



WHITE CLOUD  
FOUNDATION

## COMPLAINTS POLICY

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Drafted by	Melissa Cohen	Approved by Board on	12/01/2022
Responsible person	Adam Scott	Scheduled review date	February 2024

This policy is applicable to all employees, contractors, and volunteers of White Cloud Foundation and all those who are involved in the operations of White Cloud Foundation. This policy pertains to the receiving or management of complaints from the public or clients regarding our services and staff, or our complaint handling process.

White Cloud Foundation expects employees at all levels to be committed to fair, effective and efficient complaint handling.

### PURPOSE

This policy is intended to ensure that we handle complaints fairly, efficiently, and effectively.

This policy provides guidance to our employees, general public and service users on the key principles and components of our complaint management system.

For the purposes of this Policy:

- 'Children and young people' will refer to anybody under the age of 18.
- 'Employee' refers to paid employees, volunteers, and contractors.

### TERMS AND DEFINITIONS

#### Complaint

Expression of dissatisfaction made to or about White Cloud Foundation, our services, employees or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- Responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback']

#### Complaint management system

All policies, procedures, practices, staff, hardware and software used by White Cloud Foundation in the management of complaints.



### **Dispute**

An unresolved complaint escalated either within or outside of White Cloud Foundation.

### **Feedback**

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about White Cloud Foundation or our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### **Service request**

A service request includes:

- Routine inquiries about White Cloud Foundation's core business.
- Requests for the provision of services and assistance.
- Requests for explanation of policies, procedures and decisions.

### **Grievance**

A clear, formal written statement by an individual employee about another employee or a work-related problem.

## **RESPONSIBILITIES**

It is the responsibility of the Board and Board Chair to:

- Promote a culture that values complaints and their effective resolution, by:
  - Providing adequate support and direction to the General Manager and Tele-Mental Health Service Manager/s responsible for handling complaints.
  - Regularly review reports on complaint trends and issues arising from complaints.
  - Support recommendations for service, employee, and complaint handling improvements arising from the analysis of complaint data.
  - Encourage all staff to be alert to complaints.
  - Encourage staff to make recommendations for system improvements.

It is the responsibility of the Executive Staff to:

- Demonstrate exemplary complaint handling practices, by:
  - Treating all people with respect, including any person who lodges a complaint.
  - Assisting employees, clients, or the public to make a complaint, if needed.
  - Implement changes arising from individual complaints and from the analysis of complaint data.

It is the responsibility of all employees and contractors to:

- Understand and comply with our complaint handling process, by:
  - Treating all people with respect, including people who make complaints.
  - Direct people who wish to make a complaint to our complaints form, Tele-Mental Health Service Manager/s or General Manager.
  - Be alert to complaints and assist White Cloud Foundation staff to resolve matters promptly.



- Understand their responsibility in ensuring the safety and wellbeing of all children and youth.

## **GUIDING PRINCIPLES**

### **Key personnel**

The General Manager and Tele-Mental Health Service Manager/s will be ultimately responsible for the frontline communication and systematic management of all complaints. The allocation of a responsible manager will depend on the nature and sensitivity of the complaint.

### **People focus**

White Cloud Foundation is committed to seeking and receiving feedback and complaints about our services, systems, practices and complaint handling. Any person making a complaint can expect:

- To be provided with information about our complaint handling process;
- To be listened to and treated with respect; and
- Provided with reasons for our decision/s and any options for redress or review.

### **Timely approach**

White Cloud Foundation will seek to reach resolution of all complaints with 14 days of the complaint being received.

### **No detriment to people making complaints**

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

### **Anonymous complaints**

White Cloud Foundation accepts anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

### **Accessibility**

Information about how and where complaints can be made can be found on White Cloud Foundation website.

Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

### **Early resolution**

When appropriate, White Cloud Foundation may offer an explanation or apology to the person making the complaint.

### **Responsiveness**

White Cloud Foundation will promptly acknowledge receipt of complaints. White Cloud Foundation 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 will be escalated appropriately.



White Cloud Foundation is committed to managing people's expectations, and will inform them as soon as possible, of the following:

- The complaints process;
- The expected time frames for our actions;
- The progress of the complaint and reasons for any delay;
- Their likely involvement in the process; and
- The possible or likely outcome of their complaint.

White Cloud Foundation will advise people as soon as possible when it 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).

White Cloud Foundation will also advise people as soon as possible when it is unable to meet its time frames for responding to their complaint and the reason for delay.

#### **Objectivity and fairness**

White Cloud Foundation will address each complaint with integrity and in an equitable, objective and unbiased manner.

White Cloud Foundation will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. Internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

#### **Responding flexibly**

The White Cloud Foundation General Manager and Tele-Mental Health Service Manager/s are empowered to resolve complaints promptly and with as little formality as possible. White Cloud Foundation will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

White Cloud Foundation will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

#### **Confidentiality**

White Cloud Foundation will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the WCF010 Privacy Policy.

#### **Complaints involving multiple agencies**

Where a complaint involves multiple organisations, White Cloud Foundation 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.

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

Where White Cloud Foundation services are outsourced/contracted out, White Cloud Foundation expects the service providers to have an accessible and comprehensive complaint management system.

White Cloud Foundation takes complaints not only about the actions of its staff but also the actions of its service providers.

#### **Managing unreasonable conduct by people making complaints**

White Cloud Foundation 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 staff; and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with White Cloud Foundation, their conduct can significantly affect the progress and efficiency of our work. As a result, White Cloud Foundation will take proactive and decisive action to manage any conduct that negatively and unreasonably affects White Cloud employees in accordance with this policy.

#### **Alternative avenues for dealing with complaints**

White Cloud Foundation will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

## **ACCOUNTABILITY AND LEARNING**

### **Analysis and evaluation of complaints**

White Cloud Foundation will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

The Service Manager/s will provide regular reports to the General Manager and Board Chair on:

- The number of complaints received;
- The outcome of complaints;
- Issues arising from complaints; and
- Systemic issues identified.



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

Both reports and their analysis will be provided to the Board for review, at least annually.

#### **Monitoring of the complaint management system**

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints.
- Identify and correct deficiencies in the operation of the system.

### **PROCESSES**

The White Cloud Foundation General Manager and Tele-Mental Health Service Manager/s hold responsibility for the management of all complaints.

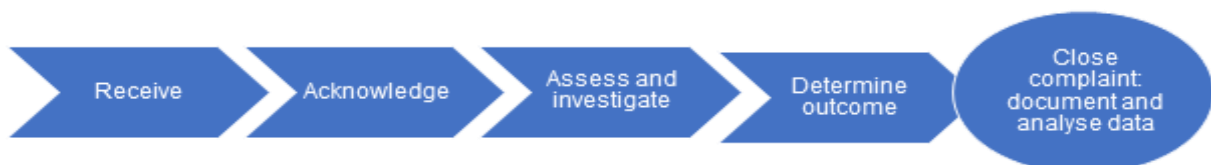
When responding to complaints, the General Manager and Tele-Mental Health Service Manager/s will act in accordance with complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

The General Manager and Tele-Mental Health Service Manager/s should also consider any relevant legislation and/or regulations when responding to complaints and feedback. All complaints related to child protection or suspicions of harm will be dealt with in accordance to WCF015 Child and Youth Risk Management Policy.

White Cloud Foundation aims to have a resolution to all complaints within a 14-day period.

All complaints should be recorded on the [White Cloud Foundation Incident Reporting Form](#) and sent to [info@whitecloudfoundation.org](mailto:info@whitecloudfoundation.org) for filing.

The key stages of our Complaint Management System are:



#### **Complaint by public or client**

##### STEP 1 – RECEIVE

Employee acknowledges actual or potential complaint. Escalates to Tele-Mental Health Service Manager/s or General Manager (via telephone or email) as soon as reasonably possible.

The employee should record:

- Contact information of the person making the complaint and the date
- Issues raised by the person making the complaint



- Any other relevant information

If the complaint concerns the immediate welfare or safety of a child or young person, the employee should call 000, immediately.

Refer to WCF015 Child and Youth Risk Management Policy for guidelines on Mandatory Reporting Requirements.

### STEP 2 – ACKNOWLEDGE

The Tele-Mental Health Service Manager/s or General Manager will acknowledge receipt of complaint promptly (preferably within 24 hours) and complete an incident form. Consideration will be given to the most appropriate medium (e.g. email, telephone call) for communicating with the person making a complaint. The allocated manager will consider:

- 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 other organisations.

The aim, where possible, is to resolve the complaint at this level. Where appropriate, offer an explanation or apology.

If resolution isn't possible, the person making the complaint will be informed of:

- The complaints process;
- The expected time frames for our actions;
- The progress of the complaint and reasons for any delay;
- Their likely involvement in the process; and
- The possible or likely outcome of their complaint;

Incident forms should be forwarded to and stored securely by the General Manager.

### STEP 3 – ASSESS AND INVESTIGATE

After assessing the complaint, White Cloud Foundation will consider how to manage it. It may:

- 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 allocated manager will keep the person making the complaint up-to-date on its progress, particularly if there are any delays. White Cloud Foundation will also communicate the outcome of the complaint using the most appropriate medium. Which actions White Cloud Foundation decide to take will be tailored to each case and in consideration of any statutory requirements.



#### STEP 4 – DETERMINE OUTCOME

Following consideration of the complaint and any investigation into the issues raised, the allocated manager will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place

If resolution has not been possible, the complaint should be escalated to the Board Chair whereby assessment and possible investigation should occur. The Board Chair will aim to facilitate a resolution acceptable to all parties.

Where a person making a complaint remains dissatisfied with the outcome of the Board Chair's decision, they may seek an external review by the Australian Charities and Not-for-Profits Commission.

#### STEP 5 – CLOSE COMPLAINT: DOCUMENT AND ANALYSIE DATA

White Cloud Foundation will keep records about:

- How it managed the complaint;
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations); and
- Any outstanding actions to be followed up, including analysing any underlying or root causes.

#### **Complaint by Employee**

Where the complaint is from an employee, the employee must complete an incident form and forward to the Tele-Mental Health Service Manager/s or General Manager. All other steps and processes remain the same as for a complaint from the public or client.

#### **REVIEW**

The Board Chair or Executive Staff can recommend a review of this policy at any time. Otherwise, this policy is to be reviewed and approved by the Board at intervals of not less than 2 years.