Feedback and Complaints
POLICY AND PROCEDURE

Responsibility	Office of CEO		
Establishment Date	30/01/2020	**Review Cycle**	Triennial
Previous Date Reviewed	1/02/2023		
Approval	29/10/2026		

Contents

1 PURPOSE OF POLICY AND PROCEDURE 1
2 SCOPE 2
3 POLICY STATEMENTS 2
4 DEFINITIONS 3
5 RESPONSIBILITIES 3
5.1. Chief Executive Officer 3
5.2. Executive Management 3
5.3. Managers 4
5.4. All staff 4
6 PROCEDURE FOR HANDLING FEEDBACK AND FEEDBACK THAT IS A COMPLAINT 4
6.1. Overview 4
6.2. Procedure for handling feedback that is not a complaint 5
6.3. Procedure for handling feedback that is a complaint 5
6.4. Handling complaints where there is disagreement about the factual nature of the complaint 8
6.5. Managing Unreasonable Complainant Conduct 8
6.6. Evaluation and Continuous Improvement 8
6.7. Cause and Resolution Categories 9
6.8. External Complaints Authorities 9
7 LEGISLATIVE OBLIGATIONS 10
8 RELATED DOCUMENTATION 10
8.1. Policies and Procedures 10
8.2. Internal Documents 11
8.3. External Documents 11

1 PURPOSE OF POLICY AND PROCEDURE

The purpose of this policy and procedure is to:

- Ensure feedback and complaints are managed in accordance with Carinity's values of Compassion, Respect, Accountability, Excellence, Teamwork and Engaging Positively;

- Encourage and support services users/representative and others to provide both positive and negative feedback (including feedback that is a complaint) about Carinity and/or its operations;

- Ensure service users/ representatives and others are made aware and assisted to understand how to provide feedback and make a complaint, have access to advocates, language services and to an external agency to raise and resolve feedback;

- Provide guidance to staff in the feedback handling system and outline their responsibilities;

- Ensure an effective, clear and transparent system is in place to record, respond to and investigate feedback where required;

- Protect service users/representatives and others' confidentiality and personal privacy;

- Ensure appropriate action is taken in response to complaints and an open communication process is used when things go wrong; and

- Ensure feedback is taken to the appropriate forum for review, discussion and consideration and used to inform continuous quality improvement.

2 SCOPE

This policy and procedure apply to:

- Carinity employees, contracted staff and volunteers (hereafter 'staff'); and

- Feedback including complaints made by service users, their representatives and families, and others concerned with the services provided by Carinity.

A request for service, comment or suggestion about an issue of interest in order to improve or change a situation is not considered a complaint.

Concerns or risks of harm to children (including reportable conduct) will be dealt with in accordance with our *Reporting Child-Related Concerns of Harm and Abuse* policy, our Child Safety and Wellbeing policies, and the law.

Staff grievances, code of conduct complaints and requests for information are dealt with through separate mechanisms and should be directed to the Executive Manger Human Resources.

3 POLICY STATEMENTS

Carinity values feedback and acknowledges time spent on handling feedback including feedback that is a complaint can be an investment in the delivery of quality services.

Carinity acknowledges the right of all our service users (including Aged Care Recipients, Students, and clients) to complaint when dissatisfied with Carinity's services, including actions, inaction, or decisions made by Carinity. We will encourage and support service users/ representatives and others to provide feedback directly to us and to other external feedback and complaints handling authorities without fear of retribution.

Wherever possible and applicable, we will take a trauma-informed and/or Child-centered, approach to dealing with complaints.

Carinity will support robust feedback handling processes and deal with feedback including complaints in a manner that is transparent, effective, complete, fair to all parties and that provides just outcomes.

Carinity will train staff in feedback and complaint handling processes.

4 DEFINITIONS

Continuous Improvement: A systematic, ongoing effort to raise an organisation's performance in achieving outcomes for service users by responding to the needs and feedback of service users.

Complainant: means a person or their representative making a complaint.

Complaint: means an expression of dissatisfaction made to or about Carinity services offered or provided.

Contracted staff: refers to temporary staff provided by an agency.

Feedback: means opinions, comments, expressions of interest to or about a Carinity service.

Google Review Post Card: is a post card produced by Carinity's Business Development and Marketing Team and is used to assist service users in how to leave Google Reviews.

Service Users: refers to aged care residents/clients, clients and students.

Manager: refers to the managing party; i.e. the manager, supervisor, principal etc.

Vexatious complaint: means a complaint without enough grounds and serving only to cause annoyance.

5 RESPONSIBILITIES

5.1. Chief Executive Officer

Chief Executive Officer will report to the Board:

- On a high-level basis feedback and complaint handling at the services.

5.2. Executive Management

Executive Management Team Members will:

- Raise awareness of the feedback and complaint-handling process and support a culture where feedback is handled seriously and thoroughly;
- Resource effective feedback-handling processes;
- Ensure appropriate action is taken to resolve individual complaints;
- Lead investigations into feedback and feedback that is a complaint (where required), assign handling responsibility to a staff member and monitor progress;
- Report any complaints in an accurate and timely manner to external authorities as required by law and/or Carinity Policies and Procedures;
- Undertake monthly and any urgent analysis of feedback that is a complaint and generate a report that is provided to the Chief Executive Officer;

- Act on recommendations for improvement arising from feedback; and
- Complete notifications to insurers if a complaint could be connected to an insured risk.

5.3. Managers

Managers will:

- Monitor staff compliance with the feedback and complaint management processes;
- Lead investigations into feedback including feedback that is a complaint and monitor progress where required;
- Undertake monthly and any urgent analysis of feedback that is a complaint and generate a report that is provided to the appropriate Executive Manager; and
- Discuss feedback trends and opportunities for improvement at various meetings as appropriate and lead improvement actions.

5.4. All staff

All staff will:

- Work in accordance with the *Feedback and Complaints Management Policy and Procedure;*
- Take immediate action where a high risk of harm, neglect or abuse to a service user is identified;
- Ensure a person making a complaint is informed of the complaints handling processes, provided with the assistance they require, and if they are a service user, make sure their immediate needs are met;
- Treat persons providing feedback respectfully and sensitively and maintain confidentiality and privacy where required;
- Aim to resolve feedback that is a request or a complaint at point of service wherever possible;
- Forward (escalate) feedback and complaints to more senior employees;
- Ensure verbal and written complaints are entered into the electronic complaints and feedback database or hard copy register (as appropriate for the service);
- Work collaboratively with others to resolve feedback and complaints;
- Attend feedback and complaints training on commencement of employment, annually and as required; and
- Support quality improvement initiatives.

6 PROCEDURE FOR HANDLING FEEDBACK AND FEEDBACK THAT IS A COMPLAINT

6.1. Overview

Providing feedback (including feedback that is a complaint) internally to Carinity.

- Carinity service users/ representatives and others can provide feedback (including complaints) about a Carinity service:

- by speaking to a staff member by phone or in person; or
- by writing feedback on a *Carinity Customer Feedback Form* or by letter and handing it to the Manager of the relevant Carinity Service; or
- by placing written feedback in a suggestion box located at most Carinity Services; or
- by providing it to the Executive Manager; or
- by sending it to PO Box 6164, Mitchelton, QLD 4053; or
- by sending it by email to info@carinity.org.au; or
- by sending it through a Carinity website feedback form; or
- by completing a Carinity Google Review.

- Feedback can also be made directly to an Executive Manager either in person or by calling 3550 3747 or 3550 3737.

Providing feedback (including making a complaint) to an external agency.

- Various external agencies also provide an avenue for service users/representatives and others (See Section 6.8 of this policy and procedure: External Complaints Authorities).

- Aged Care Quality and Safety Commission complaints brochures and information posters are available at aged care sites.

Sources of feedback include but are not limited to feedback raised in meetings or via audit/survey, verbal and written feedback and feedback received from external agencies.

Carinity utilises a secure electronic database to gather, collate and present feedback and complaints information for a number of programs. Feedback and complaints are recorded using data forms and registers for programs not using the data base. Other feedback may be recorded in meeting minutes and surveys.

Student complaints may be brought by students or by parents or guardians on behalf of their children, as appropriate in the circumstances.

The *Feedback and Complaint Policy and Procedure* is readily available to staff through the electronic Document Library.

6.2. Procedure for handling feedback that is not a complaint

Feedback that is a request for service will be resolved at the point of service.

Feedback that is a compliment, or a comment or suggestion about an issue of interest in order to improve or change a situation is welcomed as it gives us great ideas on how to improve our services. Staff will:

- thank the person for their feedback;

- ask the person to write their feedback on a Customer Service Brochure/ service specific brochure and/or record feedback directly into the feedback and complaints database/ registers;

- where requested, advise the person of the outcome of their feedback; and

- implement resulting continuous improvement initiatives where indicated.

6.3. Procedure for handling feedback that is a complaint

Complainants and people associated with the complainant will not be victimised as a result of lodging a compliant.

Ideally, most feedback that is a complaint will be dealt with directly and quickly at the point where the problem arises.

Anonymous complaints will be treated on their merits. An investigation will be conducted if the matter is of a serious nature and there is enough information in the complaint to enable an investigation.

Complaints determined vexatious or fabricated will not be further investigated.

Complaints can be managed at:

- point of service delivery;
- through a staged internal process; and
- through referral to an external agency.

Staff must contact their Manager as soon as possible (i.e. within hours) in circumstances where:

- they are unable to resolve a complaint at point of service; or
- the person making the complaint requests for their complaint to be escalated immediately; or
- the person making the complaint is persistent in making similar complaints; or
- the complaint becomes about the way the staff member is handling the complaint.

Carinity aims to resolve complaints in 21 days or less. Where a complaint is not resolved to the satisfaction of the complainant other options may include mediation and negotiation.

A complaint is considered resolved once an agreement has been reached and the complainant has accepted the outcome. Upon resolution one or more resolution categories may be assigned to the complaint (includes apology/ expression of regret, change to process, explanation, information provision, referral, service improvement) to support monitoring, analysis and review processes.

Feedback that is a complaint is recorded in either the secure electronic database using the tag "complaint" or on the relevant complaints data form and in the *Complaints Register* form.

Table1: Complaint Handling Process

Step	**Staged Complaint Handling Process**
1.	Staff member responsible will: • Receive and enter the complaint in the database/ complaints register including: o date complaint received; o nature of complaint; o name of complainant; o name of service user (if different from the complainant); and o name of person who received the complaint; • Aim to acknowledge the complaint at the time received (if received in person) or within one (1) business day of receipt; and

Step	Staged Complaint Handling Process
	• Provide information on how the complaint will be handled and the name of a person the complainant can contact.
2.	Staff member(s) responsible will: • Assess the complaint; and • For aged care and community services complaints assigned an 'Incident Category' and a low or medium or high 'Priority' rating (see *SAP CRM Complaints and Feedback User Guide*)
3.	Staff member(s) responsible will: • Plan the investigation (where an investigation is required)
4.	Staff member(s) responsible will: • Investigate the complaint; • Gather more information to help to understand the nature of the complaint; • Resolve factual issues; and • Consider options for complaint resolution.
5.	Staff member responsible will: • Respond to the complainant either verbally or in writing (i.e. email or letter) with a clear decision which will include the outcome of the enquiry or investigation, any proposed action in response to the complaint; • For Aged Care and Community services assign a 'Cause' and 'Resolution' Category (see section 6.7 of this policy and procedure: Cause and Resolution Categories); • For other services assign an outcome and remedy (see *Complaints Data Form*).
6.	Staff member responsible will: • Follow up any concerns; and • Where the complainant believes there has been no resolution or an unsatisfactory resolution, advise the complainant how they may appeal the outcome both internally and/or externally (see 6.8 of this policy and procedure: External Complaints Authorities).
7.	Staff member(s) responsible will: • Consider if there are any systemic issues that arise as a result of the complaint; • Record actions resulting from complaint/decisions made; and • Monitor the effectiveness of improvements and preventative actions.

6.4. Handling complaints where there is disagreement about the factual nature of the complaint

Where the complainant and Carinity have opposing opinions about the factual nature of a complaint:

All parties will:

- Comply with this policy and procedure;
- Acknowledge that a common goal is to achieve an outcome acceptable to all parties;
- Provide complete and factual information in a timely manner;
- Not provide deliberately false or misleading information;
- Act in good faith, in a calm and courteous manner;
- Act in a non- threatening manner;
- Be appropriately supported;
- Maintain and respect the privacy and confidentiality of others; and
- Not victimize or act in reprisal against others in relation to the dispute.

6.5. Managing Unreasonable Complainant Conduct

All complainants, whether their behaviours are challenging or not, are treated with fairness and respect. Carinity will manage complainant behaviour separate from managing the complainant issue. This is to ensure that the issue is effectively addressed.

Unreasonable complainant conduct may include:

- unreasonable persistence;
- unreasonable demands;
- unreasonable lack of cooperation;
- unreasonable arguments; and/or
- unreasonable behaviour.

Where unreasonable complainant conduct occurs and the complainant makes unreasonable demands on resources or there are safety concerns for staff, the Chief Executive Officer or Executive Manager may limit the complainant's contact with Carinity to:

- the times a complainant may make contact; and/or
- the staff a complainant may contact; and/or
- the means of contact e.g. only in writing.

6.6. Evaluation and Continuous Improvement

Feedback and feedback that is a complaint are a component of Carinity's monthly governance reporting requirements and as such are monitored, reviewed and evaluated. All complaints are recorded to enable review of individual cases, to identify trends and risk and report on aggregated complaint information.

Service user/representative experience of care and feedback is sought through audit and surveys, meetings, case conferencing, incident and feedback and complaint logs.

Information is used to inform continuous improvement of care and service provision and in feedback handling processes.

In order to ensure continuous improvement, Carinity actively monitors:

- the nature/type of feedback;
- the amount of time taken to resolve complaints;
- whether recommended improvements have been acted upon; and
- whether satisfactory outcomes have been achieved.

6.7. Cause and Resolution Categories

Table 1: Cause and Resolution Category

Category	**Menu**
Cause Category	▪ Choice ▪ Communication ▪ Information Provision ▪ Privacy & Communication ▪ Culture ▪ Policy/Procedure ▪ Resources ▪ Supervision/Control ▪ Training ▪ Other
Resolution Category	▪ Apology ▪ Acknowledgment of fault ▪ Change to Process ▪ Explanation ▪ Information Provision ▪ Referral ▪ Service Improvement ▪ Other

6.8. External Complaints Authorities

Table 2: External Complaints Authorities

External Complaints Authorities	
Aged Care Quality and Safety Commission GPO Box 9819 Brisbane QLD Tel: 1800 951 822 Email: audit.feedback@agedcarequality.gov.au. https://www.agedcarequality.gov.au/making-complaint	*Office of Fair Trading* GPO Box 3111 Brisbane QLD 4001 Tel: 13 74 68 www.fairtrading.qld.gov.au
Australian Health Practitioner Regulation Agency *(AHPRA)* *GPO Box 9958* *Brisbane Qld* *Tel: 1300 419 495* www.ahpra.gov.au	*Queensland Human Rights Commission* Brisbane Office City East Post Shop PO Box 15565 City East QLD 4002 Tel: 1300 130 670 https://www.qhrc.qld.gov.au
Centrelink – Customer Relations Manager Centrelink Customer Relations Reply Paid 7788 Canberra Business Centre ACT 2610 Tel: 1800 050 004 www.centrelink.gov.au	*Australian Human Rights Commission* Director Complaint Handling Australian Human Rights Commission GPO Box 5218 Sydney NSW 2001 Tel: 1300 656 419 www.humanrights.gov.au
Older Persons Advocacy Service(OPAN)	*NDIS Quality and Safeguards Commission* Tel: 1800 035 544 or TTY: 133677

External Complaints Authorities	
Tel: 1800 700 600 https://opan.com.au/	National Relay Service and ask for 1800 035 544 https://www.ndiscommission.gov.au/about/complaints
Department of Families, Seniors, Disability Services, and Child Safety Locked Bag 3405 Brisbane QLD 4001 Tel: 1800 080 464 https://www.families.qld.gov.au/contact-us/compliments-complaints	*Office of the Public Guardian for Children and Young People* Tel: 1300 653 187 SMS: 0418 740 186 (Children and Young People Only) www.publicguardian.qld.gov.au/child-advocate
Department of Housing and Public Works Tel: 13 74 68 or 07 3917 4600 Email: chermsidehsc@hpw.qld.gov.au www.hpw.qld.gov.au/aboutus/Complaints/	*Office of Public Guardian* Tel: 1300 653 187 www.publicguardian.qld.gov.au
Office of the Health Ombudsman GPO Box 13281 George Street Brisbane Qld 4003 Tel:133 646 www.hqcc.qld.gov.au	*Queensland Public Trustee* Tel: 1800 014 536 https://www.pt.qld.gov.au/about-us/contact-us/how-to-make-a-complaint
Non-State Schools Accreditation Board Chairperson Non-State Schools Accreditation Board PO Box 15347 City East QLD 4002 Tel: 3513 6773 Email: nssab.admin@qed.qld.gov.au www.nssab.qld.edu.au/	*Queensland Civil and Administrative Tribunal* *QCAT Registry* GPO Box 1639 Brisbane QLD 4001 Tel: 1300 753 228 www.qcat.qld.gov.au

7 LEGISLATIVE OBLIGATIONS

Carinity is committed to complying with the obligations imposed under all Commonwealth and State legislation relating to feedback and complaints management including but not limited to:

- Aged Care Act 1997 (Cth)
- Anti-Discrimination Act 1991(Qld))
- Australian Human Rights Commissions Act 1986 (Cth)
- Child Protection Act 1999 (Qld)
- Education (Accreditation of Non-State Schools) Regulations 2017
- Human Rights Act 2019 (Qld)
- National Disability Insurance Scheme Act 2013 (Cth)
- Privacy Act 1988 (Cth)

8 RELATED DOCUMENTATION

8.1. Policies and Procedures

(a) Access to Advocacy Policy

(b) Privacy Policy

(c) Aged Care Open Communication Procedure

(d) Whistleblower Policy and Whistleblower Procedure

(e) Disability Services Policy and Procedure

8.2. Internal Documents

(a) Carinity Code of Conduct

(b) Carinity Employee Guideline Handbook

(c) Complaints Data Form

(d) Complaint Form – On Track

(e) Complaints Register *(writable)*

(f) Complaints and Feedback User Guide – SAP CRM

(g) Complaints and Feedback Quick Start Guide – SAP CRM

(h) Customer Feedback Brochure

(i) On Track Young Persons Complaints Register

(j) Service Information Guides

8.3. External Documents

(a) Aged Care Quality Standards

(b) Better Practice Guide to Complaint Handling (Commonwealth Ombudsman) 2009

(c) Charter of Aged Care Rights

(d) Complaint Handling Guide: Upholding the rights of children and young people National Office for Child Safety