

Mable Incidents and Complaints Policy for Customers and Support Workers

Definitions

Complaint. This is when you express dissatisfaction to or about Mable, concerning our products, services, staff, or even how a previous complaint was handled, and you expect a response or resolution. This could cover anything from service quality to communication, delays, or financial matters like billing. Please note, we don't actively monitor or seek out complaints made on third-party media channels

Incident. This refers to any act, omission, event, or circumstance that causes, or could potentially cause, harm during a service arranged through Mable or connected to our platform. Think of it as anything from safety concerns to property damage, or even potential breaches of our policies.

Dispute. A dispute is simply an unresolved complaint that has been escalated, either within Mable or to an external body

Vulnerability. We recognise that some individuals may be more susceptible to detriment due to circumstances like disability, age, literacy levels, gender, trauma, and stress

Regulated Restrictive Practice. These are specific practices, like seclusion or various forms of restraint, monitored by the NDIS Commission, designed to influence a person's behaviour. At Mable, we have a strict zero-tolerance policy against any form of restrictive practice on our platform, authorised or not.

Introduction and Purpose

At Mable, we are passionately committed to creating a safe, high-quality, and truly supportive community for everyone. This policy is our promise to you, outlining how we manage incidents and complaints with utmost care, ensuring transparency, fairness, and easy access for all. Our approach is aligned with Australia's leading Complaints Standard and integrates our obligations under the NDIS and Aged Care regulation and legislation.

Guiding Principles

Mable's approach to managing incidents and complaints is built on principles aligned with Australian best practice in complaints handling and NDIS standards.

1. **People-Focused and Proactive:** We firmly believe everyone has the right to raise a concern. Mable takes a people-focused and proactive approach to listening to your feedback and complaints. We're deeply committed to addressing your concerns promptly, treating you with the respect you deserve, and involving you actively in the process wherever it makes sense.
2. **Accessibility:** Our system is designed to be accessible to everyone, including those who might need extra support due to vulnerability. We ensure information on how and where to complain, and what support is available, is widely shared, easy to find, and offered in Easy English. You'll never be charged to make a complaint.
3. **Responsiveness:** When you complain, we commit to acknowledging your complaint within three working days. For incidents, we act even faster: Level 5 (Major) incidents are acknowledged, during business days, within 4 business hours, Level 4 (High) within 8 business hours, and all other incidents within 48 business hours. We'll keep you informed every step of the way, explaining our process, expected timeframes, your role, and potential outcomes.
4. **Impartiality and Fairness:** Every incident and complaint is handled impartially and fairly. We guarantee that conflicts of interest will not influence the outcome. And, you'll always have the option for a review by someone different from the initial decision-maker.
5. **Equity:** We address all complaints fairly, consistent with our policy. We also have a clear framework to manage conduct that may be deemed unreasonable, ensuring fairness for everyone.

6. **Privacy and Disclosure:** Your personally identifiable information is handled with the utmost care, strictly adhering to all privacy laws and our own Privacy Policy
7. **Accountability, Learning, and Prevention:** We hold ourselves accountable for our complaint and incident system. Mable is dedicated to using data from every incident and complaint to continuously improve our services, manage risks, and prevent future issues.
8. **Safeguarding:** We maintain a zero-tolerance policy against abuse, neglect, and violence towards people with disabilities and older persons. Any allegation or incident of violence, abuse, neglect, exploitation, or discrimination is taken seriously and acted upon immediately.

Incident Management System

To ensure a swift and appropriate response, Mable categorises incidents into five impact levels (1-5). Levels 4 and 5 are considered High or Major, triggering immediate, additional steps and notification to our Trust & Safety Committee.

1. **Receiving & Recording:** You can easily report an incident through our [online webforms](#), timesheet submissions, via email at trustandsafety@mable.com.au, phone calls ([1300 736 573](tel:1300736573) – Monday to Friday, 9am to 6pm AEDT (Sydney)). If you are deaf or hard of hearing, you can contact us via the National Relay Service at nrschat.nrscall.gov.au/nrs/internetrelay. Every report is carefully recorded, assigned a unique identifier, and includes details like your contact information, the issues raised, your desired outcomes, and any support needed.
2. **Acknowledgement & Assessment:** We'll acknowledge your incident within the timeframes outlined in this document. Each case is assessed based on its severity, health and safety implications, complexity, impact, urgency, and other factors, to ensure the most appropriate response.
3. **Referral & Mandatory Reporting:**
 - a. **Notifying Registered Providers:** Where we can, we promptly notify NDIS or Home Care Package (HCP) Registered Providers of any incidents involving their clients, recognising their regulatory reporting duties.
 - b. **Mable's Indirect Reporting Obligation:** For serious incidents, if we can't confirm that the primary parties (Registered Providers or Support Providers) have reported it to a regulatory or legal body, or if they're unwilling or unable

to do so, Mable will step in and report directly to the Police, NDIS Quality & Safeguards Commission, Aged Care Quality and Safety Commission or other appropriate legal or regulatory body.

- c. **Police/Child Protection Notification:** Suspected criminal activity is reported to the state, territory, or federal police, and suspected child abuse is reported to child protection services. For Priority 1 Aged Care incidents or NDIS "reportable incidents" where there are reasonable grounds, police are notified within 24 hours, whether the incident is alleged or suspected.

Investigation and Actions

Based on the incident's nature and impact level, we develop a clear plan of action, deciding if Mable needs to investigate further or refer to external authorities or parties. Our investigations always prioritise your safety and well-being and the continued suitability of users on our platform is assessed. When a Platform Safety Measure is placed on an account, Mable contacts the account holder to inform them of the reason the Platform Safety Measure has been placed on the account and the effect of the measure, by issuing a Notice. Opportunities to respond to the Notice are outlined within the Notice itself. Where an adverse finding exists, or in our judgement, there is an unacceptable risk, outcomes can range from formal warnings to removal from the platform. We are committed to offering support to affected parties, such as counselling or help finding new workers. All details, actions, and decisions are thoroughly documented.

Resolution and Closure

We ensure you are clearly informed about the actions taken, the outcomes, and the reasons behind our decisions. A case in our complaints management system is only closed once all necessary actions are complete.

Complaints Management System

1. **Receiving & Recording:** You can easily submit a complaint via our [online complaint form](#), email, phone call ([1300 736 573](#) – Monday to Friday, 9am to 6pm AEDT

(Sydney)). If you are deaf or hard of hearing, you can contact us via the National Relay Service at nrschat.nrscall.gov.au/nrs/internetrelay. Every complaint is recorded in our system, with a unique identifier, capturing important details like the issues, your desired outcomes, and your preferred contact method.

2. **Acknowledgement:** We'll acknowledge your complaint within three working days.
3. **Referral & Mandatory Reporting:** Just like with incidents, Mable will notify NDIS/HCP Registered Providers of complaints concerning their clients. For serious incidents, if we can't confirm that the primary parties (Registered Providers or Support Providers) have reported it to a regulatory or legal body, or if they're unwilling or unable to do so, Mable will step in and report directly to the Police, NDIS Quality & Safeguards Commission, or the Aged Care Quality and Safety Commission or other appropriate legal or regulatory body. For serious incidents, if we can't confirm that the primary parties (Registered Providers or Support Providers) have reported it to a regulatory or legal body, or if they're unwilling or unable to do so, Mable will step in and report directly to the Police, NDIS Quality & Safeguards Commission, or the Aged Care Quality and Safety Commission or other appropriate legal or regulatory body.
4. **Investigation & Actions:** Every complaint prompts an investigation, whether it's to help educate a customer or resolve the issue at hand. Our investigations always consider customer safety, and the suitability of users on our platform. We follow specific protocols for each complaint category (e.g., Behaviour/Conduct, Financial Dispute, Operational), ensuring tailored contact and investigation with all involved parties.
5. **Resolution & Closure:** Outcomes for complaints vary, potentially including platform restriction or removal, warnings, financial resolutions, or referrals to our internal teams or external bodies. Where we can, we'll communicate the outcome to those involved, and once all actions are completed and recorded, the complaint will be closed in the complaints handling system.

Escalation and Appeals

If you're directly impacted by a decision or outcome from Mable regarding an incident or complaint, you have the right to access our internal appeals process.

1. **Submission:** To appeal, simply submit your request in writing to trustandsafety@mable.com.au ensuring you clearly state your reasons for the appeal and include the incident/complaint case reference number.

2. **Time Limit:** Please lodge your appeal within 3 months from the date of the original decision or outcome.
3. **Review Process:** Your appeal will be escalated to and thoroughly reviewed by members of Mable's Trust & Safety Committee. We aim to decide on appeals within 21 days of submission, and may hold special meetings to ensure a fair and timely resolution.
4. **Outcome Communication:** The appeal's outcome will be provided to you in writing.
5. **External Referral:** If you remain unsatisfied after Mable's internal appeals process, we will refer you to an appropriate external complaint handling body, such as the NDIS Quality & Safeguards Commission, the Aged Care Quality & Safety Commission, a relevant Government Ombudsman, or your State/Territory's Health & Community Services Complaints Commissioner.
 - NDIS Quality and Safeguards Commission, Ph: [1800 035 544](tel:1800035544), Web: www.ndiscommission.gov.au
 - Aged Care Quality & Safeguards Commission, Ph: [1800 951 822](tel:1800951822) Web: www.agedcarequality.gov.au
 - Health and Community Services Complaints Commissioner in your State or Territory.

Platform Safety Measures

To protect our community and uphold Mable's high ethical standards, we may implement Platform Safety Measures on user accounts. These measures, which include Permanent Account Closure, Temporary Account Closure, or Limited Access, are applied based on conduct, especially in cases of:

1. **Serious Misconduct:** This involves conduct that has caused, or could cause, serious harm, such as fraud, financial exploitation, violence or sexual assault, or poses an imminent threat to health and safety. It also includes situations where an NDIS Worker Screening or Working with Children Check has been revoked. Decisions for permanent removal require thorough investigation, assessment, and approval from the Mable Permanent Closure Committee.

2. **External Investigations:** If a user is under an external investigation (e.g., by police or a regulatory authority) for serious conduct that threatens platform users, temporary restrictions may be applied to their account.
3. **Pattern of Behaviour:** We may also apply measures if there's a consistent pattern of misconduct, typically defined as three or more repeated offences after warnings have been issued.
4. **Other Misconduct:** This covers less serious breaches of Mable's Code of Conduct or Terms of Use.

Should a Support Worker be temporarily suspended or permanently removed, Mable is dedicated to helping affected clients find new support workers.

Roles and Responsibilities

Our incident and complaint management system depends on clear responsibilities across our team, ensuring we work together for your safety:

1. **Senior Leadership:** Our leaders actively champion complaint management, providing the necessary resources, promoting awareness, and holding ultimate accountability for the system's effectiveness.
2. **Chief Executive Officer:** They oversee policy implementation, approve or appoint our Complaint Manager, report significant incidents/complaints to management, and ensure these matters are always part of our Board's focus.
3. **Complaint/Incident Manager:** This role is key to monitoring our system's performance, identifying and reporting systemic issues, allocating resources, training our staff, and maintaining robust procedures.
4. **Operational Managers:** They ensure our system is effectively implemented and understood within their teams, work closely with the Complaint Manager, record incidents/complaints, and provide essential data to senior management.
5. **Staff Handling Complaints/Incidents:** Our frontline team members are trained in complaint procedures, and how to best support vulnerable individuals. They treat you with respect, adhere to all reporting requirements, and are empowered to share feedback to continuously improve our services.
6. **Board sub-committees:** Dedicated Board sub-committees hold responsibility for our policy, conduct regular reporting on complaint/incident data and systemic

issues, and play a crucial role in reviewing and endorsing significant decisions, such as permanent platform removals.

Policy Review and Continuous Improvement

We are deeply committed to constantly improving our incident and complaint management system. Our senior management regularly reviews the system to ensure it's always suitable and effective, identifying any areas for improvement, correcting deficiencies, and embracing opportunities for enhancement. This includes continuous monitoring of our people, data, and performance, along with regular, independent audits to ensure we're always adhering to our procedures and operating effectively.

Complaint and incident data are systematically collected, classified, and analysed to pinpoint systemic issues and trends, fostering a culture of learning and preventing ongoing disputes.

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