POLICY

Feedback and Complaints Policy and Procedure

Version 4.1, reviewed 27 May 2026. How anyone can give feedback or make a complaint about IEL, and how we respond.

Integrity Empowered Living (IEL)
Feedback and Complaints Policy and Procedure
Version: 4.1
Owner: Thomas Reeves (Founder) and Nyree Davis (Operations Manager)
Applies to: all workers, participants, families, carers, advocates, and external stakeholders
Last reviewed: 27 May 2026
Next review: 27 November 2026 (or earlier if triggered)
Linked legislation: *NDIS Act 2013* (Cth), *NDIS (Complaints Management and Resolution) Rules 2018*, *Privacy Act 1988* (Cth), *Anti-Discrimination Act 1998* (Tas)
Linked policies: Participant Incident Management, Staff Code of Conduct, Disciplinary Disputes and Grievances, Privacy and Confidentiality, Records and Information Management

1. Purpose and scope

This policy sets out how anyone can give feedback or make a complaint about IEL, and how IEL responds. It exists to:
- protect participant rights and safety
- capture improvement opportunities early
- meet NDIS Practice Standards and the *Complaints Management and Resolution Rules 2018*
- keep the process simple so it actually gets used

Applies to all stakeholders — participants, families, carers, advocates, staff, other providers, government agencies, and community members.

Staff complaints about workplace matters are managed under the Disciplinary, Disputes and Grievances Policy. Staff may use this policy for service-quality concerns.

2. NDIS Practice Standards alignment

This policy supports:
- **Feedback and Complaints Management (Core Module)** — accessible system, procedural fairness, continuous improvement from complaint data
- **Governance and Operational Management (PS 2.1–2.3)** — complaints feed governance review
- **Rights and Responsibilities (PS 1.1–1.5)** — right to complain without fear of retribution

Auditors: evidence in IEL Hub (Feedback & Complaints Log, CI Log), ShiftCare communications, and Weekly Governance Huddle notes.

3. Core principles

1. **Every complaint is a gift.** It tells us where we're failing before an auditor does.
2. **No retaliation. Ever.** Anyone who raises a concern in good faith is protected. Memory flags on the complainant and any complained-about party last **90 days** so any subsequent correspondence is handled with extra care.
3. **Staff resolve at the front line.** If a participant raises something, the support worker should try to fix it on the spot. Only unresolved or serious matters escalate.
4. **Fast acknowledgement, fair process.** Acknowledge within 5 business days. Resolve within 28 days.
5. **Record everything.** If it's not in IEL Hub, it didn't happen.

4. How to give feedback or make a complaint

CHANNEL	DETAILS
Talk to any staff member	Verbally — staff log it in IEL Hub
Email	operations@integrityempowered.com.au
Phone	Contact number on IEL Hub / Participant Handbook
IEL Hub	IELHUB.com.au — direct submission

CHANNEL	DETAILS
Anonymous / confidential form	https://forms.gle/CfQNtbdQ7bio8xhp6
Mail	Postal address (anonymous complaints accepted)
Third party	With participant consent or legal representative consent

Feedback is voluntary. Complaints can be withdrawn at any time.

5. Complaint resolution — 6-step process

Step 1 — Front-line resolution (staff)

Support workers handle this autonomously. When a participant or stakeholder raises a concern:
- Listen openly and ask what outcome they want
- Fix it on the spot if you can
- If resolved → log in IEL Hub (Feedback & Complaints Log) and notify Operations Manager
- If unresolved within 24 hours or involves safety/harm → escalate to Operations Manager immediately

Staff do NOT need management approval to:
- Apologise for a service gap
- Adjust a routine or approach within the Support Plan
- Offer to change a rostered worker (flag to Ops Manager for scheduling)

Step 2 — Formal lodgement

If not resolved at Step 1, the Operations Manager:
- Records the complaint in IEL Hub
- Advises the complainant of their right to an advocate and to external bodies
- **Assigns the complaint to the Director for investigation by default.** The Operations Manager investigates when the Director is the subject. An independent investigator (engaged via the IEL Board, NDIS Commission referral, or Ombudsman Tasmania referral) handles cases where both Director and Operations Manager are subjects. Investigator must not be the person complained about.

Step 3 — Acknowledge

Acknowledge receipt within **5 business days**. The NDIS sets no fixed maximum; 5 business days is our internal target and we are often faster. Set realistic expectations for resolution timeframe.

Step 4 — Investigate and resolve

- Involve the complainant and keep them informed

- Apply procedural fairness — all parties heard
- Focus only on the identified complaint matters
- Record all decisions in IEL Hub
- Target resolution within **28 days** from acknowledgement
- If 28 days isn't enough, update the complainant with a revised date

Step 5 — Communicate outcome

- Discuss verbally first, then confirm in writing
- Written advice includes: outcome, further options (internal review, external escalation), and a request for feedback on the complaints process
- **Notify the affected participant's family / nominated representative** where the participant was involved or affected (including when their worker is removed or changed) — share an **outcome summary, de-identified where needed**; confirm the service is safe and continuing, and never disclose a worker's confidential conduct, health, or personal details. Log the notification (who, when, what was shared).
- Relay lessons learned to the relevant area of IEL for continuous improvement

Step 6 — Satisfaction follow-up (14 days after resolution)

- The Operations Manager sends Template 4 (Satisfaction Follow-Up) **14 days after** the complaint is marked resolved.
- Responses are captured in the Feedback & Complaints register.
- If the complainant indicates they remain unhappy, treat as a new complaint and link to the original Ref.

---

6. Complaints involving harm or criminal activity

If a complaint alleges actual or possible criminal activity, abuse, neglect, or exploitation:
- Refer to the Operations Manager **immediately**
- Manage under the Participant Incident Management Policy (parallel process)
- Report to NDIS Commission and/or Tasmania Police as required

Reportable incident notification timeframes

Reportable incidents are notified to the NDIS Commission within these timeframes. Within 24 hours for the most serious categories: death, serious injury, abuse or neglect, unlawful sexual or physical contact, and sexual misconduct. Within 5 business days for other reportable incidents, including the unauthorised use of a restrictive practice. Where full detail is not available at 24 hours, core details are given within 24 hours and the remainder within 5 business days. A detailed report is provided within 60 business days if the Commissioner requires it. (NDIS Incident Management and Reportable Incidents Rules 2018, sections 20, 21 and 24.)

7. External complaints bodies

Anyone can complain externally at any time. Staff must help people access these bodies if requested.

BODY	CONTACT
NDIS Quality and Safeguards Commission	1800 035 544 | ndiscommission.gov.au
Australian Human Rights Commission	1300 656 419 | humanrights.gov.au
Ombudsman Tasmania	1800 001 170 | ombudsman.tas.gov.au
Equal Opportunity Tasmania	1300 305 062 | equalopportunity.tas.gov.au
Office of the Public Guardian Tasmania	1800 006 125
Strong Families Safe Kids (child safety)	1800 000 123
NDIA complaints	1800 800 110 | feedback@ndis.gov.au
Commonwealth Ombudsman (NDIA)	1300 362 072 | ombudsman.gov.au

NDIS Commission complaints about IEL: All staff must comply with any orders or requests from the Commission and assist in any resolution process.

8. Privacy

- Handle all complaint information per the Privacy and Confidentiality Policy
- Disclose only what's necessary — by law or to prevent harm
- Notify the complainant before breaking confidentiality (unless safety risk prevents this)
- Retain complaint records for **7 years minimum**
- Store securely in IEL Hub with access restricted to Management

9. Complaints involving children

Staff working with children must be able to:
- Recognise neglect, grooming, and other forms of harm
- Understand how children express distress and disclose harm

- Respond to disclosures appropriately and meet legal reporting obligations
- Report to Strong Families Safe Kids (1800 000 123) when required

Training is provided at induction and monitored through annual performance reviews.

10. Parallel processes

IF A COMPLAINT ALSO INVOLVES…	ALSO FOLLOW…
Participant harm or reportable incident	Participant Incident Management Policy
Staff conduct breach	Disciplinary, Disputes and Grievances Policy
Privacy breach	Privacy and Confidentiality Policy
Workplace injury or hazard	WHS Policy

11. Monitoring and review

This policy is reviewed:
- Every 6 months as part of IEL's policy review cycle
- After any serious complaint that reveals a systemic gap
- After changes to the *Complaints Management and Resolution Rules 2018*
- After external audit findings

Ongoing monitoring:
- Weekly Governance Huddle — standing item: complaint trends and CI actions
- Annual participant satisfaction survey — includes questions on complaint accessibility
- Annual staff satisfaction survey — includes questions on complaint culture

The Operations Manager monitors complaint data in IEL Hub and reports trends at the Weekly Governance Huddle. Preventative and improvement measures are tracked in the CI Log.

12. Document control

VERSION	DATE	OWNER	CHANGES
3.0	25 Oct 2025	Thomas Reeves	IEL-specific conversion: integrated IEL Hub workflows, Tasmania-specific contacts, governance processes, 2-day/28-day timeframes

VERSION	DATE	OWNER	CHANGES
4.0	24 May 2026	Thomas Reeves	Expert panel review: lean operations restructure — front-line resolution empowering staff to resolve without management approval, added Practice Standards alignment, core principles, parallel process map, consolidated external bodies table. Removed redundant procedural detail. 6-monthly review cycle.
4.1	27 May 2026	Thomas Reeves	Director becomes default complaint investigator (was Operations Manager). Explicit escalation: Operations Manager when Director is subject; independent investigator when both are subjects. Anti-retaliation memory flag window codified at 90 days. Satisfaction follow-up at +14 days made an explicit Step 6 in the workflow (previously implied only via templates). Authored alongside iel-handle-complaint v0.1.5 skill.

Private and confidential. May hold personal information. Store it securely, share it only with people who genuinely need it, and report any privacy breach the day it happens. Personal information is kept securely encrypted on IEL systems.