

## **POLICY**

In recognition of consumer rights Gippsland Lakes Complete Health (GLCH) provides an efficient, fair, accessible and organizationally integrated mechanism for the handling of consumer feedback.

Information gathered from informal and formal mechanisms will be monitored for the purpose of improving the quality of health and welfare service delivery.

Staff will document complaints, concerns, compliments and/or suggestions via the electronic Consumer Feedback system (Riskman), when it is shown that a consumer has gone out of their way to provide feedback. Feedback includes verbal as well as written information.

### **Summary**

Consumer feedback is an integral part of the quality improvement approach that has been adopted by GLCH. The Consumer Feedback system provides information from which operational activity and service delivery can be reviewed, refined and improved.

GLCH encourages consumers to provide feedback on the service they receive and in doing so provides an easy, accessible and where required, anonymous process in which to do so. GLCH has a policy of open disclosure in relation to adverse events and complaints, is receptive to complaints or concerns, and treats such seriously, observing the principles of procedural fairness and natural justice. The complaints process is clearly articulated, open, and accountable to both staff and consumers.

All feedback is handled according to the requirements of the Health Records Act (2001), Information Privacy Act (2000) and the National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018. Information gathered during the process is used only in order to deal with and resolve issues or to address broader issues arising from the feedback. Information is shared with staff only on a 'need-to-know' basis.

GLCH collects information via the electronic Consumer Feedback system (Riskman). All feedback (as statistical data) is tabled with the Board and Executive Management Team for review.

Anyone may provide feedback – a client, carer, relative, support person, external health professional, individual, or group. Where a complainant is a recipient of disability services under the NDIS, the participant's record will be checked for a preferred contact for complaints and the participant will be asked if they would like to nominate a GLCH staff person assigned to handle complaints.

Should the feedback be a complaint/concern from another health, welfare or support agency, the information is to be referred to the Chief Executive Officer (CEO). If a staff member is the subject of a complaint, that staff member will be informed of the complaint as soon as practicable.

Feedback that is related to a cultural issue will be analysed with trends identified and input sought from a relevant authority such as an ACCHO for concerns regarding the Aboriginal community and Gippsland Multicultural Services for issues regarding the Culturally and Linguistically Diverse (CALD) community. GLCH has an LGBTIQ+\* Community Engagement Strategy that includes focus groups, surveys and consultation to support activities, engagement and feedback.

Consumers are advised of the services available to them to assist with unresolved complaints. Where a complaint from an NDIS participant cannot be resolved internally, the complainant may be referred to the NDIS Quality and Safeguards Commission.

\* LGBTIQ+ (lesbian, gay, bisexual, trans and gender diverse, intersex, queer, asexual and '+' which encompasses other diverse sexual orientations and gender identities) people.

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## RESPONSIBILITIES

The Board of GLCH is responsible for policy and the annual monitoring of consumer feedback.

The CEO under delegation from the Board has overall responsibility for:

- Implementation of the consumer feedback process;
- Ensuring that the Service's Consumer Feedback system is effective in providing an efficient, fair and accessible mechanism for consumer feedback; and
- That annual monitoring occurs for the purpose of improving the quality of health service delivery.

Executive Managers/Managers are responsible for:

- Implementing timely responses to referred consumer feedback items;
- Recommending any proposed action as a result of consumer feedback to the CEO as necessary;
- Where appropriate, drafting suitable responses for signature by the CEO;
- Implementing approved action; and
- Documenting follow up action via the electronic Consumer Feedback system.

Staff are responsible for:

- Documenting complaints, concerns, compliments and/or suggestions via the electronic Consumer Feedback system when it is shown that a consumer has gone out of their way to provide feedback. Feedback includes verbal as well as written information; and
- Referring items to the relevant Executive Manager/Manager for follow up where appropriate.

## PROCEDURES

**Complaints/Concerns** - can be grouped into four broad categories although some will move through all four:

### A. Point of Service Complaints/Concerns

These are straightforward, often received verbally and can be dealt with promptly and to the consumer's satisfaction immediately with as little formality as possible. Sometimes all that is needed to resolve an issue is for the consumer to speak directly with the staff involved. Where an immediate response is inappropriate staff, where reasonable, will look to telephone the consumer within 24 hours. Verbal unresolved complaints/concerns might also require a written response.

Procedure:

1. Assess whether the issue can be dealt with immediately without referral. If yes, do so.
2. Did the consumer go out of their way to provide feedback? If yes document via the electronic Consumer Feedback system (Riskman).

NB: All copies of correspondence shall be entered into the electronic Consumer Feedback system (i.e. uploaded to Riskman).

### B. Complaints/Concerns requiring investigation

More serious or complex matters or unresolved complaints/concerns may need to be referred to a Manager where there is a need for investigation and a clear outcome identified. This may involve different levels within the organization.

Procedure:

1. Document via the electronic Consumer Feedback system (Riskman).
2. Refer to the relevant Manager for investigation and follow up.
3. The Manager will:
  - investigate and conduct follow up action. This will include communication in writing within 5 working days either in the form of:

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- a) an acknowledgement, if the issue is to be referred to an Executive Manager. (Attachment 1 provides acknowledgement examples. If you would like the acknowledgement sent from a generic email address, forward the details to the Executive Assistance who will respond via the [contact@glch.org.au](mailto:contact@glch.org.au) email), or
- b) the organisation's response if resolved at this point. Letters will:
- Confirm receipt of the complaint
  - Name the person who is dealing with the complaint and a contact number
  - Provide details of agency response or provide an expected resolution date
  - Information concerning the right to contact the Health Complaints Commissioner, Victims of Crime Commissioner (if in relation to a victim's assistance service) or NDIS Quality and Safeguards Commission (if in relation to an NDIS service)
  - and/or other relevant options
- document action via the electronic Consumer Feedback system (Riskman); and
  - refer to the relevant Executive Manager should the complaint/concern remain:
    - unresolved
    - involve serious consequences
    - involve complex health issues or a number of different staff
    - need action that is beyond the responsibility of the Manager
    - need to be dealt with by someone with more authority
4. The Executive Manager will:
- investigate and conduct follow up action. This will include communication in writing within 5 working days of the organisation's initial response. Letters will:
    - Confirm receipt of the complaint
    - Name the person who is dealing with the complaint and a contact number
    - Provide details of agency response or provide an expected resolution date
    - Information concerning the right to contact a higher authority
    - and/or other relevant options
  - document action via the electronic Consumer Feedback system (Riskman); and
  - refer to the CEO should the complaint/concern remain:
    - unresolved
    - involve serious consequences
    - involve complex health issues or a number of different staff
    - need action that is beyond the responsibility of the Executive Manager.

NB: Legal advice may be sought by the CEO or delegate. All complaints that may have an implication of litigation must be reported to the agency's insurer.

All copies of correspondence shall be entered into the electronic Consumer Feedback system (i.e. uploaded to Riskman).

### **C. External Complaints/Concerns**

These are complaints that are unresolved by the organization and need to be referred on to other authorities. Consumers will be provided with contact details should they deem existing outcomes as unsatisfactory.

#### Procedure

All correspondence relating to a lodged complaint is to be referred immediately to the CEO, who will follow procedure.

### **D. Compliments/Suggestions**

This category of consumer feedback requires review, acknowledgement and in some instances follow up action with either the consumer or staff, or both.

#### Procedure

On receipt of either a compliment or suggestion staff will:

1. Document via the electronic Consumer Feedback system (Riskman).



2. Refer to the relevant Manager to facilitate communication of feedback to staff.
3. The Manager will:
  - communicate feedback to staff;
  - conduct follow up action as necessary, documenting same via the electronic consumer feedback system.
4. Should the feedback involve a suggestion that requires follow up that is beyond the responsibility of the Manager the item is to be referred to the relevant Executive Manager.
5. The Executive Manager will:
  - investigate and conduct follow up action as necessary, documenting same in the electronic consumer feedback system;
  - refer to the CEO as necessary.

NB: All copies of correspondence shall be entered into the electronic Consumer Feedback system (i.e. uploaded to Riskman).

## DEFINITIONS

**Complaint:** an expression of dissatisfaction.

**Concern:** a matter of interest or importance.

**Compliment:** an expression of praise or admiration, either in words or by an action.

**Suggestion:** an idea or plan put forward for consideration.

## RISK

Refer GLCH Risk Register.

## RELATED DOCUMENTS

- Health Records Act (2001)
- Information Privacy Act (2000)
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- Privacy Policy
- Consumer Participation Policy

### Brief description of changes for historical purposes:

- Added section on LGBTIQ+ inclusive practice

### STAFF CONSULTED IN DEVELOPMENT / REVIEW:

	Name	Position	Unit / Service
<b>Document Owner:</b>		Chief Executive Officer	
<b>Lead Reviewer / Author:</b>			
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<b>Approved by:</b>	Executive Management Team		
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**Attachment 1. Example first response templates**

Dear .....

Thank you for your feedback, which we received on [insert date]

Your feedback has been forwarded on to an Executive Manager for investigation.

A response will be provided to you in due course.

Yours sincerely,

Dear .....

Thank you for your email, dated [insert date]

Your feedback has been forwarded on to an Executive Manager for investigation.

A response will be provided to you in due course.

Yours sincerely,

*Note: If you would like the acknowledgement sent from a generic email address, forward the details to the Executive Assistant to the CEO who will respond via the [contact@glch.org.au](mailto:contact@glch.org.au) email.*