Feedback and	Complaints Policy		Stepping Stepping CREATING PATHWAYS MENTAL MENTAL
Policy No.	3.10	Version No.	2
Approved date	November 2018	Approved by	Management Committee
Review frequency	Every two years	Last review	December 2022
Supporting Documents	<ul> <li>Complaint Flowchart</li> <li>Feedback and Complaints Register</li> <li>Complaints Form</li> </ul>		
Associated Legislation			

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#### 1. PURPOSE

The purpose of this policy is to ensure that Stepping Stone handle complaints fairly, efficiently, and effectively. This policy provides guidance to our staff and to people who wish to make a complaint on the key principles and concepts of our complaint management system.

#### 2. SCOPE

This policy applies to all staff and Management Committee receiving or managing feedback and complaints made to or about us, regarding our organisation, services and staff, or our complaint handling process. It also applies to members and any other stakeholders providing Stepping Stone with feedback on any aspect of our services.

A complaint made by a Clubhouse member participating in the Work Ordered Day program will be managed according to this Feedback and Complaints Policy. Complaints made by staff and volunteers will be handled under the Grievance and Dispute Resolution Policy.

#### 3. POLICY STATEMENT

The Stepping Stone complaint handling system is modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture. At Stepping Stone, we are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, and complaint handling, and to ensuring that the Leadership Team responsible for the handling of complaints are provided with appropriate training. The procedures outlined below will be published online and hardcopies will be made available on request. All complaints will remain confidential.

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review. The outcome of any complaint or feedback received will be reviewed as part of a quality improvement process.

## 4. PROCEDURE

Stepping Stone encourages feedback from members and all other stakeholders. Feedback can be provided to any Stepping Stone staff who will be responsible for determining whether the feedback is managed as per the Complaint process or feedback process (below). If the complaint relates to the CEO or the complainant is not comfortable submitting to a staff member about the complaint, they should raise this with a member of the Management Committee.

## 4.1 Complaints

Stepping Stone has a five stage process for managing complaints (Figure 1). The details involved in each stage is outlined below.



## Stage 1: Receive

- a. A complaint can be provided to any staff member. The person who receives the complaint will be responsible for supporting the complainant to submit a written complaint, and if preferred by the complainant, can be the ongoing point of contact and support person.
- b. All complaints should be addressed to the CEO and can be provided via email <u>melanie.sennett@steppingstoneclubhouse.org.au</u> or in writing. If the complaint is about the CEO, or the complainant is not comfortable submitting a complaint to a staff member, they should raise this with a member of the Management Committee. The President can be emailed at president@steppingstoneclubhouse.org.au.
- c. When making a complaint, it is important to provide as much detail as possible to enable a thorough investigation of the issue. At a minimum, a complaint should provide information such as:
  - Dates, time and place of relevant events
  - State what occurred and who was present
  - Your preferred approach to resolving the complaint
  - Contact details to keep you updated on the complaint management process.

# <u>Stage 2: Acknowledge</u>

- d. The CEO will update the Feedback and Complaints Register within 1 business day of receiving the complaint.
- e. The CEO will acknowledge receipt of the complaint within 2 business days. Information regarding the complaint process will also be provided to the complainant using a

communication method that is appropriate to that person. This must include an expected resolution timeframe.

f. As far as possible, the lodgment of a complaint and the details of that complaint should be kept confidential amongst team members directly concerned with its resolution. The complainant's permission should be obtained prior to any information being given to other parties required to be involved in order to satisfactorily resolve the complaint.

## Stage 3: Assess and Investigate

- g. The CEO determines appropriate action to be taken to resolve a complaint. Consideration should be given to the following options:
  - internal resolution is appropriate for most complaints that involve allegations about breaches of policy
  - mediation by a neutral outsider, if this is requested by the person making the complaint or is considered the best way to manage the issue
  - arbitration by a designated external body for allegations of serious breaches of the rights of those that access Stepping Stone services
  - where a breach of law may have occurred, Police should also be informed.
- h. The complaint management process is to be completed within ten (10) business days of receiving the complaint. If there is a need to extend this timeframe it must be communicated to the complainant where contact details have been provided.
- i. The CEO will report to the Management Committee on the process of managing any active complaints via Management Committee CEO Reports.
- j. Where an identified issue is of significant concern, the CEO is required to immediately notify the President or Vice President. Significant concern includes but is not limited to a breach of legislation, a potential criminal offence, concern about the safety of members, staff, or other key stakeholders.
- *k.* Where an identified issue is considered a reportable incident, the *Reportable incident procedure* identified in policy *5.2 Incident Management* will be followed.
- If the complaint relates to the CEO, then the process will be overseen by a Management Committee member. If the complaint relates to a Management Committee member, Stepping Stone will ensure the investigation and review process will be overseen by a Management Committee member not involved in the complaint.

#### Stage 4: Notify outcome

- m. The CEO will make every endeavour to meet with the complainant in person and advise of the outcome. The complainant will have the right to have a support person present during this discussion. The outcome will also be provided in writing to the complainant.
- n. Options for review and appeal must also be provided to the complainant. If the complainant is not satisfied with the investigation and outcome, they can seek a further review of the matter by:
  - asking for an appeal which will be registered in the same manner as the complaint and attached to the original complaint documentation

- providing informed consent for information on the complaint, appeal and investigation to be disclosed to an appropriate external agency such as independent advocacy service or NDIA
- lodging a complaint with an external complaint agency (see section 4.4 External Complaint Bodies)

## <u> Stage 5: Close Complaint</u>

- o. The CEO will update the Feedback and Complaints Register to close the complaint. A record of the complaint will be analysed as per 'Record keeping and analysis' stage (see 4.3).
- p. A record of the complaint will be stored in the Feedback and Complaints Register to ensure that a record of any complaint is kept and that complaints are reviewed annually to support service and operational improvement.

## 4.2 Feedback

Feedback can be received through a variety of methods including verbal, written or any other communication methods suited to the person providing feedback.

The CEO maintains a register of all positive feedback in the Feedback and Complaints Register. An overview of feedback recorded in this register should be provided to the Management Committee through regular CEO reports.

Feedback will also be proactively sought from members and stakeholders via regular surveys that contribute to service evaluations and continuous improvement processes.

## 4.3 Record keeping and analysis

Stepping Stone will keep comprehensive, clear and useful records of all feedback and complaints in the Feedback and Complaints Register.

Records will be assessed annually for continuous quality improvement purposes as per the Quality Improvement Policy.

#### 4.4 External Complaint Bodies

If the complainant is not satisfied with the complaint management process completed by Stepping Stone, complaints can be made to the following bodies.

#### <u>NDIS Quality and Safequards Commission</u>

At any time, people can make a complaint about NDIS service providers or the support they provide to the NDIS Commission. Complaints to the NDIS Commission can be lodged:

- o Online: <u>www.ndiscommission.gov.au</u>
- Phone: 1800 035 544.
- <u>Australian Human Rights Commission</u>
  - o Online: <u>www.humanrights.gov.au</u>
  - o Phone: 1300 656 419

#### 5. ROLES AND RESPONSIBILITIES

Role	Responsibilities	
Staff Member	<ul> <li>Ensure that Stepping Stone members and stakeholders are aware of the feedback and complaints process</li> <li>Advise the process to make a complaint if requested</li> <li>Advise CEO about any complaints received.</li> </ul>	
CEO	<ul> <li>Ensure staff are aware of the complaints and feedback process, and what to do if they receive a complaint or feedback</li> <li>Acknowledge receipt of the feedback or complaint and advise estimated timeframe for response</li> <li>Review complaint with relevant team members and undertake further investigation (if required) and identify actions to resolve.</li> <li>Identify any practice changes that are needed to ensure issue does not occur again</li> <li>Provide resolution advice to complaints Register. Undertake any investigation if the complaint involves a Director/Manager/Coordinator</li> <li>Provide guidance, where required, to identify resolution.</li> <li>Approve complaint resolution proposals</li> <li>Review report and ensure quality improvement is undertaken.</li> <li>Ensure response and identify if a Quality Improvement Process (QIP) is required</li> <li>Ensure that all relevant internal and external stakeholders are aware of this policy</li> <li>Where an identified issue is considered a reportable incident, ensure the <i>Reportable incident procedure</i> identified in policy <i>5.2 Incident Management</i> is followed.</li> </ul>	
Governance and Risk Committee	• Review complaints register annually and identify any areas of focus, or practice change required.	
Management Committee	Review any major complaints, or complaints about the CEO.	

# 6. DEFINITIONS

Complaint	An expression of dissatisfaction made to or about Stepping Stone services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.
Complaint management system	The process and actions undertaken by Stepping Stone to receive, acknowledge, assess, resolve and record complaints. This includes all policies, procedures, forms and registers used by Stepping Stone in the management of complaints.
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Stepping Stone, about our services

	or complaint handling system where a response is not explicitly or implicitly expected or legally required.
Complainant	The person who has submitted a complaint.