

Feedback, Compliments, and Complaints Policy & Procedure

Introduction

This policy & procedure sets out how any person can provide feedback & make complaints about any aspect of Strong Minds Psychology's operations & the process of addressing or responding to feedback & complaints.

This policy & procedure applies to the Directors, staff, students, contractors & volunteers & all potential & existing clients, their family members & other supporters. The policy also applies to other service providers, government agencies & members of the community.

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

Policy

- Compliments, complaints & other feedback provide:
- valuable information about client satisfaction; &

- an opportunity to improve upon all aspects of its service.
- Strong Minds Psychology records & handles feedback effectively in order to:
 - identify areas for improvement;
 - coordinate a consistent approach to complaint resolution;
 - reduce the potential for future complaints; &
 - allow for reporting & efficient allocation of resources.
- **Strong Minds Psychology's feedback, compliment & complaint handling system addresses the principles of:**
 - visibility & accessibility;
 - responsiveness;
 - assessment & investigation;
 - feedback;
 - continuous improvement; &
 - service excellence.
- Strong Minds Psychology seeks to build a responsive, efficient, effective & fair complaint management system. Resolving complaints at the earliest opportunity in a way that respects & values the person's feedback can:
 - aid in recovering the person's confidence about Strong Minds Psychology's services;
 - help prevent further escalation of the complaint.
- Strong Minds Psychology's approach to feedback, compliments & complaints management ensures:
 - people understand their rights & responsibilities;
 - information on the feedback, compliment & complaint management process is easily accessible;
 - increased satisfaction of clients in the management of their compliments & complaints;
 - the recording of data to identify existing or emerging trends or systemic issues;
 - staff demonstrate an awareness of Strong Minds Psychology's feedback, compliments & complaints management processes;
 - staff develop the range of skills & capabilities required to manage compliments, complaints & feedback; &
 - an organisational culture that is focused on effective, person-centred complaints resolution & utilising feedback for continuous improvement.

Procedure

- Strong Minds Psychology will promote best practice, continuous improvement & an open, supportive, respectful culture that encourages & supports staff, clients & other stakeholders to make complaints & report concerns without fear of retribution.
- Strong Minds Psychology's *Client Charter*, *Welcome Pack* & a *Feedback, Compliments & Complaints Brochure* provide clients, their families & carers & all other stakeholders with information about this policy & procedure, in an easy to understand format. This will include information on how feedback & complaints will be addressed & who to contact to provide feedback & complaints to external agencies, including external advocacy & support agencies. Information will be clearly displayed in Strong Minds Psychology & provided by staff when requested.

- Information about providing feedback & making complaints will be provided in a variety of formats where appropriate, including in Easy English & alternative languages. Interpreters & referrals to advocates can be provided.
- Strong Minds Psychology will provide all clients, their families & carers with this policy & procedure when they first access the service &, throughout service delivery, remind them of the policy & their right to make a complaint without fear of affecting their service.
- All personal information Strong Minds Psychology collects to manage feedback or complaints will be handled in accordance with privacy legislation & the *Privacy & Confidentiality Policy & Procedure*. Feedback & complaints will be dealt with in a confidential manner & will only be discussed with the people directly involved. All information regarding feedback & complaints will be kept securely in accordance with the *Records & Information Management Policy & Procedure*.
- Complaints & feedback can be lodged by a third party on behalf of another person, if their consent has been provided.
- Where required, an advocate or someone sensitive to the client's cultural needs will be appointed to assist in providing feedback or making a complaint.
- **The Directors will track & analyse feedback & complaint data to identify any ongoing issues & opportunities for service improvement.**

Feedback

- Provision of feedback to Strong Minds Psychology is voluntary.
- Feedback will be collected regularly:
 - after each major interaction with the service (e.g. initial assessment & planning; reviews; exit);
 - during client service delivery;
 - at client forums; &
 - through satisfaction surveys.
- Stakeholders can provide feedback at any time through:
 - Feedback & Complaint Records;
 - phone: 03 5967 1438
 - email: Complaints Officer - feedback@strongminds.net.au or General - smpteam@strongminds.net.au
 - post: PO Box 566 Yarra Junction Vic 3797
- Where feedback is provided verbally, the receiving staff member will transcribe the feedback onto a *Feedback & Complaint Record*.

Complaints Management Process

- Strong Minds Psychology's complaints management process can be simplified into five steps:
 - Receive;
 - Record;
 - Acknowledge;
 - Resolve; &
 - Communicate resolution.

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 & 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 & set realistic expectations.
- Be accountable – action all commitments made & be empathic towards the affected person.
- Assess – situations that pose an immediate threat or danger, or require a specialised response.
- All complaints & grievances will be referred to the relevant supervisor (or Directors) for resolution.
- The relevant supervisor 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 Directors 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 & 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 & 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 & Complaints Form*;
 - by email to: Complaints Officer feedback@strongminds.net.au or General smpteam@strongminds.net.au
 - by phone on 03 5967 1438; or
 - in writing to: PO Box 566 Yarra Junction Vic 3797
- At any time, individuals can make a complaint directly to the NDIS Commission, or directly to the Australian Health Practitioners Regulation Agency AHPRA.
- All clients 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 Directors immediately. The Directors will follow the *Incident Management Policy & Procedure*, reporting the complaint & working 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 Directors will:
 - Record – all information that is relevant to the compliment or complaint, in its original & simplest form, in Strong Minds Psychology's *Complaints & Feedback Register*.
 - Store & protect – the *Complaints & Feedback Register* in a secure file, accessible only to the Management Team.

3. Acknowledge

- The Directors will:
 - Acknowledge – receipt of the grievance within 2 working days to build a relationship of trust & confidence with the person who raised the complaint.
 - Provide anonymity – a person may request to remain anonymous in their lodgement & therefore contact may not be possible or expected.
 - Seek desired outcomes – provide realistic expectations & 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 & expectations - to the complainant where possible.

4. Resolve

- In resolving a complaint or grievance, the Directors will:
- Involve the complainant - keep them informed of the progress of the complaint & discuss any disparities identified in the information held;
- Request additional information - when required, apply a timeframe that limits when it is to be provided by;
- Consider extensions - only where necessary & 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 Strong Minds Psychology's *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 Management Team will determine the appropriate person to undertake the investigation.

5. Communicate resolution

- Strong Minds Psychology will respond to all complaints & grievances as soon as possible & 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 Directors (or delegate) will:
- Discuss the outcome - where possible, verbally with the complainant before providing written advice & allowing them the opportunity to make further contact following receipt of the written advice.
- Include information on recourse - further action 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 & 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 understand correspondence regarding complaints & 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; &
 - training or education of staff.

Strong Minds Psychology's *Complaints & Feedback Register* will be used by Strong Minds Psychology's Directors (or delegate) to record every complaint, track investigation progress & outcomes & how the outcomes have been communicated to stakeholders.

Procedural Fairness

- Procedural fairness:
- is impartial;
- requires a response proportionate to the complaint, accusation & likely remedial action;
- ensures that a complainant or participant is not disadvantaged by the complaint or the process of resolving a complaint;
- ensures that persons who are likely to be adversely affected by a complaint process are given the opportunity to present their views & have them heard.
- Procedural fairness must be afforded to a person if their rights or interests may be adversely or detrimentally affected in a direct & specific way. In those circumstances:
- the person must be given notice of each prejudicial matter that may be considered against them;
- the person must be given a reasonable opportunity to be heard on those matters before adverse action is taken, & to put forward information & submissions in support of an outcome that is favourable to their interests;
- the decision to take adverse action should be soundly based on the facts & issues that were raised during that process, & this should be apparent in the record of the decision, &
- the decision maker should be unbiased & maintain an unbiased appearance.
- The precise requirements of procedural fairness can vary from one situation to another. The required steps can vary according to:
- the nature of the matter being dealt with;
- the options for resolving it;
- the timeframe for resolution;
- whether facts in issue are in dispute;
- the gravity of possible findings that may be reached; &
- the sanctions that could be imposed based on those findings.

Complaints Escalation & 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 & Feedback Register* in the same manner as other complaints & the same communication processes as outlined above will be applied.
- NDIS Participants can complain to the NDIS Quality & Safeguards Commission:
- by phone on 1800 035 544 or TTY 133 677
- by using a complaint contact form on the website - <https://www.ndiscommission.gov.au/>
- <https://forms.business.gov.au/smartforms/servlet/SmartForm.html?formCode=PRD00-OCF>
- NDIS participants purchasing products & services also have rights & protections under the Australian Consumer Law (ACL), including provisions on client guarantees & unfair contract terms. Consumer Affairs Victoria provides information & advice &, in some cases, dispute resolution services for client disputes under the ACL. See <https://www.consumer.vic.gov.au>.
- Complaints to the Australian Health Practitioner Regulation Agency (AHPRA) can be lodged:
- by post to: AHPRA, GPO Box 9958, Melbourne Vic 3001
- by phone on: 1300 419 495
- via their website:
<https://www.ahpra.gov.au/Notifications/Concerned-about-a-health-practitioner.aspx>