KORU CARE AUSTRALIA
DISABILITY & AGED CARE SUPPORT

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ABN: 46564969103

Complaints Policy and Procedure

Koru Care Australia

This policy explains how Koru Care receives, records, responds to and learns from complaints. It provides an accessible, fair and safe process for participants, aged-care clients, families, carers, advocates, workers and other people to raise concerns without fear of disadvantage or reprisal.

Document governance	Details
Document owner	Operations Manager / Director
Applies to	Directors, managers, employees, contractors, volunteers, students, agency staff, clients, participants and representatives involved with Koru Care Australia services.
Service context	NDIS, aged care, brokered services, private services, community support, social support, transport, personal care, domestic assistance, yard maintenance and related administration.
Version	1.0
Status	Approved
Effective date	06/10/2026
Review date	12 months after approval, or earlier following a serious complaint, system failure, audit finding or relevant regulatory change.
Policy code	KCA-POL-CMP-001

Worker quick guide	What this means in practice
Listen and thank	Listen calmly, thank the person and do not argue, blame or promise an outcome.
Check safety	If there is immediate danger, injury, abuse, neglect or another serious risk, protect the person and contact management immediately. Call 000 in an emergency.
Record and escalate	Pass the concern to a manager as soon as practicable. Record the facts, date, people involved, desired outcome and any immediate action.
Support the person	Ask whether they need an advocate, interpreter, support person or another accessible way to communicate.
Protect privacy and rights	Share information only with authorised people who need it. Never reduce support, treat someone differently or discourage a complaint because a concern was raised.

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1. Purpose

The purpose of this policy and procedure is to ensure complaints are welcomed, handled promptly and fairly, resolved as early as practicable and used to improve the safety, quality and responsiveness of Koru Care services. It supports person-centred care, procedural fairness, privacy, open disclosure where appropriate, and continuous improvement.

2. Scope

This policy applies to complaints, concerns and feedback about Koru Care services, workers, contractors, volunteers, students, management, systems, communication, fees or service delivery. It applies across NDIS, aged care, brokered, private and community services, and to all Koru Care directors, managers, employees, contractors, volunteers, students and agency staff.

It does not replace Koru Care's incident management, safeguarding, privacy, human resources or whistleblower processes. A complaint may trigger one or more of those processes where required.

3. Definitions

Term	Meaning
Complaint	An expression of dissatisfaction about Koru Care, a service, a worker or a decision, where a response or resolution is expected.
Feedback	A comment, suggestion, compliment or concern that may not require a formal response, but may identify an opportunity to improve.
Complainant	A person making a complaint, including a client, participant, family member, carer, advocate, worker or representative.
Representative / advocate	A person authorised by the client or participant to assist or speak for them. Authority must be checked and recorded where personal information is discussed.
Procedural fairness	A fair process in which relevant information and perspectives are considered, conflicts of interest are managed, and people affected have an opportunity to respond.
Open disclosure	An open and honest discussion with an affected person when something has gone wrong and caused, or could have caused, harm.

4. Policy statements and non-negotiable principles

- Complaints and feedback are welcomed and treated as an opportunity to resolve concerns and improve services.
- A person may complain in the way that feels safest and easiest for them, including verbally, in writing, through a support person, advocate, interpreter or another accessible communication method.
- No person will be disadvantaged, intimidated, treated adversely or have services reduced because they made, supported or participated in a complaint.
- Koru Care will act immediately to protect safety and wellbeing where a complaint indicates an urgent risk, incident, abuse, neglect, violence, discrimination, exploitation or another safeguarding concern.
- Complaints will be handled respectfully, confidentially and only shared with people who need the information to manage the matter or where disclosure is required or authorised by law.
- The person managing a complaint must declare and manage any actual, potential or perceived conflict of interest. Where practical, a person who is the subject of the complaint will not investigate it.

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- Koru Care will explain the process, seek the complainant's preferred communication method and desired outcome, provide updates, and give clear reasons for any decision.
- A complaint does not prevent a person from contacting an external regulator, advocate or complaints body at any time.

5. Roles and responsibilities

Role	Responsibilities
Director / Operations Manager	Approve this policy; allocate resources; oversee serious, complex or unresolved complaints; ensure reportable matters are escalated; review trends and improvement actions.
Managers / Coordinators	Receive and acknowledge complaints; assess urgency and risks; arrange a fair response; maintain records; communicate with the complainant; implement and monitor actions.
Workers	Listen respectfully; address simple concerns within their role where safe and appropriate; promptly report complaints and risks to management; preserve confidentiality; cooperate with reviews.
Complaint handler / investigator	Manage the matter impartially; gather and assess relevant information; maintain records; provide updates; recommend or implement proportionate resolution and improvement actions.
All staff	Support people to raise concerns; do not retaliate or discourage complaints; participate in training and improvement activities.

6. How complaints can be made

A complaint can be made by a client or participant, their family member, carer, nominee, advocate, worker, contractor or another person. It may be made verbally, by phone, email, letter, feedback form, through a worker or manager, or through an external body. Anonymous complaints are accepted; however, this may limit Koru Care's ability to investigate or provide an individual response.

Koru Care will provide information about complaints at service commencement and make it available in accessible formats. Reasonable assistance, communication adjustments, interpreters and advocacy support will be offered where needed.

7. Complaint management procedure

7.1 Receive, listen and make the person safe

- Listen without argument, thank the person for raising the concern and check whether there is an immediate safety, health, safeguarding or service-continuity issue.
- If there is immediate danger or a medical emergency, call Triple Zero (000) and follow Koru Care emergency procedures. Escalate any possible reportable incident or safeguarding concern immediately under the Incident Management Policy and Procedure.
- Ask how the person prefers to communicate, whether they want an advocate, representative, interpreter or support person involved, and what outcome they are seeking.
- Do not promise a particular outcome, make admissions beyond the facts known, blame another person or ask the complainant to confront a worker.

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7.2 Record and acknowledge

- Record the complaint in the approved Complaints and Feedback Register as soon as practicable, including the date received, issues raised, desired outcome, risk assessment, responsible manager and actions taken.
- Acknowledge receipt as soon as practicable and ordinarily within two business days. Explain the next steps, contact person, likely timeframe, external options and how to request an update.
- Where the complaint is received verbally, confirm the key issues and preferred contact method with the complainant. Written information must be provided where practicable.

7.3 Assess, allocate and plan

- Assess urgency, seriousness, complexity, actual or potential harm, safeguarding concerns, privacy, conflicts of interest and whether another process or external notification may be required.
- Allocate the matter to an appropriately senior and impartial person. Serious, complex, unresolved or high-risk matters must be escalated to the Director / Operations Manager.
- Develop a proportionate plan covering information to be reviewed, people to be consulted, communication arrangements, expected timeframes and any interim safety or service controls.

7.4 Review and resolve

- Gather relevant information fairly, including records, worker accounts and the complainant's perspective. Give any person who is the subject of a complaint an appropriate opportunity to respond.
- Maintain regular contact in the complainant's preferred way. Explain delays and revised timeframes promptly.
- Seek the least formal resolution that is safe, fair and appropriate. Possible outcomes include an explanation, apology, correction, service change, support arrangement, refund or fee review where applicable, staff coaching, disciplinary process, policy review or quality improvement action.
- Use open disclosure where something has gone wrong and caused, or could have caused, harm. This must be honest, respectful and focused on the person's wellbeing, what is known, what will happen next and how recurrence will be addressed.

7.5 Respond, close and review

- Provide a clear outcome in the complainant's preferred accessible format. The response should explain the issues considered, information relied on, findings or decisions, actions taken or planned, reasons, and internal and external review options.
- Aim to resolve complaints as quickly as practicable and, where the Health Complaints Act 2016 (Vic) applies, within 90 days. If this cannot be achieved, explain the reason, updated timeframe and available escalation options.
- Ask for feedback about the complaint process. Close the register entry only when the outcome, actions, communication and any review pathway have been recorded.

8. External support and escalation

A person may contact an external complaints body, advocate or regulator at any stage. Koru Care will not require a person to exhaust internal processes first and will cooperate with lawful external requests.

Service context	External option
NDIS supports	NDIS Quality and Safeguards Commission: 1800 035 544 or ndiscommission.gov.au.
Aged care services	Aged Care Quality and Safety Commission: 1800 951 822 or agedcarequality.gov.au.

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Service context	External option
Victorian health services or health information	Health Complaints Commissioner: 1300 582 113 or hcc.vic.gov.au.
Advocacy	NDIS participants and aged-care clients may seek an independent advocate. Koru Care will provide assistance to access advocacy on request.
Urgent safety concern	Triple Zero (000) for immediate danger, injury or emergency; otherwise notify management promptly.

9. Privacy, records and confidentiality

Complaint information must be accurate, factual, secure and accessible only to authorised people. It must be kept separately from a client's care or health record unless a relevant care, safety or service action also needs to be documented in that record. Information will be collected, used, disclosed, retained and disposed of in accordance with Koru Care privacy and records-management requirements and applicable law.

10. Quality improvement, monitoring and reporting

Management will review complaint data, themes, response times, outcomes, risks and complainant feedback at least quarterly and after any serious complaint. Trends, systemic issues and agreed actions will be recorded in the Continuous Quality Improvement Register and monitored for effectiveness. De-identified information may be reported to management, workers and relevant governance forums to support learning and accountability.

11. Training, consultation and implementation

All workers will receive information and training about this policy at induction and through refresher training. Training will cover respectful communication, accessible complaints pathways, no-reprisal requirements, privacy, escalation, documentation, procedural fairness, open disclosure and incident-reporting links. Koru Care will seek client, participant, family, advocate and worker feedback on whether the complaints system is accessible and effective.

12. Monitoring and review

This policy will be reviewed at least every 12 months, or earlier after a serious complaint, identified system failure, relevant regulatory change, audit finding or feedback indicating the process is not accessible or effective.

13. Related documents

- Incident Management Policy and Procedure
- Risk Management Policy and Procedure
- Privacy and Confidentiality Policy
- Code of Conduct
- Continuous Quality Improvement Register
- Complaints and Feedback Register

14. References

- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- NDIS Practice Standards and Quality Indicators - Core Module: Provider Governance and Operational Management

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- Aged Care Act 2024, Aged Care Rules 2025 and Strengthened Aged Care Quality Standards
- Health Complaints Act 2016 (Vic) and Health Complaints Commissioner Complaint Handling Standards
- Aged Care Quality and Safety Commission: Good complaints practice for providers