

# ACCOMMODATION SERVICES COMPLAINTS AND FEEDBACK PROCEDURE

Department of Human Services (DHS)

Please note this procedure is mandatory and DHS Accommodation Services staff are required to adhere to the content.

## Summary

To provide a clear and consistent process for the reporting, management and response to complaints and feedback received by Accommodation Services, which complies with the requirements of the DHS Customer Feedback and Complaints Policy (CRL-306).

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Delegated Authority	Joe Young Executive Director, Disability Services
Procedure Custodian	Muriel Kirkby Director, Accommodation Services
Content author	Penny Hutchesson Manager, Customer Engagement and NDIS
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## 1. Title

Accommodation Services Complaints and Feedback Procedure.

## 2. Purpose

This procedure aims to:

- Support the safety and well-being of clients.
- Ensure clients of the Department of Human Services (DHS) Accommodation Services, their families and support persons have the opportunity to provide feedback, whether it is a compliment, a comment / suggestion or a complaint.
- Ensure a systematic approach to complaints and feedback.
- Enhance transparency and accountability in the delivery of services.
- This Procedure Order reflects the DHS Customer Feedback and Complaints Policy (CRL-306) and related documents.

## 3. Scope

This Procedure applies to all staff, clients, their families and support persons of DHS Accommodation Services.

Any person, including clients, can make a complaint and the matter will be investigated and responded to.

### **Guiding principles:**

The following principles must guide the management of all feedback and complaints.

► **Commitment to clients:** Accommodation Services is committed to providing safe, high quality and person-centered services.

► **Responsive and coordinated:** Feedback and complaints will be responded to and managed in a timely, consistent, responsive, coordinated and effective manner.

► **Privacy, reporting and disclosure:** Personal information will be collected, managed, used and disclosed in accordance with relevant policy and legislation, and in a manner that is respectful to the individuals involved.

Personal information, particularly sensitive information, is reported and disclosed on a strictly 'needs to know' basis, with systems and processes that support the privacy and security of information and respect for affected individuals.

## 4. Procedure Detail

### 4.1. Complaints

A complaint can be made by anyone and received by any Accommodation Services staff member.

The staff member receiving the complaint should log the details of the complaint in the MySAFETY system. When receiving a complaint, the staff member should ascertain the following:

- Name of the complainant/client
- If the complaint relates to a client, include the name and address details of the client.
- Date of the complaint.
- Names of all persons involved.
- Facts of the complaint.

Once the complaint has been logged in the My Safety system, an alert will be forwarded to the relevant person that a complaint has been received and they are required to undertake an investigation.

Complaints received by Accommodation Services are categorised into three key areas based on the Severity Assessment rating criteria (refer to section 13.1):

- National Disability Insurance Scheme (NDIS) related matters, for example NDIS funding, change in circumstances, NDIS plan reviews.
- Minor/moderate complaints (refer to definition in section 13 of this document).
- Major complaints (refer to definition in section 13 of this document).

#### **Complaints relating to NDIS matters**

NDIS complaints and feedback refer to any matter relating to NDIS matters and funding and may include the actions of an Accommodation Services Service Coordinator.

The Accommodation Services staff member receiving the complaint or feedback should undertake the following actions:

- Log the complaint in the MySAFETY system. The MySAFETY Quick Reference Guide: Accessing MySAFETY and Navigation for employees: QRG1 refers.
- An alert will be forwarded for follow up to the appropriate Manager. The Lead Service Coordinator will investigate the complaint, and where appropriate with the assistance of the Service Coordinator.
- The MySAFETY - FEEDBACK Complaints, Compliments and Suggestions Work Instruction (WIN-STR-003-2021) provides information on how to enter a new matter.
- The Lead Service Coordinator will notify the complainant/client of the outcome.
- The outcome of the complaint should be logged in the MySAFETY system.
- If the matter relates to a client, the Service Coordinator will notify the family/legal decision maker of the complaint outcome.

- Lead Service Coordinator will notify the Area Manager of the complaint.

The Lead Service Coordinator must:

- Collate information on the complaint, which may include speaking to all interested parties and reviewing Salesforce and MySAFETY for information relating to the matter.
- Involve the complainant/client in the resolution process, if practical, and advise the Area Manager and Service Coordinator of the complaint and resolution outcome.
- Keep the complainant/client informed either in writing, or verbally if practicable, including:
  - Ensuring the complainant/client understands the process for resolving the complaint and the outcome of the complaint; and
  - Seeking clarification on the complaint if required.
- Record all correspondence, including details of telephone calls, on the MySAFETY system.
- Advise the complainant/client of the outcome and decision after investigation of the complaint.
- Clearly record the outcome and the complainant's/client's level of satisfaction on the MySAFETY system, ensuring all parties previously notified of the complaint are advised of the outcome.
- The MySAFETY Quick Reference Guide Investigating a Client Incident Information QRG4CINC provides guidance on this process.
- If escalation of the complaint is required refer to 4.1.2.

### **Minor/moderate complaints**

Minor or moderate complaints refer to complaints assessed as either 'minor' or 'moderate' using the MySAFETY Severity Assessment Codes available in the MySAFETY system.

Refer to section 13.1 of this procedure for information.

The Accommodation Services staff member receiving the complaint or feedback should undertake the following actions:

- Log the complaint in the MySAFETY system. The MySAFETY Quick Reference Guide: Accessing MySAFETY and Navigation for employees: QRG1 refers.
- If the complaint relates to matter of a minor or moderate nature, an alert will be automatically forwarded for follow up to the Team Leader.
- The Team Leader will investigate the complaint.
- The MySAFETY – FEEDBACK Complaints, Compliments and Suggestions Work Instruction (WIN-STR-003-2021) provides information on how to enter a new matter.
- The outcome of the complaint should be logged in the MySAFETY system.
- Team Leader will notify the complainant of the outcome.
- Team Leader, if practicable, notifies the client of the outcome.
- Team Leader will notify the family of the complaint outcome.
- Team Leader will notify the Area Manager of the complaint.

The Team Leader must:

- Collate information on the complaint, which may include speaking to all interested parties and reviewing Salesforce and MySAFETY for information relating to the matter.
- Keep the complainant/client informed either in writing or verbally, if practicable, including.
- Involve the complainant/client in the resolution process, if practical, and advise the Area Manager and Service Coordinator of the complaint and resolution outcome.
- Ensure the complainant/client understands the process for resolving the complaint and the outcome of the complaint; and
- Seeking clarification on the complaint if required.
- Record all correspondence, including details of telephone calls, on the MySAFETY system.
- Advise the complainant/client of the outcome and decision after investigation of the complaint.
- Clearly record the outcome and the complainant's/client's level of satisfaction on the MySAFETY system, ensuring all parties previously notified of the complaint are advised of the outcome.
- The MySAFETY Quick Reference Guide Investigating a Client Incident Information (QRG4CINC) provides guidance on this process.
- Where the complainant/client is dissatisfied, inform them of their options and the procedures for review of the decision in accordance with Section 6 of this Procedure.

### **Major complaints**

Major complaints refer to complaints assessed as major using the Severity Assessment Codes available in the MySAFETY system.

Refer to section 13.1 of this procedure for the information Severity Assessment Criteria.

- The complaint is received by any Accommodation Services staff member, who logs the complaint in MySAFETY.
- The MySAFETY Quick reference Guide: Accessing MySAFETY and Navigation for employees: QRG1 refers.
- The complaint is forwarded for follow up to the Area Manager for follow up.
- Area Manager notifies the Assistant Director and Director of the complaint.
- Area Manager investigates the complaint.
- The MySAFETY – FEEDBACK Complaints, Compliments and Suggestions Work Instruction (WIN-STR-003-2021) provides information on how to enter a new matter.
- The outcome of the complaint should be logged in the MySAFETY system.
- Area Manager notifies the complainant of the outcome.
- Area Manager, if practicable, notifies the client of the outcome.
- Area Manager notifies the family of the complaint outcome.
- Area Manager notifies the Service Coordinator of the complaint outcome.

The Area Manager must:



- Inform the Assistant Director and Director, Accommodation Services of the complaint, and advise of the proposed investigation.
- Collate information on the complaint, which may include speaking to all interested parties and reviewing Salesforce and MySAFETY for information relating to the matter.
- Involve the complainant/client in the resolution process, if practical, and advise the Area Manager and Service Coordinator of the complaint and resolution outcome.
- Keep the complainant/client informed either in writing or verbally, and must include:
  - Ensure the complainant/client understands the process for resolving the complaint and the outcome of the complaint; and
  - Seek clarification on the complaint if required.
- Record all correspondence, including details of telephone calls, on the MySAFETY system.
- Advise the complainant/client of the outcome and decision after investigation of the complaint.
- Clearly record the outcome and the complainant's level of satisfaction on the MySAFETY system, ensuring all parties previously notified of the complaint are advised of the outcome.
- Where the complainant/client is dissatisfied, inform them of their options and the procedures for review of the decision in accordance with section 6 of this Procedure.

### **Steps to consider for all complaints**

In managing any complaint received by any Accommodation Services staff member, the steps to follow include:

- Identify the key facts of the complaint and what outcome the complainant/client expects.
- Ensure that it is a valid complaint for the purposes of this procedure.
- Attempt to resolve the complaint - this may involve reconciling all parties, minimising the conflict, changing a practice or apologising.
- Inform the complainant/client of how the complaint will be managed and ensure that they understand.
- Inform the person of whom the complaint has been made about. This includes the investigation and resolution phase. Support should be given to clients if sensitive matters are to be discussed.
- Where required, offer the support of an independent advocate to assist a client to make a complaint or provide feedback. An advocate may be an eligible support person, a lawyer, a doctor, a professional visitor, an independent advocacy service, or the SA Ombudsman.
- Hear everyone's perspective on the issue.
- Where possible, resolve the complaint.
- Record the feedback or complaint into MySAFETY within one working day.
- Record all correspondence, including details of telephone calls, on the MySAFETY system.

- Notify the Area Manager via email of the complaint and the outcome.
- Telephone calls are returned within two working days.
- All feedback is acknowledged within a minimum five (5) working days.
- Letters, faxes and emails are responded to within ten (10) working days.
- The complaint is finalised within 30 days: and
- Where a 30-day resolution timeline is not possible, progress updates are to be given to the complainant (verbally or in writing) every 20 days until the complaint is finalised.
- Ensure the complete process, including any follow-on actions and outcomes, are recorded on the MySAFETY system.
- The MySAFETY Quick Reference Guide Investigating a Client Incident Information (QRG4CINC) provides guidance on this process.

#### **4.1.1. Local resolution of minor client complaints**

Wherever possible operational staff, in conjunction with the Team Supervisor, should seek to resolve complaints made by clients locally and as soon as practicable, particularly where the complaint is minor in nature. The complaint details should still be logged in the MySAFETY system. The MySAFETY – FEEDBACK Complaints, Compliments and Suggestions Work Instruction (WIN-STR-003-2021) provides information on how to enter a new matter.

NOTE: The MySAFETY severity assessment classifies some minor complaints as insignificant.

Staff must involve the complainant/client in the resolution process, if practical, and advise the Area Manager and Service Coordinator of the complaint and resolution outcome.

Complaints should ideally be resolved immediately or as soon as possible (the same day). It is important to make sure everyone involved with the complaint is informed and understands the outcome of the complaint.

Clients should be reminded that they can make a formal complaint through any of the methods detailed in this procedure. Clients should also be reminded they can escalate a complaint or feedback to the Area Manager in accordance with 4.1.2 of this Procedure.

#### **4.1.2. Escalation of a Client Complaint to an Area Manager**

Where a minor local client complaint cannot be resolved by local staff or the Team Supervisor following the process outlined in 4.1.1, or the client would prefer to escalate to a senior member of staff, the complaint should be referred to the appropriate Manager for escalation.

Staff must involve the complainant/client in the resolution process, if practical, and advise the Area Manager and Service Coordinator of the complaint and resolution outcome.

#### **4.1.3. Anonymous complaints**

Anonymous complaints received, either in writing or via the DHS internet site, should also be referred to the responsible persons for follow up. Anonymous complaints can also be received via the MySAFETY system.

The responsible person will:

- Assess the feedback or complaint to determine the course of action.
- Log the complaint in the MySAFETY system (if not already recorded on this system).
- If contact information for the complainant is ascertained, acknowledge the feedback or complaint within five working days. Refer to section 4.1 for complaint management processes.

#### **4.1.4. Finalising complaints**

It is important to provide an outcome or resolution of any complaint made.

- Consideration should be given to providing this information in an easy-to-read format, using pictures if necessary. A verbal response to the complaint may also be required.
- Ensuring appropriate records are kept in MySAFETY.

Where reporting the complaint to the relevant person presents a conflict of interest, the matter should be raised with the Assistant Director, Accommodation Services for advice.

#### **4.1.5. Family and Stakeholder Feedback and Complaints**

Feedback is encouraged and information regarding the DHS Client Feedback processes should be displayed and available in all sites.

Feedback forms are to be accessible within each Accommodation Services site to enable clients, family, support persons and other stakeholders to provide written feedback.

Feedback can also be provided directly to Accommodation Services via telephone (1800 952 962), on-line ([www.dhs.sa.gov.au](http://www.dhs.sa.gov.au)) or by posting the pre-addressed feedback form.

Staff should refer to the process outlined in 4.1.1 in relation to managing minor complaints at the local level,

All feedback, complaints and compliments must be recorded on the MySAFETY system, acknowledged within five days and responded to in writing by the relevant Area Manager within 30 days. A separate acknowledgement is not required if the complaint is responded to within five (5) days.

#### **4.1.6. Aged care complaints**

For complaints relating to clients in an aged care setting, feedback can be provided anonymously or can be made through the Department of Human Services Client Feedback and Complaints process via the following link:

<https://dhs.sa.gov.au/contact/feedback-and-complaints>

Additional support regarding complaints in the aged care setting is available from:

- For advocacy support: The Older Persons Advocacy Network on 1800 700 600.
- Aged Care Quality and Safety Commission on 1800 951 822.

## 5. Critical Incidents

A critical client incident is an event (or alleged event) that occurs as a result of, or during the delivery of services directly provided by DHS or a service provider and has caused or is likely to cause significant negative impact to the health, safety or wellbeing of a client or service recipient.

This procedure does not replace the staff response if the complaint relates to a critical incident.

Staff are advised to refer to the Managing Critical Client Incidents Policy regarding their response to such matters: Managing Critical Client Incidents - DHS 2019.

Staff must immediately advise their line manager and/or Director of an apparent critical client incident, either in person or by phone, who must then contact the Director Incident Management and relevant Executive Director

**NB: Immediate Response - Safety:** The safety of clients, workers and others is of the highest priority. Following any client incident, workers must respond immediately and appropriately to ensure the safety and wellbeing of client(s) and/or others. This may involve calling for an ambulance or administering first aid.

**NB:** The Director Incident Management Unit is responsible for determining if a specific incident is to be classified as a critical incident.

## 6. Review of Complaints

A client, family member or any other complainant may ask for a review of a decision either verbally or formally in writing (e.g. via the Feedback Form or the Feedback page on the DHS website).

The complainant may ask for a review of the decision by any of the following:

- Requesting further review by a more senior person, for example the Assistant Director, or Director.
- Requesting a review by the Director, Accommodation Services.
- Requesting a review by the Chief Executive, Department of Human Services.
- Requesting a review by the Minister for Human Services.
- Contacting an external body, including (but not limited to):
  - The NDIS Quality and Safeguards Commission (refer to section 7).
  - The Health and Community Services Complaints Commissioner.
  - The Public Advocate.
  - The SA Ombudsman.

- The Adult Safeguarding Unit.
- The Community Visitors Scheme.

A client or community member has the right to have their review (or original complaint) heard at any level at any stage.

Where a complaint is made to any of these external bodies, staff must inform their line manager. The Director, Accommodation Services must also be notified.

Any response to external bodies, must be made through the Director, Accommodation Services.

## 7. NDIS Quality and Safeguards Commission

The NDIS Quality and Safeguards Commission (the Commission) is an independent agency established to improve the quality and safety of NDIS supports and services.

The NDIS Commission can take complaints from anyone about:

- NDIS services or supports that were not provided in a safe and respectful way.
- NDIS services and supports that were not delivered to an appropriate standard.
- how an NDIS provider has managed a complaint about services or supports provided to an NDIS participant.

A complaint can be made to the NDIS Commission by:

- Phoning: 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.
- [National Relay Service](#) and ask for 1800 035 544.
- Completing a [complaint contact form](#).

Where a complaint is received from the NDIS Commission, staff must inform their line manager. The Director, Accommodation Services must also be notified.

The complaint should be logged by the receiver of the complaint in the MySAFETY system (refer to section 4 of this document). Response timelines provided by the NDIS Commission must be followed.

Any response to the NDIS Commission, must be made through the Director, Accommodation Services.

## 8. Complaints Involving Staff Misconduct

Where a complaint involves staff misconduct, the resolution of such complaints must be undertaken by a staff member in a supervisory / managerial position, or by the DHS Incident Management Unit, noting that:

- The staff member handling the complaint must not have a conflicting interest with the staff member who is the subject of the complaint; and

- Where the complaint is of a serious nature (i.e. severity assessment code level 1 or 2) the DHS Client Feedback System Severity Assessment Code Guideline must be followed.

Complaints can also be made to the Office for Public Integrity. The Office for Public Integrity receives, identifies and investigates complaints of corruption, misconduct or maladministration in public administration. Any person can make a report in the following way:

- Email: [admin@opi.sa.gov.au](mailto:admin@opi.sa.gov.au)
- Telephone: (08) 8207 1777, 1300 782 489 (country callers for the cost of a local call)
- Postal mail: GPO Box 11066

Adelaide, SA, 5001

The Director, Accommodation Services must be informed of any complaint involving allegations of staff misconduct.

## **9. Supports for the Client or Complainant During the Complaints Process**

Staff have a duty to support any client or complainant to make a complaint, including to the NDIS Quality and Safeguards Commission, without inhibition and to ensure that they do not suffer any harassment or retribution in response:

- Any staff member who is suspected of harassing a client or community member in response to a complaint being made will be investigated.

Clients or community members have a right to a support person when making a complaint:

- To provide communication and emotional assistance for the individual in making their complaint.
- To act to ensure that the individual understands the process and the outcome of the complaint; and
- To act to ensure that the complaint is heard and resolved fairly and promptly.
- Where the complainant is a client their support person may be:
  - Any authorised official, domestic or professional visitor; or
  - Any staff member without a conflict of interest who consents to the role.

Where the complainant is a member of the community, their support person may be anyone they nominate.

### **9.1 Interpreter**

Where necessary, an interpreter will be made available to a complainant at a cost to DHS Accommodation Services.

## 10. Confidentiality

A complaint and the complainant's identity will be treated as strictly confidential by those involved in the complaint process.

Complaints must not be discussed with or disclosed to any other staff or other persons, unless for the purposes of investigation, resolution or monitoring of the complaint.

The staff member receiving the complaint, should reassure the complainant that the information will be treated confidentially, but that care concern issues are paramount and so information may need to be shared with appropriate people in order to protect clients.

## 11. Information sharing and Privacy Principles

Information collected or shared by Accommodation Services about you will be handled in accordance with the South Australian Government Information Sharing Guidelines for promoting safety and wellbeing accessible via the Department of Premier and Cabinet website at: [https://www.dpc.sa.gov.au/\\_\\_data/assets/pdf\\_file/0009/45396/Information-Sharing-Guidelines.pdf](https://www.dpc.sa.gov.au/__data/assets/pdf_file/0009/45396/Information-Sharing-Guidelines.pdf).

Accommodation Services will work closely with other agencies and service providers to coordinate the best support for clients.

This means informed consent to share information about be sought and respected in all situations unless:

- disclosure is required by law, or
- it is unreasonable or impracticable to seek consent; or consent has been refused; and
- the disclosure is reasonably necessary to prevent or lessen a serious threat to the life, health or safety of a person or group of people

If a client is unable to give informed consent, Accommodation Services must gain the consent of their family/legal guardians/NDIS Plan Nominee. Wherever possible, written consent from family/legal guardians/NDIS Plan Nominee will be obtained prior to services being provided by Accommodation Services. Where applicable, ongoing liaison will be maintained with clients or their family/legal guardian/NDIS Plan Nominee to ensure they are involved in decision making, needs are known and decisions around consent are timely.

## 12. Staff Roles and Responsibilities

### Roles and Responsibilities

Role	Authority / Accountability
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Director/Assistant Director	<ul style="list-style-type: none"> <li>• To perform regular reviews of compliance with this Procedure and the DHS Customer Feedback and Complaints Policy and guidelines across Accommodation Services.</li> <li>• To ensure training on complaints and feedback management is available and provided to staff across Accommodation Services.</li> <li>• To refer matters of potential staff misconduct to the DHS Incident Management Unit for investigation.</li> <li>• To oversee regular reviews of complaints and feedback received across the Accommodation Services business, to identify trends, themes and opportunities to improve the quality and delivery of service and care to clients.</li> </ul>
Area Managers	<ul style="list-style-type: none"> <li>• To respond to feedback and complaints of an extreme/high risk nature.</li> <li>• To ensure they are managed formally in accordance with this Procedure and the DHS Customer Feedback and Complaints Policy and guidelines.</li> <li>• To review the report compiled by the Quality and Safety Officer and look for opportunities to improve the quality and delivery of service and care to clients within their area.</li> </ul>
Team Leader	<ul style="list-style-type: none"> <li>• To respond to feedback and complaints of a minor/moderate nature.</li> <li>• To identify serious complaints and ensure they are managed formally in accordance with this Procedure and the DHS Customer Feedback and Complaints Policy and guidelines.</li> <li>• To review the report compiled by the Quality and Safety Officer and look for opportunities to improve the quality and delivery of service and care to clients within their area.</li> </ul>
Lead Service Coordinator	<ul style="list-style-type: none"> <li>• To respond to feedback and complaints relating to NDIS matters.</li> <li>• To identify serious complaints and ensure they are managed formally in accordance with this Procedure and the DHS Customer Feedback and Complaints Policy and guidelines.</li> <li>• To ensure training on complaints and feedback management for Accommodation Services staff is current and aligns with DHS policy and Accommodation Services procedure.</li> <li>• To review the report compiled by the Quality and Safety Officer and look for opportunities to improve the quality and delivery of service and care to clients within their area.</li> </ul>
Team Supervisors	<ul style="list-style-type: none"> <li>• To assist with the handling of feedback within their staff teams.</li> <li>• To respond to complaints where required.</li> <li>• To respond to local and minor complaints made by clients. To ensure feedback information is displayed and available in sites.</li> <li>• To work with other Accommodation Services staff to implement opportunities and improvements based on analysis of complaints by the Quality and Safety Officer.</li> </ul>



All staff	<ul style="list-style-type: none"> <li>• To respond appropriately to any feedback received by a client, family member, legal guardian, stakeholder or community member in accordance with this Procedure.</li> <li>• To undertake training on complaints and feedback.</li> <li>• To support all clients, family member, legal guardian, stakeholder or community member to give feedback without inhibition, risk of harassment or retribution.</li> </ul>
Quality and Safeguarding Officer	<ul style="list-style-type: none"> <li>• To identify trends, themes, opportunities to improve the quality and delivery of service and care to clients.</li> <li>• Provide analysis of all complaints received by Accommodation Services.</li> <li>• Reports provided monthly to the Accommodation Services Quality and Safeguarding Committee and the Incident Management Committee.</li> </ul>

### 13. Monitoring, evaluating and review

The Director, Accommodation Services must:

- Be satisfied that feedback and complaints are managed in accordance with this Procedure and the DHS Customer Feedback and Complaints Policy and related documents.
- Ensure delegated officers understand their responsibilities and conduct their duties in line with the requirements set out in this Procedure.
- Ensure all responsible officers have access to the necessary training and orientation to equip them to conduct their areas of responsibility effectively; and
- Ensure regular audits of compliance with this Procedure and report any non-compliance to the Executive Director, Strategy and Accommodation Services.
- Ensure a periodic review of the end-to-end complaint and feedback procedure occurs.

#### Analysis of complaints received

All complaints and feedback will be analysed by the Quality and Safeguarding Officer responsible for the Complaint Portfolio. A report will be provided to the Accommodation Services Quality and Safeguarding Committee on a monthly basis, with key issues, themes and trends identified and reported. This will include a periodic review of the end-to-end complaint and feedback procedure.

Complaint and feedback reporting will also occur through the Incident Management Committee. The Committee will provide:

- Oversight of the quality and continuous improvement of Incident Management training for staff to support a systemic approach to the management of incidents.

- Oversight of relevant policy and procedures relating to Incident Management Practice.
- Actioning service improvement opportunities identified through incident management practice, including improvements to the care and support of clients and the safety and well-being of staff.
- Improving the prevention of, and response to, the abuse and neglect of people with disability through effective incident management practice, consistent with the Zero Tolerance to Abuse and Neglect Strategy.
- Identification and analysis of incident trends in order to identify gaps and service improvement opportunities.

## 14. Continuous Improvement

Accommodation Services will continually improve feedback and complaints systems and process by:

- Collecting complaints data to support performance monitoring, analysis and evaluation of trends
- Providing internal and public reporting on key performance indicators.
- Providing analysis of complaints and feedback to the Accommodation Services Incident Management Committee.
- Providing analysis of complaints and feedback to the Accommodation Services Quality and Safeguarding Committee.
- Providing analysis of complaints and feedback to the DHS Quality and Safeguarding Steering Committee.
- Using feedback and complaints data to identify opportunities for improvement.

## 15. Definitions

Key definitions

Term	Meaning
<b>Advocate</b>	Someone who may support a client to make a complaint or make complaint on behalf of a client. An advocate may be an eligible support person, a lawyer, a doctor, a professional visitor, or the SA Ombudsman.
<b>Client</b>	Someone who has received or is receiving one or more of DHS Accommodation Services' programs or services.

<b>Complaint</b>	Includes expressions of dissatisfaction or concerns about a DHS Accommodation Services service made by clients, their legal guardian, primary contact or other stakeholders.
<b>Complainant</b>	Any person or organisation who is providing feedback or making a complaint about Accommodation Services
<b>NDIS complaint</b>	Includes any matter relating to NDIS processes and NDIS funding
<b>Insignificant complaint</b>	Complaints assessed as insignificant using the Severity Assessment Codes available in MySAFETY.
<b>Minor/Moderate complaint</b>	Complaints assessed as either minor/moderate using the Severity Assessment Codes available in MySAFETY.
<b>Major complaint</b>	Complaints assessed as either 'extreme' or 'high' using the Severity Assessment Codes available in MySAFETY.
<b>Conflict of Interest</b>	A conflict of interest occurs when a staff member or an associate has, seeks or may be perceived as having or seeking to obtain pecuniary or other personal interest which conflicts or may conflict with the proper discharge of their duties.
<b>Feedback/Suggestion</b>	Any opinion, comment / suggestion, compliment or complaint, or concern, by a client or their representative, about DHS services or staff.
<b>Local Immediate Resolution</b>	Complaints which are resolved locally and are generally not registered or recorded. Handling a complaint locally is useful for minor complaints and can result in a quicker resolution and less administration, but there is also less accountability.
<b>MySAFETY</b>	The DHS mandated Incident Reporting and Feedback System used to register, monitor and report on feedback and complaints. Training resources and quick reference guides can be found <a href="#">here</a> .
<b>Support Person</b>	Someone providing communication or assistance to the individual making a complaint.

## 15.1 Severity Assessment Rating

Severity	Insignificant	Minor	Moderate	Major
Description	<ul style="list-style-type: none"> <li>Injury that doesn't require first aid or intervention - excluding bruising</li> <li>Mild verbal aggression, threatening behaviour</li> <li>Missing client funds - \$5 less or missing</li> </ul>	<ul style="list-style-type: none"> <li>First aid applied locally on site which only requires minimal intervention, e.g. extra observation, investigation, review or minor treatment</li> <li>Client fall without injury</li> <li>Any incident, health concern or behaviour managed by the directions in the client support plan</li> <li>PRN medication administration for a behaviour concern</li> <li>Medication errors not identification as moderate or Major</li> <li>Bruises with identified cause</li> <li>Missing client funds - \$5&lt;\$20 or less missing</li> </ul>	<ul style="list-style-type: none"> <li>Any injury that requires assessment or treatment by external health professional</li> <li>Client fall with injury</li> <li>Any incident, health concern or behaviour not managed by the directions in the client's support</li> <li>Any incident resulting in an injury which causes significant temporary impairment to the client</li> <li>Medication errors as indicated in policy flow chart - inclusive of pharmacy and administration errors</li> <li>Bruises with no identified causes</li> <li>Violation of court ordered licence or bail conditions</li> <li>Plan Hospital admission</li> <li>Missing client funds - \$20&lt;\$50 or less missing</li> <li>Missing Assets - Clients and Departments \$50 &lt; \$500</li> <li>Any infection control related incidents</li> </ul>	<ul style="list-style-type: none"> <li>Hospital admission or Emergency Department presentation</li> <li>Medication errors as indicated in policy flow chart - inclusive of adverse reaction and wrong drug</li> <li>Any incident which requires life-saving intervention</li> <li>Any incident resulting in major permanent or long-term harm or loss of function to the client</li> <li>Death</li> <li>Any form of abuse as identified in zero tolerance framework</li> <li>Severe behaviour of concern incident that occurs that is not managed as per client support plan/PBS plan</li> <li>Missing person</li> <li>Required a response from South Australia Police (SAPOL)</li> <li>Identification of any Care Concern</li> <li>Missing client funds - \$50 or more</li> <li>Missing Assets - Clients and Departments \$500 and above</li> <li>Activation of Emergency Codes</li> <li>Any Property or Vehicle Damage</li> </ul>

## 16. Reference Documents

### 16.1 Directive documents

DHS Customer Feedback and Complaints Policy (CRL-306)

DHS Managing Critical Incidents Policy (PCD/16)

Department of the Premier and Cabinet Circular, Complaint Management in South Australian Public Sector (PC039).

AS/NZ 10002:2014: Guidelines for complaint management in organisations.

MySAFETY (cammsrisk) login – accessible via the DHS Intranet

MySAFETY – FEEDBACK Complaints, Compliments and Suggestions  
Work Instruction (WIN-STR-003-2021)

MySAFETY Quick Reference Guide: Accessing MySAFETY and Navigation for employees: QRG1

MySAFETY Quick Reference Guide Investigating a Client Incident Information: QRG4CINC

MySAFETY Training Resources - <https://www.publicsector.sa.gov.au/mysafety-training-resources>

South Australian Government MySAFETY Severity Risk Assessment (refer to section 13.1).

## 16.2 Supporting documents

DHS Client Feedback System Severity Assessment Code Guideline

DHS Client Feedback form

DHS Zero Tolerance to Abuse and Neglect of People with Disability Strategy

Accommodation Services Customer Charter

NDIS Quality and Safeguarding Framework

## 17. Approval

<b>Content Author:</b>	<b>Resource Custodian:</b>	<b>Delegated Authority:</b>
Date: April 2021	Date: April 2021	Date: April 2021
Name: Penny Hutchesson Position: Manager Customer Engagement and NDIS	Name: Muriel Kirkby Position: Director Accommodation Services	Name: Joe Young Position: Executive Director Disability Services