

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 service delivery and prevention of adverse outcomes, for existing and potential clients.
- 1.2 This policy directs how Open Minds 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

- 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, including *Guidelines for complaint management in organizations (AS/NZS 10002:2014)*.
 - 2.1.2 Ensure that Open Minds’ clients, their families, Guardians or other stakeholders can:
 - provide general Feedback on any aspect of Open Minds service delivery;
 - make a Compliment about any aspect of Open Minds service delivery;
 - raise concerns, discuss or submit a Complaint about any aspect Open Minds of service delivery.
 - 2.1.2 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.
 - 2.1.3 Ensure that Open Minds identifies and implements service improvement strategies where needed as a result of Feedback.
 - 2.1.4 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 client service delivery by Open Minds.
- 3.2 This policy does not apply to the raising of concerns or grievances by a member of Open Minds staff.
- 3.3 All Open Minds staff, Board members, students, contractors and volunteers are required to comply with this 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 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.

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Complainant- Person, organization or their representative (including clients, 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 client/s or staff, or may impact the reputation of Open Minds.

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 and Officer- a designated role in Open Minds which will be held by an ELT member or Senior Manager, as nominated by the CEO.

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 client.

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 clients, carers, Guardians, stakeholders have a right to complain about any aspect of service delivery. All Complainants and clients 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 Open Minds 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 Open Minds to provide both positive and critical Feedback, as outlined in the *Client and Family Engagement Policy* and *Feedback and Complaints Procedure: Service Delivery*. Feedback and other information provided by clients or other stakeholders is reviewed and integrated into Open Minds’ quality improvement processes.
- 6.2 Internal awareness of the Feedback and Complaints system
 - 6.2.1 Open Minds 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;

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- availability of policies, procedures and Practice Manuals in the intranet ‘virtual library’ and in hard copy in office locations;
- the Open Minds Feedback Brochure;
- Information on the Open Minds 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 Open Minds 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: Client Service Provision”

6.5 An accessible process

6.5.1 The Open Minds 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 will ensure the Complaints process is accessible to all clients and their family, carers and stakeholders, particularly those who require assistance to understand and/or submit a Complaint.

6.5.2 Clients and other Complainants are to be provided with information, support and a safe environment in which to communicate about a Complaint. Clients 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 Open Minds’ 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 Open Minds 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 Open Minds 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 Open Minds for anyone to retaliate or discriminate against a person in response to them raising a Complaint or grievance. Any employee who retaliates

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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 client’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 client, 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 clients and Complainants.

7. POLICY APPROVER

7.1 The Open Minds CEO is authorised to approve this policy and any subsequent amendments.

8. POLICY OWNER

8.1 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

10.1 A Feedback Report is provided:

- Monthly to the Risk Quality and Compliance General Operations Management Committee via the General Manager Operations and General Manager Employment Services;
- Quarterly to the Executive Leadership Team (ELT), Service and Clinical Governance Committee and the Board.

10.2 Significant breaches or Complaints will be escalated to the CEO by the relevant ELT member or their delegate as outlined in the Service Delivery Feedback and Complaints Procedure.

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11. KEY RELATED DOCUMENTS

Doc. Type or ID	Description/Name
TBA	Feedback and Complaints Procedure: Service Delivery
TBA	Client and Family Participation and Engagement Policy
P4.1.2.01	Service Delivery Framework Policy
P3.1.1.02	Legal and Human Rights Policy
TBA	Responding to abuse, neglect and exploitation procedure.

12. POLICY REVIEW

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

1. PURPOSE

1.1 This Procedure outlines how Open Minds receives, responds to, records and reports on Feedback and Complaints from clients, their family members/ significant others and external stakeholders in relation to Open Minds service provision.

2. SCOPE

2.1 This procedure applies to all people working for Open Minds in any capacity (paid staff, work experience, Board members, students, contractors and volunteers).

3. DEFINITIONS

Relevant definitions can be found in the “Feedback & Complaints Policy: Service Delivery”

4. PROCEDURE

This procedure should be read alongside the “Feedback and Complaints Policy: Service Delivery” as well as the “Legal and Human Rights Policy” in situations involving suspected abuse or neglect.

4.1 Awareness of the Feedback processes

4.1.1 Information about the Feedback management system will be communicated to Open Minds’ staff via:

- formal training at induction/orientation;
- the Open Minds Intranet;
- policy folders at all office locations;
- ongoing training, support and communication by line managers and the Feedback Officer.

4.1.2 Information about the Feedback management system will be communicated to Open Mind’s clients:

4.1.2.a At service commencement, clients (and their Guardians where relevant) will be advised of how to provide Feedback to Open Minds - including being provided with information in the ‘Welcome Pack’. Clients will be reminded of the Feedback process every 12 months, aligned to the renewal of the Consent to Participate and Share Information form. These discussions will be documented in the client’s record.

4.1.2.b Feedback brochures will be available at all office locations, and Feedback boxes are located in all community hubs and Residential Support Service houses. Information will be available on the Open Minds public website.

4.2 Submitting Feedback

4.2.1 Open Minds invites Feedback (including Compliments and Complaints) through multiple methods to promote a fair, safe, transparent and accessible system of receiving and responding. This system enables submission Feedback by either an identified or anonymous person, by:

- Speaking to any Open Minds staff member.
- Filling in the Open Minds Feedback Form or writing a letter and returning it in-person, via Feedback boxes in office locations or by post to: The Open Minds Feedback Officer, PO Box 8142, Woolloongabba QLD 4022.
- Emailing the Feedback Officer at feedback@openminds.org.au
- Submitting the online Feedback Form on the Open Minds Website.

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- Phoning (07) 3896 4222 and asking to speak to the Feedback Officer.

4.3 Responding to Feedback In responding to any Complaint, people working for Open Minds will ensure:

- each Complaint is handled respectfully, taken seriously and investigated fairly.
- no retribution or discrimination results from the submission of a Complaint.
- the resolution of Complaints, to the satisfaction of the Complainant, is a goal of the Complaints process.
- responses to Feedback and Complaints are consistent and timely.
- independent and accessible mechanisms for submitting and resolving Complaints are provided.

4.3.1 All Feedback will be acknowledged with thanks- either written or verbally. It may be appropriate to contact a person who provided Feedback to communicate (verbally or in writing) any changes made as a result of their information, to contribute to a positive relationship between the organisation and its clients/ stakeholders.

4.3.2 Compliments about a staff member or team will be acknowledged by the relevant Senior Manager and passed on to line managers and other staff as appropriate.

4.3.3 Feedback which could support service improvement will be provided to the relevant Senior Manager who will ensure information is forwarded to relevant staff for consideration in service planning and quality improvement activities.

4.4 Responding to a Complaint

4.4.1 Where a person indicates that they'd like to make a Complaint- all options for submitting and resolving their Complaint will be explained, and clients should be advised on how they can access an advocate/support person throughout the process.

4.4.2 Any Complaint that involves alleged abuse (including physical, emotional, financial or sexual abuse), or actions of a criminal nature, will be responded to according to the Legal and Human Rights Policy and relevant procedures, including the Responding to abuse, neglect and exploitation procedure.

4.4.3 Any staff receiving Feedback should request consent for Open Minds to use the information they have provided, including their own details and those of the client, to investigate their concerns effectively and provide Feedback if wanted. They should be advised that they are welcome to provide anonymous information, alongside details of how this may impact on or limit the potential for Open Minds to respond to the Feedback.

4.4.4 Complaints will be responded to using the following three levels of Complaints management.

4.5 Level 1: Frontline Complaint management

4.5.1 Management of Complaints at a local, team level through discussion, development of mutual understanding and negotiation of a resolution to the Complainant's satisfaction should occur as the first response when an issue or Complaint is raised, in most circumstances.

4.5.2 Significant Complaints (defined above) should always proceed immediately to level 2.

4.5.3 Staff who become aware of a client who is dissatisfied and is thinking of, or has made a complaint about their service delivery should:

- Respectfully seek to understand the Complaint in a non-defensive manner, including clarifying the concerns and experiences of the person making a Complaint.
- Acknowledge the impact of the issue, including any distress or inconvenience resulting from the situation.

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- Ask what the desired outcomes are.
- Attempt to resolve the Complaint – by determining whether the desired outcome is suitable and can be reasonably accommodated, or if not, by negotiating a suitable alternative.
- Advise the Complainant on other options to address their concern if they are not happy with the outcome- including discussion with the staff member’s line manager, proceeding to level 2 of the Complaints management process.
- Notify their line manager of the issue or concern as soon as possible, and advise on how they have addressed it. The line manager will decide whether any further action is needed.
- Record the discussion in the client’s record on Carelink- including the issue or concern raised, actions taken to resolve and any communication provided to the person who raised the issue.
- Complete a Riskman report.

4.5.4 Complaints will ideally be managed within 1-2 working days of the issue/ concern being raised- or at the earliest possible convenient time. If the person indicates that they are satisfied with the outcome, this is to be recorded in the client’s file and the Riskman report will be finalised by the responsible manager.

4.5.5 If this option is declined or is not suitable then the issue is to be immediately reported to the responsible line manager.

4.6 Level 2: Internal assessment, investigation, facilitated resolution, review

4.6.1 This level applies

- where a Complainant is not satisfied with the outcome of level 1 resolution;
- where a Complainant declines level 1 resolution or
- for a significant/serious Complaint.

4.6.2 This level of Complaint is overseen by a management level position. The Feedback and Complaints Officer will usually assign who will lead the assessment, investigation and resolution processes for a level 2 Complaint.

4.6.3 Serious staff conduct issues, breaches to legislation, possible criminal actions or risk to organisational reputation will be escalated immediately to a Senior Manager, the Feedback Officer and relevant member/s of the Executive Leadership Team.

4.6.4 Complaints involving alleged abuse of any kind, should be responded to according to the Legal and Human Rights Policy and relevant procedures, including the Responding to abuse, neglect and exploitation procedure.

4.6.5 The Feedback Officer may elect to appoint an independent investigator (internal or external) to review and manage serious Complaints.

4.6.6 The Complainant should be contacted within two (2) working days (or earlier if urgent) to acknowledge receipt of their Complaint, and advise of the planned process that will be followed.

4.6.7 To enable the Complaint to be understood, the detailed information will be sought by the nominated manager, including:

- Name, client details, relationship to the client

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- Current contact details
 - Who was involved?
 - What happened and when?
 - Any other information to support the Complaint, if available?
 - Is anyone else involved and/or aware of the issue?
 - Has anything been done to address this matter?
 - What does the Complainant want to happen now?
- 4.6.8 It is expected that Complaints should be resolved and the outcome communicated to all involved within 28 days. If the issue is complex and requires longer to resolve, the nominated manager is required to communicate regular updates to the person until the issue is resolved or the matter finalised
- 4.6.9 If the Complaint involves staff conduct, the manager handling the Complaint will ensure an appropriate response is provided, including contacting the HR team to seek advice.
- 4.6.10 The Feedback Officer will determine the relevant statutory and/or funding bodies that require notification of the Complaint including the Executive Team and/or Board.
- 4.6.11 The Complaint, investigation and outcomes will be fully documented in the client’s file and in the Riskman System.
- 4.6.12 Where contact details and consent have been provided, written communication will usually be sent to Complainant (and/or their Guardian) within seven working days of Complaints being received, using the Responding to a Complaint letter template- with details of what is being done/ has been done to investigate and resolve the Complaint, expected timeframes and details of the appropriate contact person.
- 4.7 Level 3: External assessment, investigation, review
- 4.7.1 Internal resolution should be encouraged to ensure a timely outcome and efficient use of resources.
- 4.7.2 Where a Complaint cannot be resolved to a Complainant’s satisfaction, referral for external assessment, investigation, mediation and/or review may be appropriate.
- 4.7.3 Clients and stakeholders should be advised of their right to raise a Complaint to an external regulatory body- and that there will be no retribution or discriminatory action taken if they do prefer to submit their Complaint externally.
- 4.7.4 The Feedback Officer can provide further information on external resolution options, and these are also included on the Open Minds Feedback Brochure.
- 4.7.5 The Feedback Officer should be notified as soon as practical if a Complaint has, or is likely to go, to an external organisation for resolution. Where required, these matters should be communicated immediately to the CEO by the relevant ELT member.
- 4.8 Complaint resolution and follow-up
- 4.8.1 All reasonable attempts should be made to resolve a Complaint to the satisfaction of client’s involved. The Feedback Officer will ensure that relevant ELT/Board members are aware of any outstanding risk or consequences relating to issues that were unable to be resolved.
- 4.9 Confidentiality and privacy
- 4.9.1 Staff entering Complaint details on Riskman will consider the sensitive and/or confidential nature of a Complaint and the privacy of the individual making the Complaint with regard to

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what information is recorded and to whom within the organisation the information is communicated to.

4.9.2 Only factual information that can be supported by evidence should be recorded or where required it should be noted here information is not yet substantiated.

4.9.3 Staff will not discuss the Complaint with people who are not involved.

4.10 Special considerations

4.10.1 Staff should take steps to ensure that an appropriate response is provided to support consumers who identify as: Aboriginal, Torres Strait Islander; culturally and linguistically diverse; gay, lesbian, bisexual and transgender; or who have a disability, to feel safe and free from fear of retribution when making a Complaint.

4.10.2 Where the usual Feedback process is not suitable for a client or other relevant person, steps will be taken to ensure appropriate adaptations are made.

4.11 Unreasonable Conduct by Complainants

4.11.1 As outlined in the Feedback and Complaints: Service Delivery Policy, there may be situations where a Complainant acts unreasonably in seeking to have their concerns addressed.

4.11.2 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.

4.11.3 The Feedback Officer can provide direction in these situations.

4.11.4 The response should ensure that unreasonable behaviour does not preclude valid issues being addressed.

5. PROCEDURE APPROVER

5.1 The CEO is authorised to approve this procedure and any subsequent amendments.

6. PROCEDURE OWNER

6.1 The Company Secretary shall be accountable and responsible for ensuring that this procedure is implemented and communicated and to issue guidelines, templates or forms to support the operation of this Procedure.

7. COMPLIANCE AND REPORTING MEASURES

7.1 The Human Services Quality Framework (HSQF) requires a Feedback and Complaints process which adheres to ISO10002:2014 Guidelines for Complaint management in organizations, and this is reviewed through the HSQF Accreditation Audit process.

7.2 Where reporting of Complaints to funding bodies is required, this will be identified and undertaken as per the contract arrangements, under the guidance of the Feedback Officer.

7.3 Information on Compliments and Complaints is reported monthly to the Risk Quality and Compliance General Operations Management Committee, and quarterly to Executive Leadership Team, the Service and Clinical Governance Committee and the Board, unless the CEO considers that it is to be communicated to the Board urgently. Through these committees, Feedback and Complaints are analysed for trends and recommendations for action to be taken are made.

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8. KEY RELATED DOCUMENTS

Doc. Type or ID	Description/Name
P4.1.2.01	Service Delivery Framework Policy
P3.1.1.02	Legal and Human Rights Policy
TBA	Responding to abuse, neglect and exploitation procedure
PROC01	Investigations Procedure
P2.7.1.21	Worker Complaints and Grievance Policy
ISO10002:2014	Guidelines for complaint management in organizations
TBA	Open Minds Feedback Form

9. PROCEDURE REVIEW

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

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