Introduction

Effective complaint management is an important element of good customer service, accountability and continuous improvement. C&K supports the right to provide feedback and have complaints heard and actioned within acceptable timeframes. Complaints that are managed well, support improved operations and business processes. Therefore, time spent effectively handling complaints is an investment in improved services and outcomes.

Please refer to Appendix 1 for a flow chart summary of this procedure.

Definitions & acronyms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Complainant</td>
<td>Any person or organisation (or their representative) making a complaint</td>
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<tr>
<td>Complaint</td>
<td>Expression of dissatisfaction made to, or about an organisation, related to their products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required</td>
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<tr>
<td>Feedback</td>
<td>Opinions, comments or expressions of interest or concern, made directly or indirectly, explicitly or implicitly to, or about the organisation related to their products, services, staff or the handling of a complaint</td>
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</table>

Lodgement, receipt and acknowledgement

Who can make a complaint?

- Any person who is dissatisfied with C&K services, service delivery or staff.

How can a complaint be made?

- Complaints can be received:
  - In writing
    - Completing the C&K Online Feedback Form located on the C&K website (preferred method)
    - Emailing the relevant C&K centre / site* or emailing feedback@candk.asn.au
    - Completing a Feedback Form and forwarding to the relevant C&K centre* or C&K Central (257 Gympie Road, Kedron Qld 4031)
    - Post to the relevant C&K centre or C&K Central (257 Gympie Road, Kedron Qld 4031)
  - Verbally
    - Telephoning the relevant C&K centre* or C&K Central (07 3552 5300)
    - Visiting the relevant C&K centre* and speaking to the C&K Director.

*Please refer to C&K website or C&K Intranet Contacts Page for centre address, email and telephone details.

- Complaints can be made anonymously.
- Complaintants who are hearing impaired are encouraged to utilise the National Relay Service to support the lodgement of their complaint.
- Non-English-speaking complainants are encouraged to access the Translating and Interpreting Service (TIS National) to support the lodgement of their complaint.

Records and acknowledgement

- C&K aim to acknowledge complaints within two (2) working days of receipt.
- All complaints assessed (using the risk matrix) as level 2 / medium risk or above should be lodged on the C&K Online Feedback Form within one (1) working day of receipt. If a complaint is made in writing, a copy of the complaint must be uploaded as an attachment on the C&K Online Feedback Form.
• Upon submission of the C&K Online Feedback Form, the complainant will receive an automated email acknowledgment, including a complaint reference number and a contact email address (i.e. feedback@candk.asn.au).

• Complainants will be advised that, while C&K will take all reasonable efforts to ensure confidentiality, it may be necessary for C&K to make disclosures in circumstances where it is reasonably required in order to conduct a proper investigation or where C&K is required to make disclosure to the Early Childhood Education and Care (ECEC) regulatory office or any other relevant regulator.

• All centre-based services to maintain a complaint register via the Form Complaint Outcome Record. Maintain this register (and related records) in a ‘Centre Feedback’ folder that is available for inspection as requested.

• Depending on complaint type and assessed risk level, external statutory bodies may need to be notified. The ECEC must be notified when the following complaints are received:
  o A complaint alleging a serious incident has occurred or is occurring at a service.
  o A complaint alleging the Education and Care Services National Law / Regulations (2011) has been contravened.
  o A complaint alleging physical or sexual abuse of a child / ren has occurred or is occurring while the child is being educated and cared for by the centre.

Initial assessment, classification and case management

• The C&K Quality and Regulation (Q&R) Team to assess complaints against the C&K Risk Matrix (appendix 2) as they are submitted on the C&K Online Feedback Form.

• As detailed in the table below, the risk level will determine the escalation pathway and who will be responsible for managing the complaint (i.e. case manager).

• At any stage during the management of a complaint, the case manager can change the risk level of a complaint (which may in turn change the escalation pathway).

<table>
<thead>
<tr>
<th>Risk level</th>
<th>Example</th>
<th>Case Manager</th>
<th>Escalated to and managed by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level 1 Low risk</td>
<td>A parent has requested their child not to be allowed to sleep. Their child is asleep when they arrive to collect their child</td>
<td>Centre Director / Manager</td>
<td>Centre Director / Manager or approved / appointed delegate</td>
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<td></td>
<td>Parent / guardian is unsatisfied with a fee increase</td>
<td>To be managed at a local level.</td>
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<td>A staff member’s pay details are left on the photocopier</td>
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<td>An educator does not greet a parent on arrival after they defriend them on Facebook</td>
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<tr>
<td>Level 2 Medium risk</td>
<td>A child discloses to their parent that another child pulled down their shorts in the bathroom</td>
<td>Early Childhood Education Manager, Central Manager or approved / appointed delegate</td>
<td>Early Childhood Education Manager, Central Manager or approved / appointed delegate</td>
</tr>
<tr>
<td></td>
<td>Parent withdraws enrolment because of poor customer service regarding their fee account</td>
<td>To be maintained on C&amp;K Online Feedback Register.</td>
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<tr>
<td></td>
<td>Inadvertently an external photographer takes inappropriate pictures of a child at a photo shoot</td>
<td></td>
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</tr>
<tr>
<td>Level 3</td>
<td>High risk</td>
<td>Complaint</td>
<td>Decisions</td>
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<td></td>
<td>A service has failed to address/report a faulty gate. Child is found in the carpark by a parent</td>
<td>Regional Manager, Central Manager</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Child's enrolment is suspended because of a significant fee debt. Kidsoft notes did not indicate the child was at risk</td>
<td>Decision brief to be prepared for RSP</td>
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<tr>
<td></td>
<td></td>
<td>Parent email address is given inadvertently to another parent who is involved in a guardianship dispute</td>
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<tr>
<td></td>
<td></td>
<td>No educators present with children when a parent arrives to collect their child.</td>
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</table>

<table>
<thead>
<tr>
<th>Level 4</th>
<th>Very high</th>
<th>Complaint</th>
<th>Decisions</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>A child discloses that an educator hurt their arm</td>
<td>Regional Manager, Chief Operations Officer</td>
<td>Risk Manager convenes RSP, C&amp;K Board or approved/appointed internal or external delegate</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Decision brief to be prepared for RSP</td>
<td>To be maintained on C&amp;K Online Feedback Register.</td>
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<table>
<thead>
<tr>
<th>Level 5</th>
<th>Catastrophic risk</th>
<th>Complaint</th>
<th>Decisions</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>A child absconds from a service and is hit by a car</td>
<td>Regional Manager, Chief Operations Officer</td>
<td>Risk Manager convenes RSP, C&amp;K Board or approved/appointed internal or external delegate</td>
</tr>
<tr>
<td></td>
<td></td>
<td>An educator is arrested for allegedly possessing child pornography</td>
<td>Decision brief prepared for RSP</td>
<td>To be maintained on C&amp;K Online Feedback Register.</td>
</tr>
</tbody>
</table>

- Complaints to be classified as per the types listed below:
  - Building and Facilities
  - Children’s health, safety and wellbeing
  - Education program
  - Employee conduct
  - Enrolment/orientation
  - Equipment and resources
  - Policies and procedures
  - Privacy
  - Regulatory compliance
  - Other health, safety and wellbeing
  - Other
In most instances, the relevant Director or Manager will be the case manager for complaints assessed as level one (1) / low risk.

When appropriate the RSP or the C&K Board may appoint an external case manager.

**Investigation / review**

- Case manager to acknowledge complaints within two (2) working days of receipt.
- If a case manager identifies a conflict of interest, they must immediately cease the investigation / review and inform their line manager so that a new case manager can be appointed.
- The case manager to keep the complainant and relevant stakeholders informed of the investigation / review progress.
- Each complaint to be investigated aiming to ensure impartiality, confidentiality and transparency.
- Complainant to be informed that C&K will keep the matter as confidential as possible but may need to investigate the complaint and refer it to the Regulatory Authority, so confidentiality cannot be assured.
- When required, case managers may access the services of the National Relay Service and the Translating and Interpreting Service (TIS National) when undertaking a complaint investigation / review.
- Case managers are required to consider and complete the following steps:

**Resolution and response**

- When the investigation / review is complete the case manager will present their findings and proposed recommendations to their line manager as outlined on the C&K Online Feedback Register. Findings and proposed recommendations for complaints assessed as level 4 and 5 to be presented (via an information brief) to the RSP.
- Once findings and recommendations have been approved by the line manager / RSP the case manager will contact the complainant to outline investigation findings and any decision / s reached.
- In most instances, a response / resolution to be provided verbally to the complainant with verbal response documented.
- If the response / resolution is presented in writing, the case manager will, when appropriate / required, seek the advice of their line manager and the C&K Legal and Governance Team before providing the correspondence to the complainant.
- A response could include (but not be limited to):
  - An outline of the review / investigation process
  - An outline of the findings
  - Any action / s taken (e.g. a review of C&K policy or centre / site protocol)
  - An outline of next steps / future actions
  - An apology.
- C&K will provide opportunities for an appeal if a resolution / response is not accepted by a complainant.
- The case manager to document the following on the Form Complaint Outcome Record and / or C&K Online Feedback Register:
  - investigation / review findings
  - recommendations / actions, and
  - The complainant’s level of satisfaction of resolution / response.
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Appeal
- If the complainant requests an appeal, the matter is to be referred to the next level of management or the RSP.
- The relevant manager or RSP to conduct a review of the investigation process, findings and any recommendations / actions.
- If the relevant manager or RSP supports the investigation process, findings and recommendations / actions they will contact the complainant to outline their decision / s reached.
- If the relevant manager or RSP does not support the investigation process, findings and recommendations / actions the relevant manager or RSP will appoint a new / appropriate case manager to commence a new complaint investigation / review. The relevant manager or RSP will inform the complainant that a new complaint investigation / review will be completed.

Closure
- The case manager to communicate (without breaching privacy / confidentiality) the following information to all relevant stakeholders:
  o investigation / review findings
  o recommendations / actions and the agreed timeframes for completion, and
  o the complainant’s level of satisfaction of resolution / response.
- It is the responsibility of the relevant Director / Manager to ensure any recommendations / actions are completed by the required timeframes.
- The case manager to follow-up to ascertain the complainant’s continued level of satisfaction with the resolution / response.
- Once completed, the case manager to ‘close’ the complaint outcome record on the C&K Online Feedback Register.

Organisational review and training
- Quarterly reports to be completed by the Incidents and Complaints Advisor to determine possible complaint trends and outline a summary and analysis of recommendations / actions.
- Reports to be presented to the Children’s Services team, Executive Leadership Team (ELT) and / or the C&K Board.
- All C&K employees to undertake annual compliance training regarding complaints management and this procedure (and related policy).

Acknowledgements and references
Appendix 1

Step 1 Receipt & acknowledge
ment
Step 2 Initial assessment & classification
Step 3 Assign Case Manager
Step 4 Escalate (if appropriate)
Step 5 Investigate / review
Step 6 Resolve complaint
Step 7 Appeal
Step 8 Closure
Step 9 Organisational Review

Step 1 Plan
Step 2 Gather information
Step 3 Analyse
Step 4 Determine response
## Governance and Leadership Procedure

### Complaint Management

### Appendix 2

#### Risk Matrix Result

<table>
<thead>
<tr>
<th>Risk Matrix Result</th>
<th>Risk Rating</th>
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<tbody>
<tr>
<td>&gt;20</td>
<td>Very High</td>
</tr>
<tr>
<td>12 to 20</td>
<td>High</td>
</tr>
<tr>
<td>3 to 10</td>
<td>Medium</td>
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<tr>
<td>1 to 6</td>
<td>Low</td>
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</table>

#### Risk Matrix Descriptions

- **>20 Very High**: Immediate evacuation of risk to Board for prioritised response and treatment plan execution.
- **12 to 20 High**: The risk requires active management and monitoring. It could pose an immediate threat and the impact would be significant.
- **3 to 10 Medium**: The risk has the potential to move out of medium and cause management and/or monitoring but there is no immediate threat that would have significant impact.
- **1 to 6 Low Risk**: The risk can be controlled at a local level and represents no intermediate threat or impact. Secure control measures are in place and continue to monitor. Periodic review is not required.

#### Management & Review

- **Corporate Risk Register - Board Risk and Safety Panel**
- **Corporate Risk Register - ELT Risk and Safety Panel**
- **Departmental Risk Register - C&K Local Resolution**

#### Consequence

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<tr>
<th>Consequence</th>
<th>Catastrophic</th>
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### Likelihood / Probability

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<th>Likelihood / Probability</th>
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<tr>
<td>Highly Unlikely</td>
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<tr>
<td>Unlikely</td>
</tr>
<tr>
<td>Possible</td>
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<tr>
<td>Probable</td>
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<tr>
<td>Almost Certain</td>
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<table>
<thead>
<tr>
<th>5 Catastrophic</th>
<th>4 Major</th>
<th>3 Moderate</th>
<th>2 Minor</th>
<th>1 Very Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highly Unlikely</td>
<td>Unlikely</td>
<td>Possible</td>
<td>Probable</td>
<td>Almost Certain</td>
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<tr>
<td></td>
<td></td>
<td>5 Low</td>
<td>4 Medium</td>
<td>3 High</td>
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<td></td>
<td></td>
<td></td>
<td>6 High</td>
<td>5 Medium</td>
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<td>9 High</td>
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### Contact Officer

- ECEM

### Policy Reference

- Governance / Service Management

### Effective Date

- 03/10/2017

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