

FEEDBACK & COMPLAINTS POLICY

1. POLICY STATEMENT

- 1.1. LotUs Assist encourages participants and those involved in their lives to provide Feedback, including Compliments and Complaints, in relation to any aspect of LotUs Assist service delivery. The effective management of Feedback is essential for improvement of service delivery and prevention of adverse outcomes, for existing and potential participants.
- 1.2. This policy directs how LotUs Assist will comply with legislation and standards relating to our management of Feedback, to ensure that all Feedback received is appropriately addressed, with changes in service delivery being made where necessary.

2. PURPOSE

The purpose of this policy is to:

- 2.1 Outline LotUs Assist commitment to addressing Feedback in a timely and professional manner, which is compliant with legal and contractual requirements
- 2.2 Ensure that LotUs Assist participants, their families, Guardians or other stakeholders can:
 - provide general Feedback on any aspect of LotUs Assist service delivery;
 - make a Compliment about any aspect of LotUs Assist service delivery;
 - raise concerns, discuss or submit a Complaint about any aspect LotUs Assist of service delivery.
- 2.3 Advise on options to elevate an issue where a person raising an issue or making a Complaint is not satisfied with the outcome, or where an informal resolution process is not suitable.
- 2.4 Ensure that LotUs Assist identifies and implements service improvement strategies where needed as a result of Feedback.
- 2.5 Ensure mechanisms are in place 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 the Complaints process.

3. SCOPE

- 3.1 This policy applies to Feedback relating to participant service delivery by LotUs Assist.
- 3.2 This policy does not apply to the raising of concerns or grievances by a member of LotUs Assist staff.
- 3.3 All LotUs Assist staff, contractors and volunteers are required to comply with this policy.

4. DEFINITIONS

Commonly defined terms are located in LotUs Assist' Policy Framework Policy. Reference to specific employment positions are found in the LotUs Assist 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 the organisation, service delivery or staff, including opinions, comments, suggestions, Compliments, Complaints, and expressions of interest or concern.

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

Complainant- Person, organization or their representative (including participants, carers, Guardians, stakeholders) making a Complaint

Complaint – Expression of dissatisfaction made to or about the organization, related to services, staff or the handling of a Complaint, where a response or resolution is explicitly or simplicity 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 participant/s or staff, or may impact the reputation of LotUs Assist.

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

Feedback Officer- a designated role in LotUs Assist which will be held by an ELT member or Senior Manager, as nominated by the Director.

Guardian – a nominated person under the *Guardianship and Administration Act 2000* who has been appointed and authorised to act as the substitute decision making for the participant.

5. PRINCIPLES

The following principles apply when interpreting and applying this policy.

- 5.1 The Feedback management system will be transparent, visible and accessible to people in scope for this policy.
- 5.2 All participants, carers, Guardians, stakeholders have a right to complain about any aspect of service delivery. All Complainants and participants will be treated with respect by staff, and will not be adversely affected because of making a Complaint.
- 5.3 The Feedback management system will ensure that any issues are identified, acknowledged, reported, documented and addressed in a timely manner.
- 5.4 Responses to Feedback and Complaints are objective, ethical, effective and unbiased with the aim of achieving a satisfactory and prompt resolution.

6. POLICY REQUIREMENTS

6.1 Inviting Feedback to improve service delivery

- 6.1.1 LotUs Assist values active and meaningful engagement and participation by people with a lived experience, who are included in activities which support the achievement of the organisations strategic direction, service co-design and evaluation of existing services. A range of opportunities exist within LotUs Assist to provide both positive and critical Feedback. Feedback and other information provided by participants or other stakeholders is reviewed and integrated into LotUs Assist' quality improvement processes.

6.2 Internal awareness of the Feedback and Complaints system

- 6.2.1 LotUs Assist will 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 and Complaints, through:
 - Induction, orientation and mandatory training programs;
 - availability of policies, procedures in the intranet 'virtual library';

- the LotUs Assist Feedback Brochure;
- Information on the LotUs Assist website;
- line management and supervision;
- advice from the Feedback and Complaints Officer where required.

6.3 Compliments

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

6.4 Complaint management

- 6.4.1 LotUs Assist is committed to resolving issues relating to service delivery as promptly and effectively as possible, through a three- level system of resolution which is described in the “Feedback & Complaints Procedure: Participant Service Provision”

6.5 An accessible process

- 6.5.1 The LotUs Assist Feedback System has been designed to meet the needs of a diverse participant group, including people who have increased vulnerability to abuse, neglect and exploitation. LotUs Assist will ensure the Complaints process is accessible to all participants and their family, carers and stakeholders, particularly those who require assistance to understand and/or submit a Complaint.
- 6.5.2 Participants and other Complainants are to be provided with information, support and a safe environment in which to communicate about a Complaint. Participants should be assisted to understand/access advocacy services and advised of their right to engage a support person.
- 6.5.3 Information on the Feedback process will be widely accessible, including prominent displays at LotUs Assist’ offices, information on our website, information at service commencement; annual reviews and ad hoc as required.

6.6 Notification to Statutory and Funding Bodies

- 6.6.1 LotUs Assist will comply with external reporting in accordance with legal, regulatory or contractual obligations.

6.7 Unreasonable Conduct by Complainants

- 6.7.1 There may be situations where a Complainant acts unreasonably in seeking to have their concerns addressed, with behaviours such as aggression, abusive language, arguments, persistent, unacceptable contact or lack of cooperation.
- 6.7.2 Where a staff member believes that a Complainant’s conduct is unreasonable, the manager responsible will review the situation. If the concern about unreasonable behaviour is substantiated, staff will be supported to determine the right strategies for managing such conduct fairly, ethically and reasonably.
- 6.7.3 LotUs Assist will ensure that unreasonable behaviour does not preclude valid issues being addressed.

6.8 No retaliation

- 6.8.1 It is contrary to the values of LotUs Assist for anyone to retaliate or discriminate against a person in response to them raising a Complaint or grievance. Any employee who retaliates against someone who had made a Complaint or grievance

may be subject to disciplinary action in accordance with relevant human resources policies.

6.9 Confidentiality

- 6.9.1 Complaints will be dealt with sensitively and confidentially, ensuring the participant's privacy and dignity is respected at all times. Potential Complainants should be advised of their right to submit a Complaint anonymously, or without reference to a particular participant, but should be informed about how this may impact on the ability to investigate and respond to the situation.
- 6.9.2 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 participants and Complainants.

7. POLICY APPROVER

The LotUs Assist CEO is authorised to approve this policy and any subsequent amendments.

8. POLICY OWNER

The Feedback Officer is accountable and responsible for ensuring that this policy is implemented and communicated and to issue (or sub delegate responsibility for issuing) procedures or other processes to support the operation of this policy.

9. GOVERNING LEGISLATION AND STANDARDS

- Disability Services Act 2006 (Qld)
- Disability Services Act 1986 (Commonwealth)
- Guardianship and Administration Act 2000
- Human Services Quality Framework
- National Standards for Mental Health Services (2010)
- ISO9001:2008 Quality management systems - Requirements
- ISO10002:2014 Guidelines for complaint management in organizations
- NSW Mental Health Act (2007) No 8. and amendments
- Mental Health Act Regulation 2013

10. POLICY COMPLIANCE AND REPORTING MEASURES

A Feedback Report is provided:

- Monthly to the Operations Management
- Quarterly to the Leadership Team (LT)
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Significant breaches or Complaints will be escalated to the Director by the relevant LT member or their delegate as outlined in the Service Delivery Feedback and Complaints Procedure.