# **MyIntegra – Feedback and Complaints Policy**

# **Policy Statement**

MyIntegra Group Companies (**MyIntegra**) i.e., Integrated Care Pty Ltd (**ICPL**) or MyIntegra Choice and Control Pty Ltd (**ICCPL**) here in referred to as MyIntegra.

MyIntegra are committed to providing a robust, inclusive, and proactive system for receiving, managing, and addressing participant, their nominee/advocates and stakeholder feedback and complaints. This system provides opportunity for continual improvement, through monitoring, meeting and exceeding participant and stakeholder expectations.

### Purpose

The purpose of this policy is to set out MyIntegra's responsibility to:

- Ensure that senior management are committed to providing the resources and support to facilitate a participant-centred feedback and complaints process, as per the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018;
- Ensure that the principles of equity, procedural fairness<sup>1</sup> and natural justice are embedded in the feedback and complaints process;
- Encourage participants, their nominees, and stakeholders to exercise their right to raise any issues of dissatisfaction with the organisation;
- Respond to feedback in an appropriate and consistent manner and gain a genuine understanding of the participant/stakeholder's perspective;
- Support participants to seek independent advocacy where needed (see Use of an Advocate Procedure);
- Analyse feedback in order to determine the most appropriate corrective and preventive action to implement;
- Utilise feedback as a key part of the overall processes of continual improvement;
- Provide a transparent dispute management and resolution service;
- Provide a range of accessible feedback mechanisms;
- Practise open disclosure; and
- Provide information on how participants can access independent support, advice, and representation (See Use of an Advocate Procedure).

### Scope

This policy applies to all MyIntegra employees and contracted staff (permanent, temporary, and casual) and relates to the management of participant and stakeholder feedback and complaints.

This policy does not apply to staff feedback or grievances as there are separate mechanisms for such feedback, see <u>Employee Grievance Procedure</u>.

Feedback, regardless of its type or nature, can be provided to MyIntegra by participants and other stakeholders.

Where a complaint meets the definition of a Critical or Notifiable Incident under the National Disability Insurance Scheme (NDIS)<sup>2</sup> or State legislation<sup>3</sup>, MyIntegra will follow the mandated incident reporting requirements (See Participant Notifiable Incident Procedure).

<sup>&</sup>lt;sup>1</sup> National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018

<sup>&</sup>lt;sup>2</sup> National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018

<sup>&</sup>lt;sup>3</sup> Reportable incidents Detailed Guidance for Registered NDIS Providers June 2019

# **Principles**

MyIntegra's Quality and Incident Management System is designed to meet the principles specified within the:

- NDIS (Complaints Management and Resolution) Rules 2018
- National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018
- Reportable incidents Detailed Guidance for Registered NDIS Providers June 2019
- NDIS Effective Complaint Handling Guidelines for NDIS Providers 2015
- ISO 9001:2015 Quality Management System Requirements; and
- ISO 10002:2018 Quality Management Participant Satisfaction Guidelines for complaints handling in organisations.

# Making a complaint to MyIntegra

MyIntegra has a *Feedback and Complaints Procedure* which is designed to ensure that participant and stakeholder concerns are treated seriously, and that feedback is addressed in a timely and comprehensively.

To provide feedback or address a complaint with MyIntegra the following contact numbers are to be used:

- $\rightarrow$  Plan Management: 1800 696 347
- → Support Coordination: 1300 937 187

Alternatively, feedback can be shared <u>here</u>. Simply complete the online feedback email to help improve our services.

All feedback and complaints received are entered into the MyIntegra Quality and Incident Management System for follow up, investigation and action. We will acknowledge the receipt of your complaint within one business day or two days over weekends and public holidays. All feedback and complaints will be investigated and resolved within 30 days.

At MyIntegra we are committed to working in partnership with participants, their nominees, advocates, and other stakeholders nominated by the participant. We will include participants, their nominees and/or advocates in investigation and resolution processes.

# **Escalating Feedback and Complaints**

If a participant or stakeholder is not satisfied with the response received from MyIntegra, follow up contact can be made with the NDIS Commission.

Anyone can make a complaint about NDIS funded services that are provided to a person with disability. This includes NDIS participants, nominees, other people with disability, friends, families, carers, advocates, workers, or any other person who wishes to make a complaint.

Complaints can be made to the NDIS Commission 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 a NDIS provider has responded to a complaint.<sup>4</sup>

Actions that the NDIS Commission<sup>5</sup> may take against a provider include:

- Compliance and Enforcement
- Corrective Action Request
- Issue a warning letter
- Compliance or Infringement Notice

<sup>&</sup>lt;sup>4</sup> https://www.ndis.gov.au/contact/feedback-and-complaints

<sup>&</sup>lt;sup>5</sup> Regulatory Powers (Standard Provisions) Act 2014 (RP Act)

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# myintegra

- Enforceable Undertaking
- Injunction
- Civil penalties
- Vary, suspend, or revoke registration.
- Ban<sup>6</sup>

Complaints about the quality or safety of NDIS supports and services can be directed to:

NDIS Quality and Safeguards Commission

1800 035 544

**Complaints about the National Disability Insurance Agency** (NDIA) or participant plans can be made to the NDIA.

National Disability Insurance Agency (NDIA)

If you would like to make a complaint, compliment, or provide feedback **about the NDIA**, you can either:

- visit one of our offices or talk to your NDIS planner, Local Area Coordinator or Early Childhood partner.
- email feedback@ndis.gov.au
- use our online feedback form.
- call us on 1800 800 110.
- if you are deaf or hard of hearing, contact:
- TTY on 1800 555 677
- National Relay Service on 1800 555 727.
- for a free of charge translator or interpreter, call 131 450.

If we can't help you, we will try to refer you to someone who can.<sup>7</sup>

You can also make a compliant to the Commonwealth Ombudsman

https://www.ombudsman.gov.au/complaints/how-to-make-a-complaint

You can use the online complaint form -

https://forms.ombudsman.gov.au/prod?entitytype=Approach&layoutcode=ApproachWebForm

by telephone, in person, in writing or by fax.

If you are unsure, please refer to our Use of an Advocate Procedure. An Advocate can help participants and their nominees understand how to make a complaint.

# **Risk Management**

MyIntegra is committed to effectively managing risks through compliance with legislation, alignment with best practice and through a practical approach that carefully plans for and prioritises risks and puts in place actions to reduce or eliminate risks wherever possible.

# **Roles and Responsibilities**

#### Board of Directors, Chief Executive Officer, and Senior Leadership Team

Ensure the messaging at senior levels of the organisation has an integrity focus by complying with the spirit of this Policy when Feedback and Complaints arise.

<sup>&</sup>lt;sup>6</sup> https://www.ndiscommission.gov.au/about/legislation-rules-and-policies/compliance-and-enforcement-

policies#paragraph-id-2583 [Accessed 4July2023]

<sup>&</sup>lt;sup>7</sup> https://www.ndis.gov.au/contact/feedback-and-complaints#make-a-complaint-compliment-or-provide-feedback-about-the-ndia

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#### **Manager Risk and Quality**

Manage a central register to record all Feedback and Complaints received.

#### **Manager Human Resources**

Develop and implement Feedback and Complaints Training for Management Staff.

#### **Managers**

Provide leadership in implementing and giving effect to this Policy. Facilitate compliance with this Policy. Participate in complaint resolution with those they supervise and ensure all investigation and actions are documented. Take appropriate action for breaches of this Policy.

#### **Employees**

Remain current with MyIntegra's Feedback and Complaints Policy and Procedure.

Promptly identify, disclose, and record any actual or potential complaints received.

Participate in training provided on feedback and complaints management and open disclosure.

# **Monitoring and Training**

This policy will be:

- Incorporated into staff training and induction;
- Amended in accordance with any changes to the NDIS legislation;
- Monitored through supervision, formal and informal feedback mechanisms; and
- Audited in accordance with the internal audit schedule.

### Legislative / Accreditation Requirements

- Commonwealth NDIS Act (2013)
- NDIS (Complaints Management and Resolution) Rules 2018
- National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018
- Regulatory Powers (Standard Provisions) Act 2014
- Reportable incidents Detailed Guidance for Registered NDIS Providers June 2019ISO 9001:2015 Quality Management Systems – Requirements
- ISO 10002:2018 Quality Management Participant Satisfaction Guidelines for complaints handling in organisations.

### **Supporting Documents / Resources**

- Feedback and Complaints Policy
- State and Territory Feedback and Complaints Contacts (as at Appendix One)
- Use of an Advocate Procedure
- Use of an Advocate Information Sheet
- Support Coordination Participant Handbook (and Easy Read version)
- Plan Management Participant Handbook (and Easy Read version)
- Incident Management Procedure
- Participant Notifiable Incident Management Procedure
- Code of Conduct
- Employee Grievance Procedure

### **Business Area Contact**

Risk and Quality, Corporate Services

### **Approval and Implementation**

Content Owner:	Manager Risk and Quality
Approving Officer:	Chief Executive Officer
Approval Date:	07/07/2023
Effective From:	07/07/2023

### **Review**

This policy will be reviewed at least every 2 years.Date of last review:26/06/2023Supersedes:05.01.09 - 3.0

# Definitions

Definitions of terms used in this policy and supporting documents.

Term	Definition / Explanation / Details	
Complaint	Any verbal or written expression of dissatisfaction made to MyIntegra, related to its services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.	
Compliment	An expression of satisfaction with a service received.	
Participant	A person, agency or organisation who is receiving, or has received, a service from MyIntegra, e.g., NDIS participant, government department, insurers, employers, etc.	
Feedback	edback Any comment either positive or negative, provided in a constructive manner, by a participant stakeholder that might contribute to improving the quality of the services, systems and / o processes of MyIntegra.	
Privacy	An individual's right to have their personal information withheld and protected from loss, misuse, or unauthorised disclosure.	
Stakeholder	keholder A person or organisation with a vested interest in MyIntegra and / or its operations. Stakeholders can include NDIS participant's families, representatives, and advocates.	
Trauma Informed Care The provision of care that acknowledges how trauma affects people's lives and their ser needs. Awareness and sensitivity to the way in which people with disability may experie trauma differently. <sup>8</sup>		

# **Version Control**

Version	Date	Prepared by	Comments
0.1	07/12/2018	Risk and Quality	Draft
0.2	26/09/2019	Risk and Quality	Draft
1.0	21/10/2019	Risk and Quality	CEO Approved
1.1	29/09/2020	Risk and Quality	Draft Review
2.0	03/11/2020	Risk and Quality	CEO & General Manager Finance and Corporate
			Services Approved
3.0	18/04/2023	Risk and Quality	Rebrand
4.0	07/07/2023	Quality And Safeguarding Manager	CEO Approved

<sup>&</sup>lt;sup>8</sup> NDIS quality and Safeguards Commission, Practice Guide Expectations of workers providing services incident management and reporting incidents, 2019, p.4

# **Appendix One - State and Territory Feedback and Complaints Contacts**

FEDERAL		
National Disability Insurance Scheme (NDIS) Make a compliment, complaint or provide feedback about the NDIA <sup>9</sup>		
web: https://www.ndis.gov.au/contact/feedback-and-complaints		
If you would like to make a complaint, compliment, or provide feedback you can either:		
*visit one of our offices or talk to your NDIS planner, Local Area Coordinator or Early Childhood partner		
*email feedback@ndis.gov.au		
*use our online feedback form https://www.ndis.gov.au/contact/feedback-and-complaints/contact-and-feedback-form		
*call us on 1800 800 110		
if you are deaf or hard of hearing, contact:		
*TTY on 1800 555 677		
*National Relay Service on 1800 555 727.		
for a free of charge translator or interpreter, call 131 450		
If they can't help you, they will try to refer you to someone who can.		
NDIS Quality and Safeguards Commission (Q&S Commission)		
You can talk to the Q&S Commission or MyIntegra when something goes wrong with your support or services.		
The Q&S Commission take complaints about whether an NDIS funded service has been provided in a safe way and to an appropriate standard.		
You can also complain about how MyIntegra, or another one of your NDIS funded providers has dealt with your complaint <sup>10</sup>		
web: https://www.ndiscommission.gov.au/about/making-complaint		
phone: 1800 035 544		
Make a compleint chaut a Dravider (a.g., Multitarra)		
Make a complaint about a Provider (e.g., MyIntegra)		
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 https://www.ndiscommission.gov.au/about/complaints/making-complaint-about-provider		
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		
If you would like to provide feedback or make a complaint about the NDIS Commission:		

<sup>&</sup>lt;sup>9</sup> <u>https://www.ndis.gov.au/contact/feedback-and-complaints [Accessed</u> 29thJune2023]

<sup>&</sup>lt;sup>10</sup> https://www.ndiscommission.gov.au/about/making-complaint [Accessed 29thJune2023]



please email contactcentre@ndiscommission.gov.au

or call us on 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.

National Relay Service and ask for 1800 035 544.

If we can't help you, we will try to refer you to someone who can.

Remember MyIntegra can assist you by connecting you with an Advocate. Just ask one of our staff or ask for our Use of an Advocate Information Sheet.

Australian Human Rights Commission investigates and resolves complaints of discrimination and breaches of human rights. You can make a complaint no matter where you live in Australia. Our service is free, impartial and informal. web: https://www.humanrights.gov.au/complaints/make-complaint

phone: 1300 656 419 or 02 9284 9888

email: complaintsinfo@humanrights.gov.au

	<b>State Ombudsman</b> *Note the complainant must first raise their issue with MyIntegra and the relevant regulatory body e.g., Refer to the Participant Notifiable Incident Procedure	<b>Consumer Affairs</b> *Note complainants are encouraged to try and address their issue themselves first with MyIntegra or the relevant regulatory body e.g., Refer to the Participant Notifiable Incident Procedure
АСТ	web: <u>www.ombudsman.act.gov.au</u> phone: 02 6276 3773 mail: GPO Box 442, Canberra ACT 2601	web: <u>ACT   Consumer Law</u>
VIC	web: https://www.ombudsman.vic.gov.au/complaints/ phone: 03 9613 6222 mail: Level 2 570 Bourke Street Melbourne VIC 3000	web: <u>Contact us - Consumer Affairs Victoria</u> phone: 1300 55 8181
SA	web: https://www.ombudsman.sa.gov.au/complaints/ phone: (08) 8226 8699 email: ombudsman@ombudsman.sa.gov.au mail: PO Box 3651 RUNDLE MALL SA 5000	web: <u>South Australian Government - Customer feedback</u> (forms.sa.gov.au) phone: 131882
NSW	web: https://www.ombo.nsw.gov.au/complaints/complaint-form Phone: 02 9286 1000 email: nswombo@ombo.nsw.gov.au mail: Level 24, 580 George Street, Sydney NSW 2000	web: Lodge a general consumer complaint   Service NSW mail: NSW Fair Trading PO Box 972 Parramatta NSW 2124
QLD	web: <u>https://www.ombudsman.qld.gov.au/make-a-</u> <u>complaint/makecomplaint.aspx</u> <b>Phone:</b> 1800 068 908 mail: GPO Box 3314, Brisbane, QLD 4001	web: <u>Consumer complaint contacts   Your rights, crime and the law  </u> <u>Queensland Government (www.qld.gov.au)</u>
WA	web: http://www.ombudsman.wa.gov.au/Complaints/Making_complaints.htm phone: 08 9220 7555 / 1800 117 000 email: mail@ombudsman.wa.gov.au mail: PO Box Z5386 St Georges Terrace Perth WA 6831	web: Make a complaint   Department of Mines, Industry Regulation and Safety (commerce.wa.gov.au)

	<b>State Ombudsman</b> *Note the complainant must first raise their issue with MyIntegra and the relevant regulatory body e.g., Refer to the Participant Notifiable Incident Procedure	<b>Consumer Affairs</b> *Note complainants are encouraged to try and address their issue themselves first with MyIntegra or the relevant regulatory body e.g., Refer to the Participant Notifiable Incident Procedure
NT	web: http://www.ombudsman.nt.gov.au/complaints	web: Complaints and disputes   Northern Territory Consumer Affairs
NT	phone: 1800 806 380 mail: Level 6, NT House 22 Mitchell Street, Darwin NT 0800	phone:
TAS	web: www.ombudsman.tas.gov.au	web: What to do when you have a complaint (cbos.tas.gov.au)
	phone: 1800 001 170 email: <u>ombudsman@ombudsman.tas.gov.au</u> mail: GPO Box 960 Hobart Tasmania 7001	
	Please note the limitation of the scope of each Ombudsman's role as per guidance on their website.	For information about all states and territory Consumer Affairs and other regulatory bodies contacts see <u>ACT   Consumer Law</u>

For complaints related directly or indirectly to breaches of the National Code of Conduct for Health Care Workers or AHPRA Registered Practitioners refer to the Participant Notifiable Incident Procedure.

On how to locate an appropriate Advocacy Service to meet the participant needs and preferences, refer to the Use of an Advocate Procedure and for Participants, please refer them to the Use of an Advocate Information Sheet.