



1. Applicability

- 1.1 This Policy applies to all Employees, Contractors and Subcontractors of Bloom Agency Pty Ltd (Bloom Agency or the Company) in respect of all conduct by Employees, Contractors and Subcontractors which is connected to their employment. For the avoidance of doubt this could include, but is not limited to, work carried out in any capacity by Employees, Contractors and Subcontractors who are:
- (a) on duty;
 - (b) dressed in a Bloom Agency company uniform;
 - (c) representing Bloom Agency;
 - (d) at a work function organised by Bloom Agency;
 - (e) undertaking any activities outside of work that are relevantly connected to their employment or Bloom Agency; or
 - (f) using social media.
- 1.2 The Complaints Policy (Policy) operates in conjunction with other relevant policies, industrial instruments and legislation.
- 1.3 No policy can address every situation that may arise. Accordingly, this Policy is not a substitute for each Employee's responsibility and accountability to exercise good judgment and obtain guidance where they have any concern that particular conduct may not be acceptable to the Company.
- 1.4 Nothing in this Policy will affect the Company's right to discipline or dismiss an Employee in accordance with the terms of their contract of employment or relevant industrial instrument.
- 1.5 Bloom Agency may create, vary or rescind this Policy and any other Bloom Agency policies or procedures from time to time at its absolute discretion.

2. Purpose and Principles

- 2.1 The purpose of this Policy is to set out the procedure that the Company will take, should a complaint be received from a customer about an Employee, Contractor or Subcontractor.
- 2.2 A complaint is any statement that something is unsatisfactory or unacceptable, either written or verbal, made by or on behalf of a customer. The company treats written and verbal complaints with equal seriousness.
- 2.3 Bloom Agency is committed to the efficient and fair resolution of complaints. All complaints will be handled equitably, objectively and in an unbiased manner.
- 2.4 Complaints are encouraged and where appropriate, will be used within the company as an opportunity to improve our services.

3. Compliance

All complaints at Bloom Agency are managed by Sam Bell, Participant, People & Policy Manager. Contact can be made by phone on 0402 474 780 or by email at sam@bloomagency.net.au.



4. Responsibilities of Managers and Employees

4.1 Managers are responsible for:

- (a) ensuring that their Staff are aware of and comply with all Bloom Agency policies;
- (b) upholding and promoting all Bloom Agency policies, procedure and values;
- (c) providing Staff with a positive role model;
- (d) ensuring that work and employment processes and practices comply with all applicable Bloom Agency policies;
- (e) taking reasonable steps to prevent Staff engaging in conduct contrary to any applicable Bloom Agency policy;
- (f) taking appropriate action to deal with any employee grievances and breaches of any applicable Bloom Agency policy.

Managers also have responsibilities as Employees (see section 4.2 below).

4.2 Employees are responsible for:

- (a) their own behaviour and actions at all times;
- (b) being aware of and complying with all Bloom Agency policies;
- (c) ensuring that their behaviour is, at all times, consistent with applicable Bloom Agency policies, procedures and values;
- (d) reporting concerns regarding possible breaches of any Bloom Agency policy, promptly, honestly and respectfully.

5. Complaints Procedure

5.1 Scope

- (a) The Participant, People & Policy Manager is responsible for the coordination of Complaints Policy. This includes, but not limited to:
 - (i) Conducting a formal investigation;
 - (ii) Informing the Employee, Contractor or Subcontractor of the allegations;
 - (iii) Complaint resolution and outcome to both the complainant and Employee, Contractor or Subcontractor;
 - (iv) Following the Disciplinary Procedure (see Standards of Conduct Policy 10.);
 - (v) Enacting any recommendations identified accordingly.
- (b) The Company will use the following complaints procedure as a guide. In appropriate circumstances, the Company may depart from this procedure at its discretion and deal with any issue as it considers appropriate.



- (c) The following complaints procedure does not form part of an Employee's contract of employment with the Company and is not intended to be contractual in nature.

5.2 Informing Customers of the Right to Complain

- (a) At the time of intake to Bloom Agency, Employees will discuss the complaints process with the new Customer and/or their nominated person of contact. A new Customer is provided with a Service Agreement which is signed and a copy provided to the Customer.
- (b) Customers are periodically advised of their right to provide feedback or make a complaint during individual plan reviews, or implementation and /or review of service agreements.
- (c) When required, interpreters may be arranged to facilitate understanding of the complaint procedure.
- (d) Customers and their nominated decision maker or parent/ carer have a right to complain and at no time will suffer negative consequences as a result of exercising that right.
- (e) Complaints are referred to the Bloom Agency Participant, People & Policy Manager. Where the complainant does not wish to make a complaint to directly to the company, they can contact the National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission.
- (f) In circumstances in which a criminal/police investigation is undertaken, the company will cease to investigate the events of complaint and will take direction from the delegated authorities.

5.3 Informing Employees, Contractors and Subcontractors

- (a) All employees are provided with a welcome pack which includes Bloom Agency Policies and Procedures. These documents must be signed before commencing employment, which indicates they have read and understood all information. The Complaints Policy is included in this pack.
- (b) All employees must have watched the NDIS Quality and Safeguards Commission Worker Orientation Module and provide a Certificate of Completion which is kept on their personal file.

5.4 Where possible, complaints from Customers are best handled and resolved at the point of service delivery by front line staff in a timely and responsive manner. The Customers feedback/concerns and actions taken are recorded as a case note and the staff member advises the Care Manager accordingly.

5.5 Formal response

The following process is to be followed when formal complaints are unable to be resolved by front line staff at the local level:

- (i) Complaint is received either verbally or in writing by the Bloom Agency.
- (ii) Within 2 business days of receiving complaint, Bloom Agency will verbally acknowledge the complaint with Complainant.



- (iii) Complaint investigation to be completed within 14 days of receipt of complaint. If the investigation is delayed for any reason, the complainant will be updated with the progress and expected completion.
- (iv) Within 4 working days of completing an investigation, a Complaints Outcome Letter is to be sent to the complainant. All relevant documentation is to be filed with the Investigation report.
- (v) Where the complaint may give rise to a potential claim, the Bloom Agency will inform the Insurer accordingly. All conversations with remain de-identified due to privacy reasons.

Note: All investigation steps must be recorded by Bloom Agency.

6. Referral to NDIS Quality and Safeguards Commission

A customer has the right to make a complaint directly to the NDIS Quality and Safeguards Commission. This can be done by calling 1800 035 544 or online at www.ndiscommission.gov.au.

Where resolution fails to be achieved through the Bloom Agency complaints management procedure, a referral may be necessary to an external agency or organisation for advice, or alternate dispute resolution. In these instances, the company will source available agencies and advise the complainant accordingly.

7. Anonymous Complaints

Bloom Agency accepts anonymous complaints, and will carry out an investigation of the issues raised when sufficient factual evidence is provided. Anonymous complaints will be treated with the same priority as other complaints.

8. Document Governance

The Policy Owner will review and update this Policy as required and at a minimum annually to maintain its relevance.