

FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

1. POLICY STATEMENT

- 1.1 Open Minds encourages clients and those involved in their lives to provide feedback, including compliments and complaints, in relation to any aspect of Open Minds' service delivery. The effective management of feedback is essential for improvement of Open Minds services and prevention of adverse outcomes, for existing and potential clients.
- 1.2 This policy explains how Open Minds manages feedback, positive, negative or otherwise; and responds to complaints

2. PURPOSE

2.1 The purpose of this policy is to:

- 2.1.1 Outline Open Minds commitment to addressing feedback in a timely and professional manner, which is compliant with legal and contractual requirements.
- 2.1.2 Outline how Open Minds' clients, their families, Guardians, or other stakeholders can:
 - (a) provide general feedback on any aspect of Open Minds service delivery;
 - (b) compliment any aspect of Open Minds service delivery;
 - (c) raise concerns or submit a Complaint about any aspect of Open Minds service delivery.
- 2.1.3 Provide a mechanism for Open Minds to identify and implement service improvement strategies where needed as a result of feedback.
- 2.1.4 Facilitate mechanisms to recognise and support people who are vulnerable and/or have particular needs (e.g. related to cultural, language, disability, sexuality, gender) to receive appropriate information and assistance to navigate process for providing feedback (positive, negative or otherwise) and for making a complaint.

3. SCOPE

- 3.1 This policy applies to Feedback, Compliments and Complaints relating to all client service delivery by Open Minds.
- 3.2 This policy does not apply to the raising of concerns or grievances by Open Minds staff or to complaints which fall under the Whistleblower Policy.
- 3.3 All Open Minds staff, Board members, students, contractors and volunteers are required to comply with this policy.

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 1 of 6

FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

4. DEFINITIONS

Commonly defined terms are located in Open Minds’ Policy Framework Policy. Reference to specific employment positions are found in the Open Minds Organisational Structure if not defined below. The following definitions apply for the purpose of this Policy:

Feedback – Any information received directly or indirectly, explicitly or implicitly, about Open Minds, its service delivery or staff, including opinions, comments, suggestions, and expressions of interest or concern.

Compliment – information received by Open Minds about something that has been done well and/or satisfaction with services received.

Complainant- Person making a Complaint. This includes clients and their representatives (such as carers, Guardians, family members, friends and advocates), and other stakeholders.

Complaint – Expression of dissatisfaction made to or about Open Minds, related to services, staff or the handling of a Complaint, where a response or resolution is explicitly or implicitly expected, or legally required.

Significant Complaint – a Complaint relating to service delivery or management that alleges a possible breach of legislation, raises an issue of safety or wellbeing of a client/s or staff, or may impact the reputation of Open Minds.

Feedback System- Encompasses all aspects of the policies, procedures, practices, staff, hardware and software used by the company for the management of Feedback.

Feedback, Compliments and Complaints Officer- a designated role in Open Minds which will be held by an Executive Leadership Team (ELT) member or Senior Manager, as nominated by the CEO.

Guardian – a nominated person under the Guardianship and Administration Act 2000 (Qld) , Guardianship Act 1987(NSW) or equivalent legislation) who has been appointed and authorised to act as the substitute decision maker for the client.

5. PRINCIPLES

5.1 The following principles apply when interpreting and applying this policy:

- 5.1.1 The Feedback System will be transparent, visible and accessible to people in scope of this policy.
- 5.1.2 The Feedback System aims to identify areas of concerns, things we do well and opportunities for improvement across all Open Minds services, and for these to be acknowledged, reported, documented and addressed as required in a timely manner.
- 5.1.3 Responses to feedback, compliments and complaints are objective, ethical, effective and unbiased with the aim of achieving a satisfactory and prompt resolution.
- 5.1.4 All clients and their representatives (such as carers, Guardians, family members, friends, and advocates), as well as stakeholders, have a right to provide Feedback or make a Complaint about any aspect of Open Minds' service delivery. All persons providing Feedback, including

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 2 of 6



FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

Complainants, will be treated with respect by Open Minds staff, and will not be adversely affected because they have provided Feedback or made a Complaint.

6. POLICY

6.1 Inviting Feedback, Compliments and Complaints

- 6.1.1 Open Minds values active and meaningful engagement and participation by people with a lived experience, and respects their right and freedom to give feedback about all aspects of Open Minds Service Delivery.
- 6.1.2 A range of opportunities exist for clients and their representatives, as well as stakeholders, to provide feedback, as outlined in the Client and Family Participation and Engagement Policy and this Policy.
- 6.1.3 Feedback and other information are reviewed with the aim of integrating this into Open Minds' quality improvement processes where relevant.
- 6.1.4 It is contrary to the values of Open Minds for anyone to retaliate or discriminate against a person in response to them providing Feedback, Compliments and Complaints. Any staff member who retaliates against someone who has given feedback may be subject to disciplinary action in accordance with relevant Open Minds policies.

6.2 Internal awareness of the Feedback system

- 6.2.1 Open Minds aims to ensure that staff, students, Board members, volunteers and contractors are aware of and have access to this policy and related documents to enable them to appropriately advise and support those providing feedback, through:
 - (a) Induction, orientation and mandatory training programs;
 - (b) availability of policies, procedures and Practice Manuals on the intranet;
 - (c) the Open Minds Feedback Brochure;
 - (d) Information on the Open Minds website;
 - (e) line management and supervision;
 - (f) advice from the Feedback, Compliments and Complaints Officer where required.

6.3 Feedback

- 6.3.1 Feedback may be shared with staff/ teams they relate to, used to improve service delivery where applicable and acknowledged through reporting processes.

6.4 Compliments

- 6.4.1 Compliments may be shared with staff/ teams they relate to, where applicable to acknowledge and give recognition.

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 3 of 6

FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

6.5 Complaints and Complaints management

- 6.5.1 Open Minds is committed to resolving Complaints relating to Open Minds services as promptly and effectively as possible.
- 6.5.2 There may be situations where a Complainant acts unreasonably in seeking to have their Complaint addressed, with behaviours such as aggression, abusive language, arguments, persistent, unacceptable contact or lack of cooperation.
- 6.5.3 Open Minds supports staff to determine the right strategies for managing unreasonable conduct fairly, ethically and reasonably.
- 6.5.4 Unreasonable behaviour should not preclude valid issues being addressed.

6.6 An accessible process

- 6.6.1 The Feedback System has been designed to meet the needs of a diverse client group, including people who have increased vulnerability to abuse, neglect and exploitation. Open Minds aims to ensure the feedback process is accessible to all clients and their family, carers and stakeholders, particularly those who require assistance to understand and/or submit feedback.
- 6.6.2 Clients, their representatives and other stakeholders have access to information, support and a safe environment in which to communicate Feedback, a Compliment, or a Complaint. Clients should be assisted to understand/access advocacy services and advised of their right to engage a support person to assist them in providing feedback.
- 6.6.3 Information on the Feedback System is widely accessible, including prominent displays at Open Minds' offices, information on our website, information at service commencement; reviews and ad hoc as required.

6.7 Notification to Statutory and Funding Bodies

- 6.7.1 Open Minds complies with external reporting in accordance with legal, regulatory or contractual obligations.

6.8 Confidentiality

- 6.8.1 Feedback, Compliments and Complaints will be dealt with sensitively and confidentially, ensuring the client's privacy and dignity is respected at all times.
- 6.8.2 Potential Complainants should be advised of their right to submit a Complaint anonymously, or without reference to a particular client, but should be informed about how this may impact on the ability to investigate and respond to the situation.
- 6.8.3 Collation of Complaints data for reports for the purposes of analysing trends and quality improvement should be de-identified to maintain privacy and confidentiality of clients and Complainants.

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 4 of 6

FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

7. ROLES AND RESPONSIBILITIES

POSITION	ROLE	RESPONSIBILITY
BOARD OR DELEGATE	Approve	Authorised to approve this Policy and any subsequent amendments to this Policy
CEO OR DELEGATE	Owner	Accountable and responsible to: <ul style="list-style-type: none"> - ensure that this Policy is implemented and communicated; - issue procedures or documents to support the operation of this Policy; - receive and consider suggested improvements - ensure this policy and related documents are reviewed within required timeframes or earlier as required.
CEO OR DELEGATE	Review	Accountable and responsible to ensure this policy is reviewed as per this Policy or as required.
FEEDBACK OFFICER	Implement	Responsible to: <ul style="list-style-type: none"> - Providing advice and support to stakeholders in the exercise of their obligations under this Feedback, Compliments and Complaints Policy & Procedure; - Monitoring and reviewing the ongoing effectiveness of the procedure; and - Reporting issues of concern or opportunities for Improvement to relevant stakeholders.

8. RELATED LEGISLATION AND STANDARDS

List the title, year and jurisdiction of relevant legislation, regulations or standards

LEGISLATION AND/OR REGULATIONS
Disability Services Act 2006 (Qld)
Disability Services Act 1986 (Cth)
Disability Inclusion Act 2014 (NSW)
Human Rights Act 2019 (Qld)
Australian Human Rights Commission Act 1986
Australian Privacy Principles – Privacy Act 1988
Guardianship and Administration Act 2000 (Qld)
Guardianship Act 1987(NSW)
National Disability Insurance Scheme Act 2013 (Cth)
Mental Health Act 2016 (Qld)
Mental Health Act 2007 (NSW)
Mental Health Act Regulation 2019 (NSW)

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 5 of 6

FEEDBACK, COMPLIMENTS & COMPLAINTS POLICY

STANDARDS	
NDIS	National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018
NDIS	NDIS Practice Standards and Quality Indicators
NSMHS	National Standards for Mental Health Services
ISO	ISO10002:2018 Customer Satisfaction Guidelines for complaint management in organisations
NDIS	National Disability Insurance Scheme (Complaint Management and Resolution) Rules 2018
WHS	AS/NZS 4801:2008 Occupational Health & Safety Management Systems

9. COMPLIANCE AND REPORTING MEASURES

Feedback Report is provided:

- 9.1 Monthly to the Board and quarterly to the Service and Clinical Governance Committee via the General Manager People, Quality and Safety.
- 9.2 Significant breaches or Complaints will be escalated to the CEO by the relevant Executive Leadership Team member or their delegate as required.

10. KEY RELATED DOCUMENTS

DOC TYPE OR ID	DESCRIPTION / NAME
PRO04.01	Feedback, Compliments and Complaints Procedure
P03.01	Client and Family Participation and Engagement Policy
PRO09.32	Preventing and Responding to Abuse, Neglect and Exploitation Procedure
P05.01	Advocacy Policy
P02.24	Privacy and Confidentiality of Information Policy

11. POLICY REVIEW

This Policy should be reviewed, at a minimum, every three years, or updated more regularly where circumstances require.

Doc No.	Issue	Date Approved	Authority Level	Page
P04.01	B	09/2020	Board	Page 6 of 6