

## Feedback, Compliments and Complaints Policy and Procedure

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### Policy Intention

The purpose of this policy and procedure is to set out how any person can provide feedback and make complaints about any aspect of Good Care operations and the process that Good Care will take to address or respond to feedback and complaints.

This policy and procedure applies to all stakeholders of the organisation, including Participants, families and carers, advocates, staff, volunteers, Employees, other service providers, government agencies and members of the community.

Issues raised by Good Care staff (where applicable), volunteers and Employees would generally be dealt with under Good Care *Disputes and Grievances Policy and Procedure*, however from time to time staff may raise issues or provide feedback that is best dealt with under this policy.

This policy and procedure should be read in conjunction with Good Care *Dealing with Complaints Policy and Procedure*.

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## Definitions

**Compliment** - an expression of praise, encouragement or gratitude about an individual staff member, a team, or a service.

**Complaint** - an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.

For the purpose of this policy and procedure, a complaint is defined as an issue of a minor nature that can be resolved promptly or within 24 hours, and does not require a detailed investigation. Complaints include an expression of displeasure, such as poor service, and any verbal or written complaint directly related to the service (including general and notifiable complaints).

**General complaint** - addresses any aspect of the service e.g. a lost clothing item or the service's fees. The complaint must be dealt with as soon as is practicable to avoid escalation of the issue.

**Grievance** - a formal statement of complaint that cannot be addressed immediately and involves matters of a more serious nature e.g. the service is in breach of a policy or the service did not meet the care expectations of a family.

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## Scope

Compliments, complaints and other feedback provide Good Care with valuable information Participant satisfaction and an opportunity to improve upon all aspects of its service. Feedback is taken seriously by Good Care and seen as an opportunity for improvement.

Good Care records and handles feedback effectively in order to identify areas for improvement, coordinate a consistent approach to complaint resolution, reduce the potential for future complaints and allow for reporting and efficient allocation of resources.

Resolving complaints at the earliest opportunity in a way that respects and values the person's feedback can be one of the most important factors in recovering the person's confidence about Good Care services. It can also help prevent further escalation of the complaint. A responsive, efficient, effective and fair complaint management system will assist Good Care to achieve this.

Good Care has an effective feedback, compliment and complaint handling system that addresses the principles of visibility and accessibility, responsiveness, assessment and investigation, feedback, continuous improvement and service excellence.

Good Care approach to feedback, compliments and complaints management ensures:

- people understand their rights and responsibilities;
- information on the feedback, compliment and complaint management process is easily accessible;
- increased satisfaction of Participants in the management of their compliments and complaints;
- the recording of data to identify existing or emerging trends or systemic issues;
- staff demonstrate an awareness of Good Care feedback, compliments and complaints management processes;
- staff develop the range of skills and capabilities required to manage compliments, complaints and feedback; and
- an organisational culture that is focused on effective, person-centred complaints resolution and utilising feedback for continuous improvement.

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## Procedure

Good Care Director will promote best practice, continuous improvement and an open, supportive, respectful culture that encourages and supports staff, Participants and other stakeholders to make complaints and report concerns without fear of retribution. This will be assessed in a yearly Performance Reviews of management staff.

Upon commencement, all staff will undergo Induction, which will include information on staff retention approaches including their right to access Good Care feedback, complaints and dispute resolution process. They will also be trained in this policy and procedure and in providing stakeholders with information about feedback, compliments and complaints.

Annual Performance Reviews will assess staff awareness of this policy and procedure and their roles and responsibilities when service users make complaints. Additional on-the-job and formal training will be provided where required. This will also be monitored informally by supervisors and managers.

The Agenda for team meetings will include a standing item on Continuous Improvement, including staff and Participant feedback and complaints.

Good Care *Participant Handbook*, website and a specific *Feedback, Compliments and Complaints Brochure* provide Participants, their families and carers and all other stakeholders with information about this policy and procedure, in an easy to understand format. This will include information on how feedback and complaints will be addressed and who to contact to provide feedback and complaints to external agencies, including external advocacy and support agencies. Information will be clearly displayed in Good Care and provided by staff when requested.

Any Participant or other stakeholder wishing to lodge feedback or a complaint will be provided with information regarding this policy.

Information about providing feedback and making complaints will be provided in a variety of formats, including in Easy English and alternative languages. Interpreters and referrals to advocates can be provided.

Good Care staff will provide all Participants, their families and carers with this policy and procedure when they first access the service and, throughout service delivery, remind them of the policy and their right to make a complaint without fear of affecting their service.

All personal information Good Care collects to manage feedback or complaints will be handled in accordance with privacy legislation and Good Care *Privacy and Confidentiality Policy and Procedure*. Feedback and complaints will be dealt with in a confidential manner and will only be discussed with the people directly involved. All information regarding feedback and complaints will be kept securely in accordance with Good Care *Records and Information Management Policy and Procedure*.

Complaints and feedback can be lodged by a third party on behalf of another person, if their consent has been provided.

The Director will track and analyse feedback and complaint data to identify any ongoing issues. Feedback, complaints and dispute resolution matters will be reported to the Director on a monthly basis, as part of the Director report on Continuous Improvement.

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## Feedback

Feedback can be provided to any staff member at any time in any way by any stakeholder, including through:

- a staff member (where applicable);
- Feedback and Complaint Forms
- staff planning days and Director meetings (involving Participant and other stakeholder representatives);
- Participant forums;
- staff collection of Participant feedback after each major interaction with the service (e.g. initial assessment and planning; reviews; exit);
- annual Participant service delivery and satisfaction surveys. All Participants will be asked to complete these surveys; and
- annual staff and stakeholder satisfaction surveys. All staff will be asked to complete these surveys and stakeholders will be selected on a random basis.

Where feedback is provided verbally, the receiving staff member will transcribe the feedback onto an Good Care *Feedback and Complaint Form*.

Provision of feedback through any of Good Care channels is voluntary.

### **Good Care complaints management process**

Good Care complaints management process can be simplified into five steps:

#### **1. Receive**

To lodge a complaint, individuals are encouraged to speak directly to a staff member first, in an attempt to resolve the matter without recourse to the complaints and grievances procedures.

Staff will:

- Listen – openly to the concerns being raised by the complainant.
- Ask – the complainant what outcome they are seeking.

- Inform – the complainant clearly of the complaint process, the time the process takes and set realistic expectations.
- Be accountable – and empathic towards the affected person and action all commitments made.
- Assess – situations that pose an immediate threat or danger, or require a specialised response.

All complaints and grievances will be referred to the Director for resolution.

The Director will discuss minor complaints directly with the party involved as a first step towards resolution.

If the complaint cannot be resolved promptly or within 24 hours, the Director will treat it as a grievance (advising the individual of their right to lodge a grievance if they have not already done so, with the assistance of a support person or advocate if they wish).

A *Feedback and Complaints Form* will be made available to the individual to lodge their grievance, however it is not mandatory that they use the form. The *Feedback and Complaints Form* can be used to make anonymous complaints.

Grievances can be lodged:

- directly with a staff member, either verbally or by providing a completed *Feedback and Complaints Form*;
- by email
- in writing to:

At any time, individuals can make a complaint directly to the National Disability Insurance Agency (NDIA); the NSW Ombudsman.

All Participants making a complaint will be encouraged to use an advocate of their choice to act on their behalf if they wish. The advocate may be a family member or friend, or sourced (with the assistance of a staff member if required) through the National Disability Advocacy Program.

If a complaint alleges actual or possible criminal activity or abuse or neglect, it will be referred to the Director immediately. The Director will report the complaint as per *Good Care Incident Management Policy and Procedure* and work with the relevant authority to investigate the allegation.

Staff will take all reasonable steps to ensure a complainant is not adversely affected because a complaint has been made by them or on their behalf.

## **2. Record**

The Director will:

- Record – all information that is relevant to the compliment or complaint, in its original and simplest form, in Good Care *Complaints and Grievances Register*.
- Store and protect – the *Complaints and Grievances Register* in a secure file, accessible only to the Director.

### **3. Acknowledge**

The Director will:

- Acknowledge – receipt of the grievance within 2 working days to build a relationship of trust and confidence with the person who raised the complaint.
- Provide anonymity – a person may request to remain anonymous in their lodgement and therefore contact may not be possible or expected.
- Seek desired outcomes – provide realistic expectations and refer the matter to other organisations where identified as being more suitable to handle.
- Avoid conflict of interest – by appointing a person unrelated to the matter as an investigator if necessary.
- Provide timeframes and expectations – to the complainant where possible.

### **4. Resolve**

In resolving a complaint or grievance, the Director will:

- Involve the complainant – keep them informed of the progress of the complaint and discuss any disparities identified in the information held.
- Request additional information – when required but apply a timeframe that limits when it is to be provided by.
- Consider extensions – only where necessary and always communicate any additional time requirements to the complainant with an explanation of the need.
- Record – all decisions or actions of the complaint investigation in Good Care *Complaints Register*.
- Focus – on the identified complaint matters only. A complaint is not an opportunity to review a whole case.

Investigation of complaints will not be conducted by a person about whom a complaint has been made. If required, the Director will determine the appropriate person to undertake the investigation.

### **5. Communicate resolution**

Good Care will respond to all complaints and grievances as soon as possible and within 28 days from acknowledgement.

If a complaint or grievance cannot be responded to in full within 28 days of acknowledgement, an update will be issued to the complainant. The update will provide the date by which a full response can be expected. The update should be provided verbally in the first instance then confirmed in writing.

The Director (or delegate) will:

- Discuss the outcome – where possible, verbally with the complainant before providing written advice and allowing them the opportunity to make further contact following receipt of the written advice.
- Include information on recourse – what further action may be available to the complainant at the conclusion of the complaint investigation. An action of recourse may be to escalate the matter further with an external agency or for a further review within the organisation.
- Provide a further review – to enable the first investigation to be reviewed for soundness and allow additional information not available in the first complaint to be included.
- Identify opportunities – relay complaint outcomes to the appropriate area within the organisation for action to improve service delivery.
- Seek Feedback – from the complainant regarding their experience of the complaints process.

Support will be provided to assist complainants' understanding of correspondence regarding complaints and grievances where required (e.g. interpreters, referral to advocates, etc.).

Options for actions responding to a complaint include but are not limited to:

- explaining processes;
- rectifying an issue;
- providing an apology;
- ongoing monitoring of issues; and
- training or education of staff.

Good Care *Complaints and Grievances Register* will be used by Good Care Director (or delegate) to record every complaint, track investigation progress and outcomes and how the outcomes have been communicated to stakeholders.

## Complaints Escalation and Dispute Resolution



If a complainant remains dissatisfied with the outcome of their complaint or grievance they will be provided with the details of other agencies they can use to assist them to achieve a resolution.

Escalated complaints will be tracked in the *Complaints and Grievances Register* in the same manner as other complaints and the same communication processes as outlined above will be applied. If necessary, the Director will undertake communication with the complainant instead of the Good Care Director.

Complaints to the NDIA can be lodged:

- by email to [feedback@ndis.gov.au](mailto:feedback@ndis.gov.au)
- by phone on 1800 800 110

Complaints to the NSW Ombudsman can be lodged:

### **NSW Ombudsman**

**Telephone:** 02 9286 1000, or 1800 451 524 (outside Sydney metro)

**Email:** [nswombo@ombo.nsw.gov.au](mailto:nswombo@ombo.nsw.gov.au)

**Website:** [ombo.nsw.gov.au](http://ombo.nsw.gov.au)

### **Fair Trading NSW**

**Telephone:** 13 32 20

**Website:** [fairtrading.nsw.gov.au](http://fairtrading.nsw.gov.au)

### **Commonwealth Ombudsman**

**Telephone:** 1300 362 072

**Email:** [ombudsman@ombudsman.gov.au](mailto:ombudsman@ombudsman.gov.au)

**Website:** [ombudsman.gov.au](http://ombudsman.gov.au)

### **SafeWork NSW**

**Telephone:** 13 10 50

**Email:** [contact@safework.nsw.gov.au](mailto:contact@safework.nsw.gov.au)

**Website:** [safework.nsw.gov.au/](http://safework.nsw.gov.au/)

Workers have the right to be safe whilst supporting participants and participants benefit from having workers who feel safe and supported. SafeWork NSW is the

work health and safety regulator in NSW and has a range of advice and information which helps businesses, including participants who engage workers to create safe workplaces. For information about working safely go to: [www.safework.nsw.gov.au/your-industry/health-care-and-social-assistance](http://www.safework.nsw.gov.au/your-industry/health-care-and-social-assistance)

NDIS participants purchasing products and services also have rights and protections under the Australian Consumer Law (ACL), including provisions on Participant guarantees and unfair contract terms. Fair Trading WA provides information and advice and in some cases, dispute resolution services for Participant disputes under the ACL.

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## Monitoring and Review

Annual service delivery and satisfaction surveys will include questions regarding:

- satisfaction with Good Care feedback and complaints processes;
- whether stakeholders have received adequate information about making complaints and their awareness of complaints mechanisms;
- the extent to which Participants and their supporters feel they have been included in the review of feedback and their satisfaction with this process;
- whether stakeholders have received adequate information about how the organisation will use feedback, complaints and appeals information; and
- any barriers to lodging complaints and feedback.

Good Care *Continuous Improvement Plan* will be used to record how the outcomes of feedback have been communicated to stakeholders. Positive feedback will be recorded in the Plan as a way of recording things the organisation does well. If positive feedback relates to a Participant or staff member, that person will be formally recognised by the Director.

This Policy and Procedure will be reviewed at least annually by the Director and incorporate Participant and other stakeholder feedback.

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## Supporting of Relevant Legislation

- AS ISO 10002-2014 Participant Satisfaction – Guidelines for Complaints Handling in Organizations
- National Disability Insurance Scheme Act 2013

- NDIA Terms of Business
- Australian Consumer Law

**Organisational documents relevant to this policy and procedure:**

- Feedback, Compliments and Complaints Brochure
- Continuity of Support Policy
- Information Management Policy