

Document Identifier	Version	Reviewed By	Authorised By
LCS-PP-COR251	3.0	Ruth Wearne, QM	Tarina Venturin, OM
Next Review:	28/03/2026	Date: 28/03/2025	Date: 28/03/2025
Practice Standard:	Core Module; 0.2.5 Feedback and Complaints Management Social Services Regulator (Standard 4: Feedback and complaints)		

1.0 Purpose

The purpose of this policy is to establish a person-centred, accessible, and transparent system for handling feedback, including complaints, concerns, compliments, and suggestions. It aims to ensure that every client feels safe and supported when sharing their experiences, and that all feedback is used constructively to improve the quality of services provided by LCS.

This policy promotes a culture of continuous improvement, procedural fairness, and respect for the rights and voices of clients, recognising feedback as an essential part of delivering responsive, inclusive, and high-quality support.

The resolution of complaints will be consistent with a rights-based principle fundamental to the United Nations Convention on the Rights of Persons with Disabilities.

The complaint and feedback management and resolution system intend to:

- provide a well-handled system that values the client’s opinions and takes all feedback seriously, with the intent to improve the relationship between our organisation and our clients
- empower all employees and clients to feel free to voice their complaints or provide feedback
- allow us to respond to issues raised by individuals making complaints in a timely and cost-effective way
- boost client confidence in our administrative processes
- seek a resolution that meets all parties’ expectations, where possible
- provide Lifestyle Centred Services with information that will help us deliver quality improvements in our services, supports, roles, and complaints handling process.

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2.0 Scope

This policy applies to all clients of Lifestyle Centred Services (LCS), as well as their families, advocates, staff, contractors, and other stakeholders involved in the delivery, support, or coordination of LCS services. It covers all types of feedback, including complaints, concerns, compliments, and suggestions, related to any aspect of LCS service provision. The policy ensures a consistent, fair, and person-centred approach to handling feedback and complaints.

3.0 Definitions

Term	Definition
Feedback	<p>Feedback is when you tell us what you think about your support or services.</p> <p>It can be about something you liked, something that helped you, or ideas to make things better.</p> <p>Feedback helps us learn and improve how we support you.</p>
Complaint	<p>Telling someone that you are not happy with something about your disability service is called a complaint. It could be made to or about a disability service provider, relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.</p>
Dissatisfaction	<p>Dissatisfaction means you are not happy with something.</p> <p>It's when something doesn't meet your needs, doesn't feel right, or isn't what you expected.</p> <p>You might feel disappointed, frustrated, or upset.</p>
Resolution	<p>The official decision made to solve or end a problem or contentious matter. A resolution includes finding a way to improve a difficult situation.</p>
Role	Role Requirements
Delegated Staff	<p>The role of the delegated staff is to:</p> <ul style="list-style-type: none"> manage the complaint process

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	<ul style="list-style-type: none"> • manage reviews and make recommendations for continuous improvement using the information gained from the issue of the complaint • stand independently from the management to allow clients and staff members to be able to make a complaint about the management of Lifestyle Centred Services • provide feedback and advice, as required • review the complainant 's needs to ensure that their mode of communication is managed (e.g., Easy Read, large print, translated documents, etc.) • collaborate with the complainant and their advocate • keep all parties informed during all stages of the complaint management process • seek a resolution that benefits all parties, if feasible • handle all appeals related to the outcome of the complaint • complete all necessary reports and documents, including providing information to complainants and management • record all information into the Complaint, Compliment and Feedback Register • review the Complaint, Compliment and Feedback Register at monthly management meetings.
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4.0 Policy

Lifestyle Centred Services (LCS) is committed to creating a respectful and inclusive environment where feedback, complaints, compliments, and suggestions are welcomed as opportunities for recognition and service improvement. This policy reflects a person-centred

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approach, where each client is respected, supported, and included in decisions that impact their experience.

Feedback is encouraged from all clients, their families, advocates, staff, and stakeholders. All feedback is taken seriously and treated with confidentiality and care, guiding the ongoing development and improvement of LCS services.

a. The Client's Right to Be Heard

Clients have the right to share concerns or make complaints about their services at any time. It is not necessary for a client to use the word "complaint"—all issues raised will be acknowledged and handled appropriately. Whether an issue is small or significant, LCS commits to listening and acting with integrity.

LCS provides a safe, blame-free environment where clients can express themselves without fear of judgment or negative consequences. Complaints and feedback can be submitted in person, by phone, in writing, or with the support of a family member, advocate, or other trusted person. Easy Read formats and communication support are available upon request.

LCS ensures complaints and feedback are handled effectively by:

- Implementing an open and transparent system.
- Following the principles of natural justice and mandatory reporting requirements.
- Respecting the right of stakeholders to make a complaint directly or through a representative.
- Applying procedural fairness in all decisions.
- Informing complainants about the complaints escalation process using clear communication methods (oral and written).
- Maintaining strict confidentiality and privacy.

b. How LCS Uses a Person-Centred Approach

When managing complaints and feedback, LCS focuses on the client—their preferences, communication style, and needs. This includes:

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- Actively and respectfully listening to the client
- Involving the client in the resolution process
- Communicating in the client's preferred method (e.g., Easy Read, phone, in-person, or with support)
- Offering accessible meeting locations and support tools
- Respecting the client's background, identity, and culture
- Keeping the client updated throughout the process and regularly checking in

c. Child Safety

Complaints made by children, or on behalf of children that we support are responded to in a manner that is child-focused and uphold the rights of children and young people, in line with our Child Safety Policy. Lifestyle Centred Services will ensure that our complaints process is:

- **Accessible:** Information on how to make a complaint is available in age-appropriate and accessible formats.
- **Safe and Supportive:** Staff and volunteers are trained to recognise different ways children and young people express concerns or distress and disclose harm.
- **Barrier-Free:** Reasonable adjustments are made to ensure all children and young people can make complaints.
- **Trauma-Informed:** Responses to complaints consider the emotional and psychological wellbeing of children and young people.
- **Inclusive:** That all children and young people can participate in the complaints process, with necessary support provided.
- **Transparent:** Children and young people are informed about what aspects they have control over or a say in.
- **Responsive:** Timely feedback is provided to all who raise concerns or complaints.

d. Complaints involving suspected abuse and/or serious misconduct

LCS acknowledges the critical link between complaints and allegations of serious misconduct or abuse. If a complaint raises concerns about serious misconduct or suspected abuse, it will be addressed in accordance with our Zero Tolerance of Abuse Policy and Incident Management Policy.

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LCS recognises that complaints involving abuse or suspected abuse can have a significant impact on clients. Such complaints will be handled with sensitivity, care, and a tailored approach that considers the unique circumstances of each case.

Reporting misconduct to the Victorian Disability Worker Commission

If an employee of Lifestyle Centred Services has a reasonable belief that a member of Lifestyle Centred Services staff has engaged in reportable conduct, this will be reported to the Victorian Disability Worker Commission. Reportable conduct includes:

- **Intoxication while practicing:** a disability worker is practising while under the influence of drugs or alcohol (during working hours)
- **Sexual misconduct:** any unwelcome acts or behaviours that are experienced by the person with disability as being sexual in nature inside or outside of a disability worker’s working hours.
- **Detrimental impairment:** the disability worker has an impairment that detrimentally affects (or is likely to detrimentally affect) the disability worker’s capacity to practise.
- **Significant departure from professional standards:** if a disability worker placed, or is placing the public at risk of harm, because the disability worker practised, or is practising, in a manner that constitutes a significant departure from accepted professional standards.

If at any time during the complaints process the complaints management team forms a reasonable belief that any of the above have occurred, a notification will be made per requirements under the [Disability Service Safeguards Act 2018 \(Vic\)](#).

e. Responsibilities of the Management Team

The Management Team at LCS oversees the handling of all complaints and feedback. They ensure that each issue is managed fairly, respectfully, and in compliance with:

- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Procedural Fairness Guidelines 2018
- Social Services Regulator (Standard 4: Complaints and Feedback)

f. Fair and Transparent Process

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LCS is committed to procedural fairness and natural justice. This means:

- Clients will be protected from retribution or discrimination. No-one will be adversely affected as a result of making a complaint or a complaint being made on their behalf.
- Allowing the client a fair opportunity to share their views
- Making decisions based on accurate and relevant information
- Ensuring the person resolving the complaint is impartial and fair

Clients will be kept informed during the process, including:

- Actions being taken
- Reasons for decisions
- Opportunities to review outcomes

LCS ensures procedural fairness by:

- Giving notice of any issues or matters that may impact them.
- Providing a reasonable opportunity for the client to be heard before any adverse decision is made.
- Allowing clients to present information and suggestions in support of their preferred outcome.
- Ensuring that decisions are based on facts and documented evidence.
- Ensuring that all decision-makers are unbiased and act fairly.

g. Access and Support for the Client

LCS ensures that all clients can access and participate in the complaints process by:

- Providing physical access and communication support during meetings
- Offering Easy Read resources, interpreter services, and advocacy support
- Supporting clients who may find it difficult to express themselves
- Maintaining confidentiality and protecting the client's privacy

h. The Client's Role in the Process

When a client shares feedback or makes a complaint, LCS will:

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- Acknowledge the input
- Provide updates and information about the process
- Involve the client in finding a solution
- Share how their feedback helped improve services

i. Investigation and Resolution of Complaints

- Complaints will be investigated promptly.
- LCS will communicate and consult with clients, families, and advocates during the process.
- Clients will be provided with updates and clear explanations of actions taken, reasons for decisions, and options for review.
- All parties will have the opportunity to be involved in the resolution process.
- Clients will be kept informed at each step and supported to participate fully.
- The decision-maker or client advocate will be involved and recognised in the process.
- LCS and its staff accept responsibility for the actions and decisions made during the complaint resolution process.

j. Using Feedback for Service Improvement

Client feedback, whether positive or negative, is vital to the continuous improvement of LCS services. All complaints, compliments, and suggestions are used to:

- Inform, review and refine service planning and delivery
- Train and guide staff
- Improve service planning
- Strengthen quality assurance through ongoing improvement cycles

LCS audits the complaints and feedback process annually to ensure its effectiveness.

k. Staff Training and Support

Our in-house training includes:

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- Reporting requirements and contacts details
- providing information regarding Lifestyle Centred Services' complaint and feedback process and procedures (e.g., forms to complete and how to assist clients wishing to make a complaint)
- identifying our Complaints Manager
- encouraging employees to have a positive attitude towards complainants and a commitment to resolving all complaints
- creating an understanding of how feedback and complaints inform and guide our continuous improvement cycle
- understanding timeframes for reporting and resolving complaints.

Additional training will occur when practices and policies are changed due to a complaint or if staff are still not sure how to handle a complaint upon commencing work at Lifestyle Centred Services.

5.0 Procedures

a) Providing information to clients

- Clients are informed of their right to complain through welcome information and orientation.
- Complaints information is contained in the Client Handbook, however there is also an [Easy Read format](#) if required.

b) Submitting a Complaint or Feedback:

Complaints may be submitted by:

- using the [Complaint and Feedback Form](#) (Complaints can be made anonymously)
 - The form is designed to be easy to use and accessible.
 - Clients who require help to make a complaint will be supported to do so. The complaints form can be filled out on behalf of a client.

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- contacting a member of staff, verbally or in writing, our staff must offer to document the complaint on behalf of the client if required and refer the matter to the Director
- contacting any member of staff, verbally or in writing
- responding to questionnaires and surveys
- sending an email to our contact email
- attending meetings/care conferences
- contacting external complaint agencies, e.g., NDIS Quality and Safeguards Commission, Disability Services Commissioner (DSC), Victorian Disability Workers' Commission (VDWC)
- communicating orally, in writing, or any other relevant means.
- directly contacting the Complaints Manager:

Complaints Manager	Tarina Venturin
Email address	complaints@lifestylecentred.com.au
Phone Number	(03) 9483 4755
Postal Address	PO Box 1061 Seaford VIC 3198

c) Receipt of Complaints

All complaints, where possible, will be managed directly and quickly at the point of service unless the complaint requires investigation.

All complaints will be acknowledged within one working day, if possible.

The acknowledgment of the complaint will also seek to:

- determine the type of outcome that the complainant seeks (i.e., acknowledgement, answers, actions, or apology).
- inform the complainant of:
 - their right to an advocate and interpreter
 - the stages of the complaint management and decision-making process

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- mechanisms implemented to protect the complainant’s privacy
- their right to complain to the NDIS Quality and Safeguards Commission at anytime
- actual progress and outcomes of the investigation.
- determine the type of complaint (i.e., service, support or process).
- notify the complainant and their advocate at each stage of the investigation and seek their feedback.

This information will be used to ensure that the complainant’s feedback and requirements are at the core of the complaint investigation and management process.

d) Review of the complaint

Complaints will be reviewed to determine the most appropriate procedure to ensure procedural fairness and natural justice.

If a consultative meeting is required, it will be held in a safe environment that has been determined by the complainant and at a time relevant to the client. The client’s record will be checked for a preferred contact for complaints. The client will also be asked if they would like to nominate a staff member from Lifestyle Centred Services who is assigned to handle complaints.

e) Decision making

When the complaint is lodged, the delegated staff member should determine if it is practicable to find an immediate resolution.

i) Point of Service Resolution (non-investigatory process)

All complaints, where possible, will be managed directly and quickly at the point of service unless the complaint requires investigation. The non-investigation complaint process is as follows:

1. The issue is reviewed by the Complaints Manager or Management Team.
2. The complainant will be consulted with to determine the actions required to resolve the issue. During this process, Lifestyle Centred Services will offer

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complainant support from an independent advocate to reduce stress and anxiety.

3. All available options will be discussed with the complainant and their advocate.
4. Where possible, a collaborative decision is finalised (i.e., acknowledgement, answer, action, or apology).
5. The complainant is informed of the decision and the reasons for the outcome.
6. The complainant can review the decision if they are not happy with the resolution, implementing the complaint investigation process.
7. If a complainant seeks a review, a review of the decisions may be resolved quickly by the Operations Manager or service manager completing the above points (2 to 5) again.

ii) Detailed Investigatory Process (investigatory process)

If no immediate resolution is possible or practical (for example, due to serious allegations of misconduct or service failure, the investigation process is as follows:

Step 1. Acknowledge

1. Acknowledge all complaints quickly, within one working day, where possible.

Step 2. Review of the complaint

1. before any consultative meeting, inform the complainant that their advocate or support person can be present throughout the process.
2. offer to locate an independent advocate for the client, if required.
3. involve the complainant and their advocate using a consultative process to ensure their voice, views and preferred outcomes are heard and discussed.
4. determine the type of outcome that the complainant seeks (i.e., acknowledgement, answers, actions, or apology). Information will be used to ensure that the complainant's feedback and requirements are at the core of the complaint investigation and management process.
5. inform the complainant of:
 - o their right to an advocate and interpreter

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- the stages of the complaint management and decision-making process
 - mechanisms implemented to protect the complainant’s privacy
 - their right to complain to the NDIS Quality and Safeguards Commission at anytime
 - actual progress and outcomes of the investigation.
6. determine the type of complaint (i.e., service, support or process).
 7. notify the complainant and their advocate at each stage of the investigation and seek their feedback.
 8. if a consultative meeting is required, it will be held in a safe environment that has been determined by the complainant and at a time relevant to the client. The complainant is a recipient of disability services under the NDIS; the client’s record will be checked for a preferred contact for complaints. The client will also be asked if they would like to nominate a staff member from Lifestyle Centred Services who is assigned to handle complaints.

Step 3. Assessing the complaint

1. when assessing a complaint, the Operations Manager or service manager must prioritise the complaint and determine a resolution pathway (where required).
2. after the pathway is established, the complaint will be investigated.
3. feedback from the complainant or their advocate must be used as part of this process (e.g., consultation meeting data).

Generally, complaints will be prioritised per the decision tree below:

Type	Description
Minor Complaint or Feedback.	Feedback that is easily remedied. Usually remedied at point of service or within two to five business working days.
Complaint reporting moderate service issues or misconduct	May require telephone consult or in-person discussion. May require ongoing investigation or information gathering. May escalate to a major complaint. Usually remedied within five to ten business days, but may take longer if issue escalates.

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Complaint reporting major service issues or serious misconduct	Will require thorough investigation including escalation of misconduct to authorities. (For example, may involve abuse or suspected abuse of the complainant). Rather than a consultative meeting this may require interviews and/or information gathering. The outcome from this type of matter may be a notification to the Victorian Disability Worker Commission. May take up to a month to remedy to the satisfaction of the complainant.
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i. Meeting Accessibility

- Delegated staff will ensure that any meetings related to complaints resolution are accessible to all meeting participants.
- This includes reviewing the physical environment to ensure accessibility for clients with mobility needs.
- before any consultative meeting, delegated staff will inform the complainant that their advocate or support person can be present throughout the process.
- Where required, delegated staff will offer to locate an independent advocate for the client
- involve the complainant and their advocate using a consultative process to ensure their voice, views and preferred outcomes are heard and discussed.

Step 4. Investigation and decision making

1. When the complaint is lodged, the Operations Manager or service manager should determine if it is practicable to find an immediate resolution (see 5.2.1 non-investigation complaints process).
2. During the investigation and decision-making process, the Operations Manager or service manager will:
 - keep the complainant informed about each stage of the investigation process
 - consult with the complainant to gather information about the underlying issue/s

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- analyse antecedents and underlying issues when determining a decision
- review and approve all written reports and documents before them being sent out to all parties
- respond to the complainant with a clear decision and any next actions (if any)
- inform the complainant that they have the right to reject the outcome
- Inform the complainant of their right to make a complaint directly to their funding body.

NDIS Commission by:

- phoning 1800 035 544 (free call from landlines) or TTY 133 677 (interpreters can be arranged).
- using a [National Relay Service](#) and asking for 1800 035 544.
- completing an online [complaint contact form](#).

Disability Services Commissioner by:

- phoning 1800 667 342
- using a [National Relay Service](#) and asking for 1800 667 544
- emailing complaints@odsc.voc.gov.au

Step 5. After the decision

1. after investigation and a satisfactory response has been documented, the Complaints Manager or member of the investigatory team will:
 - inform the complainant and their advocate of the decision, including the reason for the decision, and they will provide options for how the complainant can review the decision
 - ensure that the complaint investigation is satisfactorily completed
 - determine if the complainant is satisfied with the outcome
 - follow-up and consult with the complainant/s about any concerns
 - close out the complaint.

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The delegated staff member, or lead of an investigatory team will:

- keep the complainant informed about each stage of the investigation process
- consult with the complainant to gather information about the underlying issue/s
- analyse antecedents and underlying issues when determining a decision
- review and approve all written reports and documents before them being sent out to all parties
- respond to the complainant with a clear decision and any next actions (if any)
- inform the complainant that they have the right to reject the outcome
- inform the complainant of their right to make a complaint directly to:

NDIS Quality and Safeguards Commission (NDIS Funded Services)

- phoning **1800 035 544** (free call from landlines) or TTY **133 677** (interpreters can be arranged).
- using a [National Relay Service](#) and asking for **1800 035 544**.
- completing an online [complaint contact form](#).

Disability Services Commissioner (TAC/Workcover Funded Services)

- phoning **1800 667 342**
- using a [National Relay Service](#) and asking for **1800 667 544**
- emailing **complaints@odsc.voc.gov.au**

The resolution outcomes from a complaint will recognise that people who make a complaint are generally seeking one, or more, of the following outcomes:

ii. Acknowledgement:

- genuinely listening without interruption
- empathising
- ensuring the complainant feels comfortable (e.g., being aware that staff may be defensive and consider how this is perceived)

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- acknowledgement of the effect of the situation on the individual
- resolving to a good outcome
- notifying regularly and promptly on steps undertaken.

iii. Answers:

- clear explanations relevant to the issue, which is provided ONLY once all the facts are known.

iv. Actions (Action Plan):

- what will be done?
- who will do it?
- action plan completion date
- how progress will be communicated to all parties involved
- oversight of actions.

v. Apology:

- consider the form of the apology and the managerial level of response
- consider timeliness, sincerity
- be specific and direct
- accept responsibility if appropriate and provide information on the cause and impacts
- explain without excuses
- provide a summary of key actions agreed on to move forward and resolve the issue.

f) Review and improvement

Lifestyle Centred Services takes a systematic approach to incorporate a review of all issues raised by a complaint to identify and address any possible systemic issues and determine any continuous improvement actions identified during the complaints process.

The review and improvement process includes:

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- ascertaining preventative actions and continuous improvement
- considering if any systemic issues require addressing
- recording the information regarding the complaint in the Complaint, Compliment and Feedback Register
- recording the details of the improvement stemming from a complaint in the Continuous Improvement Register (if required)
- training staff in any new systems or actions
- adjusting policies and procedures
- monitoring the complaint resolution according to the internal audit schedule
- providing feedback to the complainant personally to inform them of the outcomes and influences their issue raised within our organisation.

g) Documentation

All employees are provided training regarding the complaints process during orientation and given the Staff Handbook, which includes information on the complaints process provided (see 4.0.k – Staff Training and Support)

The complaints process is available for clients, families, carers, and advocates via the information provided in our Client Handbook and through the provision of Easy Read documents (as required).

Documentation of the complaint process is as follows:

- all complaints will be recorded in the Complaint, Compliment and Feedback Register, and information in the register will include the following:
 - complaint details
 - identified issues
 - actions are undertaken to resolve the complaint

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- the outcome of the complaint.
- all documents, including the Complaint and Feedback Forms, are uploaded into the computer system.
- copies of any information provided to the complainant are stored in their relevant file.
- all documents are kept confidential, and access is only permitted to employees relevant to the complaint. The Complaints Manager determines who is relevant.
- a copy of all complaint documents will be retained in the file for seven years from the record date. If the documents relate to a client under 18 years of age, the documents will be retained until the client turns 25 years of age.
- statistical and other information will be collected to:
 - review issues raised
 - identify and address systemic issues
 - report information to the Commissioner, if requested by the NDIS Quality and Safeguards Commission.
- a policy review will occur if there are legislative changes or when determined by a regular or annual internal audit review.

h) Unresolved complaints

Unresolved complaints will be referred to the Director or delegate for investigation and resolution. Should the complaint not be resolved to the complainant's satisfaction, the complaint will be escalated to a person nominated by the complainant (with the complainant's permission).

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Practice Standard:	Core Module; 0.2.5 Feedback and Complaints Management Social Services Regulator (Standard 4: Feedback and complaints)		

When complaints cannot be resolved internally, the complainant may be referred to:

NDIS Quality and Safeguards Commission (NDIS Funded Services)

- phoning **1800 035 544** (free call from landlines) or TTY **133 677** (interpreters can be arranged).
- using a [National Relay Service](#) and asking for **1800 035 544**.
- completing an online [complaint contact form](#).

Disability Services Commissioner (TAC/Workcover Funded Services)

- phoning **1800 667 342**
- using a [National Relay Service](#) and asking for **1800 667 544**
- emailing complaints@odsc.voc.gov.au

6.0 Related documents

- [Complaint and Feedback Form](#)
- [Complaints Process Checklist](#)
- [Complaint, Compliment and Feedback Register](#)
- [Continuous Improvement Policy and Procedure](#)
- [Continuous Improvement Register](#)
- Client Handbook
- Staff Handbook
- [Recruitment Confirmation \(Training Enrolment Plan\)](#)
- Staff Training Records, Plans, Registers (Brevity)
- [Risk Management Policy and Procedure](#)
- Service Agreements

7.0 References

- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2021
- NDIS Act 2013 (Commonwealth)
- NDIS (Procedural Fairness) Guidelines 2018
- Social Services Regulator :Standard 4: Complaints and Feedback (Victoria)



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- Privacy Act 1988 (Commonwealth)
- Disability Services Act 1986 (Commonwealth)
- Disability Discrimination Act 1992 (Commonwealth)
- Work Health and Safety Act 2011 (Commonwealth)