1. Purpose

To outline how to manage complaints, feedback and compliments from the people we support and their representatives, workers and any other person who engages with Newcastle Anglican and makes a complaint that falls within the scope of the Complaints Policy.

2. Scope

This procedure applies to complaints and feedback including compliments in relation to the following Newcastle Anglican agencies:

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

This procedure does not apply to complaints involving the Bishop, which are managed by the Episcopal Standards Commission.

3. Definitions

All definitions are in line with the Newcastle Anglican Complaints Policy.

4. Relationship to Whistleblowing

Where a complaint raises concerns about serious misconduct, corruption, unlawful behaviour or reprisals, workers must also consider whether the matter may fall under the Integrity Assurance (Whistleblower) Policy or the Anglican Care Whistleblower Policy and escalate appropriately.

Where there is any uncertainty as to whether the complaint may also be a whistleblower disclosure, it should be escalated to the Executive Director Transformation and Operations for guidance.

5. Procedure

5.1 Informal Complaint Process

A complainant should try to resolve their complaint informally through communication with the worker most directly involved with the subject matter of the complaint or the service concerned.

If resolution with the direct worker is unsuccessful or inappropriate, then depending on the subject matter of the complaint either:

(a) the complainant can escalate the complaint to the worker's supervisor; or

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(b) the worker can escalate the complaint to their supervisor

unless their supervisor is the respondent, in which case it should be raised with the next most senior manager.

If the complaint is then not resolved to the complainant's satisfaction, a complaint may be lodged through this process.

Repeated complaints will trigger further investigation to establish the root cause.

5.2 Lodgement of Complaint

If a complaint is not resolved through the informal complaints process, the complainant is to be provided the ability to submit a Complaints and Feedback Form (including anonymously) through the Newcastle Anglican website.

Complaints may also be lodged by other means including by phone, email, in writing a hard copy letter or in person.

Workers must take reasonable steps to support people to make complaints, including:

- assisting with verbal complaints;
- supporting the use of advocacy groups or representatives;
- ensuring the complaints process is culturally safe, including by asking the complainant how they wish to be supported, whether they would like an Aboriginal and/or Torres Strait Islander worker, cultural support person, advocate, interpreter, family member or representative involved, and how they would prefer to communicate;
- arranging interpreters or accessible formats where needed; and
- ensuring people are not discouraged from making a complaint.

Workers must take reasonable steps to ensure the complaints process is culturally safe, trauma informed and responsive to the complainant's identity, language, culture, communication needs and preferences. This includes asking the complainant how they wish to be supported, whether they would like an Aboriginal and/or Torres Strait Islander worker, cultural support person, advocate, interpreter, family member or representative involved, and how they would prefer to communicate.

Workers must not require a complainant to complete the online form before a complaint is accepted. If a person makes a complaint verbally, by phone, email, letter or in person, the worker receiving the complaint must support lodgement and ensure the complaint is recorded in R3.

At all times workers must respect the rights of the complainant including, in the case of aged care recipients, the Statement of Rights.

If the complaint contains an allegation that is criminal in nature, this must be reported to NSW Police in accordance with the Newcastle Anglian Reporting of Crime Procedure.

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5.3 Complaints Management System

Upon submission within R3, the complaint, feedback or compliment will be registered in the Newcastle Anglican electronic risk management R3, using the most appropriate template. The R3 record must include, where known, the complainant's name and contact details, the person or service the complaint relates to, the date the complaint was received, how the complaint was received, a summary of the issues raised, any immediate risks or safeguarding concerns, the complainant's preferred communication method, any cultural, language, accessibility or support needs, and any action already taken.

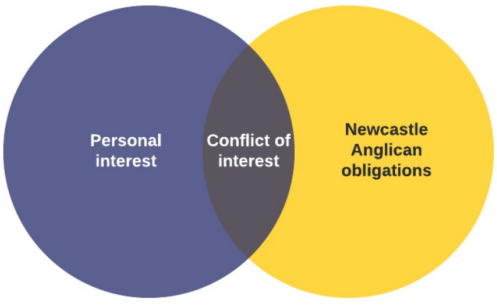
If the complaint is not initially submitted via R3, the Newcastle Anglican worker receiving the complaint, will register it, within one business day, in R3.

Anonymous and third-party complaints must be entered into R3 and assessed in the same manner as other complaints, noting any limitations this may place on any investigation or ability to respond.

When managing a complaint, workers must consider whether any actual, potential or perceived conflict of interest could affect, or reasonably be seen to affect, the impartial handling, assessment, investigation or outcome of the complaint.

A conflict may arise where a worker is the subject of the complaint; has a personal, family, professional or financial relationship with a complainant, respondent or witness; has prior involvement in the matter; or holds views or interests that may compromise impartiality.

Workers must disclose any such conflict as soon as it is identified and must not take part in decisions or actions relating to the complaint until an appropriate management strategy has been determined to eliminate or manage the conflict. Where there is uncertainty, workers must err on the side of caution and make a disclosure.



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5.4 Acknowledge

Newcastle Anglican will acknowledge receipt of a complaint within two business days. Feedback and compliments may not require a response by Newcastle Anglican.

Where a response is required, the acknowledgement should:

- confirm receipt of the complaint;
- provide a contact point;
- outline next steps and indicative timeframes for a response; and
- reinforce that complaints are welcomed and that the response will be dealt with in accordance with the Newcastle Anglican Complaints Policy.

5.5 Assess and Escalate

Complaints will be assessed and escalated for resolution in line with consequence index of the complaint definitions in the Newcastle Anglican Risk Matrix as per the table below.

If the complaint is escalated, a notification will be sent to the complainant advising of the escalation. If the complaint relates to an incident, an incident report is required to be generated, and the contents of the incident report shall be considered in the resolution of the complaint.

As part of any assessment, consideration must be given to:

- potential risk of harm to any person;
- risk of reprisals or victimisation;
- whether interim protective actions are required; and
- any cultural, language, communication, disability, trauma-related or support needs that may affect how the complaint should be managed; and
- any legislative requirements including, in the case of aged care recipients, the Statement of Rights.

Catastrophic	Escalate in line with the Priority Incident Briefing Procedure as follows: a) to the most senior officer available for the organisational unit to the School Principal or Director; b) to the relevant Executive Director; c) to the CEO and Bishop; The Bishop and CEO to escalate to the Board For resolution via crisis management as determined by the Bishop, CEO or Board
Extreme	Escalate in line with the Priority Incident Briefing Procedure as follows:

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	a) to the most senior officer available for the organisational unit to the School Principal or Director; b) to the relevant Executive Director; c) to the CEO and Bishop; for resolution as soon as approved by the Bishop and CEO
Major	Escalate in line with the Priority Incident Briefing Procedure as follows: a) to the most senior officer available for the organisational unit to the School Principal or Director; b) to the relevant Executive Director; c) to the CEO and Bishop; for resolution as soon as possible.
Moderate	Escalate as follows: a) the most senior available officer for the organisational unit for example, the School Principal or Director. for resolution within one month.
Minor	Resolve by the worker with the resolution approved by the line manager or supervisor at the organisational unit level within one month.

5.6 Investigate

Complaints will be investigated within the service with a view to establishing what action Newcastle Anglican can take to achieve a suitable outcome.

Where a formal investigation is required, the appropriate officer will be appointed to manage the investigation in accordance with the policies of Newcastle Anglican and engage with the complainant.

Investigations must be conducted in a fair, objective, culturally safe, trauma-informed and timely manner, free from conflicts of interest, and in a way that protects the dignity, safety and wellbeing of all parties.

Complaints requiring an independent investigation may be identified, and this may be conducted by People and Culture or the Professional Standards Office. The findings of such investigations will be reported to the relevant executive director.

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5.7 Report

Newcastle Anglican must comply with reporting obligations and reporting timeframes including those specified in law in line with the Requirements for Reporting to Other Authorities.

It should be noted that:

a) complaints which involve serious indictable crime or child abuse will be referred to NSW Police.

b) complaints which involve clergy or church workers will be referred to the Director of Professional Standards in line with the Priority Incident Briefing Procedure.

c) complaints which are not appropriate for reporting through the Complaints Policy and Procedure may be reported through the Integrity Assurance (Whistleblower) Policy.

d) concerns in relation to the safety and wellbeing of a person we support, or other person impacted by the complaint may need to be managed through the Incident, Hazard and Disclosure Procedure.

Some complaints will be more complex and will take longer to investigate and resolve. Complainants will be updated throughout the investigation.

5.8 Take corrective actions

Corrective actions must be tracked to completion and, where appropriate, inform broader service improvement activities.

The most senior manager providing oversight of the complaint is to ensure any recommendations are implemented where appropriate.

5.9 Respond

Newcastle Anglican will communicate the outcome and the reasons for the decision as well as any actions taken as soon as possible.

When communicating the outcome of a complaint, the principles in the Open Disclosure Policy and, in the case of aged care recipients the Aged Care Quality Standards and the Statement of Rights, must be considered if the complaint involves an incident that resulted in unintended harm, or had the potential to cause unintended harm, loss or damage, to a person we support.

Responses should be respectful, clear and proportionate, and should not discourage the complainant or others from raising concerns in the future.

Responses should be provided in a culturally appropriate, accessible and preferred communication format wherever practicable.

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5.10 Appeal

If a complainant is not satisfied with the response received, a request for the complaint to be reviewed may be made to the Executive Director Transformation and Operations via Complaints@newcastleanglican.org.au

Where appropriate, complainants should also be informed of their option to raise concerns with external oversight or regulatory bodies.

5.11 Close

Prior to closure, the worker must consider whether:

- the complainant has been kept appropriately informed; and
- there are any indicators of reprisal, retaliation or unresolved risk.

Once the complaint process has been completed, the record in the electronic complaints management system must be closed by the relevant worker. The relevant worker must ensure that the record in the complaints management system is up to date at all times and includes all relevant information. Records are required to be retained for a minimum period of time, in accordance with the Records Management Policy.

5.12 Complaints to external authorities

In addition to the internal consideration of any complaint, where the complaint involves a requirement to report the subject matter of the complaint to an external regulator such as:

(a) the NSW Police;

(b) the Ombudsman;

(c) the Aged Care Quality and Safety Commission via the Complaints Commissioner; or

(d) the NDIS Quality and Safeguards Commission,

the requirements of that regulator must be properly considered and prioritised in the deployment of this investigation procedure.

Anglican Diocese shall work with such external regulators to resolve complaints respectfully and effectively.

6. Roles and Responsibilities

6.1 Executive Directors

It is the responsibility of the relevant Executive Director to:

a) ensure the appropriate implementation of the Complaints Policy, Procedure and system

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b) ensure workers have undertaken relevant training to resolve complaints and feedback promptly in line with the Complaints Policy and Complaints Procedure

c) action matters escalated from the relevant services

d) escalate matters to the Bishop and Chief Executive Officer using the Priority Incident Briefing Procedure

e) ensure matters of open disclosure are appropriately managed

f) analyse complaint data and actions trends appropriately

g) ensure annual review of the complaints and feedback management system

6.2 Executive Director Transformantion and Operations

It is the responsibility of the Executive Director Transformation and Operations to:

a) ensure the organisation has an appropriate Complaints Policy, Procedure and system;

b) receive and action investigation reports from the investigations team

c) review appeals to complaints outcomes as requested by complainants.

d) escalate matters to the Bishop and Chief Executive Officer using the Priority Incident Briefing Procedure.

6.3 All Workers

It is the responsibility of all workers to:

a) understand and comply with the Newcastle Anglican Complaints Policy and Complaints Procedure;

b) treat all people with respect including people who make complaints and feedback;

c) assist people who wish to make complaints and feedback by providing access to the Newcastle Anglican complaints and feedback process;

d) support people to raise complaints without fear of reprisal;

e) not discourage, deflect or delay complaints;

f) be alert to complaints and feedback and assist workers handling complaints to resolve matters promptly;

g) provide recommendations to management on issues arising from complaints and feedback;

h) provide recommendations to management on ways to improve complaints management; and

i) implement changes arising from individual complaints and feedback and from the analysis and evaluation of complaint data as directed by management.

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7. Information and Assistance

For further information, please contact the Executive Director Transformation and Operations at complaints@newcastleanglican.org.au

8. Legal and Policy Framework

8.1 Legislation and Standards

Please refer to the Legal and Policy Framework in the Newcastle Anglican Complaints Policy.

8.2 Policy Documents

Anglican Care Whistleblower Policy

Newcastle Anglican Complaints Policy

Newcastle Anglican Conflict of Interest Policy

Newcastle Anglican Grievance Handing and Dispute Resolution

Newcastle Anglican Incident, Hazard and Disclosure Procedure

Newcastle Anglican Integrity Assurance (Whistleblower) Policy

Newcastle Anglican Priority Incidents Briefing Procedure

Newcastle Anglican Records Management Policy

9. Document Governance

Tier	4
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