



ADMINISTRATIVE POLICY

YP Leisure Options Feedback, Complaints Management and Resolution

Policy Number:	PO176		
Strategic Plan Objective:	5. Responsible Governance and Leadership		
Policy Owner:	Manager People Culture and Safety	Record Number:	20/34525 [v3]
Responsible Officer:	YP Leisure Options Coordinator	Minute Reference:	CMT: 28/10/2024
Date Adopted:	03/02/2025	Next Review Date:	February 2029

1. POLICY OBJECTIVES

This policy provides guidance on the key principles and standards of our feedback management system to our workers and interested parties of the YP Leisure Options (YPLO) programme who wish to provide feedback, raise an issue or concern, or make a complaint or compliment to or about us, regarding our services.

This policy is intended to ensure that:

- we handle all feedback and complaints fairly, efficiently and effectively to a satisfactory resolution within a reasonable timeframe;
- that appropriate actions are taken to improve our services where required; and
- that we provide better outcomes to our stakeholders.

2. SCOPE

This policy applies to the YPLO programme workers, contractors and consultants receiving or managing complaints from stakeholders made to or about us, regarding our services, our workers and our complaint handling process.

There is a close relationship with the PO174 YPLO Incident Management and Reportable Incidents Policy where incidents or complaints brought to our attention are assessed and treated accordingly.

3. DEFINITIONS

Refer to Attachment 1.

4. POLICY STATEMENT

YPLO aims to consistently provide services that meet the needs of clients and stakeholders and satisfy applicable statutory, regulatory and contractual requirements.

YPLO undertake a range of strategies to adopt a “Best Practice” approach to monitor, measure and respond to and improve customer experience and satisfaction. Processes in place may include directly solicited feedback from our clients and stakeholders in a planned, coordinated, purposeful and measurable way. This includes:

- Surveys where parents/carers or other stakeholders can give us feedback on a range of areas in relation to the service;
- Forums, information or education sessions where topics can be presented and discussed; and
- Individual meetings with parents/carers about the client’s program and service plan reviews.

5. PROCESS

5.1. Commitment

YPLO is committed to supporting and enabling people to provide feedback, raise a concern, make a complaint to us, or to the NDIS Quality and Safeguards Commissioner (NDIS Commission). By providing a safe environment for people to speak up, ensures the business responds and acknowledges, and allows us to acknowledge when our services have not met expectations or the applicable standards. Everyone should feel confident to make a complaint or provide negative feedback without fear of adverse consequences, retribution or loss of service.

YPLO has processes and mechanisms to receive and respond to feedback, compliments and complaints from any of the interested parties.

5.2. Protections for Worker Disclosures

YPLO will ensure workers are supported by management to report incidents and complaints and that there are no negative consequences for doing so. All workers are advised that they can make a complaint on behalf of a person, or a parent/guardian, to YPLO or to the NDIS Commission. All workers are required to comply with this Policy in addition to the PO175 YPLO Incident Management and Reportable Incidents Policy and be aware of the roles and responsibilities in identifying, managing and resolving incidents and complaints and in preventing incidents or complaints from occurring.

5.3. Complaint Handling Guidelines

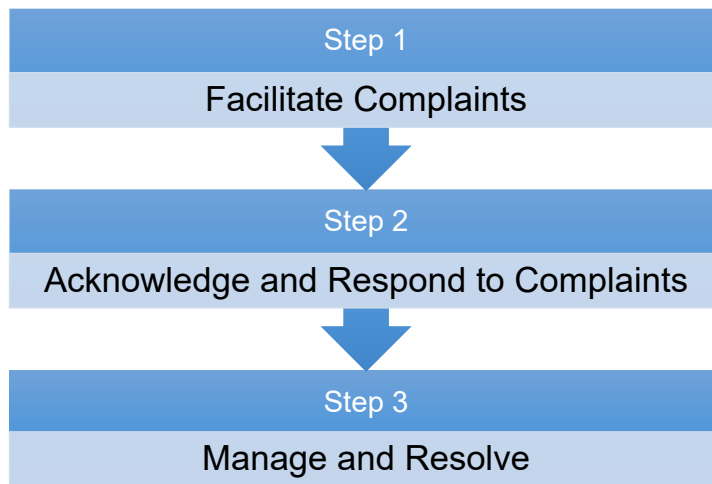
The principles underpinning this policy include processes that are:

- Accessible – All clients and stakeholders have knowledge of our feedback and complaints procedures and are able to access ways appropriate to their needs to communicate their feedback.
- Person centred – complaints management is respectful of and responsive to a person’s preferences, needs and values.
- Outcome focussed – complaints management should reveal the contributing factors to the complaint being made, and seek to prevent matters giving rise to complaints from reoccurring, where appropriate.
- Clear, simple and consistent – the process for receiving and responding to complaints is easy to understand, accessible and consistently applied.
- Accountable – the response to complaints is appropriately managed. Everyone involved in the management of a complaint understands their role and

responsibilities, and will be accountable for decisions or actions taken in regard to a complaint.

- Continuous improvement – the complaints process facilitates the ongoing identification of issues and implementation of changes to improve the quality and safety of supports and services.
- Proportionate – the nature of any actions following a complaint will be proportionate to the issue raised and any risk of harm to people.

YPLO complaints handling process is modelled to ensure fairness, accessibility, responsiveness, efficiency and integration into organisational culture.



YPLO encourage stakeholders to provide feedback, compliments and/or complaints about our services.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time. People making complaints will be:

- provided with information about our complaint handling process and how to access it;
- listened to, treated with respect by workers actively involved in the complaint process where possible and appropriate; and
- provided with reasons for our decision/s and any options for redress or review.

YPLO will take reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

In line with Council's Public Interest Disclosure Policy (PO171) and Procedure (PR152), YPLO accepts anonymous complaints and will carry out a confidential investigation of the issues raised where there is enough information provided.

The management of complaints will be accessible to all members and assistance provided to understand where appropriate, particularly for people who may require additional assistance. If a person prefers or needs another person or organisation to assist or represent them in making and/ or resolution of their complaint, YPLO will communicate with them through their representative if this is their wish. A support person may represent a member wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, Member of Parliament, or another organisation).

Each complaint will be addressed with integrity and in an impartial, objective manner. YPLO will ensure that the person handling a complaint is different from a worker whose conduct or service is being complained about.

Conflicts of interest, whether actual, perceived or material, will be managed responsibly. Internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker if required and managed in accordance with Councils Internal Review of a Council Decision Policy (PO037).

5.4. Who Can Make a Complaint

Any member, or their support person/carer can provide feedback, raise an issue, concern or make a complaint. A complaint can be made anonymously if there is a compelling reason to do so.

5.5. How to Make a Complaint

A complaint can be made in a number of ways including:

- In person, directly approaching a worker;
- Website online form
<https://yorke.sa.gov.au/about-us/online-services/feedback/> ;
- By phone, contacting YPLO staff;
- Email at admin@yorke.sa.gov.au;
- By writing via letter; or
- Using the YPLO Compliments, Complaints and Feedback Form.

For NDIS participants, complaints can be made directly to the NDIS Quality and Safeguards Commission <https://www.ndiscommission.gov.au/> or phone 1800 035 544 (free call from landlines). Interpreters can be arranged. The NDIS Commission can take complaints about:

- Services or supports that were not provided in a safe and respectful way; or
- Services and supports that were not delivered to an appropriate standard.

In certain circumstances, it may be necessary to notify an external agency about a complaint, if the matter relates to a notifiable reportable incident. Details for this process are provided in PO174 YPLO Incident Management and Notifiable Incidents Policy.

5.6. Acknowledgement of Complaints

YPLO will aim to respond to a complaint within two (2) business days, acknowledging receipt of the complaint and, where possible, resolve the complaint at first contact. When appropriate, we may offer an explanation, or an apology, to the person making the complaint.

A record of the complaint will be added to the YPLO Complaints Register (R104), including those complaints that have been resolved at the first point of contact. This register will be regularly analysed to identify issues and track more accurately the complaint handling activities.

If a resolution is not possible, complainants will be advised of the ensuing process, likely timeframe required to investigate, and resolve a complaint, and regularly update the complainant as to progress where necessary in line with 5.9 below.

A copy of this Policy may also be provided to the Complainant.

5.7. Prioritising Complaints

A complaint will be prioritised in accordance with the urgency and/or seriousness of the issues raised. The Priority Risk of Low, Medium, High, and Extreme of outlined in Councils Risk Matrix (Attachment 2). The level of worker involvement in the assessment of an complaint will be determined by the Assessment Escalation Actions Matrix (Attachment 3).

If a matter concerns an immediate risk to safety or security, or higher risk of harm the response will be immediate and will be escalated and reported appropriately. The PO174 YPLO Incident Management and Reportable Incidents Policy will also be applied.

5.8. Assessing the Complaint

YPLO is committed to managing people’s expectations, and will inform them as soon as possible of this Policy. After acknowledgement, and where early complaint resolution isn’t appropriate, we will confirm whether the issue/s raised in the complaint are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed. When determining how a complaint will be managed, YPLO will consider the following:

- How serious, complicated or urgent the complaint is;
- Whether the complaint raises concerns about people’s health and safety;
- How the person making the complaint is being affected;
- The risks involved if resolution of the complaint is delayed; and
- Whether a resolution requires the involvement of another organisations.

We will advise as soon as possible when YPLO is unable to deal with any part of the complaint and provide advice about where such issues, concerns and/or complaints may be directed (if known and appropriate).

In some cases, this could include reporting to external agencies or funding bodies for investigation.

Delays may occur where external agencies (e.g. NDIS Commissioner, Work Health Safety (WHS), or an external investigator or other agency) are engaged or otherwise involved.

Workers are empowered to resolve complaints promptly and with as little formality as possible. Flexible approaches will be adopted to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

Complaints will be assessed on its merits and involve people making complaints and/or their representative in the process as far as possible.

The identity of complainants will be protected where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by YPLO as permitted under the Privacy Act 1988 including any applicable exemptions, secrecy provisions and any relevant confidentiality obligations.

5.9. Investigation of Complaint

After assessing the complaint, YPLO will consider how to manage the complaint including

- Give the person making a complaint information or an explanation;
- Gather information about the issue, person or area that the complaint is about; or
- Investigate the claims made in the complaint.

The person making the complaint will be kept up-to-date on the progress, particularly if there are any delays. Communication of the outcome using the most appropriate medium will be undertaken which included actions we decide to take that are tailored to each case and will take into account any statutory requirements.

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated. Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint. This may include verifying appropriate consents to share information.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

5.10. Outcome of Complaint

Following consideration of a complaint and any investigation into the issue/s raised, YPLO (if appropriate) will contact the person making the complaint to advise:

- The outcome of the complaint and any action taken;
- The reasons for the outcome;
- The remedy or resolution/s that are proposed or put into place; and
- Any options for review that may be applicable to the complainant, such as an internal review or external review.

5.11. Managing Unreasonable Conduct by People Making Complaints

YPLO is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible;
- the health, safety and security of our workers; and
- our ability to allocate our resources fairly across all the complaints we receive. When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work.

As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our workers to do the same in accordance with this policy.

5.12. Alternative Avenues for Dealing with Complaints

YPLO will inform people who make complaints to or about us, about any internal or external review and reconsideration options available to them (including referring the complaint to the NDIS Commission, or Ombudsman for oversight of regulatory bodies, and other relevant agencies and advocacy support available).

Where a person making a complaint is dissatisfied with the outcome of their complaint, they may request a reconsideration for an internal review in line with Councils Internal Review of Council Decisions Policy (PO037) where new information or evidence is presented within a reasonable timeframe, which is conducted by the Manager People, Culture and Safety (or representative) not previously involved in the complaint assessment process, or seek an external review of our decision (for example, by the NDIS Quality and Safeguards Commission for NDIS participants, or other agency).

It is important to note that a reasonable timeframe follows that of the NDIS Commission, currently six (6) weeks.

5.13. Monitoring

YPLO will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the YPLO Working Party. A regular report will be provided at each YPLO Working Party meeting outlining:

- the number of complaints received;
- the outcome of complaints, including matters immediately resolved;
- types of issues arising from complaints;
- systemic issues identified; and
- the number of requests received for internal and/or external review of complaint handling processes.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our service and make improvements.

5.14. Privacy and Confidentiality

Rights related to privacy are set out in Commonwealth Privacy Act 1988, the Australian Privacy Principles and State and Territory Privacy laws. Information provided in a complaint is kept confidential and only disclosed if required by law or if the disclosure is otherwise appropriate in the circumstances where disclosure would be reasonably expected.

YPLO will only provide information about a complaint to those individuals directly involved and all parties will be informed of the need for upholding privacy and confidentiality.

All information regarding the complaint will be stored securely in the client's files and the YPLO Complaints Register (R104). There are certain circumstances where exceptions can apply and our workers should disclose information about a person that can be without consent. YPLO has mandatory reporting obligations to report incidences of violence, exploitation, neglect and abuse, and sexual misconduct to the Commission and SA Police. Other than reporting the matter to relevant personnel within our organisation and other authorities, YPLO will not share any information about a complaint with other workers unless they form part of the investigation team or have been given permission to do so by the person impacted. The only exception is when it is essential to deal with an immediate safety issue.

6. RESPONSIBILITIES

All YPLO workers are responsible for implementing this policy.

7. COMPLAINTS

Complaints relating to this Policy can be made in writing to Council’s Manager People, Culture and Safety. All complaints will be managed in accordance with Council’s PO147 Complaints Policy (or in the case where the Policy only applies internally and not to the public, refer to the Dispute/Conflict Resolution procedure contained in the relevant Enterprise Agreement).

8. REVIEW

This policy will be reviewed every four (4) years, in consultation with employees and/or their representatives. The policy will also be reviewed as deemed necessary in consideration to any changes to legislation, relevant standards, codes and guidelines, audit findings, any corrective actions/controls arising from risk assessment and/or hazard/incident reports and stakeholder feedback.

9. TRAINING

All workers shall receive training and support in understanding this policy and associated processes during their induction and at subsequent refresher training and/or when processes change.

YPLO Coordinator will facilitate training for workers to ensure continued awareness of this policy.

10. RECORDS

Records shall be maintained as required by Council’s Records Management Policy (PO063) and relevant legislation.

11. RELATED COUNCIL POLICIES/PROCEDURES AND DOCUMENTS

PO037 Internal Review of Council Decisions Policy

PO063 Records Management Policy

PO091 Risk Management Policy

PO171 Public Interest Disclosure Policy

PO174 YPLO Incident Management and Reportable Incident Policy

PR048 Corrective and Preventative Actions Procedure

PR152 Public Interest Disclosure Procedure

RO084 Corrective Actions Register

RO104 YPLO Complaints Register

YPLO Compliment and Complaints Support Statement

YPLO Compliment, Complaints and Feedback Form

12. REFERENCES AND LEGISLATION

Aged Care Quality Standards

Anti-Discrimination Legislation (Age Discrimination Act 2004, Disability Discrimination Act 1992 and Racial Discrimination Act 1975)

Australian Standard AS/NZ 10002:2014 – Guidelines for Complaint Management in Organizations

Charter of Aged Care Rights

Disability Discrimination Act 1992

Information Privacy Principles 1992 (SA)

NDIS Act 2013

NDIS Complaints Management and Resolution Rule 2018

NDIS Explanatory Statement NDIS (Code of Conduct) Rules 2018

NDIS Explanatory Statement NDIS (Incident Management and Reportable Incidents) Rules 2018

NDIS Explanatory Statement NDIS (Procedural fairness) Guidelines 2018

NDIS Explanatory Statement NDIS (Restrictive Practices and Behaviour Support) Rules 2018

NDIS Quality Indicators Guidelines 2018

Privacy Act 1988

Work Health and Safety Act 2012 (SA)

13. COUNCIL DELEGATION

Any applicable delegations are available on Councils website via the Delegations register via <https://yorke.sa.gov.au/about-us/forms-plans-and-publications/registers/>

14. VERSION HISTORY

Version No	Issue Date	Description of Change
1	28/04/2020	New Policy.
2	23/12/2020	Minor Revision.
3	03/02/2025	Minor revision including update to legislation, references and adding in complaint section.

ATTACHMENT 1: DEFINITIONS

Term/Reference	Definition
Complaint	An expression of dissatisfaction made to or about YPLO, the services, workers or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.
Compliment	A positive feedback or praise, a polite expression of praise or admiration.
Conflict of Interest – Actual or Perceived	<p>Any person who carries out Council Work has an interest in a matter if the person, or another person with whom the person carrying out Council Work is closely associated, would, if the person carrying out Council Work acted in a particular manner in relation to the matter, receive or have a reasonable expectation of receiving a direct or indirect pecuniary benefit or a non-pecuniary benefit or suffer or have a reasonable expectation of suffering a direct or indirect pecuniary detriment or a non-pecuniary detriment. A person is closely associated with a person carrying out Council Work —</p> <ol style="list-style-type: none"> a. if that person is a body corporate of which the person carrying out Council Work is a director or a member of the governing body; or b. if that person is a proprietary company in which the person carrying out Council Work is a shareholder; or c. if that person is a beneficiary under a trust or an object of a discretionary trust of which the person carrying out Council Work is a trustee; or d. if that person is a partner of the person carrying out Council Work; or e. if that person is the employer or an employee of the person carrying out Council Work; or f. if that person is a person from whom the person carrying out Council Work has received or might reasonably be expected to receive a fee, commission or other reward for providing professional or other services; or g. if that person is a relative of the person carrying out Council Work. <p>However, a person carrying out Council Work, or a person closely associated with a person carrying out Council Work, will not be regarded as having an interest in a matter—</p> <ol style="list-style-type: none"> a. by virtue only of the fact that the a person carrying out Council Work or person closely associated with the person carrying out Council Work — <ol style="list-style-type: none"> i. is a ratepayer, elector or resident in the area of the council; or ii. is a member of a non-profit association, other than where the person carrying out Council Work or person closely associated with the person carrying out Council Work is a member of the governing body of the association or organisation; or b. in a prescribed circumstance (as per Section 120 of the Act).
Conflict of Interest - Material	Occurs when a person has a personal interest in an issue as well as a professional interest. An example, Council may be discussing

PO176 – YP Leisure Options Feedback, Complaints Management and Resolution Policy

Term/Reference	Definition
	a development application that has been submitted by a close relative of a Council member.
Dispute	An unresolved complaint escalated either within or outside of the organisation.
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about YPLO, about the services or complaint handing system where a response is not explicitly or implicitly expected or legally required.
Interested Parties	Include the public, clients, children and their family, parents, guardians, carers, friends, workers, advocates or agencies who provide support, our clients (members), community visitors, other professionals and organisations who have a relationship or connection with us.
Member	Refers to an individual who attends the YP Leisure Options program and is eligible to receive supports and services under the National Disability Insurance Scheme (NDIS) or as part of the My Aged Care system.
Pecuniary	Relating to or consisting of money.
Serious/ Reportable Incidents	Types of complaints treated under the Incident Management and Reportable Incidents Policy (PO174) would include allegations or crimes under the criminal code, notifiable data/ privacy breaches, notifiable Work Health Safety incidents, death, serious injury, abuse or neglect, unlawful sexual or physical contact or assault, sexual misconduct, grooming of a person for sexual activity, and the use of unauthorised restrictive practice.
Staff	For the purpose of making a complaint, staff includes the YPLO Coordinator and YPLO Support Workers.
Worker	<p>A person who carries out work in any capacity for a PCBU, including work as:</p> <ul style="list-style-type: none"> a. An employee; or b. A contractor or subcontractor; or c. An employee of a contractor or subcontractor; or d. An employee of a labour hire company who has been assigned to work in the person’s business or undertaking; or e. An outworker; or f. An apprentice or trainee; or g. A student gaining work experience; or h. A volunteer <p>[as per the Work Health and Safety Act 2012]</p>