

Feedback, Complaints, Grievance and Compliments Policy

<p>Applies to all employees and volunteers of Koorana Child & Family Services Limited (Koorana) who are employed on a permanent full time or part time basis or employed for contracted periods.</p> <p>Purpose: Addresses the rights and responsibilities of Koorana stakeholders when providing feedback, lodging a complaint or a grievance or making a compliment.</p>	<p>Version: 2</p>
	<p>Date approved: 23/02/2022</p>
	<p>Next review date: 23/08/2022</p>
	<p>Approved by: CEO</p>

Policy context: This policy relates to	
Standards or other external requirements	<ul style="list-style-type: none"> ▪ National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 <ul style="list-style-type: none"> - Schedule 1 (Core Module) Item 7 – Freedom from violence, abuse, neglect, exploitation or discrimination - Schedule 1 (Core Module) Item 9 – Governance and operational management - Schedule 1 (Core Module) Item 11 – Quality management - Schedule 1 (Core Module) Item 12 – Information management - Schedule 1 (Core Module) Item 13 – Complaints management and resolution - Schedule 1 (Core Module) Item 21 – Responsive support provision - Schedule 1 (Core Module) Item 24 – Safe environment ▪ Australian Children’s Education & Care Quality Authority (ACECQA) – National Quality Standards
Legislation or other requirements	<ul style="list-style-type: none"> ▪ National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 ▪ Privacy Act 1988 ▪ Education and Care Services National Regulations 168 (2)(0)
Contractual obligations	

Documents related to this Policy	
Related Policies and Documents	<ul style="list-style-type: none"> ▪ Governance, Management of Records and Confidentiality Policy ▪ Feedback, Complaints, Grievance and Compliments

	Register ¹ <ul style="list-style-type: none"> ▪ Privacy and Data Confidentiality Policy
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Definitions
<p>Koorana: Koorana Child & Family Services Limited.</p> <p>Complaint: An expression of dissatisfaction made to or about Koorana, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.</p> <p>Compliment: An expression of praise or admiration made to or about Koorana, our services or staff, based on a lived experience. ‘Mission moments’, the practice to showcase achievements, outcomes and comments from participants and their families, often includes compliments.</p> <p>Dispute: An unresolved complaint escalated either within or outside of Koorana.</p> <p>Feedback: Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Koorana, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.</p> <p>In this policy we use ‘feedback’ to mean all compliments, complaints, grievances, and feedback submitted by any of Koorana’s stakeholders.</p> <p>Feedback Officer: The designated senior manager who is the first port of call for all types of feedback and whose responsibility it is to assess and grade all feedback, to coordinate or prepare a response, and to manage the respective register and escalation protocol. The General Manager Corporate Services acts as the Feedback Officer at Koorana.</p> <p>Grading: All feedback is graded in alignment with Koorana’s Risk Framework: 1 Insignificant; 2 Minor; 3 Moderate; 4 Major and 5 Catastrophic.</p> <p>Grievance: A clear, formal written statement by an individual staff member about another staff member or a work-related problem.</p>

1. POLICY STATEMENT

A copy of this Feedback, Complaints, Grievance and Compliments Policy and a Feedback form will be made available to any stakeholder of Koorana immediately upon request. Copies of this policy and form are present in all Koorana premises and the policy is also viewable on the Koorana website.

Any stakeholder in Koorana has the right to provide feedback, complaints and compliments (henceforth ‘feedback’). Staff have a right to provide grievances, as well as feedback, compliments and complaints.

We will take all reasonable steps to ensure that people providing any kind of feedback are not adversely affected because of it.

We accept anonymous feedback; however, where this anonymous feedback constitutes a complaint, we may be limited in our ability to investigate or resolve the complaint. We will ensure that information about how and where feedback to or about Koorana can be provided is well publicised on our website. We will ensure that our systems to manage feedback are easily understood and accessible to everyone, particularly people who may require assistance.

Providing feedback to Koorana is free of charge.

All feedback is documented and dealt with in a reasonable time frame, keeping all parties affected by the feedback regularly informed. An initial response to feedback, where one is required, will be forthcoming within three (3) business days.

The purpose of documenting feedback is to enable continuous improvement to uphold Koorana’s quality management system. If there are aspects of Koorana that are going well, this assists us with

¹ See [03-POPR-Accident-Incident-Illness and Feedback-Complaints and Quality-Improvement Register - 2020](#)

strengthening and supporting that practice. If there are trends, common issues, or recurring concerns or suggestions, the executive management team must address those by seeking to identify the root cause, and recommending appropriate corrective action in consultation with the employees or teams involved, and where practicable with the person(s) providing feedback in order to avoid the issue from reoccurring.

2. TYPES OF FEEDBACK

The Feedback Officer will assess what type of feedback has been received and will direct it to the appropriate Koorana employee for action or escalate it if required.

The type of feedback received will differ in the way it is processed, but both contribute to the overall continuous quality improvement of Koorana.

Compliment or Feedback	Complaint or Staff Grievance
<ul style="list-style-type: none"> ▪ usually not in writing (but may be) 	<ul style="list-style-type: none"> ▪ usually in writing
<ul style="list-style-type: none"> ▪ usually not disputed 	<ul style="list-style-type: none"> ▪ record of it being made exists
<ul style="list-style-type: none"> ▪ not difficult to establish/resolve 	<ul style="list-style-type: none"> ▪ may be disputed
<ul style="list-style-type: none"> ▪ rarely with evidence 	<ul style="list-style-type: none"> ▪ difficult to establish/resolve
<ul style="list-style-type: none"> ▪ may not require formal action to be taken 	<ul style="list-style-type: none"> ▪ usually with some evidence
<ul style="list-style-type: none"> ▪ may be given anonymously 	<ul style="list-style-type: none"> ▪ requires formal action to be taken
	<ul style="list-style-type: none"> ▪ can be given anonymously, but identity of the complainant must be protected

3. PROCEDURE

a) How to provide feedback

Feedback can be provided to any Koorana staff member in person or in writing, online, via email to feedback@koorana.org.au or by using the Feedback, Complaints, Grievance and Compliments Form (available on Koorana's website or by request).

All stakeholders providing feedback of any kind will be encouraged to do so in writing, to avoid misunderstandings or false interpretations of verbal feedback. Where this is not possible, feedback may be provided in any way that suits the circumstances of the person providing it, including verbally, through an independent advocate or interpreter, by physical or electronic email, by drawing a picture and so forth.

For all written feedback, Koorana has a unique email address, which is received by the Feedback Officer only: feedback@koorana.org.au.

If feedback is given verbally, it is incumbent upon the staff member who received the feedback to prepare a written version of it and to forward it to the above email address within six (6) hours of receipt of the feedback.

Details of feedback provided are shared on a needs-to-know basis and wherever possible de-identified in line with the Australian Privacy Principles in the Privacy Act 1988.

In addition, the complainant is entitled to an independent advocate during the resolution of the allegation, in which case they may choose to engage a family member or friend. Koorana will offer to engage the services of the Complaints Resolution and Referral Service (CRRS) to act as an advocate for the complainant if this is their preference.

b) The process

All type of feedback will be sent to Koorana's Feedback Officer. The Feedback Officer oversees the feedback process. All feedback is logged in the Feedback, Complaints, Grievance and Compliments Register which is reviewed regularly by the Executive Management Team (EMT). Feedback with Grade 3, 4 or 5² will be tabled at the next meeting of the Stakeholder Feedback Committee, and

² Feedback is graded in alignment with Koorana's Risk Framework: 1 Insignificant; 2 Minor; 3 Moderate; 4 Major and 5 Catastrophic. Feedback with Grade 1 and 2 is not normally escalated.

feedback graded 4 and 5 will also be presented to the Board of Directors at the earliest possible opportunity.

Personal details of the people affected by all and any feedback is disclosed on a needs-to-know basis only. For the purpose of the work of the EMT, Stakeholder Feedback Committee and the Board of Directors, all feedback will be presented de-identified.

i) Feedback

The employee receiving any verbal feedback will transcribe it – either into the Feedback Form or any other written format – and forward it to the Feedback Officer. Where appropriate, an acknowledgement will be provided to the person providing feedback, either by the Feedback Officer or the respective line manager, including any steps taken to address the matter of the feedback.

The Feedback Officer records all feedback in the Feedback, Complaints, Grievance and Compliments Register, where it serves to analyse trends by the EMT and the Stakeholder Feedback Committee.

ii) Compliments

Compliments are important as they demonstrate that the people and culture of Koorana are achieving organisational objectives. Recording compliments and sharing them with the team, is as important as managing feedback and complaints.

The employee receiving a verbal compliment will transcribe it – either into the Feedback Form or any other written format – and forward it to the Feedback Officer. Where appropriate, an acknowledgement will be provided to the person who made the compliment, either by the Feedback Officer or the respective line manager.

Compliments are also recorded in the feedback register and presented to the Stakeholder Feedback Committee. Analysis of the compliment will be used to enhance service delivery and upskill employees.

iii) Complaints and Staff Grievances

Koorana encourages complainants to discuss their concerns directly with the person in question and seek to agree a resolution of the matter in the first instance. Koorana employees are encouraged to try to resolve complaints when they are first raised, and to consult their manager about potential resolution strategies, which may assist in resolving the issue in the first instance (e.g., cancelling charges for an appointment if this is fair and gives a client the benefit of the doubt for the first instance).

A notification of the Feedback Officer is required regardless and even if this process results in the satisfactory resolution of the complaint. This helps in documenting good feedback and complaints practice across the organisation.

In the instance that the complainant is dissatisfied with the outcome achieved by this means, is uncomfortable to pursue that conversation, or in circumstances where the resolution is perceived to be inadequate, the matter will be referred to the Feedback Officer and it will automatically be treated as a complaint.

In cases where the feedback is found to be a complaint it will be immediately treated as such by the Feedback Officer and a formal resolution process initiated. This will include:

- allocating the matter to the relevant manager within the business to manage the below:
 - clarification of the concerns and any circumstances giving rise to the concerns;
 - investigating these concerns;
 - implementing any resolution actions as appropriate; and

- providing regular updates to the complainant every 2-3 days or more frequently, as necessary.

Further to this, the Feedback Officer will:

- oversee the process;
- prepare and deliver a formal response to the complainant within 15 days.

Koorana will provide the complainant with a written response to any formal complaint, and with a written report on the outcome of any complaint. The person will be provided with support in understanding the outcomes (and any subsequent action taken), if required.

In the event that the person providing feedback is still dissatisfied with the outcome, the Feedback Officer will review and take further action as required.

If the individual is still dissatisfied, the Feedback Officer will consult with the CEO.

Additional resolution actions will be directed by the CEO in this case and discussed with the complainant.

If the complainant is still dissatisfied, they may ask for a final review. In this case, the CEO will consult the Board on any additional resolution actions the organisation is able to take. The CEO will pass on additional resolution actions to the complainant.

If the person continues to be dissatisfied with the outcome of these proceedings, they will be encouraged to take their complaint to the NDIS Quality and Safeguards Commission or the NSW Ombudsman's office. They may seek support from a friend, a family member or an independent advocate in making a complaint.

a. Escalation of feedback

Any feedback of a serious or criminal nature, severe physical or emotional distress, reoccurring unacceptable behaviour, allegations of abuse, discrimination, neglect or exploitation constitutes a Grade 4 or 5 complaint and will immediately be escalated to the CEO.

In the instance that the complaint is levelled against the CEO, it is immediately escalated to the President of the Board.

All reports of alleged criminal nature, of abuse, neglect or exploitation is deemed a reportable incident and Koorana will comply with all statutory reporting requirements.

Koorana's management, Board sub-committees, and Board also review all forms of feedback on a regular basis to inform quality management systems and improvement within Koorana.

b. Communication and Rights

Koorana will keep the person informed of the progress and any action taken regarding the investigation of their feedback either verbally or in writing.

The person, if a participant or family, will continue to receive Koorana services as usual, unless they decide to withdraw themselves from the service. Alternative arrangements will be made if a complaint is against their existing teacher or allied health professional.

Koorana gives an unequivocal undertaking that lodging a complaint or providing feedback will not affect service delivery in any way whatsoever, and that no adverse action shall be taken against a participant or other client of Koorana as a result of a complaint.

In the case of a serious allegation made against a Koorana employee, that employee may be placed on administrative leave with pay for the duration of the complaints process, in accordance with applicable policies and pieces of legislation.

4. DOCUMENTATION AND ANALYSIS

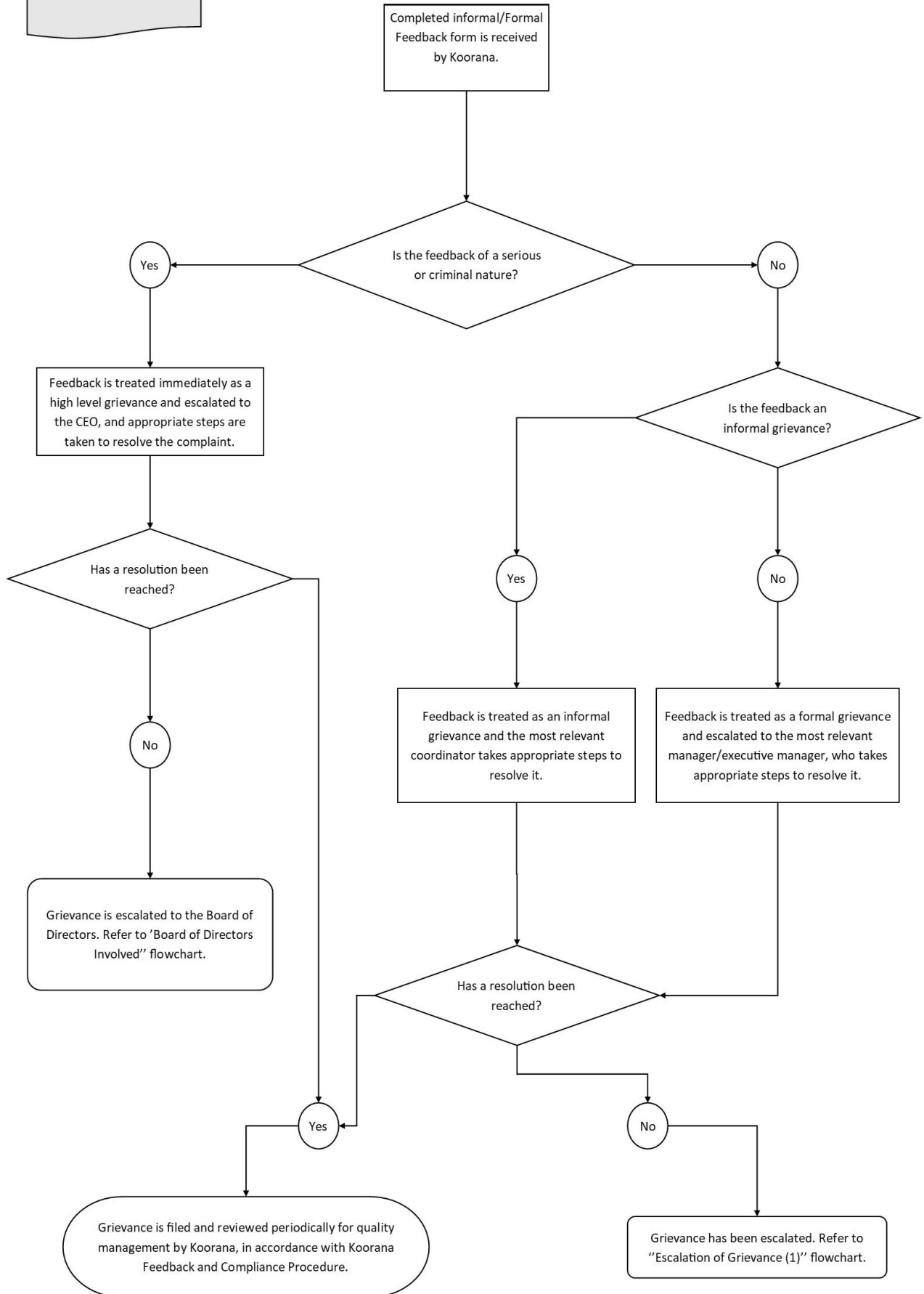
All feedback received is logged in the Feedback, Complaints, Grievance and Compliments Register, where it is graded and where outcomes are also recorded. The register forms the basis of analysis and reporting to the EMT, Stakeholder Feedback Committee and Board, where necessary.

The Feedback Officer is responsible for maintaining the register, and for maintaining a cover sheet with all documentation pertaining to each instance of feedback. This assists in identifying trends and managing all feedback equally.

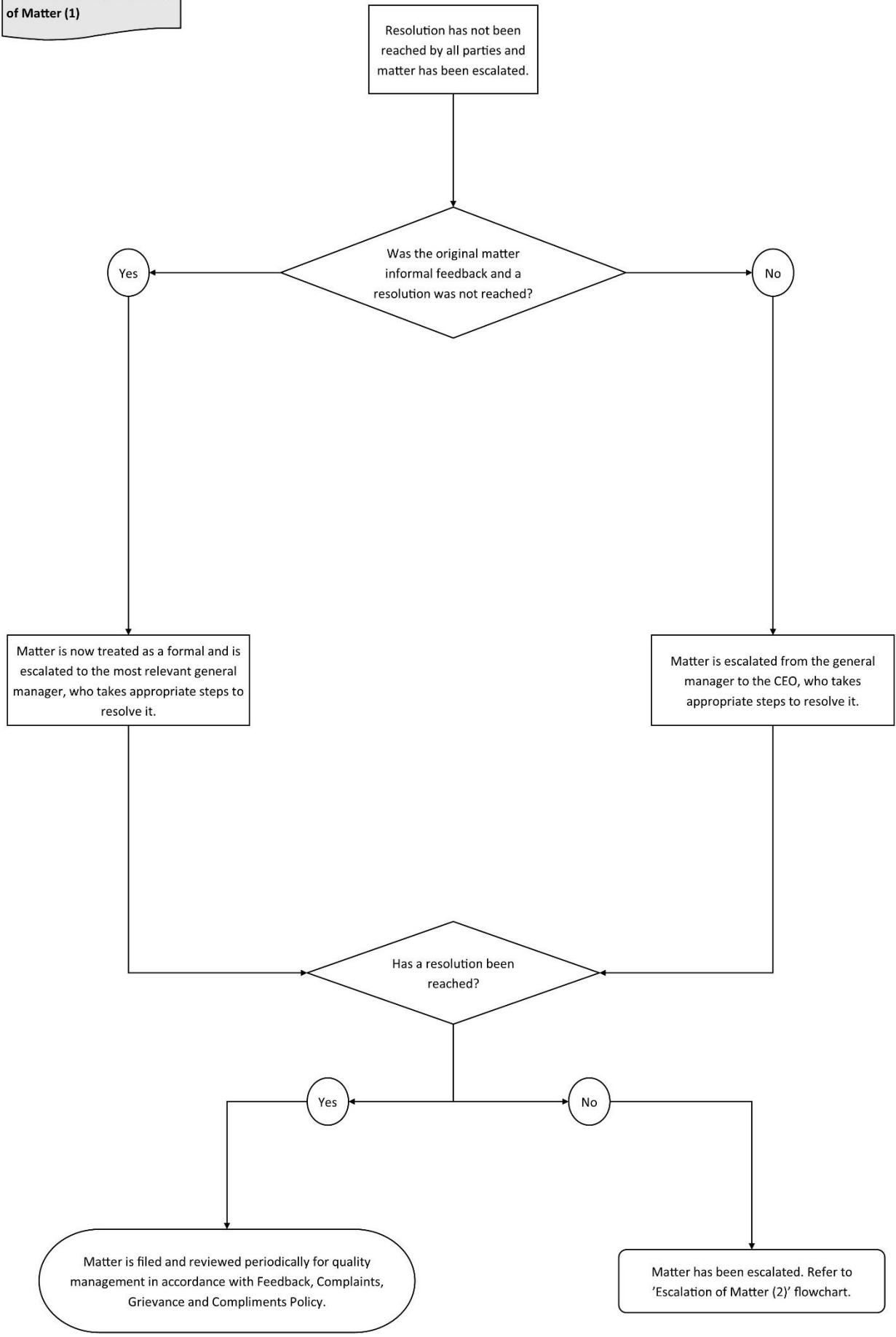
Feedback received by Koorana is analysed monthly. An analysis of any follow up action taken in response to feedback will also be reviewed quarterly to ascertain whether it has had the desired effect. Monthly analysis and reporting is provided to the Board. All names are kept confidential and all information is de-identified.

5. PROCESS MAPS

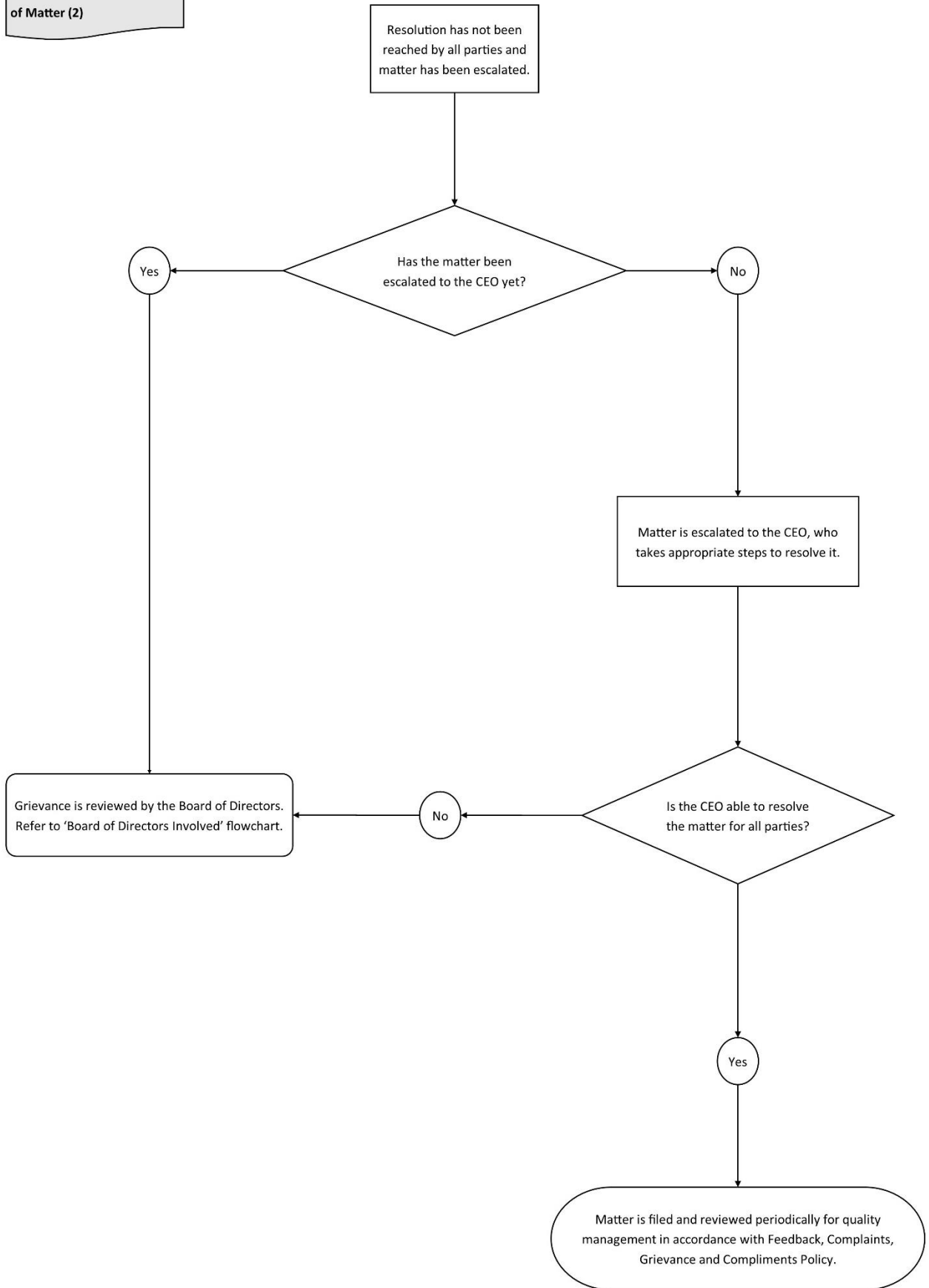
Feedback Process: First Steps

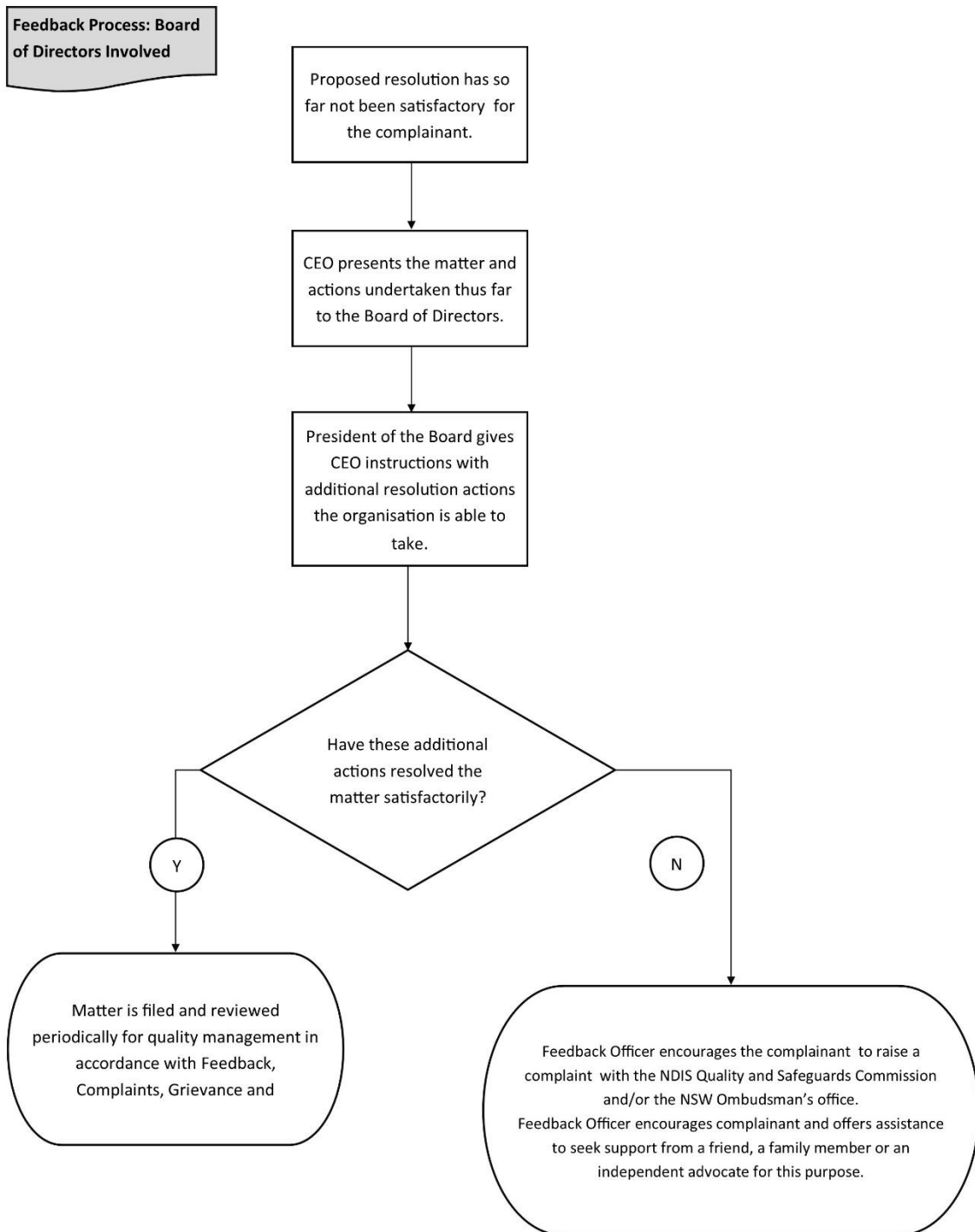


Feedback Process: Escalation of Matter (1)



Feedback Process: Escalation of Matter (2)





Feedback, Complaints, Grievance and Compliments Form



Please ask us if we can help you fill in this form.



You may use this form if you are unhappy about something.



You may use this form to tell us if something makes you happy.



One of our managers will contact you to respond, or to arrange a meeting with you, if whichever you prefer.



Please let us know if you want one of our managers to call you.

What is your phone number?



Please let us know if you want to speak with one of our managers in person.

If you have a particular one in mind, please tell us who.



If you want to tell us your name, write it down here, please.

Please turn the page over.





Do you want to tell us something that makes you unhappy?



Do you have an idea how we can make something better?



Do you want to tell us about something we did well?



You may give this form to a Koorana employee.



**Or you may post in to:
Koorana, PO Box 403, Belmore NSW 2192**



**Or you may email it to:
feedback@koorana.org.au**

Complaints Register File Cover³

Record No		Date of Complaint	
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Type	
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Grading	
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Complaint lodged by	
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Role	
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Recorded by	
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Primary issue	
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Date of response		Open or closed?	
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Notes	
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Outcome	
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³ See [03-POPR-Accident-Incident-Illness and Feedback-Complaints and Quality-Improvement Register - 2020](#)