

Feedback, Compliments and Complaints Procedure

1. Purpose

Uniting is committed to providing high quality and safe services and recognises that feedback, compliments and complaints provide valuable information to help us improve the services we provide.

Uniting provides support and assistance to any person who wishes to make, or has made, a complaint including access to advocates and supporting the consumer to report complaints to the Commissioner.

Uniting supports people making a complaint to be involved in the resolution of the complaint by Uniting and ensures that a person who makes a complaint, or a person with disability affected by an issue raised in a complaint, is not adversely affected as a result of the making of the complaint.

This procedure describes how Uniting collects, records, reviews, acts and reports on feedback and complaints from consumers, their guardians and advocates.

Uniting's **Excellence Framework** links consumer feedback to continuous improvement activities on Uniting's central **Improvement Action Register**.

This procedure applies to all employees (including contractors and volunteers) involved in service delivery to consumers. This procedure does not apply to employees who wish to make a complaint and employees should refer to the **Issues Resolution Policy**.

2. Procedure

2.1 Providing information

Consumers, and where appropriate carers, advocates or other authorised representatives, are informed of consumer rights and the processes for providing feedback or complaints in the **Consumer Handbook – Welcome to Uniting**, which is provided to consumers at service commencement. Employees must ensure consumers are aware of their right to provide feedback (or make a complaint) and the avenues available at Uniting to do so. The options for providing feedback at Uniting

should be covered in subsequent discussions with the consumer to ensure continued awareness.

Uniting also provides information about feedback and complaints in accessible formats in line with consumer need, including an Easy-English version and a Child Friendly version of the **Consumer Handbook – Welcome to Uniting**.

Each Uniting service site will display information (such as posters) in accessible formats, informing consumers of their rights and responsibilities (which includes the right to provide feedback/make a complaint) and will ensure that this information is visible and accessible to consumers, carers and advocates.

Consumers and other stakeholders can also access information about how to provide feedback and complaints via the Uniting website. Information provided will include:

- Confidentiality – and exceptions
- Options for support and advocacy
- Options for interpreter support where appropriate

2.2 Uniting-initiated feedback

Uniting employs a range of methods to obtain feedback from consumers and collect information regarding their experience with the services they have received including experience surveys, facilitated feedback sessions and focus groups. Programs are encouraged to develop local work instructions that enable regular collection of feedback data. Focus groups are managed in accordance with the **Consumer Partnerships Framework** and supporting documentation. Feedback methods adapted to engage children and young people are managed in accordance with the **Child Safety Policy** and in accordance with the National Principles for Child Safe Organisations.

2.3 Acknowledgement of consumer-initiated feedback including complaints

Uniting will actively and openly listen to consumer feedback, compliments and complaints without judgement. All will be responded to in a respectful and transparent manner, with complaints resolved as promptly as possible.

Unsolicited feedback can be received in either written form (letter, survey, SMS, **consumerfeedback@uniting.vt.org** email, submission of the feedback form on the Uniting website, and social media via our Facebook page) or verbal form (phone, in person, phone recording or via a web based platform).

Regardless of how feedback, a compliment or a complaint is received, acknowledgement must be made on receipt. Feedback received via the

consumerfeedback@uniting.vt.org email or on submission of the feedback form on the Uniting website, is acknowledged via an automated message.

Feedback and/or compliment: Once acknowledgement has been made, pass the feedback/compliment to the relevant manager as soon as possible.

Complaint: Once acknowledgement has been made, the employee receiving the complaint should attempt to resolve it at that time if appropriate. If this is not possible or the complainant wishes to escalate the complaint, pass the complaint to the relevant manager as soon as possible.

2.4 Registering feedback, a compliment or a complaint

The feedback, compliment or complaint must be recorded in the local stream/cluster feedback register. This is done by sending a copy of it to the relevant stream/cluster local incident officer for inclusion in the local feedback register, or by completing the relevant cluster feedback reporting form on the Intranet Quality and Safety Hub. Once this information is entered into the relevant stream/cluster feedback register it will automatically populate the central Uniting feedback register. This information is used to generate the monthly cluster/stream Quality report. The data is used to report to the Clinical Governance Committee on feedback trends and issues across Uniting.

If the feedback, compliment or complaint relates to a consumer, record it in the consumer file. If it involves an allegation of abuse or neglect, then it may need to be treated as an incident. Refer to the **Incident Reporting & Management procedure**.

2.5 Investigating a complaint

When a complaint is received by the relevant manager, she/he must determine those which require investigation and/or a response provided to the consumer. The manager must also assess who is most appropriate to deal with the complaint and who needs to be notified both internally and externally. Consider whether the complaint needs to be referred to the Incidents and Investigations Team for review.

The manager must:

- Provide the complainant with information about the process including escalation (both internally and externally), access to a translator where applicable and support options available.
- Attempt to immediately resolve the complaint. If this is not possible, advise the person making the complaint of this, and organise a time within 10 business days to contact them to advise how the complaint is being investigated or resolved. Identify the format of response the complainant prefers. As a rule, written complaints should be responded to in writing, and verbal complaints by phone or face to face.

- Investigate the complaint in order to gain a better understanding and determine the appropriate action(s):
 - Identify and clarify the issue(s) for resolution, including the key concerns raised by the complainant, and any other issues that arise or are identified by employees.
 - Identify the relevant parties to the complaint, i.e. key people involved with the complaint plus those involved. They may not always be a respondent to the complaint but may be key people in the provision of service under investigation.
- Update the local feedback register / advise the local incident officer on the status of the complaint.

2.6 Complaint resolution and final response

Complaints must be resolved as quickly as possible, within 28 calendar days. Resolutions may include an apology, advising the consumer on a change to service delivery, or other improvement actions undertaken.

Final responses should be communicated to the complainant in the format agreed upon in the '**Investigating a complaint**' stage.

Management must update the feedback register with details of the response, follow up and corrective actions, and close the complaint or advise their local incident officer to complete this.

2.7 Quality and safety improvement

A report on feedback, compliments, complaints and improvement actions for each cluster is provided by the Quality Improvement Team each month to Cluster Leadership Teams and Executive Leadership Team. This report helps identify trends and actions for improvement.

Refer to the **Continuous Improvement Procedure** for further information.

2.8 Disclosure of information

When a complaint is received, the complainant needs to be informed:

- there will be disclosure of information to any respondents identified;
- assurance of absolute confidentiality cannot be given. Anonymous written complaints may reveal the identity of the complainant or it may be apparent from the complaint details.
- what will happen with the information given to Uniting including that it will be recorded and stored in a central file.

The Executive General Manager should be consulted about all anonymous complaints that are deemed as having a major consequence.

2.9 Declining to deal with a complaint

Uniting may, in rare circumstances, decide to decline to deal with a complaint because it is:

- vexatious or frivolous
- is outside jurisdiction, or
- the subject matter of the complaint (or part) has been or is under investigation by some other competent person or body or has been or is the subject of legal proceedings.

Refer to the relevant manager who will seek advice from the General Manager to assess the complaint to ensure that every effort is made to understand the information the complainant is attempting to convey.

If a complaint has been declined, the complaint should still be recorded. Complainants should be advised of the reasons for the decision as well other agencies that may be able to assist them with their concerns.

2.10 Complaint to Regulators

Complaints can be made directly to a regulator. Refer consumers to the External advocacy and complaints services section of the Uniting website under the Contact Us tab -'Give feedback, a compliment or make a complaint here'.

2.11 Mandatory Notifications

In some cases, feedback or a complaint raises issues that require mandatory external notification or referral to another agency, such as the Police, the Coroner, Office of the Children's Guardian or the Department of Health and Human Services and Department of Education and Training (Vic) and Education and Care Unit (Tas). This may only become apparent once preliminary inquiries are made. Refer to **Reportable Conduct Scheme Protocol**.

2.12 Other external bodies

Other external bodies, such as the NDIS Quality & Safeguards Commission and the Mental Health Complaints Commissioner, may need to be involved in the investigation and resolution of a complaint.

2.13 Obtain consumer authorisation

Authorisation is required whenever the complaint relates to the services received by a consumer and the complainant is not the consumer or the person legally authorised to act on behalf of the consumer, or the complaint investigation requires information outside Uniting. In these instances, a **Consent to Release Information Form** is required in order to provide confidential information to the third party.

Responsibility	All employees are responsible for:
	<ul style="list-style-type: none">• Complying with the instructions outlined in this procedure
	The ELT, and Managers are responsible for:
	<ul style="list-style-type: none">• Monitoring awareness of and adherence to this procedure• Overseeing all action and outcomes pertaining to this procedure

3. Related Policy, Instructions and Advice

External

NDIS Quality & Safeguarding Framework

NDIS Practice Standards and Rules 2018

Children's Services Act amendment 2019

Children's Services Regulation 2020

Education and Care Services National Law Act 2010

Education and Care Services National Regulations 2011

Health Complaints Act 2016 (Vic)

[Complaints - Mental Health Complaints Commissioner – Victoria, Australia \(mhcc.vic.gov.au\)](http://mhcc.vic.gov.au)

Tasmanian Licensing Standards for Centre Based Child Care, 2014. Class 5 (0-12 years)

Victorian Complaints Handling Standards 2020

Internal

Child Safety Policy

Consumer Handbook – Welcome to Uniting/NDIS Welcome Pack (or other Welcome Pack as used by the service)

Complaints flyer (as used by the service)

Consent to Release Information Form

Consumer Rights and Responsibilities Policy

Consumer Partnerships Framework

Continuous Improvement Procedure

Early Learning Complaints Procedure

Excellence Framework (coming soon)

Feedback Policy

Complaints, Compliments & Feedback Form

Quality & Compliance Policy

Reportable Conduct Scheme Protocol

Incident Reporting & Management Procedure

Issues Resolution Policy

Information Security Policy

Privacy Policy

Risk Management Framework
 Risk Management Policy

Revision Record			
Version	Date	Document Writer	Revision Description
0.0	07/05/2020	Senior Manager, Compliance & Policy & Procedure	First draft of new procedure
0.1	13/05/2020	Senior Manager, Compliance Policy & Procedure	Feedback from quality team
0.2	11/07/2020	Quality Improvement Business Partner – East South Division	Finalisation of procedure.
0.3	24/07/2020	Compliance & Policy team	Inclusion of feedback from review panel and Early Learning services.
1.0	28/07/2020	General Manager, Quality & Compliance	Approved.
1.1	06/11/2020	Compliance & Policy team	Minor updates following consultant review.
2.0	06/11/2020	Compliance & Policy team	Approved.