via external avenues.

Depending on the circumstances, this might involve (but is not restricted to) any of the following companies.

Contact details of which may be given to the complainant.

* the Health and Disability Services Complaints Office;
* Disability Services Commission;
* WA NDIS;
* National Disability Insurance Agency;
* Blind Citizens Australia;
* National Complaint Resolution and Referral Service;
* Equal Opportunity Commission;
* Australian Human Rights Commission;
* WA Police;
* The Public Advocate;
* Department of Health Aged Care Complaints Scheme; or
* Advocacy Agencies such as:
  + People with Disabilities
  + Citizens Advice Bureau mediation service

**4.6 Promotion and Provision**

The External Stakeholder Complaints Policy and Procedure, which describes how a complaint may be lodged, will be:

1. available via the company’s website, and
2. included in any documents/information provided to new clients; and
3. promoted within VisAbility’s Client/Members’ newsletter on an annual basis; and
4. provided in alternative formats on request.

**5.0 ACCOUNTABILITY**

**5.1 Reporting and Monitoring**

VisAbility will maintain a central Feedback Register from which regular reports will be produced.

Report details to include the overall number of complaints within each designated period and for each complaint; its subject, the number of days to resolve and any responding quality improvement measures introduced.

These reports will be reviewed by the Executive Team and submitted to the Budget, Audit and Risk Committee of the Board.

**5.2 Reviewing**

The External Stakeholder Complaint Management Policy will be regularly reviewed, in consultation with VisAbility’s Consumer Advisory Committee.

Any identified changes to the Complaints Management Process will be implemented as required.

**6.0 RELATED DOCUMENTS**

* Misconduct and Disciplinary Policy and Procedure
* External Stakeholder Feedback Policy

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Debra Barnes Effective Date

Deputy Chief Executive Officer to be reviewed in 1 year

First Adopted 2000; Reviewed in consultation with VisAbility’s Consumer Advisory Committee 2004, 2005, 2007, June 2015\*, Sept. 2015, Feb.2017, May 2017, June 2018

\*Following consultation with the Health and Disability Services Complaints Office