

Policy Statement

It is the policy of Northern Sydney Community Transport Group Limited (NSCTG) and its associated entities Stryder Limited (STR) and Lower North Shore Community Transport Incorporated (LNSCT), trading as Community Connect Transport, referred in this document as the (**Group**), to create an environment where complaints and concerns, compliments and feedback are welcomed and viewed as an opportunity for acknowledgement and improvement. Individuals have the right to make comments and complaints and are encouraged to exercise their right in blame free and resolution focused culture; respecting an individual's right to privacy and confidentiality.

It is acknowledged that such comments and complaints are vital to review internal performance and processes and to seek continuous improvement of services. Clients, families, and / or other stakeholders may submit compliment, complaint and / or feedback about the Group's services, employees, volunteers and/ or contractors.

Policy Principles

It is our policy to follow the principles of procedural fairness and natural justice and comply with the requirements under the;

- Aged Care Act 2024
- Aged Care Quality and Safety Commission Rules 2018
- Aged Care Code of Conduct for Workers
- Transport of NSW Service Contract 2020-2022
- National Disability Insurance Scheme (NDIS) (Complaints Management and Resolution) Rules 2018
- Department of Health – NGO Grant Service Contract 1 Jul 2025 to 30 Jun 2027.
- Transport for NSW – Bus Operator Accreditation Scheme (BOAS) and Point to Point Transport (P2P)

The Group maintains that complaints and feedback can be managed effectively through:

- An open and transparent complaint handling system.
- The observation of the principles of natural justice and compliance with relevant mandatory reporting under Australian law.
- Commitment to the right of stakeholders to complain either directly or through their representatives.
- Undertaking procedural fairness to reach a fair and correct decision.
- Taking reasonable steps to inform the complainant of the Group's Complaints, Compliments & Feedback process as well as their options to enlist support from external agencies if required. This may include using various communication means such as oral and written
- The maintenance of complete confidentiality and privacy.
- Assurance that employees must abide by the Group and other overarching industry standards including Aged Care Code of Conduct for workers, NDIS Code of Conduct and Aged Care Charter of Rights.

- Employee training and a clear documented process.
- Complaints being considered seriously and with respect.
- Informing clients about their right and providing guidance on how to make a complaint during the assessment and orientation process.
- Easily available information for people, about the complaints process.
- The provision of support for those people who may need assistance to make the complaint.
- The protection of complainants against retribution or discrimination.
- The prompt investigation and resolution of complaints.
- Communicating and consulting with clients, family, carers and advocates during the complaint's process, and providing feedback and resolutions.
- Consistent interpretation and application of policies and processes.
- The provision of opportunities for all parties to participate in the complaints resolution process.
- The acceptance of the Group and its employees being accountable for actions and decisions taken as a result of the complaint.
- The commitment to resolve problems at the point of service or through referral to alternatives.
- The commitment to use the complaint as a means of improving the planning, delivery and review of services through our continuous improvement processes, and
- Referring complaints and feedback into continuous improvement policy.

Roles and Responsibilities

Chief Executive Officer:

- Responsible for the management of complaints of a serious nature.
- Training employees on best practice complaints handling.
- Reporting to the Board/Management Committee the feedback data on a quarterly basis.
- Creating a culture that respects people's right to complain.
- Using the insights from feedback to inform continuous improvement.

Head of Operations & Head of Client Services:

- Responsible for coordinating the internal complaints resolutions process when a less serious complaint has not been satisfactorily resolved through the frontline complaints handling process or the complaint is of a more serious nature.
- The Head of Operations and Head of Client Services are responsible for providing feedback and reporting the outcome to the complainant, their families or representatives

Employees and Volunteers:

- All team members are responsible for providing safe, accessible, quality services to people using services and play an integral role in the frontline complaints handling process.
- Employees will work with the CEO, and Head of Operation and Head of Client Services, to find a satisfactory resolution to all complaints.
- Employees have the authority to address less serious complaints quickly and efficiently as they are received.
- Team members will practise open disclosure at all times.

Compliment, Complaint and Feedback Process

Complaints may be made by:

- Employees,
- Volunteers,
- Clients,
- The public,
- An advocate,
- Family members,
- Carers, or
- Anonymously.

Complaints, Compliments and Feedback can be made through:

- Utilisation of the Complaints, Compliments and Feedback Forms available on request from the Group's offices or downloadable via websites www.communityconnect.org.au and/or www.stryder.org.au
- Contacting an employee verbally or in writing. The employee must offer to document the complaint on behalf of a client (if required) and refer the matter to:
Head of Client Services | Ph: 02 9490 9500 | sc@nsctg.org.au
Head of Operations | Ph: 02 9816 5000 | operations@nsctg.org.au
- Contacting the Chief Executive Officer verbally or in writing via:
By Email: ceo@nsctg.org.au
By Mail: CEO, PO Box 162, Gladesville NSW 1675
By Phone: 02 9490 9500
- If complainant is not satisfied with the provision of support and wishes to make a confidential or further complaint, the complainant can contact the Group Chair via:
By Email: chair@nsctg.org.au
By Mail: PRIVATE & CONFIDENTIAL
CHAIR, PO Box 162.Gladesville NSW 1675
- If a NDIS customer wishes to complain about the Group, they can contact:
NDIS Quality and Safeguards Commission | Ph: 1800 035 544
- If an older client who is aged 65 years and older, or Aboriginal and Torres Strait Islander aged 50 and older, wishes to complain about the Group, they can contact:
Aged Care Quality and Safety Commission by calling 1800 036 544

Results are recorded in the Group - Complaint Register to allow for input into Continuous Improvement processes.

If a complaint is about:

- **Support or Services:** The complaint will be dealt with by the Head of Client Services or Head of Operations
- **Employee:** The complaint will be dealt with by the Chief Executive Officer
- **Group:** An external person or body may be approached, as outlined in 'Unresolved Complaints' (see below).

Complaint and Resolution Stages

Acknowledge all complaints quickly (within one working day where possible)

Review and analysis of complaint will include:

- Consulting with client regarding desired outcome.
 - Informing the complainant of support regarding - their right to advocacy, an interpreter, stages of decision making, mechanisms to protect privacy, option to complain to the relevant external agencies (i.e. Aged Care Commission and NDIS Commission).
 - Determining the type of complaint - service, support or process.
 - Ascertaining preventative actions and continuous improvement.
 - Keeping the complainant informed of all stages of the status of their complaint.
 - Informing the complainant of the decision including the reason for the decision and give options for reviewing the decision.
 - If a meeting is required, then it will be held in a safe environment that has been determined by the complainant and at a time relevant to the client.
- Investigate adhering to the principles of impartiality, privacy, confidentiality, transparency and timeliness
 - Complaints will not be discussed with anyone who does not have a genuine responsibility for resolving the issue.
 - Where the complainant is a recipient of disability services under the NDIS, check the client record for a preferred key contact for complaints or ask the client if they would like to nominate a key contact from one of the Group's employees; assigned to handle complaints.
 - Complainant must be informed at all stages of the status of their complaint.
 - The Group must take into consideration any cultural and linguistic needs of the client and provide the relevant support mechanism such as interpreters or similar.

Assessing the Complaint

- Assess the complaint.
- Give it priority;
 - think about resolution pathway (where required),
 - plan and investigate.
- Complaints will be investigated and wherever practicable the resolution is attempted at the time the complaint is lodged with the Head of Operations or Head of Client Services and/or the Chief Executive Officer. It is always the Head of Operations or Head of Client Services and/or the Chief Executive Officer's responsibility to keep the complainant informed in relation to the complaint. Written responses must be approved by Chief Executive Officer prior to being sent out.
- Respond to the complainant with a clear decision.
- After investigation and a satisfactory response has been documented, the Head of Operations or Head of Client Services, and/or Chief Executive Officer will:
 - Ensure that the complaint investigation has been satisfactorily completed.
 - Determine if the complainant is satisfied with the outcome.
 - Follow-up and consult with complainants about any concerns.
 - Consider if there are any systemic issues.
- Employees, clients and/or person's responsible, are informed of the complaints process through:
 - Client Information Pack
 - Employee Induction and Orientation Training

- Staff Meetings
- Client Communication
- Signage
- Contractor Agreements
- Complaints resolution will be monitored according to the audit schedule and feedback will be provided to the complainants personally.

Documentation

- All complaint forms will be recorded in the Group's Complaints Register
- Information in the register will include:
 - Information about the complaint
 - Identified issues
 - Actions undertaken to resolve the complaint
 - Outcome of the complaint
- Upload documents including Compliments, Complaint / Feedback forms into computer system.
- Keep copy of information given to complainant in relevant file.
- Keep all documents for seven (7) years from day of record.
- Collect statistical and other information to:
 - review issues raised
 - identify and address systematic issues
 - report information to the Aged Care or NDIS Commissioner or other relevant Authorities, if requested
- Policy review will occur if there are legislative changes or on a regular basis.

Unresolved Complaints

In the first instance the person is encouraged to raise their compliment or complaint either by filling in the appropriate form or speak with the team member concerned if they feel comfortable about doing this.

Unresolved complaints will be referred to the Group's Chief Executive Officer for investigation and resolution.

Definitions

Complaint	An expression of dissatisfaction or a statement that something is unsatisfactory.
Compliment	An expression of gratitude or appreciation.
Feedback	Opinions, comments and expressions of interest or concern made directly or indirectly.
Open Disclosure	Refers to the practice of openly communicating with clients and their families regarding any incidents or issues that affect the safety and quality of services.

Version History

No. 3.07-STR No.1.6.2- CCT	Complaints, Compliments & Feedback		Date Last Approved	27/09/23 12/03/21	
Version/Document Number	Date Policy Reviewed	Amendments	Positions informed / trained regarding amendments	Method	Date
6.1	26 Aug 25	CCT & STR Policies & Proc. reviewed & consolidated as NSCTG			

ANNEXURE A

Related Documents

PLEASE NOTE: All documents listed are currently LNSCT documents and will be required to be reviewed and index numbered according to the consolidated (Group) NSCTG Policy and Procedures.

- 1.6.2.1 Complaint Form
- 1.6.2.2 Compliments Form
- 1.6.5 Compliment Register
- 1.8.15 Responsibilities for the Group Employees and Drivers
- 1.8.15.1 Staff Qualification Schedule
- 2.1 Fraud Policy
- 2.6.2 Employee Induction Checklist
- 2.6.2.3 Confidentiality and Conflict of Interest Agreement Form
- 2.7.4 Code of Conduct
- 2.7.5 Induction and Orientation Policy
- 2.7.5.1 Induction and Orientation Procedures
- 2.7.9 Learning & Development Policy
- 2.7.9.1 Learning & Development Procedures
- 4.1 Drivers Manual
- 4.3 Service User Survey
- 4.8 Staff Member Orientation Kit
- 7.6 Privacy & Confidentiality Policy
- 7.6.1 Privacy & Confidentiality Procedure
- 7.11.2 Conflict between Service User & Carer
- X.X Whistleblower Policy

References

- Aged Care Act 2024
- Aged Care Code of Conduct for Workers
- Aged Care Quality and Safety Commission Rules 2018 (Rules)
- Anti-Discrimination Act 1977
- Charter of Aged Care Rights 2019
- Human Rights and Equal Opportunity Act 1986
- NDIS (Code of Conduct) Rules 2018
- NDIS (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators 2018
- Privacy Act (1988)
- Work Health and Safety Act (2011)
- Work Health and Safety Regulations 2017
- Workplace Gender Equality Act 2012

ANNEXURE B

If you have given the Group a reasonable chance to resolve your complaint and you remain dissatisfied, you may contact one of the following external agencies for further assistance;

Aged Care Quality and Safety Commission

Any person, including consumers or their family members, friends, or aged care employees, can make a complaint about an Australian Government funded aged care provider to the Commission. Complaints may relate to any aspect of service including care, choice of activities, discrimination, catering, communication or the physical environment.

Complaints about the aged care service can be made by:

- Calling 1800 951 822 (free call from landlines)
 - Use TTY on 133 677
 - Use [National Relay Service](#) (opens a new window) and ask for 1800 035 544
 - Use an interpreter (this can be arranged for you)
- Submitting an Online Complaints Form
<https://www.agedcarequality.gov.au/making-complaintlodge-complaint/online-complaints-form>
- Letter to: Aged Care Quality and Safety Commission, GPO Box 9819, in your capital city

NDIS Commission

If you have a concern about your current NDIS supports or services, it's important to talk about it. Anyone receiving NDIS supports or services can make a complaint about a NDIS Provider.

Your family or friends can talk to the NDIS Commission on your behalf and the service is completely free and independent.

There are many ways to make a complaint to the NDIS Quality and Safeguards Commission:

- Call us on 1800 035 544 (free call from landlines)
- Fill out the complaint contact form below and we will contact you
<https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=PRD00-OCF>
- Use TTY on 133 677
- Use [National Relay Service](#) (opens a new window) and ask for 1800 035 544
- Use an interpreter (this can be arranged for you)

NSW Ombudsman

The NSW Ombudsman Office encourage you to talk to the Group first and try to resolve the complaint by allowing them reasonable time to address your complaint.

If you remain dissatisfied by the management of the complaint, you can;

Call us on 02 9286 1000 or 1800 451 524 to discuss your complaint, or

- **Translating and Interpreter Service (TIS)** 131 450
- **If you are deaf, have a hearing impairment or speech impairment, contact us through the [National Relay Service](#):**
 - Speak and Listen users phone 1300 555 727 then ask for 02 9286 1000.
 - [NRS Internet relay](#) users connect then ask for 02 9286 1000.or go to their [ONLINE COMPLAINTS FORM](#) to submit a complaint for assessment
- www.ombo.nsw.gov.au/complaints/complaint-form

Older Persons Advocacy Network (OPAN)

My Aged Care clients can also contact the Older Persons Advocacy Network (OPAN) if they would like assistance in directly engaging with Commonwealth-funded aged care services.

OPAN supports consumers to access and interact with Commonwealth funded aged care services and can be contacted on (free call) 1800 700 600 from 9.30am to 4.30pm Monday to Friday.

They offer a free confidential advocacy and complaints resolution service. An advocate will always seek your permission before taking action.

Phone: 1800 700 600

Website: <https://opan.com.au/aged-care-complaints/>

Transport for NSW

Transport for NSW are committed to responding appropriately to customer complaints and feedback which will be handled equitably, objectively and in an unbiased manner:

Phone: 02 8265 6962

Email: community.transport@transport.nsw.gov.au

Online Form: <https://transportnsw.info/contact-us/feedback/general-feedback>
