

Feedback and Complaints Policy & Procedure

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6.2 FEEDBACK AND COMPLAINTS

Client/ participant/ residents (including family, friends and others) are encouraged to express their complaints to enable us to improve the quality of our support. We utilise the Better Practice Guide to Complaints Handling in Aged Care Services¹ to guide our management of complaints and the Complaints Journey² card to ensure staff understand the complaints process from the Client/ participant/ residents' perspective. We have adopted the Australian Open Disclosure Framework³ principles and processes to support the effective and inclusive management of complaints (including complaints that may be a result of an adverse event or incident related to care and services).

Client/ participant/ residents are made aware of their right to complain and are encouraged to make a complaint if they are not happy with any of the services provided by BASSCARE. This is explained to Client/ participant/ residents at service commencement, at reviews, when they wish to make a complaint and whenever appropriate, including at meetings with Client/ participant/ residents and representatives. Information on Client/ participant/ residents' right to complain without fear of retribution, the complaints process and their right to use an advocate in making a complaint, is included in the Client/ participant/ resident Handbook.⁴

We have complaints brochures from the Aged Care Quality and Safety Commission in a range of languages available to Client/ participant/ residents.

Client/ participant/ residents can expect complaints to be dealt with fairly, with transparency and promptly and for staff to take steps to ensure that Client/ participant/ residents feel comfortable to continue receiving services after making a complaint.⁵

All complaints are reviewed by the Executive Team to identify improvements to services and processes that underpin all of our services and operations. Our complaints-handling approach reflects our vision, objectives and philosophy outlined in Section 8: Organisational Governance.

All staff involved with Client/ participant/ residents receive information on their responsibility to encourage and support Client/ participant/ residents to make complaints and to support them through the complaints process.

Client/ participant/ residents are encouraged to talk to us before raising a complaint with an external complaint agency, but Client/ participant/ residents can choose to raise their complaint with an external agency at any time. Details of external complaints agencies are detailed in 6.4 Advocates.

6.2.1 KEY CONSIDERATIONS IN MANAGING COMPLAINTS

BASSCARE adopts the following principles, from the Aged Care Quality and Safety Commission and NDIS Commission, in managing complaints⁶ and the Open Disclosure Principles. If an open disclosure meeting is to be held, the relevant Manager will prepare and conduct the meeting/s with the Client/ participant/ resident/representative. We consider these principles in the management of complaints and open disclosure meetings (where an adverse event may have occurred with harm or potential harm to Client/ participant/ residents is evident). The specific details of how complaints are managed are included in Table 6.2.1 Complaints Management Process.

¹ Australian Government Aged Care Complaints Commissioner
Better Practice Guide to Complaints Handling in Aged Care Services 2017
National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
National Disability Insurance Scheme: Your guide to complaints management

² Australian Government Aged Care Complaints Commissioner
The Complaints Journey November 2017

³ Australian Commission on Safety and Quality in Health Care
Australian Open Disclosure Framework 2013

⁴ Australian Government Department of Health and Australian Government
Aged Care Quality and Safety
Commission Charter of Aged Care Rights (Effective 1 July 2019)
Web page accessed November 2020

⁵ Australian Government Aged Care Complaints Commissioner
The Complaints Journey November 2017

⁶ Australian Government Aged Care Complaints Commissioner
The Stages of Complaint Handling 2017

Be open and Timely

If things go wrong in the provision of care and services to a Client/ participant/ resident (including adverse events or incidents) we communicate and provide information in a timely, open and honest manner. We provide ongoing information until the complaint or issue is resolved.

Acknowledge

The person managing the complaint will:

- Acknowledge all complaints quickly.
- Repeat what you've heard in your own words. This creates a shared understanding and establishes empathy.
- Express regret using the words 'I/we are sorry', but do not admit liability or apportion blame.
- Tell the complainant what happens next with their complaint and provide contact details for the staff member handling the complaint.
- Reassure all parties that confidentiality is respected.
- Give an estimate of how long the process may take.
- Invite those involved to participate in the resolution process; engage the Client/ participant/ resident.

- Complaints that are straightforward with low risk can be resolved on first contact.

Assess

- Assess the complaint and prioritise against other complaints the service is handling.
- Clarify the concerns and issues raised by the complainant.
- Determine the level of risk to the Client/ participant/ resident, other Client/ participant/ residents and the service.
- Ask the Client/ participant/ resident and complainant how they would like to see the complaint resolved.
- Show a positive, professional attitude and thank the complainant for bringing the matter to your attention.
- Plan (if required)
 - o Consider the best way to resolve the complaint (e.g. conciliation with the complainant or investigation).
 - o Prepare a short-written plan of how the complaint is to be managed and any information to be collected.
 - o Focus attention on the issue to be investigated.
 - o Remain flexible and adjust as required
 - o Investigate (if required)
 - Gather relevant information to resolve the complaint.
 - A fair investigation is impartial, confidential, transparent and timely.
 - Keep written notes of discussions.
 - Allow complainants to present their points of view.

An effective complaint handling process is fair, accessible, responsive, efficient, and contributes to ongoing quality improvement in service delivery.

Respond

- Apologise using the words 'I/we are sorry'. It can improve your relationship with the complainant.
- Respond to the complainant with a clear decision and explain your reason for the decision. Written responses may be more suitable for complex matters.
- Communicate outcomes promptly.
- Recognise that it may take several meetings to come to a resolution.

Follow up

- Check if complainant is satisfied with the resolution.
- Ask complainants for feedback.
- Outline alternative options available to the complainant.
- Reviews should be carried out by staff who haven't been previously involved.
- Complaints are evaluated and discussed at the relevant committee e.g. Operational Risk Committee (with consideration to confidentiality).

Consider

- Evaluate the outcome for the complainant; ask yourself/the team (and document):
 - o Are there issues or problems which could be repeated?
 - o Was there a delay in resolving the complaint?
 - o Can procedures and policies be reviewed to improve the complaints process?

Regular contact with the complainant should be maintained throughout the process. It's important to keep the complainant informed if their issue is taking longer to resolve than first advised.

6.2.2 PROCESS FOR MANAGING COMPLAINTS

Table 6.2.1 Complaints Management Process

Step	Timeline
<p>1. Complaint is received verbal/ phone</p> <ul style="list-style-type: none"> - Acknowledge the complaint - Apologies for any inconvenience or distress caused. (Open Disclosure) - Inform the manager/ supervisor of the complaint. - Document all details in ionMy, and progress notes if care related. <p>2. Feedback form/ email/ letter/ website review/ social media complaint/survey</p> <ul style="list-style-type: none"> - Upload the complaint in ionMy, and document in progress notes if care related. 	<p>On day complaint is received</p>
<p>3. Relevant Manager</p> <ul style="list-style-type: none"> - Contact the complainant to acknowledge and apologies for any inconveniences or distress caused within 2 business days of becoming aware of the complaint. - Investigate, discuss and try to resolve the issue to the desired outcomes of the complainant. - Escalate to the relevant Executive Manager if the issue is moderate (see complaints severity matrix Appendix 1). 	<p>Within 2 working days of receipt of complaint</p>
<p>4. Person/s affected by the complaint are fully informed of all facts and given the opportunity to provide further information and contribute to the solutions.</p>	

Step	Timeline
<p>5. The Client/ participant/ resident is advised of the actions taken to address the issues raised and the outcome of the complaint in a letter</p>	
<p>6. Alert the CEO and the General Manager Compliance, Risk and Continuous Improvement (GM-CRCI) as soon as possible if the issue is major or severe (see complaints severity matrix Appendix 1). Set up meetings to discuss the action plan and document in ionMy.</p>	<p>Within 5 working days of receipt of complaint</p>
<p>7. The GM-CRCI updates the CEO on complaint progress (serious complaints) if CEO is not directly involved.</p>	
<p>8. Document all the actions taken and attach relevant evidence in ionMy. 9. Discuss with the person/s affected by the complaint of the actions and outcome of the complaint. 10. Given the opportunity to provide feedback or further information.</p>	<p>Within 15 working days of receipt of complaint</p>
<p>11. If the complainant is not satisfied with the outcome, further actions can be taken in discussion with the complainant. Offer the complainant the possibility to have an advocate. 12. If the complainant wish to appeal and escalate to relevant bodies, provide details if requested.</p>	<p>Within 25 working days of receipt of complaint</p>
<p>13. If the complainant is satisfied with the outcome, ensure all relevant information is documented in ionMy. 14. The relevant manager will contact the complainant within a week to ensure that the complainant is fully satisfied with the outcomes. 15. If the complaint is identified as a continuous improvement, log in ionMy. 16. The relevant manager can then sign off and close the complaint in ionMy.</p>	

6.2.3 DISPUTES BETWEEN CLIENT/ PARTICIPANT/ RESIDENTS AND SUPPORT STAFF

BASSCARE support staff are required to report immediately to their Manager any dispute with Client/ participant/ residents, regardless of how small. Disputes are reported verbally in the first instance. The Manager then decides:

- Whether the Client/ participant/ resident should be contacted
- If a written report is required
- The format of the report
- Any other action to resolve the dispute as early as possible.

The Manager may offer the Client/ participant/ resident the opportunity to make a formal complaint. If the Client/ participant/ resident accepts this offer the Manager completes an Improvement Form with them and the complaints process is followed.

6.2.4 PEOPLE WITH SPECIAL NEEDS

Where Client/ participant/ residents may have special needs, such as people from culturally and linguistically diverse (CALD) backgrounds or Aboriginal and Torres Strait Islander people, the staff ensure that any cultural aspects are considered when reviewing a complaint or dispute and ensures the person feels comfortable in discussing a dispute. The presence of a family member or friend or the support of an interpreter may be required.

Where we can, we use the resources on the Aged Care Quality and Safety Commission website⁷ to provide information in simple language or in the language of the Client/ participant/ resident. We also ensure that any actions, interventions or referrals are appropriate to people from special needs groups. This may require the involvement of organisations with expertise in special needs groups either in providing advice or assisting in actions.

6.2.5 USE OF AN ADVOCATE

Client/ participant/ residents are advised in the Client/ participant/ resident Handbook and verbally at the time they indicate, they have a complaint that they can use an advocate or external agency at any point in the complaint process or if they feel their feedback or complaint was not satisfactorily resolved. We provide the Client/ participant/ resident with a list of agencies and assist them and support them to make contact as required.

Agencies that Client/ participant/ residents can lodge a complaint with or provide advocacy services are detailed in 6.4: Advocates.

6.2.6 CONFIDENTIALITY OF COMPLAINTS AND DISPUTES

As far as possible, the fact that a Client/ participant/ resident has lodged a complaint and the details of that complaint are kept confidential amongst staff directly concerned with its resolution. The Client/ participant/ resident's permission is 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. Complaints that are sensitive in nature are managed by the GM-CRCI.

6.2.7 WORKING WITH EXTERNAL COMPLAINTS AGENCIES

If we receive a request to provide information or input from an external complaints/advocacy agency we provide relevant information as requested with consideration to privacy. Information provided to external agencies is documented in a complaint form, detailing the information provided and any relevant documentation and filed by the GM-CR&CI after review by the CEO. If we are provided with a direction from the Aged Care Quality and Safety Commission, we follow that direction and keep a record of the actions taken on the complaint form/file.

Information on contact details for external complaints or support agencies is included in 6.4 Advocates.