



Council of Social Service of New South Wales

66 Albion St, Surry Hills NSW
phone 02 9211 2599 fax 02 9281 1968
email info@ncoss.org.au web www.ncoss.org.au

abn 85001 797 137

30 April 2008

The Coordinator Client Relations
NSW Department of Ageing, Disability and Home Care
Level 5
83 Clarence Street
SYDNEY NSW 2000
service@dadhc.nsw.gov.au

NCOSS Submission to the Review of DADHC Feedback and Complaint Handling Principles & Guidelines

About NCOSS

The Council of Social Service of New South Wales (NCOSS) is the peak body for the social and community services sector in New South Wales. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in this State.

NCOSS provides an independent voice on human services policy issues and social and economic reforms and is the major co-ordinator for non-government social and community services. It was established in 1935 and is part of a national network of Councils of Social Service, which operate in each State and Territory and at Commonwealth level.

Overall Comments

NCOSS appreciates the opportunity to provide feedback to this review. Overall, the policy is comprehensive and provides clear steps in complaints handling. Some sections of the policy are wordy and could benefit from the use of plain language.

NCOSS recommends the following specific suggestions for improvement to the May 2005 policy.

Recognising and handling Feedback

The document under review describes the DADHC commitment to feedback and complaints handling on page 6 and then on page 8 discusses other feedback. There is no mention of feedback made to a DADHC employee in the course of their service provision or client interaction which may be preliminary to a formal complaint. Sometimes issues can be nipped in the bud if acknowledged and addressed in the early stages, thereby negating the need for a formal complaint. This should be more fully described, so that

DADHC staff is empowered to recognise constructive or other feedback as well as processes to receive such feedback and take appropriate actions.

Use of an advocate

The policy states that the complainant can enlist the support of an advocate but it should be made clear that the advocate can be of the complainant's own choosing. DADHC must not dictate who can act as an advocate for the complainant.

Dealing with difficult complainants (page 12)

Where communication is difficult between DADHC and a complainant, the policy states that the complaint should be put into writing. It could be helpful here to suggest the use of an independent third party mediator to facilitate easier communication. If used, this facilitator should be in addition to the complainant's chosen advocate. This could serve to recognise that some complainants cannot put their issues in writing, nor are resources always easily available to assist them to do so.

The policy also states that making a complaint will not adversely affect the complainant's access to or use of services. However, on page 12 a process is laid out for restricting the "complainant's access to services". NCOSS recommends that this section is deleted and replaced with the direction that extreme cases should be referred to senior officers or the Director for further action. If this is to remain part of the policy, it should be clarified that this would only be ***in extreme circumstances*** and with the direct approval of the Director only. The emboldened sentence stating who can approval such restriction should appear much earlier in this section.

Accessibility (page 13)

The first sentence implying due regard to the complainant's circumstances and characteristics should be reframed and clarified. It is difficult to understand the intent of this statement.

Outcomes driven (page 13)

The focus on outcomes in the policy is applauded. However, the list of possible outcomes in the final sentence of the first paragraph should also include...may include *but should not be limited to* such things as.....

The policy is clear that agreed outcomes may not be reached in all cases. Therefore, the word *agreed* should be deleted from the sentence commencing "At the end of the complaint handing process..."

Further, the final sentence in this section should read: "It is advisable to confirm the outcome in writing, *especially* for complex and contentious complaints. "

Timeliness (page 15)

NCOSS suggests that the term *week* be replaced with the appropriate number of working days in the timeframes. This would bring this part of the policy in

line with the appendix F on page 22. This term should be similarly amended in Appendix E process map on page 21.

Appendix I: Reporting... (page 25)

The dates in this section are now obsolete and should be deleted or amended.

Appendix I: Attachment 1 recording format pro-forma (page 26)

The layout of this table is not in a printable format, ie the margins are outside the printable areas. This pro-forma should be easily read when printed by any external printer.

Appendix I: Attachment 2 summary report format pro-forma (page 27)


NCOSS suggests an additional column for improved reporting to the Public Accountability Branch PAB. The extra column should have the following heading:

- Resolution status at the time of this report:
 - Now underway
 - Resolved within policy timeframes
 - No resolution reached
 - Other action taken (eg referred to NSW Ombudsman)

Conclusion

Thank you for the opportunity to provide feedback. Should you require any further information, please contact Christine Regan on ph 9211 2599 ext 117 or chris@ncoss.org.au.

Yours sincerely



Alison Peters
Director