

## PROCEDURE: COMPLAINTS

### 1.0 COMPLAINTS

This procedure establishes an effective and consistent framework for the management of complaints to ensure staff manage all customer complaints and appeals in a professional and timely manner to enhance the quality of service provided to our customers through STEPS Group Australia (STEPS) services, activities, systems, and processes can be continually improved.

Quality is ultimately determined by customers; encouraging our customers to express their dissatisfaction is critical as complaints are an opportunity for improvement.

The principles of natural justice and procedural fairness underpin this procedure. We will support customers to access advocacy and/or bilingual support.

#### 1.1 DEFINITIONS

<b>Complaint</b>	<p>Expression of dissatisfaction made to STEPS, related to its products (including services), or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.</p> <p>A complaint is not:</p> <ul style="list-style-type: none"> <li>• a request for information or explanation of policies; or</li> <li>• a disagreement with a decision that has a formal avenue of appeal.</li> </ul> <p>Where no contact details are provided, the complaint will be treated as feedback.</p> <p>The above definition is consistent with Australian Standard ISO 10002-2006.</p>
<b>Complainant</b>	The individual raising a complaint.
<b>Customer</b>	Any person who receives products or services from STEPS including students, participants, and jobseekers.
<b>Stakeholder</b>	All those who have a stake/interest in STEPS e.g. government, schools, employers.

### 2.0 GENERAL

#### 2.1 DEALING WITH COMPLAINTS

All workers in direct contact with customers and stakeholders have a responsibility to report any concerns or complaints in accordance with this procedure.

Customers and stakeholders are to be reassured that all complaints will be dealt with in a fair, prompt, and confidential manner, with no retributive action towards them as their complaints will be making a positive contribution towards assisting us improve our services.

In recognition of the special needs of some customers and stakeholders (for example those from culturally and linguistically diverse backgrounds, those who speak another language or those who have a cognitive or physical impairment) complaints can be raised on their behalf by their nominated advocate.

A colour copy of the Complaints Process (i040101) is displayed at all STEPS sites that deliver a service to our customers.

#### 2.2 PROCESS FOR RAISING COMPLAINTS

Customers and stakeholders can raise complaints using one of the following methods:

- Tell Us What You Think (i040102) form
  - Via email to [cs@stepsgroup.com.au](mailto:cs@stepsgroup.com.au)

- Via STEPS website [www.stepsgroup.com.au](http://www.stepsgroup.com.au)
- By Letter
- Face-to-face with a member of staff
- Through a phone call to a manager or coordinator
- Through a phone call to the STEPS Customer Service Officer (CSO) on (07) 5458 3000

Any of the above methods can be used by a customer's nominated advocate.

In the event of a complaint being posted on social media sites, the Executive Manager - Marketing and Communications will post a response and forward the complaint to STEPS Customer Service Officer (CSO) for processing in accordance with this procedure.

### 2.3 INFORMING CUSTOMERS

On entry to a service, all customers are to be presented with an information pack relevant to the Service Stream that will include the Feedback and Complaints Policy (i010103) and process.

All customers are to be advised of:

- The processes for raising a complaint
- Details of any external complaint's resolution bodies
- Their right to access and be supported by an independent advocate of their choice

Reminders of the complaints process should be provided regularly with awareness maintained by the visibility and availability of promotional materials.

### 2.4 COLLECTION OF COMPLAINTS

Any staff member receiving a complaint, including the STEPS Customer Service Officer (CSO), will forward all complaints to the relevant line manager.

Where a complainant indicates that they do not want to communicate with the direct line manager, the complaint is to be forwarded to the next senior manager.

### 2.5 ANTICIPATED RESPONSE TIMES

Action all complaints in a fair, prompt, and confidential manner.

STEPS Customer Service Officer (CSO) or the line manager is required to confirm receipt of the complaint by email within the following timeframes listed below:

- Within one (1) business day if received verbally, via telephone or email; and
- Within five (5) business days if received in writing via a letter or Tell Us What You Think (i040102) form

Resolution of a complaint should occur within:

- Ten (10) business days when the complaint was made in person, by telephone or via email, or
- Twenty (20) business days when the complaint was made in writing.
- Where a complaint is not resolved within the above timeframes, the customer or stakeholder must be kept informed and file notes recorded.

STEPS Customer Service Officer (CSO) will send the confirmation of receipt of complaint email to the relevant line manager for filing in relevant folder.

### 2.6 ASSESSMENT OF A COMPLAINT

Some complaints can be resolved quickly through open communication or an apology, however, sometimes the scope of a complaint is not clear, or the complaint is complex, and an investigation may be required to identify the underlying issues.

The assessment should include:

- Clarifying the concerns and issues raised in by the complainant

- Determining the level of risk to the wellbeing, safety and health of the client and staff identified in the complaint
- Deciding if priority should be given to one or more aspects of the complaint
- Asking the complainant how they would like to see their complaint resolved.

Resolution can be quite straightforward e.g., an apology, or small change in services. Some complaints are to raise awareness of a problem or ensure that other people do not find themselves in the same situation. The best way to establish a complainants expectation is to ask them what they are trying to achieve or what would resolve the complaint for them. If the resolution is inappropriate or disproportionate it is important to explain why a request cannot be met, and it's equally important to offer an alternative solution, if possible.

To assist in the assessment and resolution of a complaint the line manager should:

- Define the concerns to be examined
- Identify the resolution the complainant is looking for and whether this expectation can be met
- List the types of information required and the possible sources of the information
- Include complainants, workers and the care recipient (if this person is not the complainant)
- Provide an estimate of the time it will take to resolve the complaint
- Note any special considerations e.g. sensitive or confidential information involved

The amount of detail obtained during the assessment should reflect the complexity and seriousness of the issues you are trying to resolve.

## 2.7 INVESTIGATION OF A COMPLAINT

The purpose of investigation is to gather relevant information that can be used to identify an appropriate solution which will resolve the complaint. Not all complaints required a formal investigation to be resolved.

Any investigation should be:

**Impartial** – each complaint must be approached with an open mind and findings should be objective

**Confidential** – an investigation should be conducted in private. The complainant's confidentiality needs to be respected at all times, and information should only be shared on the 'need to know' basis

**Transparent** – a complainant and client should be told about the steps in the complaints process and be given an opportunity to participant in reaching a resolution. Maintain regular contact with all parties to the complaint

**Timely** – conduct the investigation in a timely manner, keeping in mind the anticipated response times (section 2.5 of this procedure)

**Documented** – keep written records of any information or finding, keep documentation that is provided by the complainant

**Following procedural fairness** – complainants should be given an opportunity to comment on information or claims from other sources.

## 2.8 REGISTERING COMPLAINTS

All complaints, including verbal complaints, are to be recorded in an OSI by STEPS Customer Service Officer (CSO) or relevant line manager within two (2) business days of receipt of complaint. This includes:

- **Raising an OSI**

Please note the complaint is not required to be resolved before raising the OSI.

Each entry in the OSI System is given an OSI number. This acts as the Complaints Register for STEPS.

- **Creating an Electronic Folder**

The relevant line manager or CSO will create a separate file folder for each complaint in the relevant Complaints folder in 'O' Drive.

- **Evidence**

At a minimum, the following forms of evidence should be collected and saved in the specific complainant's folder on the 'O' Drive

- All correspondence
- File notes
- Interviews with complainant
- Interviews with staff

## 2.9 PROCESSING COMPLAINTS

At the time of raising the OSI the line manager must indicate if the complaint has been resolved, requires further action, or needs to be escalated. The Quality Assurance & Risk team will forward to the appropriate Responsible Person (RP) for resolution or escalate to a senior manager. Where the complaint refers to a manager, the Quality Assurance & Risk team must forward to the next senior line manager.

If a system improvement is required in response to a complaint, a further OSI is to be raised.

Where a service stream has a third-party software system for customer management purposes, conversations and actions between the client and STEPS employee must be recorded with the complaint's OSI number included. If the correspondence is internal, it is to be saved in the relevant Complaints folder in 'O' Drive, not the third-party software.

The Quality Assurance & Risk team will save a copy of the OSI in the electronic complaints folder in 'O' Drive.

## 3.0 COMPLAINTS RESOLUTION

The line manager will be responsible for initiating a response to the complaint and working with the customer or stakeholder towards resolution.

The resolution process can occur in the most appropriate manner for the customer or stakeholder. Formal letter templates are provided for use if required, however these are optional. Complaint Acknowledgement Letter (i040104) and the Complaint Outcome Letter (i040105) are required to be printed on STEPS letterhead.

Again, copies of all documentation must be saved into the relevant Complaints folder in 'O' drive.

### 3.1 APPEALS

If the complaint is not able to be resolved by the Executive Manager, the complainant will be advised to contact the CSO by phone, email or in writing and the matter will be referred to the Managing Director.

### 3.2 EXTERNAL COMPLAINTS RESOLUTION

If the complainant is dissatisfied with the outcome, they may access relevant external agencies to assist in mediation and resolution processes. STEPS provide the following information to customers on the applicable external regulatory bodies as required under regulation or contract.

- **National Disability Insurance Scheme (NDIS) Quality and Safeguards**  
**Phone:** 1800 035 544 (free call from landlines) or TTY 133 677 Interpreters can be arranged.  
**Online:** Complete a Complaint Contact Form ([business.gov.au](https://business.gov.au))
- **Australian Skills Quality Authority (ASQA)**  
**Phone:** ASQA Info line on 1300 701 801 between 9.00 am and 7.00 pm (EST) Monday to Friday (dial +61 3 8613 3910 from outside Australia). Interpreter services are available through the Australian Government's Translating and Interpreting Service by calling 131 450.  
**Online:** Contact ASQA online by completing the [Enquiries | Australian Skills Quality Authority \(ASQA\)](#) form or email [enquiries@asqa.gov.au](mailto:enquiries@asqa.gov.au) **Post:** ASQA's postal address is GPO Box 9928, Melbourne, VIC 3001
- **Disability Employment Services (DES)**  
**Phone:** 1800 634 035  
**Email:** [complaints@dss.gov.au](mailto:complaints@dss.gov.au)

- Individual Recovery Support Program (IRSP)**  
**Sunshine Coast Hospital and Health Service, Patient Liaison Service**  
 Email: [SC-PLO-Inquiry@health.qld.gov.au](mailto:SC-PLO-Inquiry@health.qld.gov.au)  
**Post:** Complete the [SCHHS consumer feedback form: compliment, complaint and suggestion for improvement \(PDF 108 kB\)](#) and send to The Patient Liaison Officer, Patient Safety and Quality Unit, Nambour General Hospital, PO Box 547, Nambour QLD 4560

## 4.0 REPORTING AND ANALYSIS

Line managers are responsible for ensuring actions taken for resolution are recorded in the OSI System. The Quality Assurance & Risk team is responsible for analysing entries in the OSI System to identify and manage trends, and to recommend system improvements.

The Quality Assurance & Risk team will provide monthly Complaints Reports through the Quality & Compliance Board Report which will be forwarded to:

- the Executive Leadership Team (ELT)
- Board of Directors

Every six (6) months the Quality Assurance & Risk team will:

- conduct an Internal Audit against the Complaints process
- analyse complaints to look for commonalities or trends

This analysis can help identify high risk processes and practices to facilitate work on systemic solutions to problems. Trend analysis can also show where the root cause of a problem may lie. This is essential to ensure continual improvement of the services offered by STEPS.

## 5.0 RELATED DOCUMENTS

Document Name	Document Name
<a href="#">Complaint Acknowledgement Letter (i040104)</a>	<a href="#">Complaint Outcome Letter (i040105)</a>
<a href="#">Complaints Process (i040101)</a>	<a href="#">Feedback and Complaints Policy (i010103)</a>
<a href="#">Tell Us What You Think (i040102)</a>	

## 6.0 GOVERNANCE

<b>Document Owner</b>	Manager – Quality Assurance & Risk	<b>Approval Date</b>	31 March 2022
<b>Effective Date</b>	22 April 2022	<b>Document Number</b>	i040500_v3_220422

This Policy / Procedure relates to the following STEPS Group of Companies Legal Entities

<input checked="" type="checkbox"/> STEPS Group Australia	<input checked="" type="checkbox"/> STEPS Social Business	<input checked="" type="checkbox"/> STEPS Staffing Solutions	<input checked="" type="checkbox"/> STEPS Charity
-----------------------------------------------------------	-----------------------------------------------------------	--------------------------------------------------------------	---------------------------------------------------

*(Uncontrolled when printed)*