

Feedback & Complaints Management

POLICY AND PROCEDURE

1. Purpose

The purpose of this policy is to ensure that incidents involving Subee Pty Ltd's client's, staff and stakeholder are responded to, reported, investigated and finalised in a transparent, effective and timely manner, and in accordance with legislative and contractual requirements

The ultimate aim of feedback and incident reporting is to learn from events and improve services to clients and client outcomes.

2. Scope

This policy applies to all staff and clients of Subee as well as the general public.

The policy applies to all formal and informal feedback (complaints and compliments) that sit outside of the incident process.

Feedback may be internal or external.

Feedback is considered a vital part of continuous quality improvement and should be received and acted upon without prejudice and in good faith, regardless of the content.

Feedback may trigger the incident process at the discretion of the receiving manager.

3. Relevant Standards and Legislation

Aged Care Act 1997, The New Aged Care Standards 6 Feedback and Complaints & Standard 8 Organisational Governance.

The National Disability Insurance Scheme Rules 2018, Practice Standard 2 Provider Governance and Operational Management

National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018

National Disability Insurance Scheme Act 2013, s 73Z (4) and s 16 of the NDIS (Incident Management and Reportable Incident) Rules

Australian Community Industry Standards (ACIS) 2018, Standard 2.5

4. Definitions

Complaint – An expression of dissatisfaction with the level or quality of service, conduct of an employee, or the application of policies and procedures that affect service delivery.

Compliment – An expression of satisfaction around service delivery which may focus on exemplary employee conduct or commitment, efficiency, accessibility or responsiveness.

Compliments reflect expectations that have been exceeded.

Incident – An Incident is defined as a specific event or deviation from procedure that may result in injury (minor or major) or death; or damage to private or

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public property, and as such requires resolution and/or reporting.

If the receiving manager decides that the complaint is an incident, they are responsible for implementing the incident process.

nature of the feedback and in line with policies around mandatory reporting (refer to relevant policies here?).

In all instances feedback is assumed to be a positive consequence of service delivery in that it supports continuous improvement of processes.

5. Procedure

For the purposes of this policy a client is defined as a direct client of Subee Pty Ltd, T/As Banana Coast Home Nursing & Respite, Newlake Health Services & Beeall Domestic Services and Minor Home Modifications (Subee) (including their nominated representative), one that is brokered through a third party, or a service provider.

All employees are responsible for knowing and following this procedure.

Subee has a policy of maintaining clear communication channels for feedback of any nature. Clients, potential clients, service providers and any community stakeholders can provide feedback via the Subee website, the Client Feedback form, verbally or by email. Feedback may also be reported verbally by staff as a result of direct client contact. Feedback may be anonymous in nature, relate to a specific incident or client, or be generic. It may also result from client surveys initiated at least annually. Feedback does not automatically constitute the raising of an incident record.

All feedback is to be treated confidentially, within and outside of the business. Information is shared internally strictly on a need to know basis that supports resolution and continuous improvement. All feedback is acted upon without prejudice and in good faith, regardless of the

6. Reporting System

Client and Service Provider Feedback forms are disseminated as part of Subee Information Pack, upon request or as online contact form accessible on the website. Feedback is encouraged at every opportunity within the service delivery process. Clients and service providers are given several clear options to provide feedback including:

- in writing on the Client and Service Provider Feedback form
- verbally or via email – information should be recorded on the Client and Service Provider Feedback form, Incident Report, client/employee record whichever is more appropriate.
- Informal feedback taken verbally can be recorded on the client/employee record should be reported to the Service Coordinator or Operations Manager
- as part of the annual survey and evaluation process (or more frequently as required)
- using the contact form on the website

Clients and service providers may choose to speak to:

- any staff member they are comfortable discussing their concerns with
- alternatively, to speak directly with the Senior Management Team.

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Contact details are provided on the Client and Service Provider Feedback Form and on the website. Support Workers are encouraged to pass on both formal and informal feedback. This may coincide with the Incident Reporting Process.

Incident Register. The register is a key reporting mechanism for management reviews and CQI.

Once received the process is as follows:

- All feedback is to be passed onto the responsible senior staff member. In the first instance this is the Roster Coordinator or Site Service Coordinator who will escalate, manage or delegate as necessary as an 'Incident'.
- An Incident is defined as a specific event or deviation from procedure that may result in injury (minor or major) or death; or damage to private or public property, and as such requires resolution and/or reporting.
- All incidents of an urgent nature (those which put the client, staff or business at risk) should be escalated to the Senior Management Team immediately.
- An incident report form should be filled out by the receiving staff member and the process on the form followed.
- Client and service provider surveys are conducted annually, or more frequently as directed by the Operations Manager (OM) or Company Director (CD). They are managed by the Quality Manager and are underpinned by the same assumptions of other types of feedback. Survey outcomes are reported directly to the OM and CD.
- All complaints, compliments, incidents and the like, regardless of the reporting method and the site, should be recorded centrally on the TRACK

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Resolution

Note, that for the purposes of this policy, the completion of a Client and Service Provider Feedback form does not necessarily indicate an incident or involve a resolution process. This additional step is initiated at the discretion of the Senior Management Team.

All processes involving record keeping and the collection and storage of personal and sensitive information should be read in conjunction with the Privacy Policy.

It is the responsibility of the Senior Management Team to ensure all records are managed in a timely manner and closed only upon satisfactory resolution.

- Resolution is achieved only when the client, staff member or any other stakeholder is advised in writing or verbally
- If the client or other party is not happy with the resolution, refer them to the Operations Manager.
- If the matter is still not resolved, it is Subee's responsibility to advise stakeholders of opportunities for further recourse such as the Disability Advocate, police and government agencies.

Review System

Incident reports, Corrective Action and Non-Conformance Reports are recorded on Subee's Quality and Information System (TRACK).

Incident reports and action plans are discussed at Management Quality Review meeting held at least bimonthly.

The Quality & Safety Co-ordinator is responsible for capturing information on the Incident Register. Trends and gaps in services that need reviewing can be obtained from TRACK reports.

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Relevant Documentation

- Client and Service Provider Feedback Form
- Incident Reporting Process
- Feedback Policy
- Privacy Policy
- Confidentiality Policy
- Advocacy Policy

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