CatholicCare
DIOCESE OF BROKEN BAY

Agency Complaints & Feedback

Policy

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Introduction

CatholicCare Diocese of Broken Bay (CatholicCare) has a responsibility to ensure that the services and supports it provides are safe and of the highest possible quality, taking into account the individual needs of the person receiving the services. CatholicCare therefore recognises and respects the right of any person to make a complaint or provide feedback on the quality of our services.

While this policy and the associated *Managing Complaints Practice Guideline* deals mostly with complaints, CatholicCare values other feedback that may be provided, including opinions, comments and concerns as well as compliments and positive feedback. Understanding what we do well can assist CatholicCare in better tailoring services for all of its clients.

Our *Client Feedback Practice Guidelines* sets out our practices for encouraging and seeking feedback from clients and using the feedback for service and quality improvement.

The intent of CatholicCare's complaint management system is to:

- Make it easy for a person who has a concern to make a complaint to CatholicCare.
- Ensure a timely and effective response, including appropriate engagement of the person making the complaint through the process.
- Support CatholicCare to improve its services and supports.
- Offer confidence to the community and government in our transparency and processes.

Purpose

This policy provides guidance to staff so that complaints are handled fairly, efficiently, and effectively in accordance with community expectations and the requirements of our regulatory authorities including key stakeholders:

- National Disability Insurance Scheme Quality and Safeguards Commission
- NSW Ombudsman
- NSW Office of the Children's Guardian
- NSW Department of Communities & Justice
- Aged Care Quality and Safety Commission
- State and Federal Departments of Education
- Australian Children's Education & Care Quality Authority (ACECQA)
- Attorney-General's Department

Scope

This policy applies to all staff or volunteers receiving or managing complaints from a client, their carer/family member, or from the public made to, or about CatholicCare regarding our programs and services, staff, volunteers and/or the complaints handling process.

This policy and associated practice guideline deals with general complaints.

If a complaint deals with possible child protection matters, reportable conduct or reportable incidents, it will be referred to CatholicCare's Safeguarding Team and managed in accordance with:

- *Reportable Conduct and Incidents Practice Guideline*
- *Child Protection and Risk of Significant Harm Practice Guidelines*

If the complaint involves an allegation regarding a staff member, volunteer or client which may be reportable conduct, an unexplained serious injury or a reportable incident under the NDIS or Serious Incident Response Scheme, the person receiving the complaint must report to their immediate supervisor and the Safeguarding Office. Allegations that meet the reportable conduct threshold must be managed in accordance with the *Reportable Conduct and Incidents Practice Guidelines* and the *Safeguarding Notification Form – Reportable Allegation* must be completed. Complaints involving allegations or suspicion of harm or neglect to clients in our Seniors programs should be managed as set out in *Seniors Managing Client Incidents including SIRS Practice Guidelines*.

If you are unsure whether the information you receive falls into these categories, consult your Supervisor or the Safeguarding Office for clarification.

Important Note – Children's Services have a separate *Feedback and Complaints* which their staff must adhere to.

Complaints by staff about other CatholicCare staff, other than those that may potentially be reportable conduct, are dealt with in accordance with the *Resolving Workplace Issues (Staff Grievance) Policy*.

Responsibilities

CatholicCare recognises that effective and efficient management of complaints and feedback will only be possible when there is a whole of agency commitment, with clear responsibilities and accountabilities at all levels. The following table outlines the nature of the commitment expected of staff and the way that commitment is implemented.

Who	Commitment	How
Executive Director	Promote a culture that values complaints and their effective resolution	• Ensures an effective complaints and feedback system is in place • Ensure open disclosure principles are adopted in complaints management • Ensures CatholicCare complaints systems are externally visible via relevant web and media platforms, and relevant organisation literature. • Ensures CatholicCare complaints systems are accessible to clients, including children, young people and vulnerable adults. • Ensure CatholicCare provides clients with information on internal and external complaints mechanisms. • Reports on CatholicCare complaint handling. • Provides adequate support and direction to key staff responsible for handling complaints. • Regularly reviews reports about complaint trends and issues arising from complaints. • Encourages all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourages staff to make recommendations for system improvements. • Recognises effective complaint management by staff in accordance with this policy. • Supports recommendations for programs and services, staff and complaint handling improvements arising from analysis of complaint data.

Who	Commitment	How
General Managers and Executive Managers responsible for complaint(s)	Establish, implement and manage the complaint management system	• Ensure that each program and service provides children, young people, and adults with accessible, culturally safe, and tailored complaints information. This includes formats and communication methods that are age-appropriate, trauma-informed, and inclusive of diverse needs such as disability, language, and cognitive capacity. • Ensure that all clients—children and adults—are clearly informed about the receipt, review, and outcome of their complaint. This includes providing updates in a way that is understandable and respectful of their individual circumstances, and ensuring any actions taken to address or redress their concerns are communicated with sensitivity and transparency. • Provides regular reports to the Executive Director on issues arising from complaint handling. • Ensures recommendations arising out of complaint data analysis are canvassed with the Executive Director and implemented where appropriate. • Recruit, train and empower staff to resolve complaints promptly and in accordance with CatholicCare policies and procedures. • Encourages staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system. • Encourages all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. • Recognises effective complaint management by staff in accordance with this policy. • Ensure complaints involving child protection, unexplained injuries, reportable conduct, reportable incidents or incidents falling under the Serious Incident Response Scheme are referred to Safeguarding. • Ensure all complaints are documented on their operational complaints register. • Monitor complaints resolution and utilise complaints trends data for corrective and continuous improvement purposes.
Staff whose duties include complaint handling	Demonstrate exemplary complaint handling practices	• Treat all people with respect, including people who make complaints. • Assist people who wish to make complaints to access the CatholicCare complaint process. • Comply with this policy and its associated practice guidelines. • Keep informed about best practice in complaint handling. • Provide feedback to management on issues arising from complaints. • Provide suggestions to management on ways to improve the organisation's complaints management system. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.
All staff	Understand and comply with CatholicCare 's complaint handling practices	• Treat all people with respect, including people who make complaints. • Be aware of CatholicCare complaint handling policies and practice guidelines. • Assist people who wish to make complaints to access the CatholicCare complaint process. • Be alert to complaints and assist staff handing complaints so they can resolve matters promptly. • Ensure that complaints and feedback are referred to the appropriate person for action. • Provide feedback to management on issues arising from complaints. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management. • Commit to continuous improvement of services.

Policy statement

CatholicCare respects the rights of all people seeking support from CatholicCare to safe and quality services and supports.

We are committed to:

- Being open to complaints about our standards of support, service delivery and practice and respect the right of any person to complain to us about any issue of concern that relates to the safety and quality of our services, including about our staff, our policies, our processes, or our systems.
- Implementing a complaints management system that is accessible and fair, as a means of supporting our clients and improving our performance.
- Ensuring that it is easy for people to make a complaint, including an anonymous complaint, and that a person receives any assistance they need to make a complaint.
- Ensuring that complaints are dealt with quickly and fairly, recognising that some complaints may be more complex.
- Managing every complaint with integrity, impartiality and objectivity, in accordance with CatholicCare's *Managing Complaints Practice Guidelines* which reflects industry best practice.
- Ensuring that complaints investigation processes are responsive to the unique needs of children and vulnerable adults, including people with disabilities, mental health conditions, and experiences of trauma. This includes applying child-safe principles, providing trauma-informed support, enabling effective communication, and making reasonable adjustments to ensure accessibility and equity throughout the process.
- Trying to resolve complaints at a local level wherever possible. If that is not possible, we will provide clear and accessible pathways for escalation, including advice about raising concerns with the relevant external authorities.
- Ensuring that a person making a complaint will be appropriately involved in the resolution of the complaint, and that they will not be adversely affected as a result of making the complaint.
- Monitoring and reviewing outcomes and trends from the management of complaints, feedback, and compliments to provide a source of learning and continuous improvement.

Complaints Principles

All clients, and their families, carers and advocates are encouraged and supported to raise any concerns they have about the service or organisation. In receiving, managing, and responding to complaints and feedback, CatholicCare adheres to these principles:



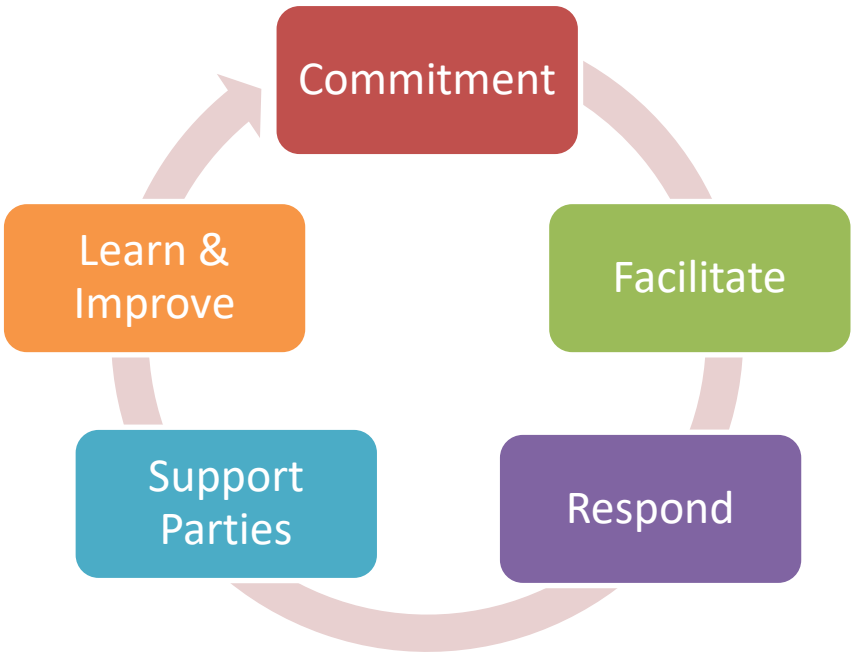
* Subject to the rights of any individual to privacy and confidentiality.

Child-Safe Complaints Principles

There are some special considerations when receiving and responding to a complaint from a child, and we are committed to also adhering to these Child Safe Complaint Principles:

1. Accessibility	• Complaints processes must be easy to understand and access for children, young people, and their families. • Information should be provided in age-appropriate formats, using plain language, visuals, and alternative communication methods where needed.
2. Participation & Voice	• Children and young people must be proactively supported to express concerns safely and confidently. • Their views must be taken seriously and considered in all complaints processes, with feedback loops that show how their input influenced outcomes.
3. Safety & Support	• CatholicCare staff must understand and manage the risks children and young people are exposed to. • CatholicCare will establish a designated Child Safety Contact Person who will act as the central point for children and young people to raise concerns and communicate with throughout the complaints process. • Child safety and wellbeing must be prioritised throughout the complaints process • Children's complaints should not be dismissed or perceived of lesser value because of the child's age. • Complaints processes must be trauma-informed and culturally safe, and our staff will be trained in recognising and responding to trauma in children. • Children and families should be offered emotional support, advocacy, and referrals where needed during, and after, the complaints process.
4. Non-Retaliation & Fair Treatment	• The opinions and expressed concerns of children and young people carry equivalent weight to that of adults, including where expression or opinion differ, and should be prioritised in complaints review and resolution processes. • CatholicCare recognises that Children and young people may not express a complaint in the same language as an adult. Staff working with children and young people should be proactive listeners and utilise child-centred engagement practices. • Making a complaint must not result in discrimination, disadvantage, or negative impacts on service access or relationships with children and young people. Children, Young people must be reassured, in a way they can understand, that their complaint will be handled respectfully and without fear of retribution.
5. Transparency & Communication	• Children and young people must be informed about how complaints are received, reviewed, and resolved using child-friendly communication. • Children and young people should receive timely updates and clear explanations of outcomes (taking into consideration privacy, confidentiality and procedural fairness), in formats they can understand.
6. Cultural Safety & Inclusion	• Complaints processes must respect and reflect the cultural and personal identities of children and young people, including Aboriginal and Torres Strait Islander peoples. • Staff must be trained in cultural competence and inclusive practice to facilitate culturally sensitive complaints responses.
7. Accountability & Continuous Improvement	• Complaints are an opportunity to improve services and strengthen child safety. • Trends and feedback from complaints from children and young people should be identified and should inform service design, staff training, and safeguarding strategies.
8. Confidentiality & Privacy	• Complaints privacy and confidentiality must be managed with sensitivity to children's age and development stage. • Children and Young people should be informed in a child-friendly way of who will informed, and why, if their complaint is related to their safety.

Our Complaints Management System



CatholicCare's complaint management system recognises the inter-relationship between each element of the system. The Guiding Principles of our Complaints Management System are as follows:

1. Commitment

Our commitment to complaints management is outlined in our *Policy Statement*.

2. Facilitate Complaints

We will be people focused

CatholicCare invites feedback and complaints about our services, systems, practices, procedures, products and complaint handling. Any feedback will be dealt with within a reasonable timeframe.

CatholicCare will ensure that all clients—including children, young people, and vulnerable adults—are fully informed of both internal and external complaints mechanisms in a way that is accessible, culturally safe, and responsive to their individual needs.

Complaints information will be provided at the point of entry to the service, regularly revisited in line with the program model, and re-issued whenever a client indicates they wish to make a complaint.

Information will be delivered in formats and language appropriate to the client's age, capacity, and communication preferences, with reasonable adjustments made to support understanding and engagement.

People making complaints will be:

- Listened to, treated with respect by staff, and will be involved in the complaint resolution process where relevant and appropriate.
- Provided with clear outcomes in writing including reasons for our decision/s and options for redress or review if required.

No detriment to people making complaints

- CatholicCare will ensure that individuals who make a complaint—either directly or through a representative—are not subject to discrimination, disadvantage, or any negative impact on their service experience with us as a result of raising their concerns. This includes access to services, provision of service, or service-related decisions,
- Where complaints relate to matters outside our control we remain committed to treating all clients fairly, respectfully, transparently and in accordance with our values and obligations.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided. Also see *Whistleblowing Policy*.

We note that it is sometimes difficult to gather sufficient information about a complaint, or effectively respond to the complainant when a complaint is made anonymously.

Accessibility

We will ensure information about how and where complaints may be made to, or about us, is well publicised. We ensure the systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

Where complaint is not made immediately

We understand that some complaints may not be made immediately. We receive and respond to complaints for at least 12 months after service has been provided.

3. Responding to Complaints

Early resolution

Where possible, complaints will be resolved at first contact with CatholicCare and at a local level.

Responsiveness

CatholicCare will promptly acknowledge receipt of complaints. We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and escalated accordingly.

CatholicCare is committed to managing people's expectations, and will inform them as soon as possible, of the:

- Complaints process,
- Expected time frames for our actions,
- Progress of the complaint and reasons for any delay,
- Likely involvement in the process, and
- Possible or likely outcomes of their complaint.

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

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective, and unbiased manner.

The person handling the complaint will be different from any staff member whose service or conduct is being complained about. Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Staff are empowered to resolve complaints promptly and with as little formality as possible. CatholicCare uses flexible approaches to service delivery and problem solving. CatholicCare assesses each complaint on its merit and involves people making a complaint and/or their representative in the process as far as possible.

Confidentiality

CatholicCare will protect the identity of those making a complaint where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by CatholicCare as permitted in accordance with privacy laws.

Risk Management

In receiving and responding to any complaint, CatholicCare will conduct a risk assessment in relation to the matters raised in the complaint; and provide an effective risk response. Risks identified as a result of a complaint may include:

- Risk to the well-being or safety of any person, including the complainant, a person about whom a complaint is made, or another person. This may include consideration of whether a complaint is of a nature that requires referral to the Safeguarding Team.
- Risk of financial or property damage to CatholicCare or another person.
- Risk of regulatory breach or other compliance obligation.
- Reputational risk to CatholicCare, another person or agency.

Seniors Services – Principles of Open Disclosure

As set out in the Seniors Managing Client Incidents including SIRS Practice Guidelines our staff in Senior Services must adhere to the Open Disclosure principles when responding to a complaint.

The four principles which underpin open disclosure are also reflected in the Aged Care Quality Standards:

Principles of Open Disclosure	Aged Care Quality Standard
Dignity and Respect	Standard 1: Consumer dignity and choice
Privacy and Confidentiality	Standard 3: Personal and clinical care
Transparency	Standard 6: Feedback and complaints
Continuous quality improvement	Standard 8: Organisational governance

For further information on responding to complaints using Open Disclosure Principles staff are to refer to the *Seniors Managing Client Incidents including SIRS Practice Guidelines.*

4. Support for parties to a complaint

Fairness and natural justice

Each person involved in a complaint has a right to be heard. CatholicCare recognises that there may be multiple perspectives on issues relating to a complaint and will ensure that each party has a right to be heard fully.

Each party will be kept informed of the progress of response to the complaint and provided with opportunity to contribute where possible and appropriate to the process.

At the conclusion of the review of the complaint, parties will be provided with information on the outcome and reasons, and possible avenues for further review. If requested, CatholicCare may arrange for mediation between the parties to a complaint.

Complaints involving multiple CatholicCare services

Where a complaint involves one or more CatholicCare services, we will work with each service 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.

Empowerment of staff

Staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities. Staff with specific responsibilities will be provided with relevant training to assist them in undertaking those responsibilities. Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are 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 staff, and
- Our ability to allocate our resources fairly across all complaints received.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, CatholicCare will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

Complaint resolution timeframes

All complaints will be dealt with as efficiently as possible, in the least possible time frames. A person who makes a complaint will be advised of the approximate time frame for having their complaint dealt with and of any delays in the process.

- If the complaint can be resolved relatively simply, CatholicCare aims to resolve it within two (2) business days.
- If a complaint cannot be resolved in two (2) business days, the person making the complaint will have their complaint acknowledged in writing within five (5) business days of the date of receipt of the complaint with advice of the steps being taken to resolve the complaint.

- CatholicCare expects that all complaints should be resolved within a maximum of 21 calendar days of being received.

If a complaint takes more than 21 days, the complaint and the appropriate Senior Manager must be informed of the reasons for the delay and an agreed timeframe documented.

Complaint handling procedures

CatholicCare has developed a best practice guideline for the management of complaints. Our *Feedback & Complaints brochure* is available on our website and should be provided to any person making a complaint and also includes information on how to make a complaint to an external body including contact details.

5. Learning and Improving

CatholicCare will maintain a register in each operational area for all complaints and feedback, detailing the nature of the complaint, the outcome and time frames, to monitor its performance against this Policy and to identify opportunities for improvement to our practice, processes, systems, staff performance, and training, including the effectiveness of our complaints management system. Oversight of complaints as they inform clinical and other risks is managed through quarterly reporting to both the Clinical and Care Governance, and the Finance, Audit and Risk Sub-Committees.

Related documents

Policies and practices

- *Child Protection and Risk of Significant Harm Practice Guidelines*
- *Children's Services Feedback and Complaints Policy*
- *Client Feedback Practice Guidelines*
- *Clinical & Care Governance Framework*
- *Continuous Improvement Policy*
- *Continuous Improvement Practice Guidelines*
- *Managing Complaints Practice Guidelines*
- *Managing Unsatisfactory Performance and Misconduct Policy*
- *Quality Management System*
- *Reportable Conduct and Incidents Practice Guidelines*
- *Resolving Workplace Issues (Staff Grievance) Policy*
- *Resolving Workplace Issues (Staff Grievance) Practice Guidelines*
- *Risk Management Policy*
- *Risk Management Practice Guidelines*
- *Whistleblowing Policy*
- *Seniors - Managing Client Incidents including SIRS Practice Guidelines*

Forms and resources

- *Complaints and Feedback Presentation*
- *Complaints and Feedback Register in IsidoreShare*
- *Complaints Form*
- *Complaints Resolution Process*
- *Feedback and Complaints Brochure for Clients*
- *PSP Complaint Poster*
- *PSP Welcome Pack for Kids Under 14*
- *PSP Welcome Pack for Kids 14-17*
- *Safeguarding Notification Form – Reportable Allegation*
- *Spirit Easy Read Complaints Poster*

Legislation

- *Aged Care Quality Safety Commission Act 2018*
- *Children's Guardian Act 2019*
- *Community Services (Complaints Reviews and Monitoring) Act 1993 (CS-CRAMA)*
- *Education and Care Services National Law Act 2010*
- *NDIS (Complaints Management and Resolution) Rules 2018*
- *Ombudsman Act 1974*
- *Privacy Act 1988*
- *Privacy and Personal Information Protection Act 1998*

Sign off and review

This policy remains valid until it is either superseded by a new version or officially revoked.

CatholicCare values your input and welcomes feedback on this policy. Your suggestions help us improve and better support your work. Please send any feedback to policy.updates@catholiccaredbb.org.au.

Version	Authorised by	Approved date	Review cycle	Review due
6.0	Executive Director	21 November 2022	2 years	November 2024
7.0	Executive Manager Quality Safeguarding Risk and Compliance	15 October 2024	Review date adjusted to align with new review schedule	July 2027

Revision history

Version	Description	Author	Amendment date
6.0	Policy	Policy Specialist	21 November 2022
6.1	Policy	Policy Specialist	14 December 2022
6.2	Policy	Policy Specialist	4 June 2024
7.0	Policy	Policy Specialist	15 October 2024
7.1	Minor change	Policy Specialist	15 April 2025
7.2	Child Safe Complaint Principles added	Executive Manager Quality Safeguarding Risk and Compliance/Policy Specialist	20 October 2025
7.3	Name change CS policy	Policy and Program Officer	10 March 2026
7.4	Link changes	Policy and Program Officer	6 August 2026