

Feedback Policy

PURPOSE

Kentish Regional Clinic (KRC) welcomes and encourages all feedback, which is inclusive of complaints, compliments and suggestions from consumers, consumer advocates, family members, stakeholders and the community. This feedback provides essential information that can inform improvements to service delivery and organisational practice.

KRC is committed to:

- Maintaining an accessible, fair and responsive feedback system
- Supporting a culture of openness and willingness to learn from complaints, compliments and suggestions
- Providing consumers with the right information, in a format that facilitates understanding, to enable them to make a complaint or provide feedback
- Ensuring consumers are protected from retribution when making a complaint, are supported, and their rights to confidentiality respected as per privacy legislation
- Improving quality and safety across all programs by following a robust process that contributes to building a continuous improvement culture

RESPONSIBILITIES

Staff and volunteers are to ensure all program participants have the opportunity to provide feedback and to treat all complaints seriously and as an opportunity for improvement. Staff and volunteers will assist service users to resolve complaints to the best of their ability and notify the coordinator or Chief Executive Officer (CEO) if required.

Coordinators and the CEO are responsible for ensuring complaints are tabled at the Board meetings, where relevant. Coordinators and the CEO are responsible for receiving feedback and complaints; ensuring the appropriate person resolves the complaint in a timely manner and that feedback is monitored and reviewed. Coordinators and the CEO are equipped to handle complaints in a professional manner and adhere to the complaint management process.

DEFINITIONS

Complaint - any written or verbal statement outlining a problem or concern involving the organisation including its staff, the service they provide, or the terms of engagement or contract with the organisation.

Feedback - information given by a program participant, stakeholder or community member in relation to the program that may be in the form of a compliment, suggestion or complaint.

Compliment - an explicit expression of satisfaction or praise in relation to the program or a team member working on behalf of the program.

Suggestion - a comment that indicates how the organisation could improve its service delivery. It may be part of a compliment or complaint but may also be offered as standalone information.

Complaint resolution - a complaint is resolved when both parties reach an agreement. The parties will be informed, in writing, of the complaint agreement.

Vexatious grievances - where complainants use the complaint/grievance resolution process without reasonable cause, the processes as outlined above will still be adhered to. If complaints are malicious or vexatious and therefore not made in good faith, the complainant may be referred to undertake counselling and/or other actions if appropriate.

Corrective action - addressing an ongoing systemic issue to eliminate the root cause of the problem to prevent recurrence.

Confidentiality - only people directly involved in the complaint as part of the nature of the complaint or the resolution of it will have access to the information about the complaint.

PROCEDURES

Receiving Complaints and other Feedback

All staff and volunteers are able to receive feedback or a complaint in writing or verbally from service users or stakeholders. Verbal complaints made in person should be addressed in a private area where possible. The staff member or volunteer should then notify the Coordinator and/or CEO at the earliest convenience.

Feedback

When receiving a complaint record the information (if communicated verbally) and pass the information onto the Coordinator or CEO.

The Coordinator and/or CEO may then deem it appropriate to raise the information at the next regular network or board meeting

Complaints

Any investigation and resolution of complaints is undertaken using an open disclosure process. Complaint information should be forwarded to the Coordinator and/or CEO who will review the information, assess the severity of the complaint (Serious, Major, Moderate, Minor) and coordinate a response. If the complaint concerns the Board it is forwarded to the Board Chair.

Responding to Feedback

Depending on the type of feedback received, particularly if it is a comment or suggestion for improvement, it may be appropriate to contact the individual who gave the feedback to communicate any changes made as a result of their suggestion. This will contribute to a positive relationship between the organisation and its participants and stakeholders.

Responding to a Complaint

The following action will be taken on the basis of the severity of the complaint:

- **Serious** – serious complaints should be referred to the Coordinator and/or CEO on the day the complaint was made.
- **Major** – major complaints should be referred to the Coordinator and/or CEO within one working day of receiving the complaint.
- **Moderate/ Minor** – the program team member receiving the complaint will, within their scope of responsibilities, attempt to resolve the complaint at point of service. If the complaint is unable to be resolved in this manner, the complaint should be referred to the Coordinator and/or CEO within one working day.

In responding to complaints, program team members:

- Handle all complaints seriously, no matter how trivial they may seem.
- Use tactful language when responding to complaints.
- Assure the participant that their complaint will be investigated and the matter not disregarded.
- Acknowledge the complaint and the person's right to complain - acknowledge the concerns and experiences of someone making a complaint, particularly if the issue has caused distress or considerable inconvenience.
- Offer the person an opportunity to complete a formal complaint form (they may accept or decline).
- Attempt to resolve the complaint directly with the complainant - clarify the specific issue that the individual is complaining about and their desired outcomes. It may be necessary to contact the complainant to ask for more information.
- Detail how the complaint will be investigated - provide clear timeframes and the contact details for an appropriate person that can be contacted by the complainant if necessary.

- Consider the sensitive and/or confidential nature of a complaint and the privacy of the individual making the complaint - staff will carefully consider what information is recorded and to whom within the organisation the information is communicated to.
- Consider whether the complaint needs to be managed in a particular way, either because the person making a complaint has specific rights of review or because the complaint includes allegations that must be reported to an external body. For example, criminal allegations should be reported to the Police.
- Reassure the complainant that making a complaint will have no negative consequences or repercussions on their participation in the program.
- Inform the complainant they can select which staff member is their primary contact regarding the complaint and ask if they wish to nominate a particular person.

KRC aims to investigate and resolve all complaints within one month of receiving the complaint. If this timeframe cannot be met, the complainant will be informed of the reasons why and of the alternative timeframe for resolution.

KRC aims to keep the complainant informed at all stages of the decision-making process concerning their complaint and the reasons for those decisions.

Complaints Involving Staff Members

Complaints involving program team members, should be forwarded to the Coordinator and/or CEO who will coordinate a response to the complaint in conjunction with the team member's line manager.

Team members are to be kept informed at all times about any participant complaint involving them. Complaints by participants about team members will not be seen as negative comments about the team members, but as comments on the service provided by the program. Team members play a vital role in supporting participants to complain and will not be penalised for doing so. Team members will be positively recognised for advocating on behalf of a participant, including when the participant makes a complaint. Team members will not be penalised as a result of a participant complaint unless malpractice has occurred.

Responding to the complaint may involve:

- Investigating the complaint and providing the program team member with an opportunity to respond to issues raised;
- Attempting to mediate the dispute (if appropriate) and/or attempt to resolve the matter
- Taking further action necessary to resolve the issue (e.g. external mediation and dispute resolution services);
- Any disciplinary action against a team member arising from a complaint will be taken in accordance with the Staff Misconduct and Discipline Policy, Staff Development and Performance Policy and the Conflict and Grievance Resolution Policy

- Any action against a staff member for reportable conduct will be taken in accordance with the Staff Misconduct and Discipline Policy, Staff Development and Performance Policy and the Conflict and Grievance Resolution Policy

Complaints Involving Board Members

Complaints concerning a Board member should be referred to the Board Chair. The Chair, or an approved delegate, will attempt to resolve the issue to the satisfaction of the complainant. Where the Chair is the subject of a complaint, the complaint should be referred to the Deputy Chair.

A response to the complaint may involve:

- Investigating the complaint and providing the Board Chair with an opportunity to respond to issues raised
- Attempting to mediate the dispute (if appropriate) and/or attempt to resolve the matter to the satisfaction of the outside party
- Take further action necessary to resolve the issue (e.g. external mediation and dispute resolution services)
- Raising the complaint at a Board meeting to determine a suitable course of action to resolve the issue, if appropriate

Complaints Resolution and Follow Up

Within two months of the complaint being resolved, KRC will follow up with the complainant to review their satisfaction with the actions taken, where applicable.

Feedback information (both positive and negative) is to be considered in operational planning as well as implementation and review activities in the areas of governance, risk management, participant services, project management and workplace health and safety.

Confidentiality of Complaints and Disputes

As far as possible, the fact that a participant has lodged a complaint and the details of that complaint are kept confidential amongst team members, other than those directly concerned with its resolution. The participant's permission is to be obtained prior to any information being given to other parties that it may be desirable to involve in order to satisfactorily resolve the complaint or dispute.

Where a complaint is lodged against a program team member, those program team members shall be only advised of the complainant identity where relevant. Complainants should be made aware of this where necessary before the official lodge of a complaint.

Monitoring and Reporting Information about Complaints

Feedback is to be collated and recorded electronically utilising the **Feedback Register** by the Coordinator and/or CEO.

Any program team member involved in the handling of the feedback will document and record any activities associated with the feedback provided (e.g. emails, telephone notes and correspondence).

Provision of Staff Training in Complaints Handling

KRC will provide and ensure all team members, management and volunteers receive information and training as part of their induction on complaints handling, including:

- Receiving complaints and the policy/procedures in which should be followed,
- The importance and role of feedback within the organisation,
- The importance of record keeping in relation to feedback and
- How to address and correspond safely with participants who are providing feedback.

Refresher training will be provided to team members annually via policy circulation.

Appendix 1

Regulators for Charities

Commonwealth

Legal structure (incorporation)

Australian Securities and Investments Commission (ASIC)

Telephone: 1300 300 630

Office of the Registrar of Indigenous Corporations (ORIC)

ORIC regulates Aboriginal and Torres Strait Islander corporations

Telephone: 1800 622 431

Fundraising

Australian Securities and Investments Commission (ASIC)

ASIC regulates companies seeking funds from the public, and requires fundraising disclosure documents.

Telephone: 1300 300 630

Australian Competition and Consumer Commission (ACCC)

The ACCC regulates on consumer law, for example, misleading and deceptive conduct.

Telephone: 1300 305 502

Australian Capital Territory

Legal structure (incorporation) and fundraising

Access Canberra

For information about fundraising regulation and incorporated association regulatory requirements:

Telephone: 13 22 81

New South Wales

Legal structure (incorporation)

NSW Fair Trading

Telephone: 13 32 20

Fundraising

NSW Fair Trading

For information about fundraising registration and regulatory requirements

Telephone: 13 32 20

Northern Territory

Legal structure (incorporation)

Licensing NT

Telephone: (08) 8999 1800

Fundraising

Department of Attorney-General and Justice

For information about raising money through raffles or gaming activities

Telephone: (08) 8999 1800

Queensland

Legal structure (incorporation)

Office of Fair Trading

Telephone: 13 QGOV (13 74 68)

Fundraising

Office of Fair Trading

For information about fundraising regulation for charities

Telephone: 13 74 68

South Australia

Legal structure (incorporation)

Consumer and Business Services

For information about incorporated associations

Telephone: 13 18 82

Fundraising

Consumer and Business Services

For information about fundraising registration and regulatory requirements, including gaming regulation:

Telephone: 13 18 82

Tasmania

Legal structure (incorporation)

Consumer, Building and Occupational Services

Telephone: 1300 654 499

Fundraising

Consumer, Building and Occupational Services
For information about fundraising regulation
Telephone: 1300 654 499

Victoria

Legal structure (incorporation)

Consumer Affairs Victoria
Telephone: 1300 558 181

Fundraising

Consumer Affairs Victoria
For information about fundraising regulation for charities:
Telephone: 1300 558 181

Western Australia

Legal structure (incorporation)

Department of Mines, Industry Regulation and Safety
Telephone: 1300 304 054

Fundraising

Department of Mines, Industry Regulation and Safety
For information about fundraising registration and regulatory requirements:
Telephone: 1300 304 054