

Title: FEEDBACK, COMPLAINTS AND COMPLIMENTS	REF NO: BHCC SERVICE 01 Page 1 of 7 Page/s
Organisation: Bridges Health & Community Care Ltd	Distribution: All Facilities
Approved by: Sharon Sarah Chief Executive Officer	Responsible for Review: Quality Manager

VERSION CONTROL

Original Date	Version Number	Description of Changes Made	Who By	Date	Next Planned Revision Date
01/2020	1.0	New Policy and Procedure	Quality Manager	01/2020	01/2024
	2.0	Full review	Quality Manager	11/2020	11/2024
	3.0	Full review Change to name of Policy and Procedure Purpose amended and updated. Addition of Definitions Change in Procedure Change in Responsible Persons Updated related Documents and Forms Updated References	Quality Risk and Compliance Manager	12/2023	12/2024
	3.0	Updated references and related documents to include NDIS (Complaints Management and Resolution) Rules 2018 and Complaints Handling Guidance for NDIS Providers	Quality Risk and Compliance Manager	02/2024	02/2026

1.00 Purpose

Bridges Health & Community Care Ltd (BHCC) is committed to providing quality services to Service Users. This policy is intended to ensure that BHCC handles feedback, complaints and compliments fairly, efficiently, and effectively and in accordance with the *Human Right Act 2019* (Qld). We recognise that an essential part of this commitment is ensuring that our Service Users and their families and guardians have ways of providing us with feedback and holding us accountable. This policy provides guidance to our staff and Service Users.

2.00 Scope

This policy/procedure applies to all employees and vocational placements of Bridges Health & Community Care Ltd.

3.00 Definitions

Term	Definition
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly, or implicitly, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.
Complaint	An expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. As well as complaints being made directly to our organisation, some complaints (or at least negative comments) may be made on social media.
Compliment	Positive feedback that is formally raised by the client/service user.
Grievance	(1) a complaint due to injury, injustice, or wrong. (2) The injustice itself.
Dispute	An unresolved complaint escalated either within or outside of our organisation.

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4.00 Roles and Responsibilities

Role	Responsibility
Board of Directors	Accountable for the existence of a BHCC Feedback, Complaints and Compliments Policy and Procedure and are aware of its purpose within BHCC.
Chief Executive Officer (CEO)	Responsible for the oversight of acceptable use of the Feedback, Complaints and Compliments Policy and Procedure and management within BHCC, including: <ul style="list-style-type: none"> • Approval of the Feedback, Complaints and Compliments Policy and Procedure and • Reporting on Feedback, Complaints and Compliments Policy and Procedure to the Board of Directors.
Chief Information Security Officer (CISO)	Responsible for the implementation of the Feedback, Complaints and Compliments Policy and Procedure within BHCC, including: <ul style="list-style-type: none"> • Ensuring the Feedback, Complaints and Compliments Policy and Procedure remains contemporary. • Ensuring the Feedback, Complaints and Compliments Policy and Procedure is disseminated and understood; and • Reporting on compliance of the Feedback, Complaints and Compliments Policy and Procedure to the Chief Executive Officer.
Executive Leadership Team	Responsible for supporting the implementation of the Feedback, Complaints and Compliments Policy and Procedure within BHCC, including: <ul style="list-style-type: none"> - Ensuring the Feedback, Complaints and Compliments Policy and Procedure is applied across executive functional responsibilities; and - Ensuring compliance with the Feedback, Complaints and Compliments Policy and Procedure.
Operational Management Team	Responsible for supporting the implementation of the Feedback, Complaints and Compliments Policy and Procedure within their respective teams within BHCC including: <ul style="list-style-type: none"> - Ensuring the Feedback, Complaints and Compliments Policy and Procedure is applied across operational management teams; and - Ensuring compliance with the Feedback, Complaints and Compliments Policy and Procedure within operational management teams.
Staff	Responsible for complying with the Feedback, Complaints and Compliments Policy and Procedure within BHCC.
Volunteers	Responsible for complying with the Feedback, Complaints and Compliments Policy and Procedure within BHCC.

5.00 Policy

BHCC Ltd will ensure that procedures are implemented and maintained to:

- Ensure there are fair, accessible and accountable feedback, compliments and complaints mechanisms.
- Our feedback, complaints and compliments processes are effectively communicated to our stakeholders.
- People accessing our services and other stakeholders are informed of external avenues of feedback, complaints processes that can assist them and how they can be accessed.
- Information gathered from all feedback and grievances lead to improvement via our Continuous Improvement procedure; and

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- Outcomes of any feedback and/or grievance are communicated to the relevant stakeholders in a timely and respectful manner.

6.00 Procedure

6.1. Formal opportunities for feedback

Staff should facilitate and encourage all Service Users to provide feedback on our services. Formal opportunities for feedback are provided via:

- Enquiries link on website (restricted to CEO, Executive Assistant to the CEO and Senior delegate)
- Client / Participant Feedback Forms provided in reception and upon request.
- During initial meetings, follow-up meetings, or other meetings.
- During goal/service review meetings.
- Upon request/initiation of any Service User and/or their representatives.
- Agenda item at Service User/stakeholder meetings.
- Open door policy for all Service Users and other relevant stakeholders to the senior team.
- YES surveys (Your Experience of Service).

6.2. Informal opportunities for feedback

Service Users and their families, decision-makers or advocates can provide verbal feedback to any member of BHCC Ltd staff at any time.

- Support staff regularly checking-in conversationally while providing support (“how are things going? Are you happy with how I’m supporting you? Do you have any feedback for me?”); and
- Where people provide advice on how something could be improved, we thank them for the advice and ensure it is flagged with the relevant staff member/team.

When receiving verbal feedback from a Service User or other stakeholder, all BHCC Ltd staff are to:

- Listen actively and respectfully.
- Paraphrase the feedback back to the person to ensure you have understood it correctly.
- Thank the person for the feedback and avoid providing excuses/justifications.
- Ask if the Service User wishes to speak to a manager or make a formal complaint.
- Provide a copy of our Client / Participant Feedback Form.
- Refer the Service User to the What to Expect From our Service leaflet and posters located around the sites on how we address concerns, compliments and complaints.
- If feedback is provided to a staff member directly and is relation to their performance and/or interaction with the Service User, reflect on the feedback and ask the following questions:
 1. How does this impact the way I do my job?
 2. Does this feedback impact more than just this particular Service User?
 3. What can I learn from the feedback as a practitioner?
 4. How do I report this feedback to BHCC; and
 5. What can BHCC Ltd learn from the feedback.

6.2. Collection of verbal feedback

A brief written record should be made of any verbal feedback, complaint, and compliment and must be provided to the Manager/Team Leader. If the feedback is a complaint related to a staff members

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performance, the Manager/Team Leader must consult with the CEO and/or the Human Resources Manager (Refer to BHCC HR 26 Staff Grievance and Dispute Resolution Policy and Procedure).

Feedback, complaints, and/or compliments provided via phone, are to be transferred to the CEO or Executive Assistant. If required, the CEO or Executive Assistant will delegate the feedback, complaint and/or to an appropriate person.

6.3. Maintaining, recording, and reporting of feedback

The purpose of keeping a record of feedback both positive and negative is to ensure BHCC has independent assessments and views on the quality of our services. All service providers funded by the government using public monies are required to collect feedback from Service Users. This information is then used to promote the benefits of our programs and intervention and improve areas of underperformance and for continuous quality improvement and learning.

It is the responsibility of the local Administration Officers and/or Practice Managers to ensure that the data the Service User provided on the Yes Survey, Client/Participant Feedback Form and General Client Feedback is entered into BHCC's Microsoft Online Forms in the links below:

1. Yes Survey:
<https://forms.office.com/r/pmKHfwsbGe>
2. Client/Participant Feedback:
<https://forms.office.com/r/V6ukgCkGTQ>
3. General Feedback:
<https://forms.office.com/r/FLKWBZQdmn>

After the data has been entered into the Microsoft Online Form, the Administration Officer is responsible for scanning and saving a copy of the feedback form and placing it into the secure Feedback folder in One Drive.

The Programs Coordinator is responsible for providing quarterly feedback reports to the Individual Service Leads, Operational Management Team, and the Executive Leadership Team for analysis.

The CEO will provide the Board with a Feedback Summary of Service User Feedback every 6 months, so that it forms part of strategic planning and continuous improvement.

6.4. Feedback - corrective actions, observations, and reporting

It is the responsibility of the Administration Officer/ Team Leader to communicate with the Quality Risk & Compliance Manager or delegate (i.e., Quality Risk and Compliance Officer and/or the Executive Assistant) any feedback that requires a corrective action or observation. The corrective action or observation must be recorded into LogiQC QMS by the Compliance Manager or delegate for any actions/tasks to be followed up.

Where a Service User has requested BHCC Ltd to do so, the Manager/Team Leader will provide a formal response as to the outcome of the feedback.

The Team Leader will consult with either the Quality Risk and Compliance Manager and/or Human Resource Manager based on whether feedback/complaint received requires:

- Review any nonconformities with policies and procedures.
- Determine the cause of any nonconformities.
- Evaluate the need for action to ensure that nonconformities do not reoccur.

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- Determine and implement action needed; and
- Review the effectiveness of the corrective action taken.

Where a service user is not satisfied with the outcome, and would like to elevate the grievance, they can elevate the grievance to the relevant Program Lead or CEO.

7. Equity and Legal Considerations

BHCC Ltd is protected generally against legal action if they:

- Act in accordance with this policy and procedures.
- Act in good faith; and
- Do not disclose information concerning the grievance other than to persons with a legitimate interest in the information.

8. Making a complaint to an external source

Where service users and or stakeholders do not feel comfortable making a complaint to BHCC Ltd directly, they are able to access an alternative complaints processes. This is detailed in the information Service Users receive when they first commence services at BHCC Ltd.

There are several areas where Service Users can lodge an external complaint (depending on the program they access):

1. Department of Employment and Workplace Relations National Customer Service Line for Time to Work Employment Service
1800 805 260
<https://www.dewr.gov.au/about-department/contact-us/complaints/making-complaint-about-employment-services> complaints@dewr.gov.au
2. Job Access Complaints Resolution and Referral Service
1800 880 052
<https://www.jobaccess.gov.au/complaints/crrs>
3. National Disability Abuse and Neglect Hotline
1800 880 052
<https://www.jobaccess.gov.au/complaints/hotline>
hotline@workfocus.com
4. Department of Communities, Child Safety and Disability Services
1800 080 464
<https://www.communities.qld.gov.au/feedback@communiites.qld.gov.au>
Online Complaint form: www.qld.gov.au/contact-us/complaints
<https://www.communities.qld.gov.au/resources/about/complaints/guide-to-makingcomplaint.pdf>
5. National Disability Insurance Agency
1800 800 110
feedback@ndis.gov.au
6. Office of the Public Guardian
1800 653 187
publicguardian@publicguardian.qld.gov.au

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7. The Commonwealth Ombudsman
1300 362 072
Online Complaint Form:
<https://forms.ombudsman.gov.au/prod?entitytype=Approach&layoutcode=ApproachWebForm>
8. Australian Health Practitioner Regulation Agency (AHPRA)
1300 419 495
<http://www.ahpra.gov.au/Notifications/Make-a-complaint.aspx>
9. Queensland Health
<https://www.qld.gov.au/health/contacts/complaints>
10. Office of the Health Ombudsman
133 646
<http://www.oho.qld.gov.au/make-a-complaint/>

9. Accessing External Support, Including Advocacy:

BHCC Ltd understand that there will be times where some Service Users wish to seek the assistance of an external advocate or representative to assist them in lodging a complaint, resolving an issue, or advocating for their needs. BHCC Ltd will work with whoever the individual nominates as their representative in good faith.

Where BHCC Ltd staff identify that there is a potential conflict in them supporting the person in making informed decisions, they are obliged to offer and connect the person with a relevant advocate/representative. This may include but is not limited to:

People with Disability Australia (Advocacy Group)
1800 442 016 | TTY: 1800 422 016
pwd@pwd.org.au
www.pwd.org.au

Office of the Public Guardian:
1300 653 187
Publicguardian@publicguardian.qld.gov.au
<http://www.publicguardian.qld.gov.au/adult-guardian>

10. Related Documents/Forms

- BHCC HR 39 Conflict of Interest Policy and Procedure
- BHCC Policy and Procedure Manual – Services Manual
- BHCC Policy and Procedure Manual – Quality Management
- BHCC HR 02 Code of Conduct
- BHCC HR 26 Staff Grievances and Dispute Resolution
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018

11. References

- AS/NZS 10002:2014 – Guidelines for Complaint Management in Organisations
- Australian Human Rights Commission Act 1986 (Cth)*
- Health Practitioner Regulation National Law Act 2009*
- Anti-Discrimination Act 1991 (Qld)*
- Human Rights Act 2019 (Qld)*
- Privacy Act 1988 (Cth)*
- Information Privacy Act 2009 (Qld)*
- National Disability Insurance Scheme Act 2013*

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NDIS (Complaints Management and Resolution) Rules 2018

NDIS Quality and Safeguards Commission Effective Complaint Handling Guidelines for NDIS Providers

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