

1. Purpose

Newcastle Anglican is committed to a rights-based approach to complaints. All people have the right to raise concerns, provide feedback or make a complaint without fear of reprisal, victimisation or disadvantage. Complaints are welcomed as an important way to uphold dignity, safety, accountability and continuous improvement across all services.

This policy will ensure Newcastle Anglican handles complaints fairly, efficiently, honestly and proactively.

2. Scope

Newcastle Anglican welcomes all complaints and considers they provide opportunity to identify areas for improvement.

Complaints may be made by any person, including the people we support and their representatives, as well as students, family members and friends, church members, carers, workers, advocates and guardians and may relate to any Newcastle Anglican agency as follows:

Newcastle Anglican Churches (Ministry)	Samaritans	Anglican Care	Newcastle Anglican Schools	Newcastle Anglican Corporate
✓	✓	✓	✓	✓

This policy does not apply to complaints of conduct involving the Bishop personally, which are managed by the Episcopal Standards Commission. Further information can be found [here](#).

3. Definitions

Advocate is a person who puts a case on someone's behalf such as a care manager.

Complaint is any expression of dissatisfaction, concern or unmet expectation, whether written or verbal, made by, or on behalf of, a service user or other person about Newcastle Anglican services, conduct, decisions or actions, where a response or resolution is explicitly or implicitly sought.

Complainant is a person making a complaint.

Complaints management system refers to the policies, procedures, practices, workers and systems used by Newcastle Anglican in the management of complaints.

Dispute is defined as an unresolved complaint that is escalated to a more senior level within or outside Newcastle Anglican as required by the NSW Ombudsman or the Aged Care Quality and Safety Commissioner (as appropriate).

Feedback is a compliment, criticism, comment or suggestion, received verbally or in writing, where a response is not sought, or not reasonable to expect.

Just culture is a culture where people feel supported and are encouraged to identify and report adverse events so that opportunities for systems improvement can be identified and acted on.

Mandatory reporters are people who are legally obligated to report concerns about risk of significant harm to children to the Department of Family and Community Services (FACS) or to aged care recipients or

others under the Serious Incident Response Scheme. This includes a person and managers of the following services:

- health care, for example doctors and nurses;
- education, for example teachers;
- aged care accommodation, for example care workers;
- children's and other social services, for example childcare and social workers

Person we support includes consumers, NDIS participants, care recipients, children, aged care residents (including those in independent living), service users and parishioners.

Representatives include family members, carers, partners, friends, guardians, substitute decision makers, social workers and trained advocates, where available.

Reprisal means any adverse action, threat, discrimination, intimidation or unfavourable treatment taken because a person has made, intends to make, or is believed to have made a complaint or raised a concern.

Serious complaints are complaints that cannot be managed at the frontline and require investigation. These may include, but are not limited to, legislative or other compliance or organisational risk, repeated pattern of complaints or concerns, conflicts of interest and/or unsuccessful resolution at the frontline.

Workers refers to all Newcastle Anglican workers, including those engaged by Anglican Care, Samaritans and Newcastle Anglican Schools, Corporate and Ministry whether workers are full-time, part-time, permanent, temporary, casual or in an honorary or volunteer capacity and includes contractors, agents and consultants.

4. What is the difference between a complaint and feedback?

The key difference between complaints and critical feedback is the reasonable expectation of a response. Generally, complaints require an individual response. Feedback may also be responded to however is generally managed informally by frontline workers. Complaints and feedback may both be analysed to identify opportunities for improvement.

Examples of complaints include:

- **accessibility to and quality of services** and treatment by workers;
- **incorrect or unfair actions or decisions** or where reasons are not properly explained;
- **not responding to requests or applications**, delay providing services or inaction or delays are not explained; and
- **disagreement with policy or process** or the policy or process has not been properly explained.

A complaint is not:

- **an initial request for a service or action** however, subsequent requests may be an implicit complaint about service, inaction or delay.
- **statements about an overall opinion** are generally not complaints, unless a response or resolution is expected, or should reasonably be provided.
- **requests for information or explanations** however, repeated requests for explanations may be implied complaints about the quality of services, decisions or reasons previously provided.

-
- **requests for updates are not generally complaints** however, some requests for updates may be implied complaints about delay or inaction.

5. Principles

Newcastle Anglican takes a positive and transparent approach to complaint management by adopting the following principles:

- a) **Objectivity and Fairness** – dealing with complaints objectively and fairly;
- b) **Accessibility and Information** – providing information on our complaints process that is easy to access and understand;
- c) **Responsiveness** – resolving complaints in a timely manner and keeping stakeholders informed;
- d) **Privacy and Confidentiality** – upholding privacy and confidentiality;
- e) **Reporting** – complying with reporting obligations including to external authorities;
- f) **Continuous Improvement** – learning from complaints to improve our services;
- g) **Accountability** – clearly establishing accountability for complaints including escalation, governance and reporting throughout the organisation;
- h) **Freedom from Reprisal** – ensuring people can raise concerns, give feedback or make complaints safely without fear of retaliation, victimisation or disadvantage; and
- i) **Respecting the Rights** of the people we support.

6. Application

6.1. Objectivity and Fairness

Newcastle Anglican will receive, review and manage complaints objectively and fairly.

Complaints will be handled with integrity and in a positive and transparent manner with no reprisal for the person making the complaint.

The principles of objectivity and fairness will inspire confidence in our complaints management systems.

6.2. Accessibility and Information

The people we support, and their representatives, are informed that we welcome complaints through multiple channels including in person, by phone and through online feedback, emails and hard copy letters.

Information on this policy and related complaints procedures is available in accessible formats. Newcastle Anglican will take reasonable steps to support people to make a complaint in a way that works for them.

This may include:

- providing information verbally, in writing or in alternative accessible formats;
- supporting the use of advocates, support persons or representatives;
- using interpreters or communication aids where required; and/or
- allowing complaints to be made on behalf of another person with appropriate consent or authority.

We accept complaints made anonymously and will take reasonable steps to assess and respond to the issues raised. However, anonymity may limit our ability to seek further information, provide updates, fully investigate the matter or advise the person of the outcome.

6.3. Responsiveness

Complaints will be acknowledged as soon as possible following receipt. Some complaints will be more complex and will take longer to investigate and resolve.

Matters that cannot be resolved by frontline workers will be referred to more senior levels of management as necessary.

Escalation of a complaint will be communicated to the complainant in the interests of transparency.

Investigations will be completed in a timely manner to the extent due process allows and outcomes will align to our 'just culture'.

Investigation of complaints will be undertaken by appropriately trained people with no conflicts of interest. Complaints will be investigated as close as possible to where the complaint is made.

Complainants will be updated throughout the investigation and advised of outcomes as soon as possible. A complainant's representative may receive updates on behalf of the complainant.

Where a complainant is not satisfied with the outcome or handling of a complaint, they will be informed of available review or escalation options, including internal review and, where appropriate, external oversight bodies.

6.4. Privacy and Confidentiality

Complaints will be handled confidentially to respect the rights of all parties.

The Australian Privacy Principles, in line with the *Privacy Act 1988 (Cth)*, are observed when collecting, storing, using and disclosing personal information obtained in managing complaints, including through investigations.

Where the complaint relates to aged care, there will be strict compliance with the relevant provisions of the Aged Care Act 2024 (Cth) and the Statement of Rights.

6.5. Reporting Obligations including to External Authorities

As a mandatory reporter, Newcastle Anglican must comply with reporting obligations specified in law and shall ensure that all of its Workers comply with their mandatory reporter obligations. Please refer to the Complaints Procedure.

Complaints which involve serious indictable crime or child abuse will be referred to NSW Police. Please refer to the Newcastle Anglican Reporting of Crime Policy and Priority Incidents Briefing Procedure.

Complaints that require reporting under the aged care Serious Incident Response Scheme will be reported to the Aged Care Quality and Safety Commission.

Complaints which involve clergy or church workers will be referred to the Diocesan Director of Professional Standards. Please refer to the Priority Incidents Briefing Procedure.

6.6. Continuous Improvement

Newcastle Anglican promotes a culture of valuing complaints and their effective resolution. Newcastle Anglican is committed to improving the way it operates which is informed by our complaint management system.

Complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis. Newcastle Anglican utilises complaints data as a valuable source of information to improve service delivery, systems and practices. This includes a process to ascertain the views of people utilising the complaints process.

Changes arising out of the analysis of complaints data are implemented in a timely manner. The quality of response and any identified corrective actions are continuously reviewed to develop improvement plans, policy, procedure and training and to assist workers in applying best practice in complaints handling.

Newcastle Anglican will, from time to time, review the application of continuous improvement opportunities identified through complaints management. These reviews confirm the complaint has been closed and end to end business improvements have been made.

6.7 Relationship to Whistleblowing

Some complaints or concerns may also qualify as protected disclosures under Newcastle Anglican's Integrity Assurance (Whistleblower) Policy and, in the case of Anglican Care, its Whistleblower Policy.

Where a complaint raises concerns about serious misconduct, corruption, unlawful behaviour or other matters covered by the relevant Whistleblower Policy:

- the protections under that policy may apply, including confidentiality and protection from reprisal; and
- the matter may be managed under, or in conjunction with, the Whistleblower framework.

This policy does not replace or limit whistleblower protections. Workers and others are encouraged to raise concerns in good faith utilising the most appropriate pathway.

7. Roles and Responsibilities

The table below outlines internal ownership, accountability, escalation and governance of complaints within Newcastle Anglican:

	First Line	Second Line	Third Line	Fourth Line
Responsible Officers/Teams	- Frontline workers - Managers	Risk and Assurance team	- Clinical Assurance Team - People & Culture team	External oversight – regulators
Roles/ Key Actions	- Log complaints - Support people to raise concerns and make complaints - Investigate - Respond and resolve complaints - Take action and identify trends and risks	- Advise functional areas of complaints management system - Review complaints to identify systemic issues - Monitor trends and risks	- Conduct and/or oversight investigations - Seek assurance that no reprisals have occurred	External investigation, review or audit reporting to business
Internal Escalation Where frontline workers are unable to resolve, or the complainant is not satisfied with the initial resolution, the complaint may be escalated.	Line Manager	- Assurance team to review identified systemic issues. - Compliance and Investigations teams to conduct and/or oversight investigations	- Executive Leadership Team member and/or Bishop as required where higher level support is required - External investigators	- Executive Leadership Team to ensure awareness of issues to inform organisational response(s) - The Bishop is final point of review
Internal Governance Oversight of Complaints Management System	- Diocesan Chief Executive - Bishop	- Audit and Risk Committee for oversight - Bishop	- NAC Board - Bishop	- Diocesan Council - Bishop

8. Information and Assistance

Complaints which involve serious indictable crime or child abuse must be referred directly to NSW Police on 1800 333 000. Child abuse must also be reported to the Child Protection Helpline on 132 111.

Complaints that involve aged care services can be referred to the Aged Care Quality and Safety Commission: email: info@agedcarequality.gov.au, telephone: **1800 951 822** or mail: GPO Box 9819 Sydney NSW 2001.

Complaints which involve clergy or church workers will be referred to the Diocesan Director of Professional Standards on DPS@NewcastleAnglican.org.au or 1800 774 945.

All other complaints may be submitted via the following avenues:

- by submitting the enquiry form at
- by using QR codes published in prominent places in our services.

-
- c) by phoning:
- a. the Customer Relations Team on 1800 733 553;
 - b. your usual contact in your service;
 - c. the manager of your service;
- d) by emailing complaints@newcastleanglican.org.au;
- e) in writing a hard copy letter to 87 Toronto Road, Booragul NSW 2284; or
- f) in person at 87 Toronto Road, Booragul NSW 2284.

For further information on this policy, please contact Executive Director Transformation and Operations on QualityandRisk@newcastleanglican.org.au

9. Legal and Policy Framework

9.1. Legislation

[*Administrative Decisions Review Act 1997 \(NSW\)*](#)

[*Aged Care Act 2024 \(Cth\)*](#)

[*Aged Care Rules 2025 \(Cth\)*](#)

[*Anti-Discrimination Act 1977 \(NSW\)*](#)

[*Children \(Education and Care Services National Law Application\) Act 2010 \(NSW\)*](#)

[*Children and Young Persons \(Care and Protection\) Act 1998 \(NSW\)*](#)

[*Children and Young Persons \(Care and Protection\) Regulation 2012 \(NSW\)*](#)

[*Civil and Administrative Tribunal Act 2013 \(NSW\)*](#)

[*Community Housing Providers \(Adoption of National Law\) Act 2012 \(NSW\)*](#)

[*Community Services \(Complaints, Review and Monitoring\) Act 1993 \(NSW\)*](#)

[*Competition and Consumer Act 2010 \(Cth\)*](#)

[*Disability Inclusion Act 2014 \(NSW\)*](#)

[*Fair Trading Act 1987 \(NSW\)*](#)

[*Health Care Complaints Act 1993 \(NSW\)*](#)

[*National Disability Insurance Scheme Act 2013 \(Cth\)*](#)

[*National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018 \(Cth\)*](#)

[*National Disability Insurance Scheme \(Procedural Fairness\) Guidelines 2018 \(Cth\)*](#)

9.2. Standards

[*Aged Care Quality Standards*](#) and Statement of Rights

[*National Principles for Child Safe Organisations*](#)

[NDIS Practice Standards and Quality Indicators](#)

[NSW Child Safe Standards](#)

9.3. Policy Documents

Anglican Care Whistleblower Policy

[Newcastle Anglican Code of Conduct](#)

[Newcastle Anglican Grievance Handling and Dispute Resolution](#)

Newcastle Anglican Integrity Assurance (Whistleblower) Policy

Newcastle Anglican Privacy Policy

10. Document Governance

Tier	1
Process Owner	Executive Director Transformation and Operations
Policy Owner	Executive Director Transformation and Operations
Policy Approver	Diocesan Council
Date of Approval	August 2026
Version	V2.2
Review Cycle	3 years
Next review date	August 2029
Published externally	Yes