

## Purpose

To establish Older Persons Advocacy Network's (OPAN) transparent, responsive, accessible and collaborative complaints management system.

## Scope

This policy applies to complaints, from sources external to OPAN employees, received by OPAN.

## Out of Scope

This policy does not include:

- Complaints made by a current or former employees, where the complaint relates to an internal dispute during the period of that person's employment. Please refer to the *Workplace Grievance Policy* and its Procedure for these matters.
- Complaints that contravene laws or legislation. Potentially unlawful behaviour may be covered by legislation which will determine how the grievance is to be handled.
- General Aged Care system complaints that are out of scope for OPAN. These will be referred to the relevant agency, Commission or Department section.
- Disclosable matters that involve information that the discloser has reasonable grounds to suspect concerns of misconduct, or an improper state of affairs or circumstances, in relation to OPAN. Please refer to the *Whistleblower Policy* for these matters.
- Complaints posted in/received via OPAN's social media channels.

## Key terms

Complaint	<p>An expression of dissatisfaction about OPAN that are made by any person who is not an OPAN employee or a member of the OPAN Board.</p> <p>In this document, general enquiries, requests for information and provision of feedback will not be considered as a complaint.</p>
Complainant	<p>A person making a complaint.</p> <p>In the context of this document, this does not include the following:</p> <ul style="list-style-type: none"> <li>• consumers, their family, as well as representatives, carers and health professionals making a complaint against the general aged care system</li> <li>• former and current OPAN employees.</li> </ul>
Informal complaint	<p>An external complaint that is not made in writing.</p>

Employee	Refer to OPAN employees, Board members and National Older Person Reference Group
OPAN complaints platform	Software/platform that OPAN uses to record and manage complaints.

## Policy

The right to be heard is a fundamental human right. OPAN is committed to the preservation of human rights for all people. OPAN is committed to being open and responsive to all feedback, including complaints.

OPAN recognises that complaints are a valuable driver for continuous improvement.

OPAN takes complaints seriously and aim to treat those making complaints with confidentiality, respect and without retribution. Complaints made to OPAN will be handled transparently and resolved promptly.

In managing complaints, OPAN will provide complainants with specific needs to access necessary supports, such as translators, to ensure a fair and equitable application of this policy.

All complaints / feedback will be captured and actively managed within the OPAN complaints platform ensuring central visibility, supporting security and protection, reporting and continuous improvement.

OPAN undertakes to regularly review its *External Complaints Management Policy* and its procedure to ensure the complaints experience constantly informs organisational change and development.

OPAN *Complaints Management Policy* and its procedure will comply with all relevant legislation and regulation.

OPAN complaints management system is defined in this policy, *Complaints Management Procedure* and its associated work instructions.

## Access to information about making a complaint

Anyone seeking advocacy from OPAN will be given verbal information and offered written information about how to make a complaint.

Complaints may be in the form of an informal complaint or a complaint in writing.

Information on OPAN's complaint management system will be available on the OPAN website.

## Anonymous complaints

OPAN will respect the complainant's request to remain anonymous and will accept anonymous complaints where possible. It is noted that the ability to investigate and/or resolve an anonymous complaint may be limited depending on the level of information provided.

## Confidentiality

Complaints will be handled sensitively and confidentially.

Information on a complaint will only be disclosed to the persons that are involved in the complaint and/or where OPAN considers disclosure is required to handle the complaint.

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Some complaints may need to be reported to external authorities and information including details of the complainant and involved parties and nature of complaint may need to be disclosed. In these instances, consent from the complainant and/or involved parties will be sought where possible.

Information and records collected throughout the complaints management process will be kept confidential and handled in accordance with the *Privacy Policy*.

## Retention of information

The *Privacy Policy* will apply to information collected during the complaint investigation process.

Records of the complaints will be maintained in OPAN complaints software. Maintaining these records is significant to monitoring status, avoiding duplication and ensuring continuous improvement.

## Reporting

OPAN will provide to its Finance, Audit and Risk Committee and the Board of Directors de-identified complaints data / reports and annual complaints analysis reports .

Where an outcome of a complaint leads to change in policy or practice the de-identified complaint may be used as context for OPAN employees to understand the change and the need for change.

All complaints and associated documents will be recorded in the Complaints Register.

## Outcomes

The outcomes of the complaint process may be:

- Change in policy and/or procedures
- Staff training, counselling and/or disciplinary proceedings
- No changes in OPAN policy and/or procedures and no action required.

## References

### Related OPAN documents

- Whistleblower Policy
- Privacy Policy
- Complaints Management Procedure
- Receiving Complaints/Feedback by ONCC Work Instruction
- Creating Complaint/Feedback Cases Work Instruction
- Assessing and Triaging Cases Work Instruction
- Managing Complaint/Feedback Cases Work Instruction
- Coordinating SDO Managed Cases Work Instruction
- Extracting Complaints/Feedback Data Work Instruction
- Workplace Grievance Policy
- Workplace Grievance Procedure

### Related external references

- Nil.

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# Version history

Approval date	Document Owner	Approving Authority	Amendment Details
31 January 2025	Director, Operations	OPAN Finance, Audit and Risk Committee	<ul style="list-style-type: none"><li>• Changed title from “External Complaints Policy” to “Complaints Management Policy” to align with the current context and scope</li><li>• Updated and aligned format to new policy template and standards</li><li>• Added sections and contents in line with the outline of the new policy template.</li><li>• Included policy sections and content on Confidentiality and Anonymous complaints</li><li>• Provided definition of key terms used in this policy and its associated documents for consistency.</li></ul>
15 May 2024	Director, Operations	OPAN Board of Directors	<ul style="list-style-type: none"><li>• Added “Policy and” on the first item below the Out of Scope section</li><li>• Added Workplace Grievance Policy as one of the references</li><li>• Deleted Complaints Map as one of the references.</li></ul>
4 July 2022	Chief Executive Officer	OPAN Board of Directors	First version.

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