Feedback and Complaints Policy

PURPOSE

SBH Queensland is committed to the provision of quality services to service users, members and other interested parties. SBH Queensland believes that people with a disability have a right to have a say about and be involved in decisions affecting their lives which includes providing feedback and complaints about SBH Queensland services.

A key element of quality service is the ongoing maintenance and improvement of service through feedback from service recipients. As such, SBH Queensland values receiving and is committed to resolving complaints from service users, members and other interested parties as they arise, with a view to improving the services and processes of SBH Queensland.

This policy provides a framework for clients and external stakeholders to provide feedback or make a complaint and for SBH Queensland staff to work within to resolve complaints promptly and effectively.

SBH Queensland acknowledges that the supports and services provided may not always meet people’s expectations and/ or that mistakes can happen. SBH Queensland values clients, parents/ guardians, carers or external stakeholders providing feedback or acknowledgement when expectations have not been met so that the supports and services can be continuously improved.

SCOPE

This policy applies to all clients and their families, carers, friends or advocates, visitors and all other community members who wish to provide feedback or make a complaint related to any aspect of SBH Queensland activities.

SBH Queensland staff would generally express their feedback or grievances about work related issues through the Staff Feedback and Grievances Policy.
COMPLAINTS POLICY

POLICY

Principles:

SBH Queensland Will:

- Take all complaints seriously
- Provide a user friendly process which is applied positively, consistently and fairly
- Ensure that the clients, parents/guardians, carers or external stakeholders are aware that they can make their feedback or complaints anonymously
- Ensure that the client, parent/guardian, carers and other stakeholders are aware of the Feedback and Complaints process and are encouraged to provide feedback or make complaints
- Treat people fairly and ensure their concerns are dealt with in an unbiased and objective manner
- Provide people with opportunities to tell their story
- Provide people with appropriate support and assistance to work their way through this process
- Not make fun of or treat people unfairly/negatively for providing feedback or making a complaint\(^1\)
- Attempt to understand the person’s expectations regarding this process
- Address feedback and complaints as quickly as possible while ensuring the process is thorough
- Assess complaints for their seriousness and ensure that the appropriate level of management is delegated to address and resolve complaints appropriately
- Resolve issues in a prompt, impartial and just manner
- Communicate with all stakeholders throughout and at the completion of the process. Where a formal complaint has been raised then the final notification will be in writing, including reasons for the decisions
- Protect individual’s privacy and keep information confidential
- Not make assumptions or conclusions until all information has been carefully collected and considered
- Train staff how to effectively manage complaints
- Document the process of receiving, investigating and resolving complaints and periodically review the system to assess its effectiveness
- Log all feedback and complaints received on the SBH Queensland Feedback & Complaints Register. The Register can be completed by the SBH Queensland Service Manager or CEO
- Incorporate any actions for quality improvement to systems or procedures into the SBH Queensland Continuous Improvement Register
• Acknowledge and celebrate positive feedback
• Clients at all times will feel no threat of retribution, reduction or discontinuation of service when giving feedback or making a complaint

ADVOCACY AND SUPPORTS

If clients, parents/ guardians, carers or external stakeholders require assistance or an advocate to assist with providing feedback or making a complaint, SBH Queensland can provide assistance with completing feedback or complaint forms, or where required, assist the person/s making the complaint to find external assistance. For more information on how to find an external advocate please refer to the SBH Queensland Advocacy Flyer which is available on the SBH Queensland website under resources.

PROVIDING FEEDBACK

Feedback may be provided where someone can see a way to improve processes or systems or to acknowledge and celebrate something being done well.

A Feedback Form should be filled in where possible when feedback is provided by clients, parents/ guardians, carers or external stakeholders. Where positive feedback is received the relevant Team Leader or Services Manager is responsible for acknowledging the feedback and appropriately recognising the staff involved.

If the feedback is about the CEO, the Feedback Form can be referred directly to the SBH Queensland Board.

Feedback which is recorded on a Feedback Form will be saved in the SBH Queensland Feedback folder in the integrated management system.

WHAT IS A COMPLAINT

An expression of dissatisfaction made to or about a disability service provider, relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
PROCEDURES

Informal Complaints (Tier 1 Complaints)
Informal Complaints may consist of issues that are raised by clients, parents/guardians, carers or external stakeholders which they do not wish to progress to a formal complaint however still seek a resolution. If the issue is not resolved through this procedure the client, parents/guardians, carers or external stakeholders are then given the option to make a formal complaint.

Stage One:
The issue is to be addressed with the client, parents/guardians, carers or external stakeholder as best as possible at the time the issue is raised by the staff member/s present.

Stage Two:
The staff member/s who has received the informal complaint is to raise the issue with the staff member involved and their relevant senior, team leader or service manager. It is up to the relevant staff member/s to acknowledge and resolve the issue with the client in a timely manner. Acknowledgement of the issue should be made within 2 business days with the person/s who have made the complaint and the staff member involved should seek resolution of the issue within 5 business days.

Stage Three:
If the issue is unable to be resolved the staff member involved is required to seek guidance from the client, parents/guardians, carers or external stakeholders as to whether they would like to progress the issue to a formal complaint. If this is the case, the senior/team leader is to take this formal complaint to the service manager or CEO as appropriate and follow the formal complaint procedure. If the client, parents/guardians, carers or external stakeholders decide not to progress the issue to a formal complaint this is to be recorded and all efforts made to ensure the service is improved to avoid a reoccurrence of the issue. Where necessary the relevant staff member is encouraged to meet with their senior/team leader/service manager to discuss the outcome and ways this could be avoided in future.

Notes and outcomes need to be documented in a secure location accessible only by SBH Queensland department seniors, team leaders and management in the Tier 1 Complaints Folder.

Feedback on Complaint
Once a resolution has been actioned, feedback is sought from all parties involved on their experience of the process and any recommendations for improvements. This information will then be provided to SBH Queensland management to review and implement improvements/training as appropriate.
COMPLAINTS POLICY

Formal Complaints

Formal complaints may consist of issues that are raised by clients, parents/guardians, carers or external stakeholders which they wish to progress to a formal complaint and seek a resolution. An issue may progress to a formal complaint when:

- the person complaining wants to do it formally
- informal attempts have failed
- the allegations are serious
- discipline is a possible outcome if the allegations are substantiated
- the allegations are denied and the person complaining wants to try to substantiate them
- the person complaining has been victimised for complaining
- the complaint is against a senior person and a formal procedure helps ensure the people involved are not disadvantaged

Procedures

The person making the complaint is encouraged to have an independent advocate or other person to support them with all aspects related to the making and resolution of the complaint.

Stage One (Tier 2 Complaints):

Complaints may initially be made in person, by phone or in writing but a complaint form must be completed at this stage.

The complaint form is to be completed preferably by the person making the complaint or his or her support person; otherwise an SBH Queensland staff member will complete it.

The Service Manager or CEO will contact those involved in the complaint within 1 working week to acknowledge that the complaint has been received and to discuss the ideal outcomes of the complaint for all parties involved.

The Service Manager/CEO of SBH Queensland will investigate the complaint in consultation with any staff member(s) who is/are directly involved.

The Service Manager/CEO will write to all parties concerned advising them of the outcome of the investigation within 1 month. This letter must advise the complainant of the next step to take if they aren’t satisfied with the outcome.

The Service User Complaint form and all relevant documentation will be kept in the Tier 2 Complaints File which is accessible only by the CEO and Service Manager. An entry will be made in the Complaints register kept in the Complaints file by either the CEO or Service Manager.
COMPLAINTS POLICY

Where a complaint remains unresolved to all parties' satisfaction at this stage, or if the investigation takes more than one calendar month, the matter will automatically proceed to stage 2 of the policy.

Stage Two (Tier 3 Complaints):

At this stage, complaints will be forwarded to the Secretary of the Board of Directors of SBH Queensland who will circulate via email to all board members except if a board member is involved in the complaint for consideration.

A member of the board is to be delegated to contact those involved in the complaint within 1 working week to acknowledge that the complaint has been received and to discuss the ideal outcomes of the complaint for all parties involved.

At the next Board meeting or a relevant subcommittee of the Board of Directors the complaint is to be raised and a resolution plan formulated. This information should then be shared with all parties involved within 3 months of when the board was notified of the complaint.

If a member of the Board of Directors is involved in or the subject of a complaint they must remove themselves from the management of the complaint.

The Service User Complaint form and all relevant documentation will be kept in the Complaints File which is accessible only by the Board of Directors. An entry will be made in the Complaints register kept in the Complaints file by either the CEO or Service Manager.

Feedback on Complaint

Once a resolution has been actioned, feedback is sought from all parties involved on their experience of the process and any recommendations for improvements. This information will then be provided to SBH Queensland management to review and implement improvements/training as appropriate.
COMPLAINTS POLICY

Where people making a complaint are dissatisfied with SBH Queensland’s response, they may contact

- Disability Services Commissioner XXXXXXXXXX
- the Queensland police 000 (Triple Zero)
- the Office of the Public Guardian 1300 653 187
- the Commissioner for Children and Young People 1800 688 275
- the Department of Communities Complaints Team 1800 080 464
## DELEGATION

<table>
<thead>
<tr>
<th>Policy delegations</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of policy and policy compliance</td>
<td>CEO</td>
</tr>
<tr>
<td>Approving policy and policy changes</td>
<td>CEO</td>
</tr>
</tbody>
</table>

## DOCUMENT AND RECORD KEEPING

<table>
<thead>
<tr>
<th>Documents related to this policy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Related policies</strong></td>
</tr>
<tr>
<td><strong>Records</strong></td>
</tr>
<tr>
<td>• Tier 1 Complaints Folder</td>
</tr>
<tr>
<td>• Tier 2 Complaints Folder</td>
</tr>
<tr>
<td>• Tier 3 Complaints Folder</td>
</tr>
<tr>
<td><strong>Related Legislation</strong></td>
</tr>
<tr>
<td>• United Nations Convention on the Rights of Persons with Disabilities</td>
</tr>
<tr>
<td>• Privacy Act 1988</td>
</tr>
<tr>
<td>• Australian Privacy Principles – Privacy Amendment (Enhancing Privacy Protection) Act 2012</td>
</tr>
<tr>
<td>• Disability Inclusion Act 2014</td>
</tr>
<tr>
<td>• National Disability Insurance Scheme Act 2013</td>
</tr>
<tr>
<td>• National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018</td>
</tr>
</tbody>
</table>

## POLICY REVIEW

<table>
<thead>
<tr>
<th>Approved by:</th>
<th>Date Approved</th>
<th>Next Review Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEO</td>
<td>22/08/2019</td>
<td>22/08/2020</td>
</tr>
</tbody>
</table>