



BCR Communities

Complaints and Feedback Policy



CONTENTS

1	PURPOSE.....	1
2	SCOPE.....	2
3	RESPONSIBILITIES	2
	The Board of Directors	2
	Quality and Safety Committees	2
	Chief Executive Officer	2
	Executive Managers.....	2
	Care Partners	3
	Leadership Team.....	3
	Workers.....	3
4	MAKING A COMPLAINT	3
5	COMPLAINT AND FEEDBACK MANAGEMENT	4
6	UNRESOLVED MATTERS	5
	Aged Care Quality and Safety Commission	5
	NDIS Quality and Safeguards Commission	6
	Office of the Children's Guardian	6
7	MONITORING COMPLAINTS AND FEEDBACK	7
8	IMPLEMENTING AND MONITORING IMPROVEMENTS.....	7
9	COMPLAINTS AND FEEDBACK REGISTER	7
10	FAILURE TO COMPLY WITH CODES OF CONDUCT AND BCR'S POLICIES AND/OR PROCEDURES.....	7
11	DEFINITIONS AND TERMS	7
12	COMPLIANCE WITH THIS POLICY	8
13	RELATED LEGISLATION AND DOCUMENTS	9
14	FEEDBACK.....	9
15	APPENDIX	9
16	DOCUMENT VERSION CONTROL	10
	APPENDIX 1 - AGED CARE QUALITY AND SAFETY COMMISSION'S STAGES OF COMPLAINTS AND FEEDBACK MANAGEMENT SYSTEM	12

1 PURPOSE

- 1.1 Bay & Basin Community Resources Limited/BCR Communities (BCR) recognises that complaints are an important mechanism we can use to continually improve our supports and services. This policy provides a framework for taking a consistent and professional approach to feedback and complaints provided by participants, their carers and anyone who is not a BCR worker.

- 1.2 The purpose of this Policy is to document BCR's approach to managing feedback and complaints about the supports and services it provides. The policy affirms and supports the rights of participants, their representatives and members of the public to provide feedback or make a complaint if dissatisfied with our supports and services, workers or processes.
- 1.3 The Worker Complaints, Feedback, Grievance and Conflict Resolution Policy manages worker feedback and complaints.

2 SCOPE

- 2.1 This Policy applies to all of BCR's operations, workers and processes.

3 RESPONSIBILITIES

The Board of Directors

- 3.1 The Board of Directors (the Board) is responsible for:
 - 3.1.1 ensuring that continuous improvement is embedded into the governance processes and that systems are in place to enable the Board to maintain current knowledge and understanding of any complaint that might severely impact the organisation across immediate, short-term, and longer-term timeframes and
 - 3.1.2 reviewing and approving this Policy.

Quality and Safety Committees

- 3.2 The Quality and Safety Committees are responsible for regularly reviewing complaints and feedback, analysing the data and identifying trends to improve how we deliver our supports and services.

Chief Executive Officer

- 3.3 The Chief Executive Officer (CEO) is responsible for:
 - 3.3.1 ensuring the Complaints and Feedback Policy is implemented,
 - 3.3.2 ensuring that the relevant Board Sub-Committees report to the Board any complaint that might severely impact the organisation, and
 - 3.3.3 organising and facilitating appropriate training for Directors and Executive Managers about this Policy and related procedure and, if appropriate, any refresher training following a complaint or feedback.

Executive Managers

- 3.4 Executive Managers are responsible for:
 - 3.4.1 contributing to regular review and monitoring of complaints and feedback and any improvement strategies implemented to manage them,
 - 3.4.2 participating in the relevant Board Sub-Committees,

- 3.4.3 investigating and managing complaints and feedback,
- 3.4.4 supporting, guiding and training relevant staff with investigating and managing complaints and feedback and identifying and implementing improvements to reduce their recurrence, and
- 3.4.5 embedding this Policy into organisational culture and everyday business.

Care Partners

3.5 Care Partners are responsible for:

- 3.5.1 investigating and managing complaints and feedback and
- 3.5.2 implementing improvements to reduce their recurrence.

Leadership Team

3.6 The Leadership Team is responsible for:

- 3.6.1 investigating and managing complaints and feedback and
- 3.6.2 implementing improvements to reduce their recurrence.

Workers

3.7 Workers are responsible for

- 3.7.1 completing all required training, performing their roles in accordance with their position description and
- 3.7.2 identifying and escalating complaints, feedback and improvement opportunities appropriately.

4 MAKING A COMPLAINT

- 4.1 Participants, their representatives and members of the public are encouraged to provide feedback or make a complaint if their expectations of BCR, including its supports and services, have not been met. They can also provide suggestions about improvement opportunities or pay a compliment if their expectations of our supports and services have been met or exceeded.
- 4.2 Anyone who makes a complaint or provides feedback:
 - 4.2.1 will be made aware of, and will have access to, advocates, language services and other methods of raising concerns about the service or organisation in accordance with the Participant Privacy, Rights and Advocacy, and Response to, and Prevention of Abuse Policy and
 - 4.2.2 can do so without fear of retribution or disadvantage.
- 4.3 All complaints and/or feedback will be managed in accordance with BCR's Privacy Policy, which complies with the [Privacy Act 1988 \(Cth\)](#), the [Australian Privacy Principles](#), [Health Records and Information Privacy Act 2002 \(NSW\)](#), the [Health Privacy Principles](#), the [Aged Care Quality Standards](#), the [NDIS Practice Standards](#) and the [National Principles for Child Safe Organisations](#).

- 4.4 To ensure that everyone is able to provide feedback or make a complaint, BCR provides several mechanisms or tools for feedback and complaints to be raised. They include:
- 4.4.1 talking to any member of staff, either in person or by calling 1300 222 748,
 - 4.4.2 using the online form on the [Contact](#) page of the BCR Communities website,
 - 4.4.3 sending an email to info@BCRCommunities.com,
 - 4.4.4 writing to BCR at 18 Sanctuary Point Road, Sanctuary Point, NSW, 2540, or
 - 4.4.5 using any other method of communication that may be more appropriate to them.
- 4.5 Where a complaint has been made, BCR will report and investigate it within its Incident Management System, including, if appropriate, reporting the matter to the relevant external authorities within the defined timelines.
- 4.6 BCR will ensure that procedural fairness is applied when managing complaints and feedback, including an appropriate and impartial investigator. For more information, refer to the Conflicts of Interest, Gifts and Benefits Policy.
- 4.7 All people involved in the incident will be informed about what has happened or alleged to have happened. They will have the opportunity to explain their view of the incident. Corrective action will be based on relevant facts and circumstances. The investigator and decision maker will be fair and impartial.

5 COMPLAINT AND FEEDBACK MANAGEMENT

- 5.1 BCR has implemented a six-stage approach to manage complaints and/or feedback that mirrors the Aged Care Quality and Safety Commission's [Better practice guide to complaints handling in aged care services](#) and that aligns with the NDIS Quality and Safeguards Commission's [Effective Complaint Handling Guidelines for NDIS Providers](#). These are explained in more detail in the Feedback and Complaints Procedure but here is a quick overview of BCR's procedure:
- 5.1.1 receive all complaints and support people to make complaints,
 - 5.1.2 acknowledge all complaints quickly,
 - 5.1.3 record and securely store the details of all complaints and related information,
 - 5.1.4 assess the complaint to:
 - 5.1.4.1 understand the facts and the outcomes people want,
 - 5.1.4.2 give it priority, and
 - 5.1.4.3 start planning about how to resolve it,
 - 5.1.5 respond to the complaint using a resolution process that gives the person who made the complaint a clear decision and improves the care or improves care and support and/or addresses the issues raised, and

- 5.1.6 report on complaints and feedback management system and its outcomes.
- 5.2 In addition, BCR has implemented an Open Disclosure process that aligns with the Aged Care Quality and Safety Commission's [Open Disclosure Framework and guidance](#). This ensures BCR:
 - 5.2.1 engages in honest and timely communication with participants when things go wrong,
 - 5.2.2 addresses any immediate needs or concerns and provides support to those affected,
 - 5.2.3 acknowledges and apologises or expresses regret,
 - 5.2.4 investigates, understands and explains what happened, and
 - 5.2.5 learns from the experience and makes improvements to prevent it happening again.
- 5.3 All feedback and/or complaints will be:
 - 5.3.1 acknowledged as soon as possible, but no longer than within 3 business days of receiving them and
 - 5.3.2 resolved as soon as possible, based in the complexity of the matter and availability of relevant staff.

6 UNRESOLVED MATTERS

- 6.1 In the unlikely event that BCR cannot resolve the matter, complainants can seek assistance from the relevant governing body to which the matter relates.

Aged Care Quality and Safety Commission

- 6.2 If the complaint relates to Aged Care supports or services, a complaint can be made to the Aged Care Quality and Safety Commission by:
 - 6.2.1 phoning 1800 951 822. Interpreters can be arranged,
TTY 1800 555 727 and ask for 1800 951 822.

Participants can also call one of these services and ask to be connected to call the Aged Care Quality and Safety Commission:
[Translating and Interpreting Service \(TIS\)](#) - 131 450
[Aboriginal Interpreter Service \(AIS\)](#) - 1800 334 944
 - 6.2.2 completing an online [complaint contact form](#), or
 - 6.2.3 writing to Aged Care Quality and Safety Commission
GPO Box 9819
Sydney NSW 2001

More information can be found at agedcarequality.gov.au/contact-us/complaints-concerns/what-do-if-you-have-complaint

- 6.3 The [Older Persons Advocacy Network](#) offers a free, confidential service. Participants can call them on [1800 700 600](#).

NDIS Quality and Safeguards Commission

- 6.4 If the complaint relates to NDIS supports or services, a complaint can be made to the NDIS Quality and Safeguards Commission by:

6.4.1 phoning 1800 035 544

TTY 1800 555 727 and ask for 1800 035 544,

6.4.2 completing a [complaint contact form](#), or

6.4.3 writing to NDIS Quality and Safeguards Commission

PO Box 210

Penrith NSW 2750

More information can be found at ndiscommission.gov.au/contact-us/makeacomplaint.

More information in easy read format can be found at ndiscommission.easyread.com.au/making-the-ndis-safe/8-contact-us.

- 6.5 Participants can find an advocate using the [Disability Advocacy Finder](#).

Office of the Children's Guardian

- 6.6 If the complaint relates to supports or services being provided to children and young people under 18, a complaint can be made to the Office of the Children's Guardian by:

6.6.1 phoning 13 77 88

TTY 133 677 then ask for 13 77 88

speaking and listening service call 1300 555 727 then ask for 13 77 88

SMS relay service on 0423 677 767 then type 13 77 88

make an internet relay call then type 13 77 88

6.6.2 completing a [complaint contact form](#), or

6.6.3 writing to Office of the Children's Guardian

Locked Bag 5100

Strawberry Hills NSW 2012

More information can be found at ocg.nsw.gov.au/parents-and-carers/how-parents-can-raise-concern.

PLEASE NOTE: The Office of the Children's Guardian does not deal directly with complaints or concerns about the risk of harm to individual children. To report suspected child abuse or neglect, contact the Child Protection Helpline on 132 111 (TTY 1800 212 936).

7 MONITORING COMPLAINTS AND FEEDBACK

- 7.1 Feedback and complaints are regularly reviewed by BCR's Quality & Safety Committees. By analysing the data, BCR can identify trends and ensure the system is used to improve how supports and services are delivered.
- 7.2 The information from these reviews allows BCR to apply the broader learnings and improvement opportunities across all areas of the organisation.

8 IMPLEMENTING AND MONITORING IMPROVEMENTS

- 8.1 All corrective actions and improvement opportunities identified will be implemented and monitored to ensure they are appropriate and effective.
- 8.2 Any procedures that may need to be updated as a result of the complaint or feedback will be reviewed and amended and, if appropriate, training, including refresher training, will be developed and rolled out to workers, where appropriate.

9 COMPLAINTS AND FEEDBACK REGISTER

- 9.1 BCR will maintain a register within its Incident Management System that contains details of all complaints and feedback received, including details of the corrective actions and improvement opportunities identified and implemented and any training recommendations or requirements.

10 FAILURE TO COMPLY WITH CODES OF CONDUCT AND BCR'S POLICIES AND/OR PROCEDURES

- 10.1 If, during the investigation, it is discovered that a director, committee member or worker failed to comply with any Codes of Conduct or BCR policies and/or procedures, it will be recorded and investigated in accordance with Incident Management Policy and Incident Management Procedure and may result in:
 - 10.1.1 the director or committee member being asked to resign their position or
 - 10.1.2 the worker facing disciplinary action and/or reasonable management instruction in accordance with the Performance Development, Performance Management and Disciplinary Policy and Performance Management and Disciplinary Procedure. This disciplinary action may include warnings, (whether written or verbal), a reduction in classification, position, and/or remuneration, and up to and including dismissal.

11 DEFINITIONS AND TERMS

- 11.1 **Board of Directors:** a group of elected individuals representing the members and who are responsible for governing, overseeing the affairs of, and making strategic decisions for an organisation on behalf of its members, noting that the Board is appointed by the members of the organisation.
- 11.2 **Complainant:** the person making the complaint or providing the feedback.

- 11.3 **Complaint:** any expression of dissatisfaction with supports and services provided by BCR, our workers or the action or lack of action taken regarding an issue that requires a response or resolution.
- 11.4 **Compliment:** any expression of praise, positive recognition or gratitude about BCR's products, programs and services provided or its workers.
- 11.5 **Director:** an individual appointed to the Board of Directors responsible for contributing to the collective decision making of the Board.
- 11.6 **Executive Manager:** a member of BCR's Executive Team.
- 11.7 **Executive Team:** the CEO and Executive Managers.
- 11.8 **Feedback:** any reaction to supports and services provided by BCR, our workers or the action or lack of action taken regarding an issue that requires a response or resolution, both positive and negative. It is encouraged from participants, families, staff and other providers and can be received via multiple mechanisms.
- 11.9 **Leadership Team:** the Executive Team plus relevant direct reports.
- 11.10 **Open Disclosure:** the open discussion that BCR has with its participants when something goes wrong that has harmed or had the potential to cause harm to a person receiving a support or service from BCR.
- 11.11 **Participant:** an individual to whom BCR provides a support or service and includes their carers, parents, guardians and other support people.
- 11.12 **Recipient:** anyone to whom a complaint or feedback is made.
- 11.13 **Reportable incident:** as determined by the [Aged Care Quality and Safety Commission](#), the [NDIS Quality and Safeguards Commission](#) or the [Office of the Children's Guardian](#).
- 11.14 **Risk:** the likelihood of a specific consequence occurring. Risks are usually expressed in terms of likelihood and consequences, e.g. the risk of suffering complications from contracting meningococcal disease whilst at BCR is extremely low.
- 11.15 **Staff:** people who have entered into an employment contract with BCR and receive remuneration or payment for the work and duties they perform.
- 11.16 **Volunteer:** a person who provides unpaid support to BCR,
- 11.17 **Worker:** anyone who carries out work for BCR and includes employees, Labour hire staff, volunteers, apprentices, work experience students, subcontractors and contractors.

12 COMPLIANCE WITH THIS POLICY

- 12.1 If there is reason to believe that a worker has failed to comply with this Policy, it will be investigated in accordance with relevant Policies and Procedures.
- 12.2 Failure of a worker to comply with this Policy may result in the worker facing disciplinary action and/or reasonable management instruction in accordance with the Performance Development, Performance Management and Disciplinary Policy and Performance Management and Disciplinary Procedure.

13 RELATED LEGISLATION AND DOCUMENTS

[Aged Care Quality and Safety Commission](#)

Aged Care Quality and Safety Commission's [Better practice guide to complaints handling in aged care services](#)

Aged Care Quality and Safety Commission's [Open Disclosure Framework and guidance](#)
[Aged Care Quality Standards](#)

[Australian Privacy Principles](#), [Health Records and Information Privacy Act 2002 \(NSW\)](#)

Complaints and Feedback Commitment Statement

Complaints and Feedback Procedure

Conflicts of Interest, Gifts and Benefits Policy

[Health Privacy Principles](#)

Incident Management Policy

Incident Management Procedure

[National Principles for Child Safe Organisations](#)

[NDIS Practice Standards](#)

[NDIS Quality and Safeguards Commission](#)

NDIS Quality and Safeguards Commission's [Effective Complaint Handling Guidelines for NDIS Providers](#)

[Office of the Children's Guardian](#)

Participant Privacy, Rights and Advocacy, and Response to, and Prevention of Abuse Policy

Performance Development, Performance Management and Disciplinary Policy

Performance Management and Disciplinary Procedure

[Privacy Act 1988 \(Cth\)](#)

Privacy Policy

Worker Complaints, Feedback, Grievance and Conflict Resolution Policy

14 FEEDBACK

14.1 Anyone can provide feedback about this document by emailing info@bcrcommunities.com.

15 APPENDIX

15.1 Appendix 1 - Aged Care Quality and Safety Commission's Stages of Complaints and Feedback Management System

16 DOCUMENT VERSION CONTROL

- 16.1 BCR will maintain a high standard of quality and control of all documented information and records. All documents (either retained or referred to) will be current, suitable for use, accessible, quality controlled, and stored in a safe and secure location.
- 16.2 BCR policies and procedures will be reviewed by the relevant responsible officer either:
- 16.2.1 prior to the mandatory three year review period or
 - 16.2.2 when an incident or a known change (legislative or internal) has occurred or a complaint or feedback has been received that relate to specific BCR policies and/or procedures,
- whichever occurs first.

Section 1	Title	Complaints and Feedback Policy		
	Policy Location	Intranet		
	Responsible Officer	Chief Executive Officer		
	Created By		Date Created	26/06/2023
	Date Approved		Board to Approve all Modifications	No
	Reviewer	Executive team		

Section 2	Version No	Modified/Reviewed By	Modifications Made	Date	Status
	001		Policy approved and implemented	26/06/2023	Approved
	002	KMT	Reformatted original document	15/01/2023	Draft
	003	Executive Team	Recommended changes for KT	29/09/2025	Draft
	004	Executive Team	Amended Section 5 to mirror ACQSC's Complaints Management Guidelines, reference NDIS Q&SC's complaints procedure and outline the Open Disclosure framework. Amended Section 10 to reference Codes of Conduct	14/10/2025	Draft
	005	Executive Team - pending Board endorsement		10/11/2025	Approved
	006	KMT & SC	Added reference to Participant Privacy, Rights and Advocacy, and Response to, and Prevention of Abuse Policy, Conflicts of Interest, Gifts and Benefits Policy, Privacy Act 1988 (Cth) , the Australian Privacy Principles , Health Records and Information Privacy Act 2002 (NSW) , the Health Privacy Principles , the Aged Care Quality	19/01/2026	

			Standards , the NDIS Practice Standards and the National Principles for Child Safe Organisations , included protection for complainants from retaliation		
	007	Board		11/06/2026	Approved

APPENDIX 1 - AGED CARE QUALITY AND SAFETY COMMISSION'S STAGES OF COMPLAINTS AND FEEDBACK MANAGEMENT SYSTEM¹

The stages of complaints and feedback management system

An effective complaints and feedback management system is fair, easy to use, responsive and efficient. It supports providers to continuously improve the services they deliver.

The aim is for older people, their supporters and aged care workers to have confidence in your complaints and feedback management system.

A complaints and feedback management system must have these steps:

1. **Receive** all complaints and support people to make complaints.
2. **Acknowledge** all complaints quickly.
3. **Record** and securely store the details of all complaints and related information.
4. **Assess** the complaint:
 - a) understand the facts and the outcomes people want
 - b) give it priority
 - c) start planning about how to resolve it.
5. **Respond** to the complaint using a resolution process that gives the person who made the complaint a clear decision and improves the care or fixes the issues.
6. **Report** on your complaints and feedback management system and its outcomes.



¹ [Better practice guide to complaints handling in aged care services](#) accessed 12:12 30/09/2025