

Feedback and Complaints Management Policy

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SECTION 1: INTRODUCTION

1.1 Policy overview

Klint is committed to being transparent and responsive to any feedback offered by our clients and community. We ensure that they have an accessible and safe avenue for providing feedback that fosters a culture which supports clients and the community to make positive comments as well as raise a complaint.

Klint will endeavour to seek an outcome in a timely manner to a complaint which is satisfactory to all parties.

In line with the focus on participant rights and person-centred care, Klint encourages people to provide feedback through multiple mechanisms including conversations with treating therapists and administration staff, phone calls, emails, via our website and third parties such as funding bodies. Information on how to make a complaint is provided to participants before services commence and reinforced during support delivery.

Complaints will be managed as per under the [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#), [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#) and the [NDIS Effective Complaint Handling Guidelines for NDIS Providers](#)

All feedback, both positive and negative, is used by Klint to evaluate services and to make changes to ensure our participants are safe and satisfied.

All staff will receive initial and refresher training on Complaints / Feedback Management. This is to include examples of how to assure participants that feedback is welcome, what may constitute a 'complaint' and tips on being open to feedback. Refer to *Annual Training Plan*. The Four A's of successful resolution (see appendix) will guide our training.

A current copy of Klint's Feedback and Complaint Management Policy is uploaded onto the Klint Website to ensure clients, carers and employees can easily access a most up-to-date copy. In addition, information on how to make a feedback or complaint is contained in the NDIS Service Agreement which is provided to the participant (+/- support coordinator) in advance of the initial consultation and during the consultation itself.

1.2 Outcomes

The Klint Feedback and Complaint Management Policy intend to achieve the following outcomes:

- Clients are aware of how they can provide feedback both positive and negative about the services they receive from Klint.
- Clients have their concerns satisfactorily addressed, feel supported through the complaints / feedback process and are kept informed of progress with their own issue and of any changes made.

- Involved workers have their concerns satisfactorily addressed, feel supported through the complaints / feedback process and are kept informed of progress with their own issue and of any changes made.

All feedback is documented and changes are made as required to improve service delivery and procedures to improve client satisfaction.

1.3 Related Policies / Documents

Internal

- Incident Management Policy
- Safe Practice and Environment Policy
- Risk Management Policy
- [NDIS Procedural Fairness Guidelines 2018](#)
- Risk Management Register
- Service Delivery Model
- Incident and Complaint Report
- Incident Investigation Form
- Participant Survey Form

External

- [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#)
- NDIS *Effective Complaint Handling Guidelines for NDIS Providers* – includes a valuable approach to managing complaints extracted from [Victorian Disability Services Commissioner booklet 'Everything you wanted to know about complaints...'](#), - refer to Appendix.

1.4 Definitions

Complaint Is a statement that something is unsatisfactory.
NDIS Commission “A complaint is 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 or legally required.”

[NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019 p8](#)

Feedback Information about reactions to a service, a person's performance of a task, a product etc. which is used as a basis for improvement.
Feedback can be positive or negative.

Note: As per the definitions in the Incident Management Policy, a complaint or negative feedback about the service is also a type of **incident**.

SECTION 2: PROCEDURE

2.1 Inviting and gathering positive and negative feedback

In order to make clients aware that feedback, including complaints are welcomed, Klint will:

- a) Provide clients with information on how and where to provide feedback / make a complaint before services commence through provision of information:
 - In the *Welcome email (sent to every client before initial consultation)*
 - On the website (*klintneuro.com.au*)
- b) Make clients aware that they can provide feedback / make a complaint at any time
- c) Regularly invite clients to participate in a client satisfaction survey at different points during their care so that they can provide feedback in an anonymous setting.

2.2 Managing positive feedback

It is useful to keep a record of positive feedback / compliments received to review with colleagues / mentors.

At Klint, all compliments and positive feedback are collated and shared either in an individual setting or group setting, with data de-identified where appropriate. These will be shared for the sole purpose of facilitating discussions on how to continuously improve.

Individual settings: feedback will be provided at individual mentoring and performance meetings throughout the year

Group settings: feedback may be provided at operations meetings or at annual workshops

2.3 Managing complaints and negative feedback

Management of feedback / a complaint will be handled as per any incident as follows. There are also **additional** steps to be taken and issues addressed.

2.3.1 Overarching principles:

- a. The person handling the feedback must ensure procedural fairness is afforded to all affected person/s. This includes giving the person a reasonable opportunity to be heard and put forward information, and all decisions made are unbiased and soundly based on the facts that were raised.
- b. It is critical that the complainant feels the complaint has been adequately acknowledged and they are given time to express how it has affected them and what actions they would like to see taken.
- c. If possible, the treating therapist and administration will talk fairly, sensitively and confidentially to the person making the complaint in a way which reflects their individual, cultural and linguistic needs.
- d. 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.

- e. Information provided in a complaint is kept confidential and only disclosed if required by law or if the disclosure is otherwise appropriate in the circumstances.

2.3.2 Procedure

- a. The staff member involved will obtain as much detail as possible about what happened and why the complaint has been made.
- b. The staff member will discuss complaint with Practice Manager (and Clinical lead, if the complaint is of a clinical or professional practice nature).
- c. The staff member who receives the complaint is to complete an Incident and Complaint Report form and provide this to the Practice Manager (and Clinical lead, if the complaint is of a clinical or professional practice nature). The report must include all necessary factual details, immediate actions that have been taken and any identified / planned follow-up actions. It is important that information collected enables Klint to provide a full report to the Commissioner if requested to do so.
- d. The Practice Manager (OR Clinical lead, if the complaint is of a clinical or professional practice nature) will contact the complainant as soon as practically possible, but at least within two (2) business days.
- e. The Practice Manager will ensure the incident is recorded in the Klint Incidents and Complaints Register.
- f. The Senior Leadership Team will, in collaboration with the complainant, decide on the course of action. The actions should include / address:
 - o How to resolve the complaint. This could include acknowledgement, an apology, answers and / or action
 - o Where appropriate, seeking feedback from others e.g. other clients / Participants, workers
 - o When and how complainant will be kept informed of progress
 - o How to improve the service if / as required. This could include:
 - Further training of staff / others involved
 - Reviewing and enhancing policies and / or procedures
 - Change of personnel
 - Changes to the environment / delivery mode for therapy services.
- g. If the complaint is of a serious nature (e.g. mandatory reporting required, could lead to litigation), a formal incident investigation will be conducted (use the *Incident Investigation* form) to explore what led to the complaint and if any steps are required to prevent it occurring again.

Note: If police are involved in the incident, no internal investigation is to commence until the police investigations are complete
- h. Agreed actions will be implemented and complainant informed about its progress.
- i. Actions will be monitored by the Senior Leadership Team and updates on progress will be added to the register until the incident is satisfactorily concluded.
- j. If the complainant is not satisfied with the outcomes of the initial discussions, a third party (e.g. colleague, HR professional) will be called in to assist with discussions.
- k. The complaint is to be followed up as per incident management.
- l. If the complainant is still not satisfied with the way the complaint has been handled or the outcomes achieved, they can contact the NDIS Quality and Safeguards

Commission, National Disability Neglect & Abuse Hotline or Disability Services Commissioner. Contact details will be provided to the participant.

m. Complaints reports and all related documents are to be kept for 7 years.

2.4 Referring complaints

It is the responsibility of the Director to ensure complaints are referred or notified to any other bodies in accordance with any requirements under relevant Commonwealth, State or Territory laws.

SECTION 3: APPENDIX

The Four A's of successful resolution

The following is an extract from the NDIS Quality and Safeguards Commission's *Effective Complaint Handling Guidelines for NDIS Providers*

In responding to a complaint, the Four A's of successful resolution is a useful approach developed by the [Victorian Disability Services Commissioner in their booklet 'Everything you wanted to know about complaints...'](#):

The approach recognises that people who make a complaint are generally seeking one or more of these four outcomes:

- Acknowledgment
- Answers
- Action
- Apology

Acknowledgement

In many ways this is the most important step as it sets the tone for the rest of the process. Making a complaint can be difficult for people. It is important that people feel that their concerns have been understood and that the impact on them is recognised.

Acknowledgment can include:

- genuinely listening to the person without interrupting
- empathising
- making sure the person feels comfortable talking to you, and being aware of whether you are feeling defensive and how this may be perceived
- acknowledging how the situation has affected the person
- rectifying by asking the person what a good outcome would look like for them, and
- notifying the person regularly and promptly of the steps that will be taken in response to their complaint, ensuring commitments aren't made that can't be fulfilled.

Answers

People want to know why something has or has not happened, or why a decision was made. People need to understand what has happened in order to better understand how they can move on to resolving their concern. Answers should include a clear explanation that is relevant to the concern raised but ONLY if you know the facts.

Actions

People want you to fix or take steps to address their concerns. This may be in relation to their specific complaint, or more broadly around systems to ensure that similar issues

won't occur for other people. Sometimes you won't be able to fix the issue raised, but you can initiate actions to prevent it from happening again. Taking action to prevent recurrence may validate the concern for the person making the complaint. A good way to approach actions is to use an action plan, which includes:

- what will be done
- who will do it
- when it will be done by
- how the progress of the complaint and outcomes will be communicated to the person making the complaint and the participant, and
- how the progress of the complaint actions and implementation will be oversights.

The action plan may be formulated with the person who raised the complaint and any participant affected by an issue raised in the complaint. It is really important to follow up with the person who made the complaint, and any affected participant, to make sure they are satisfied with the actions being undertaken, and that the actions relate appropriately to their concerns. This is also a good opportunity to seek their feedback on the complaints resolution process.

Apology

An apology may be part of, or the sole outcome a person is seeking when they make a complaint. It is important to consider who should provide the apology and the form of the apology. A genuine apology can be a meaningful step; however a poorly provided apology can make the situation worse. An apology should often come from the person complained about, as well as a more senior member of the organisation, in order for the person complaining to be satisfied that their concerns were taken seriously.

When providing an apology, it is helpful to consider:

- timeliness
- sincerity
- being specific and to the point
- accepting responsibility for what occurred and the impacts caused
- explaining the circumstances and causes (without making excuses), and
- summarising key actions agreed to as a result of the complaint.

A genuine and timely apology is a powerful healing force and a way to separate the past from the future, to put things to rest and get on with any agreed new arrangements.

After a complaint has been dealt with

It is important that you have systems in place to allow the organisation to reflect on the complaints process and any outcomes. This includes ensuring that you are checking in with the person who made the complaint for feedback around the finalisation of their complaint, and their response to any follow up or implementation of actions.

Things to consider:

- What was the complaint about? What service, policy or procedure did it call into question?
- What was the experience for the person who made the complaint, or for any affected participant? Were the issues resolved for them?
- What information did the complaint provide that will allow you to identify and improve those services, policies and procedures and your organisation as a whole?
- How effectively did you communicate with the person who made the complaint, any affected participants, affected staff and other stakeholders?
- Do people using your services, their families, carers and friends require more or improved information about their rights and the complaints process? Does the person who made the complaint feel more comfortable about speaking up in the future?

- Does anything need to change in your complaints handling system or approach to dealing with complaints?
- Do staff require further training?
- Did the handling of the complaint reflect your stated values and expectations for complaint handling? Or, was the complaint perceived as something negative that needed to be dealt with as quickly as possible?