

ORGANISATIONAL GOVERNANCE

Title: External Complaints Policy

Policy Statement and Objectives

Australian Inclusion Group (the Organisation), comprising of three entities and referenced in its entirety, values complaints from people with disability, families, carers, service providers, customers, suppliers and regulators to ensure people are treated fairly when they use our services, or liaising employees.

Complaints are an important source of information and are used to improve our services wherever possible.

The purpose of the External Complaints Policy is to:

- Guide the practices of the Organisation in providing high quality services to people with disabilities and their families/carers through an open, efficient and effective process for receiving and managing complaints and to promote proactive feedback from all Clients
- Guide all employee interactions with external customers, communities and stakeholders.

Link to National Standard

This policy is linked to Standard 4 of the National Disability Services Standards, and Core Module of the NDIS Practice Standards and Quality Indicators.

Guiding Principles

- Everyone has the right to complain
- People making complaints should be supported to access complaints processes
- Complaints processes should be sensitive to any cultural requirements
- Robust complaints processes and systems are an important part of quality service management and help safeguard people with disability and other vulnerable people
- The complaints processes support the principles of procedural fairness and natural justice
- Complaints identify risks to people with disability as well as visitors and staff. They support the Organisation in meeting its Occupational Health and Safety obligations
- Complaints identify opportunities for the Organisation to continuously improve its services

Definitions

Allegation – a claim that an illegal act has occurred. Allegations are always investigated and sometimes an external authority undertakes the investigation such as the police.

Concern – a notification that a person is worried that something is not working, has gone wrong or is otherwise not as it should be.

Complaint – formal advice that an incident has occurred, something is not working the way it should, something is inappropriate, or someone is at risk. A serious incident process is required for legal and contractual purposes when a complaint is about a serious incident.

Complainant - Client, family, person(s) or organisation representative making a complaint.

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Complaints Handling

Complaints can be made in various ways, including verbally, in writing, or in any other method preferred by the person making the complaint. The staff member who receives the complaint has the discretion to decide if it should be recorded, considering that the Organisation values complaints as important feedback. Family members, carers, or advocates can lodge complaints on behalf of a person with a disability. The contact details for making a complaint are available in the Organisation's Terms of Service and Service Agreements. Information about the external complaints process is provided upon request.

When an employee receives a complaint, they are responsible for documenting it as per the Organisation's guidelines outlined in the [External Complaints Procedure](#). The complaint should be recorded on the [External Feedback and Complaints Form \(Group\)](#), which is accessible on all company websites and internal SharePoint portals, at the time of the complaint or within 24 hours. It is necessary to verify with the complainant that the complaint has been accurately recorded. Complaint information is confidential and should not be shared outside of the complaints process, and anonymous complaints are accepted.

The complaint is then logged into the **External Feedback & Complaints Register** (restricted access), which automatically alerts the Administration Officer. The officer assigns the complaint to the appropriate Manager or Executive staff member. If the complaint is a reportable incident to the NDIS Commission, the relevant procedures in the [Incident Management Policy](#) are followed.

Follow-up and Resolution

The designated person will contact the complainant **within three working days** to discuss the complaint. The delegate and relevant staff aim to work with the complainant to find a satisfactory **resolution within three weeks**. If the complaint is against an employee or volunteer, they will not have contact with the complainant while the complaint is being resolved. All interactions, including the date, type of meeting or correspondence, and outcomes or notes, must be clearly recorded as advised in the relevant complaint ticket. Correspondence can be uploaded directly to the ticket as a reference or record.

Staff must follow the [External Complaints Procedure](#) which includes detailed step by step instructions.

Support and Advocacy

Complainants have the right to support from an independent advocate at any stage of the process. Advocacy agencies are available to assist people with disabilities ([refer to Appendix A](#)), and Fair Work Australia provides support for non-individualised service-related issues.

If the complaint concerns individualised services, the complainant should be informed about their right to lodge the complaint with the NDIS Commission. The Organisation will assist the complainant in submitting the complaint to the NDIS if necessary. In cases where an external agency needs to be involved or an investigation is required, all staff are expected to cooperate and provide any requested information.

Responsibilities

All staff are responsible for the implementation of the complaints procedure. This includes encouraging and supporting people accessing the Organisation's services to raise any concerns or complaints they have on any issue.

The Administration Officer is responsible for ensuring complaints are delegated appropriately within the Organisation, actioned and pertinent details are updated regularly, as advised by the delegated person/s.

For NDIS complaints, the delegated person/s are responsible for communicating with people with disability, family, carers and other key stakeholders, or organisations, during a complaints process. Where a matter needs to be referred to an outside agency or otherwise investigated, all staff will cooperate with the inquiry and produce material requested.

Version History Table:

Version	Version Date	Authorised Officer	Amendment Notes	Next Review Date
1.7	03/03/2020	Exec Committee	AIG policy created, updated flowchart	March 2022
11.0	12/08/2024	Exec Committee	Bi-annual review, separated policy from procedure	Aug 2026
11.1	20/02/2025	Nikki Ilich	Company banner updated	Aug 2026

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Reporting

De-identified complaint activity is routinely reported to the Board as part of ongoing quality assurance and continuous improvement.

Review and evaluation

The Organisation will communicate with people with disability about quality evaluations and encourage their participation in evaluating services.

The Executive Management will analyse complaints data regularly in order to:

- determine service gaps, issues or trends in practice, procedures or policies that need to be amended to better safeguard individuals accessing services.
- to improve services to clients generally.
- to ensure positive representation from all staff with external stakeholders.

Records of complaints will be kept for at least 7 years.

References

[External Complaints Procedure](#)
[Incident Management Policy](#)
[External Feedback and Complaints Form \(Group\)](#)
[Positive Behaviour Support and the Use of Restrictive Practices Policy](#)
[Internal Employee Complaints Form](#)
[Internal Employee Complaints Procedure.pdf](#)
[Formal Complaint Investigation Report \(template\).docx](#)
[Internal Employee Complaints Process Flow Diagram](#)
[Psychological Safety Policy.pdf](#)
[Workplace Bullying Policy.pdf](#)
[Code of Conduct Policy.pdf](#)
[Sexual Harassment Policy.pdf](#)
[Poor Performance Management Policy.pdf](#)
[Whistleblower Policy.pdf](#)
[Occupational Health and Safety Policy.pdf](#)
[Human Rights Policy.pdf](#)
[Privacy and Confidentiality Policy.pdf](#)

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APPENDIX A

Independent Advocacy Services

People with Disabilities (WA)

City West Lotteries House, 23/2 Delhi St, West Perth (08) 9420 7279

Provides advocacy, information, lobbying and referrals for all people with a physical, intellectual, psychiatric or sensory disability.

Sussex Street Community Law Service (WA)

29 Sussex Street, East Victoria Park. (08) 6253 9500

Legal advice and advocacy on social welfare problems. Specialist advocacy and advice for people with disabilities.

Community Legal and Advocacy Centre (WA)

Birmingham Centre, 24 Parry Street, Fremantle (08) 9432 9790

Advice and advocacy on legal, Centrelink and consumer issues, financial counselling and welfare rights service.

Welfare Rights and Advocacy Service (WA)

98 Edward Street, East Perth. 9328 1751

Advice and advocacy on Centrelink, Homes West and consumer and legal rights, financial counselling service.

Disability Advocacy Finder (WA)

<https://disabilityadvocacyfinder.dss.gov.au/disability/ndap/>

Department of Social Services

Search for disability advocacy services via location or keywords.

ADA Australia (WA)

<https://adaaustralia.com.au/>

Search for disability advocacy services via location or keywords > **NDIS Complaint Services**

National Disability Insurance Scheme

1800 800 110

www.ndis.gov.au

NDIS Commission

1800 035 544

www.ndiscommission.gov.au/about/complaints

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