



# ASTORIA

## PLATINUM VILLAGES

### COMPLAINTS AND FEEDBACK POLICY AND PROCEDURES

#### AUTHORISATION

**Authorised by:** Chief Executive Officer

**Date Effective:** January, 2020

**Review/Consultation:** Senior Managers

**Review Date:** January, 2024

**Changes to Version:** June, 2022

- i) Complaints Mechanisms – deleted word “health”
- ii) Lodging feedback – deleted word “home” and replaced with word “Village”
- iii) Complaint managing process –
  - a. Delete “one” and replace with “five” – Clause 27(3) Rule of Conduct;
  - b. Addition of words “preferably no more than 60 days from the date of the complaint”.
  - c. Delete “seven” and replace with “sixty”.
- iv) Change footer version date

**DISTRIBUTION:** All staff

**RISK:** High

#### POLICY

- (Resident)s/representatives, staff and other stakeholders will be engaged in the complaint and feedback process
- Complaints will be viewed as an opportunity to improve services.
- A three-level model of complaints management will be utilised whereby complaints will be handled on the frontline; through the internal system and where required externally
- (Resident)s/representatives will be provided with information and access to the internal/ external complaints mechanism

- Management will actively support (Resident)/ representative and staff to make complaints and provide feedback on all aspects of care and service delivery
- All suggestions will be recorded, monitored and acted upon to achieve a satisfactory solution via the comments/suggestion mechanism.
- Issues raised by a (Resident)/ representative will be dealt with fairly, promptly, confidentially and without fear of reprisal. This is in accordance with the Retirement Villages Act.
- (Resident)s will have access to advocates, language services and other methods when making complaints
- Procedural fairness and privacy will be afforded to all complainants
- Principles of cultural safety will be maintained when managing complaints
- Suggestions unable to be resolved internally will be referred to external agencies for resolution.
- Complaints that are resolved will be reviewed for effectiveness
- Systemic issues relating to complaints will be identified and investigated
- Stakeholders, including (Resident)s and community will be consulted in relation to the feedback and complaint processes
- Staff will receive orientation and education on the comments/ complaint's mechanism.

## KEY DEFINITIONS

- **Complaint:** An expression of dissatisfaction or a circumstance regarded as a cause for such expression.
- **Cultural Safety:** (Resident) experience of the care and services they are given and how they able they feel they are to raise concerns. The key features of cultural safety are; understanding a (Resident)'s culture, acknowledging differences, and being actively aware and respectful of these differences in planning and delivering care and services.
- **Open Disclosure:** An open discussion with Resident about an incident(s) that resulted in harm to the Resident while they were receiving health care.
- **Procedural Fairness:** Procedural fairness is concerned with the procedures used by a decision-maker, rather than the actual outcome reached. It requires a fair and proper procedure be used when making a decision.
- **Reprisal:** Retaliation for damage or loss suffered.

## PROCEDURES

### Complaints mechanisms

Staff, (Resident)s, representatives, contractors, visiting professionals and visitors are informed of internal and external complaints mechanisms and outcomes via:

- Handbooks
- Brochures
- Newsletters
- Meetings
- (Resident) and Contractor Agreements
- Posters and Signage
- Website
- Staff training
- Focus groups
- Orientation
- Education (staff and contractors)

### Lodging feedback and complaints

Complaints and feedback can be made through:

- Feedback forms – available throughout the Village
- Confidential boxes located at (reception)
- Speaking with staff
- Contacting management in person or in writing
- Responding to questionnaires and surveys
- Attending meetings and care conferences
- Contacting the Complaints Officer:

(Organisation) Complaints Officer:

Name	Terry Shanahan
Title	Director
Address	Level 1, 55 Grandview Street, Pymble
Phone	(02) 9488 6800
Email	terry@astoriagroup.com.au

- Contacting external complaints and advocacy agencies:
  - **Department of Fair Trading**
    - Phone: 133 220
- If the (Resident) or representative is deaf or has a hearing or speech impairment: support can be provided by 1800 555 677 (National Relay Service).

- If an interpreter is required: call 131 450 (Translation and Interpreting Service).

### Complaint management process

- Complaints relating to services are managed by the Village Manager and complaints relating to operations and support services will be managed by the Managing Director.
- Wherever possible, response and resolution will be provided immediately to (Resident)s/ representatives from Management or frontline staff
- Where a complaint is not able to be immediately resolved, Management will ensure:
  - Complaints and feedback are acknowledged within **five working day of receipt**. Complainants/ persons providing feedback (complainants) must be informed of the complaint procedure and their right to:
    - privacy
    - cultural safety
    - translation services (as required)
    - advocacy
    - preferred complaints handler
    - procedural fairness – a full and factual investigation is conducted, allowing the complainant for consideration of response and right of reply. The assigned Manager does not proceed with complaint handling where there is an actual or perceived conflict of interest, for, e.g. the complainant has previously lodged a complaint about the Manager or the complaint involves the Manager
  - The complainant is consulted regarding preferred outcome and acceptable timeframe for resolution preferably no more than 60 days from the date of the complaint. Where the preferred timeframe cannot be met, a reasonable explanation is provided to the complainant and the timeframe is negotiated. An expression of regret and where applicable, apology is provided to the complainant, e.g. “I am sorry that you are distressed”
  - A risk rating of complaints is completed to ensure any high-risk issues are investigated and managed as a priority and the agreed timeframe is set in keeping with the risks associated with the complaint and the complainant’s preference for closing the complaint out.
  - Where the complaint involves a health or safety incident, the Village Manager must utilise the Open Disclosure Standards for incident management
  - Complaints that involve reportable notification to government departments or criminal activity are reported by management in

accordance with required timeframes, e.g. suspected criminal activity will be reported immediately to the police

- Complaints and feedback (where applicable) are investigated and action taken to resolve issues.
- The complainant is kept up to date with progress of complaint investigation and informed of the outcome of the investigation.
- Where the complaint is not resolved after sixty days, the Managing Director will be informed to ensure there is oversight to the timely resolution of complaints.
- The complainant is satisfied with the resolution.
- The outcome is evaluated to ensure it is effective.
- An outcome is provided in writing to the complainant (where requested or where required based on the risk associated with the complaint).
- In consultation with the complainant, the complaint is referred to the Managing Director when the complaint cannot be resolved by the Village Manager.
- Where the complaint cannot be resolved a recommendation will be made to the resident to seek advice from the Department of Fair Trading on Complaints and Mediation services that they offer.
- All feedback and complaints must be recorded on the Comments and Complaints Form and Complaint Investigation Form and on the Complaints and Feedback Register.
- Systemic issues must be investigated in relation to complaints

## Documentation and reporting

- Until a complaint is resolved, the Comments and Complaints Form and Complaint Investigation Form are to be held by the relevant manager and then returned to the Managing Director for recording when finalised.
- Complaint and comments records must include all supporting evidence to the complaint including:
  - The complainants name and contact details
  - Details on the nature of the complaint
  - Dated and signed records of any correspondence or discussion with the complainant
  - Records of any action taken in addressing concerns detailed in the complaint
  - Signed and dated records of discussions or correspondence with the complainant on resolution of the matter
  - Evaluation method and outcome.

## Complaints and Feedback: Consultation

Staff, (Resident)s, representatives, contractors, visiting health professionals and visitors are consulted in relation to complaints mechanisms and provided with feedback via:

- Newsletters
- Meetings
- Focus groups
- Surveys (consultation only)

## RELATED DOCUMENTS

- Compliment, Complaint or Feedback Form ((Resident)s, Representatives, Contractors)
- Complaint Investigation Form (registering and investigating of complaint)
- Feedback and Complaints Register
- Complaint Acknowledgement Letter
- Feedback and Complaint Questionnaire

## REFERENCES

- NDIS Quality and Safeguards Commission Effective Complaint Handling Guidelines for NDIS Providers, 2015, Commonwealth of Australia (Department of Social Services)
- Australian Commission on Safety and Quality in Health Care (2013), Australian Open Disclosure Framework.
- Department of Fair Trading
- The Retirement Villages Act 1999