



Feedback and complaints policy and procedure

Purpose and scope:

This policy and procedure applies to all staff, contractors and subcontractors involved in the handling of feedback and complaints related to the care and services of HomeMade customers.

The purpose of this policy and procedure is to ensure that HomeMade safely and effectively manages all feedback and complaints, minimises risk and the impact of these on customers and staff.

This policy provides the reader with information relating to how HomeMade views and handles feedback and complaints so that we can ensure transparency.

It is a requirement of the Aged Care Quality Standards that aged care providers have an effective complaint handling system and process in place to manage and minimise the risk of harm to customers.

Policy Statements:

HomeMade is committed to working with our customers and their chosen representatives to achieve timely resolutions to feedback and complaints. We use a collaborative and positive approach to complaints handling through open communication and transparent processes.

HomeMade adopts an open disclosure approach to communication when things go wrong, aiming to address any immediate needs or concerns and providing support, apologising and explaining the steps we have taken to help reduce the likelihood that issues will occur again.

HomeMade is committed to receiving complaints in good faith, and treating all complaints fairly, including from our staff. We proactively and transparently handle complaints in line with our requirements under the Aged Care Act 1997 and foster a blame-free, resolution focused complaints culture.

HomeMade encourages and will support our customers or their representatives to provide feedback or complain about the care and services they receive. We utilise this feedback and complaint information to help improve how we deliver care and services and we always consider continuous improvement when finalising complaints.

HomeMade has an effective complaints management system in place, which considers acknowledgement of complaints, assessment and assigning a priority, planning, investigation, response, escalation, follow up and continuous improvement.

Feedback and complaints policy and procedure



HomeMade will comply with all legislative and regulatory obligations in relation to complaint and feedback management.

Applicable Aged Care Practice Standards:

- *Standard 1. Consumer Dignity and Choice*
- *Standard 6. Feedback and Complaints*
- *Standard 7. Human Resources*
- *Standard 8. Organisational Governance*

Definitions:

Apology	<p>Providing an apology can assist in the resolution process. Apologies aid in strengthening trust and confidence. It shows transparency and respect toward complainants.</p> <p>An apology to customers is not considered to be an admission of fault or liability and is not considered in determining fault or liability. All Australian jurisdictions have enacted laws that are designed to protect statements of apology or regret made after 'incidents' from subsequent use in certain legal settings.</p>
Complaint	<p>An expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected</p>
Complaint management system	<p>All policies, procedures, practices, staff, hardware, and software used by an organisation in the management of complaints.</p>
Complainant	<p>A person who makes a complaint, or has a complaint made on their behalf.</p>
Compliment	<p>An expression of praise, encouragement or gratitude about an individual staff member, a team or a service.</p>
Continuous improvement	<p>Continuous improvement is an essential part of an effective complaints handling system. It is defined as an ongoing approach to improve care and services</p>

Feedback and complaints policy and procedure

	through analysing data, identifying and addressing trends and aiming to reduce risk whilst strengthening quality of care for our customers.
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 where a response is not necessarily expected or required. This is often used as a basis for improvement
Open disclosure	<p>Open disclosure is the transparent discussion that a service provider has with a customer when something goes wrong and has harmed, or had the potential to cause harm to the customer. This discussion may also involve the customer’s family, carers, other support people and representatives, when a customer would like them to be involved.</p> <p>Open disclosure refers to the practice of communicating with a customer when things go wrong, addressing any immediate needs or concerns and providing information on what has happened, offering support, apologising and explaining the steps the provider has taken to prevent it happening again.</p>

Policy:

HomeMade respects each person’s right to provide feedback or make complaints. We recognise that effective processes for handling feedback and complaints ensures that we continue to foster positive relationships with our customers, their representatives and all our stakeholders. Receiving, managing and analysing feedback and complaints enables us to improve the quality of care and services that we provide and enhances our ability to listen and respond to our customer voice.

We actively seek feedback from our customers, their representatives and our workforce through feedback (which includes compliments) and complaints that helps to inform our organisational continuous improvement. We aim for best practice complaint handling and resolution, supported by our effective complaint management system.

Feedback and complaints policy and procedure



HomeMade encourages feedback through:

- A management open-door practice
- Regular customer and staff satisfaction surveys
- Supporting varying levels of health literacy to support feedback processes
- Provision of information in the Customer Handbook

All customers are provided with information on 'how to make a complaint' during the onboarding process and during care plan and service reviews. HomeMade supports its customers and their representatives through the complaint process and we provide information on the use of advocates as well as avenues for complaining externally such as to the Aged Care Quality and Safety Commission. People who complain internally or externally will not face negative consequences for doing so.

HomeMade is dedicated to resolving complaints promptly and where possible within the timeframes set out in the Feedback and Complaints Policy and Procedure document. We aim to resolve the majority of complaints at first point of contact and have an effective internal escalation process that ensures complex and serious complaints are escalated to appropriate levels of management and our senior leadership team where required.

Feedback and complaint trends are reviewed regularly and reported on at a minimum monthly to senior leadership. We also provide updates to the governing body. Identified trends inform continuous improvement initiatives and learnings are disseminated to staff and customers where suitable to help support changes being sustained.

Through our feedback and complaint management system, HomeMade protects the identity of people who would like to provide anonymous or confidential feedback and complaints.

Aged care advocacy:

Aged care advocacy services can assist any customer or representative to make a complaint, including complainants with mental or cognitive impairments. An advocate's role is to provide support at any stage of the complaints process. It is an external service that is free and confidential. They can stand beside a customer, or work on their behalf, at their direction, and in a way that represents their expressed wishes.

Feedback and complaints policy and procedure



Older Persons Advocacy Network (OPAN)

Phone: 1800 700 600

8am–8pm Monday to Friday

10am–4pm Saturday

Translating and interpreting services:

- Translating and Interpreting Service (TIS) – Phone: 131 450
- Aboriginal Interpreter Service (AIS) – Phone 1800 334 944

External complaint bodies including the Aged Care Quality and Safety Commission:

Outside HomeMade, complaints can be made to the following bodies.

Complaints to the Aged Care Quality and Safety Commission can be lodged:

- by phone on 1800 951 822
- online at www.agedcarequality.gov.au
- by post to
Aged Care Quality and Safety Commission
GPO Box 9819
Sydney, NSW, 2000

Customers of HomeMade can also contact the Australian Securities and Investments Commission (ASIC) if they have concerns regarding consumer protection in relation to finances.

The New South Wales Ombudsman:

- online at www.ombo.nsw.gov.au;
- by phone on 02 9286 1000 or (regional areas) 1800 451 524; and
- by post to Level 24, 580 George Street, Sydney, NSW, 2000.

Customers also have rights and protections under the Australian Consumer Law (ACL), including provisions on consumer guarantees and unfair contract terms.

Fair Trading New South Wales (www.fairtrading.nsw.gov.au) provides information and advice about customer disputes under the ACL.

Privacy and Information Management:

All personal information HomeMade collects to manage feedback or complaints must be handled in accordance with HomeMade's *Privacy Policy*.

Staff must keep information about complaints confidential. They may only disclose necessary details if they are required to do so by law, or if not disclosing is likely to place the safety, health or wellbeing of any person at risk. Staff must take all reasonable steps to notify the complainant before

Feedback and complaints policy and procedure



deciding not to keep personal information confidential.

HomeMade's *Complaints Register* must be used to record information about feedback and complaints; any action taken to resolve complaints and the outcome of any action taken. All information regarding feedback and complaints is kept securely in our Complaint Management System. All records regarding complaints must be retained for at least 7 years from the date they are created.

Feedback:

Providing feedback to HomeMade is voluntary.

Feedback can be provided at any time, in any way, by any stakeholder, through:

- a staff member;
- email, mail or phone;
- HomeMade's *Feedback and Complaints Form* (in the instance a complaint is linked to someone who is not yet a customer);
- HomeMade's website and Platform
- An advocacy service
- The Aged Care Quality and Safety Commission
- Customer satisfaction surveys
- Staff satisfaction surveys, one on one's and annual performance reviews.

Where feedback is provided verbally, the receiving staff member will transcribe it to the HomeMade *Complaint Management System*.

Complaints and Dissatisfactions:

People can provide feedback or make a complaint about any aspects of HomeMade's services, including breaches of policies and procedures, the *Code of Conduct for Aged Care* or the *HomeMade Code of Conduct*.

What You Can Expect from Us:

1. To be listened to and understood
2. To be able to choose to have a person of your choice, including an aged care advocate, support you or speak on your behalf if you wish
3. To make complaints free from reprisal and to have your complaints dealt with fairly and promptly
4. To have your personal privacy respected and your personal information protected
5. To be able to exercise your rights without it adversely affecting the way you are treated

Feedback and complaints policy and procedure



How to notify of a complaint at HomeMade:

To lodge a complaint or dissatisfaction, people are encouraged to speak directly to a staff member first, in an attempt to resolve the matter where possible. However, we respect each person's right to escalate formally should they wish.

Information can be can be lodged:

- directly with a staff member, either verbally or by email
- Through the 'Feedback' tab on our website
- by email to: feedback@homemadesupport.com.au;
- by phone on 1300 655 688;
- in writing to: Quality Manager, HomeMade, Level 12, 255 Pitt Street, Sydney, NSW 2000

Mail and phone submissions as well as the *Feedback and Complaints Form*, which can be found under the feedback tab on our website can be used to make anonymous complaints.

Complaints and feedback can be lodged by a third party on behalf of another person, if their consent or the consent of their legal representative has been provided.

People making or impacted by a complaint or providing feedback can be supported by staff to use an advocate of their choice to act on their behalf if they wish. The advocate may be a family member or friend, or sourced (with assistance from staff if required) through the Older Persons Advocacy Network (OPAN).

At any time, people can raise a formal complaint about aged care service providers or the support they provide to the Aged Care Quality and Safety Commission or other external complaints bodies (listed above). Staff should assist people in making these complaints by providing the relevant contact details where required.

If a complaint alleges actual or possible criminal activity or abuse or neglect, it must be referred to a Manager immediately. The Manager must report and action the complaint as per HomeMade's *Incident Management Policy and Procedure*. The Manager must immediately follow up with relevant staff and must remain involved to its conclusion. The incidents and complaints team and Quality Manager will provide oversight and support during this process.

Staff must take all reasonable steps to ensure complainants or people affected by providing information are not adversely affected or are in fear of retribution because a complaint, feedback or dissatisfaction has been made by them or on their behalf.

Feedback and complaints policy and procedure



How complaints are managed:

Stages of handling complaints as informed by The Better Practice Guide to complaints handling in Aged Care (Aged Care Quality and Safety Commission, 2021).

1) Acknowledgement:

- We aim to acknowledge all complaints within 2 business days of receiving them, if they have not been resolved at the point of first contact.
- Where a person has requested to remain anonymous, contact may not be possible or expected.
- An open disclosure approach will be taken throughout the process, as outlined in the above definitions section.
- All parties involved in a complaint must be provided with procedural fairness and with the support and information necessary to participate in the complaints process.
- All complaints that have been received through an external complaints body such as the Aged Care Quality and Safety Commission will be referred to the Quality Manager for review, and they will direct the appropriate person to manage and respond to the issue in line with this policy and accompanying *Feedback and Complaints Procedure*.
- In the first instance, as per HomeMade's *Open Disclosure Policy and Procedure*, the respective staff member must acknowledge the concerns of the person making the complaint and provide a sincere and unprompted expression of regret and/or apology, for example "I am sorry this has occurred" or "I am sorry this has happened". Often this response can assist with resolving the complaint (but not always).
- In HomeMade's acknowledgment our staff will:
 - Confirm that the complaint is being addressed,
 - If not already stated ask the complainant what outcome they are seeking,
 - Action, mitigate and appropriately escalate any identified risk,
 - Provide clear information regarding our complaint processes, including time frames for response and resolution and who will be assisting them to resolve the concern

2) Assessment and assigning priority:

- If we cannot resolve the complaint at first contact or it is more complex, we will investigate issues raised in further detail.
- Once the complaint is logged in our complaint management system, the incidents and complaints team will assess and assign its priority/category, then ensure the appropriate person is managing the resolution process.
- During this stage HomeMade will clarify the issues, desired outcomes, and determine the level of risk to the wellbeing, safety and health of those involved. Staff are expected to escalate to management in line with the *High Impact and High Prevalence Risks - Policy and Procedure* and *Standard Operating Procedure: Complex and High Risk Customer Escalation* where risk is identified.

Feedback and complaints policy and procedure



3) Planning:

- Considering the desired outcome, staff involved in managing the complaint will determine the possible sources and types of information that need to be gathered for effective resolution.
- Potential sources of information include the HomeMade Platform, shift notes submitted by service providers, staff, brokered service providers, incident forms, customers and their representatives.
- The person making the complaint or their representative can be included during this stage to help ensure a mutual resolution is achieved.

4) Investigation (where required):

- An effective investigation aims to gather relevant information to achieve an appropriate solution.
- HomeMade acknowledges all complaints are different therefore require different methods for investigation, for example, the subject, cause and resolution for some complaints may be clear, however others may need further/lengthy investigation.
- A root cause analysis approach can be utilised to help determine:
 - What is the problem?
 - Why did it happen?
 - What will be done to prevent it from happening again?
- HomeMade adheres to the following principles during an investigation:
 - *Impartiality*: complaints are approached with an open mind and findings are objective
 - *Confidentiality*: Information pertaining to the complaint and its management is shared on a 'need to know' basis only. Confidentiality is respected at all times in line with HomeMade's *Privacy Policy*.
 - *Transparency*: Those involved are informed of the complaints management process and given the opportunity to participate where appropriate.
 - *Timeliness*: Investigations are conducted in a timely manner.
- Information collected or findings made during the course of the investigation are documented by staff involved in the complaint management system (HomeMade Platform).

5) Response:

- Once a decision has been reached HomeMade will communicate this clearly with the complainant and other relevant stakeholders such as customer representatives or an advocate.
- A response can be provided in a conversation where appropriate. However, we will follow a conversation up with written clarification, unless the complaint is resolved at the first point of contact. A written explanation can be more suitable for serious, complex or disrupted issues.
- The written response will provide the complainant an opportunity to make further contact if required.

Feedback and complaints policy and procedure



- The written response must also include information on what further action may be available to the complainant at the conclusion of the complaint investigation, as set out in this policy.
- A response aims to support a mutually agreed solution where possible and can involve an apology.
- During our response HomeMade will explain the information that has been utilised to inform our decision on this.
- Support must be provided to assist complainants' understanding of correspondence regarding complaints, where this is required (e.g. interpreters, referral to advocates, etc.).
- HomeMade will respond to all complaints as soon as possible and within 28 business days from receiving the concern (or sooner where possible).

6) Escalation:

- In instances where complaints are unable to be resolved after the initial response, staff will escalate the issue in line with the *HomeMade Feedback and Complaints Procedure*.
- Internal escalation is first made to the Team Leader or Manager of the staff member involved, then to the Incidents and Complaints team and finally the Quality Manager.
- Options for external complaint escalation should be provided if customers are dissatisfied with the outcome of their complaint.

7) Follow up:

- It is good practice to ask complainants for feedback on how their complaint was handled and resolved.
- We understand that it is not possible in all instances to resolve complaints. In these instances HomeMade will consider internal escalation (as discussed above) conciliation, mediation and external complaint mechanisms such as advocacy and the Aged Care Quality and Safety Commission.

8) Consideration of the learnings / Continuous improvement:

- HomeMade will record and review all complaints, no matter how minor.
- All types of complaints are used to help identify areas for continuous improvement.
- Complaint data is reviewed, analysed and discussed at a minimum monthly by HomeMade Management. The Quality team and Quality Manager review this data daily and will discuss and review for trends at a minimum weekly.
- Trends, themes and high risk issues are reviewed and findings are utilised to inform continuous improvement initiatives within the business. This function is overseen by the Quality Manager, Continuous Improvement Analyst and Senior Leadership.
- Where preventative or improvement measures are identified, these must be tracked in the *Continuous Improvement Plan*.

Feedback and complaints policy and procedure



- HomeMade engages in continuous improvement in line with our *Continuous Improvement Policy and Procedure*.
- Feedback and Complaints data will be reported to the HomeMade Board to enable organisational quality improvement and drive business and strategic objectives.
- Compliments and feedback can help identify what's being done well and provide a balance to complaints. Compliments are shared internally (adhering to the principles of confidentiality) and help staff feel motivated, rewarded and valued and can provide the opportunity for celebration.

What if you are not satisfied with the outcome of a complaint:

As discussed in this policy, HomeMade will follow the internal escalation process to ensure that we can continue to work collaboratively with complainants to ensure that a resolution is achieved. Complainants can request their complaint be escalated internally if they are unhappy with the process or outcomes at any stage during our management of the issue.

Alternatively, we can support complainants to escalate externally to the Aged Care Quality and Safety Commission (contact details listed above) at any stage throughout our investigation and management of the issues raised. We will proactively provide information regarding external escalation in the instance where complainants are not happy with our response or the resolution we propose.

Relevant legislation:

- *Aged Care Act 1997 (Cth), User Rights Amendment (Charter of Aged Care Rights) Principles 2019*
- *User Rights Principles 2014*
- *Aged Care Quality and Safety Commission Act 2018*
- *Aged Care Quality and Safety Commission Rules 2018*
- *Accountability Principles 2014*
- *Information Principles 2014*
- *Quality of Care Principles 2014 (including the Accreditation Standards)*
- *Records Principles 2014*
- *Sanctions Principles 2014*

Supporting documents:

- *HomeMade Code of Conduct*
- *Continuous Improvement Policy and Procedure*
- *Continuous Improvement Plan*
- *Feedback and Complaints Procedure*
- *High Impact and High Prevalence Risks - Policy and Procedure*

Feedback and complaints policy and procedure



- *Incident Management Policy and Procedure*
- *Open Disclosure Policy and Procedure*
- *Privacy Policy*
- *Standard Operating Procedure: Complex and High Risk Customer Escalation.*
- *Welcome Pack*

Resources:

- *Aged Care Open Disclosure Framework and Guidance - (Aged Care Quality and Safety Commission, 2019)*
- *Better practice guide to complaints handling in aged care services (Aged Care Quality and Safety Commission, 2021)*
- *Charter of Aged Care Rights 2019*
- *Code of Conduct for Aged Care 2022*
- *Quality Standards 2019*

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Feedback and complaints policy and procedure

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