

<b>Title</b>	Feedback and Complaints Policy & Procedure		
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<b>Effective date</b>	27/10/2017	<b>Review date</b>	27/10/2020
<b>Authorised by</b>	Executive	<b>Date approved</b>	27/10/2017
<b>Applicable to</b>	Not state specific		
<b>Policy Statement</b>	<p>Good Shepherd Australia New Zealand (GSANZ) and Good Shepherd Services (GSS) will encourage all forms of feedback (including complaints) about the way it works, its interactions and relationships with the community and the services and programs it provides. People who provide and use GSANZ &amp; GSS programs and services have the right to contribute to the quality of the programs and services.</p> <p>GSANZ &amp; GSS will act fairly and transparently and treat both those who provide and those who are the subject of complaints with dignity, courtesy and respect. The privacy and confidentiality of all parties will be protected. GSANZ &amp; GSS will be responsive to feedback and complaints and accountable for the management and outcomes of the feedback and complaints.</p> <p>GSANZ &amp; GSS will actively promote, to all who come into contact with it and those who use its services, opportunities to:</p> <ul style="list-style-type: none"> <li>▪ provide feedback</li> <li>▪ take all feedback (positive or negative) seriously and respond promptly</li> <li>▪ judge all complaints on their merits and facts, acting on any conflict of interest</li> <li>▪ provide an appropriate remedy for any complaint that is substantiated</li> <li>▪ provide a clear explanation of what actions have been undertaken, and why, as a result of the feedback or complaint</li> <li>▪ provide those giving feedback with access to the appeals procedure and/or external processes, should they be dissatisfied with the way the feedback process was handled</li> <li>▪ record, assess and review feedback, positive or negative</li> <li>▪ manage information obtained through the feedback process according to privacy and confidentiality requirements.</li> </ul>		
<b>Policy Objective</b>	<p>This policy aims to inform and educate GSANZ staff, volunteers, consultants and contractors, and the people they work with about:</p> <ul style="list-style-type: none"> <li>▪ the feedback and complaints processes</li> <li>▪ the complaints register and process for documenting and reporting complaints</li> <li>▪ the value of complaints and</li> </ul>		

	<ul style="list-style-type: none"> <li>our ability to learn from complaints for continuous improvement.</li> </ul> <p>It specifies the processes for resolution of complaints made by people who come into contact with or use GSANZ &amp; GSS programs and services, including avenues for complaint resolution outside GSANZ.</p>
<b>Background</b>	The gathering and acceptance of feedback will support the development of quality of programs and services the Agency provides and the continuous improvement philosophy.
<b>GSANZ Purpose</b>	To disrupt the intergenerational cycle of disadvantage and enable fullness of life especially for women and girls.
<b>Scope</b>	<p>The policy and procedure is available to all people who come into contact with or use Good Shepherd Australia New Zealand and Good Shepherd Services programs or services including our partners and their clients.</p> <p>This policy applies to feedback and complaints about programs, services and all staff, volunteers, consultants, contractors, and carers.</p> <p>All GSANZ &amp; GSS people are expected to comply with this policy. This includes, but is not limited to, employees who are engaged by GSANZ &amp; GSS on a permanent, full-time, part-time, fixed term or casual employment basis, as well as board members, volunteers, contractors, consultants and students engaged by GSANZ.</p> <p>For work related complaints refer to HRE-006 Grievance and Dispute Resolution Policy</p>
<b>Relevant legislation and Standards</b>	<p>ACFID Code of Conduct - <a href="http://www.acfid.asn.au/code-of-conduct/code-of-conduct">http://www.acfid.asn.au/code-of-conduct/code-of-conduct</a></p> <p>UN Guidelines for Consumer Protection - <a href="http://www.un.org/esa/sustdev/publications/consumption_en.pdf">http://www.un.org/esa/sustdev/publications/consumption_en.pdf</a></p> <p><i>Ombudsman Act, 1973 (Vic)</i></p> <p><i>Ombudsman Act, 1974 (NSW)</i></p> <p><i>Freedom of Information Act, 1982 (Cth)</i></p> <p><i>Victorian Charter of Human Rights and Responsibilities Act 2006 (Vic)</i></p> <p><i>Australian Human Rights Commission Act 1986 (Cth)</i></p> <p><i>Privacy and Data Protection Act, 2014 (Vic)</i></p> <p><i>Privacy Act, 1988 (Cth)</i></p>
<b>Related Policies and Procedures</b>	<p>SER-FRM-009 Complaint Form</p> <p>SER-PLN-005 Complaints Investigation Plan</p> <p>SER-REP-001 Complaint Investigation Report</p> <p>SER-PRO-023 Your Say (client feedback) Procedure</p> <p>For work related complaints refer to HRE-006 Grievance and Dispute Resolution Policy</p>

<b>Risk awareness</b>	Potential compliance and reputational risks.
<b>Supersedes</b>	SER-005 Feedback and Complaints Policy
<b>Abbreviations/Term</b>	<b>Definitions/Description</b>
<i>Advocate/ Representative</i>	<i>a person who supports or defends another person's cause</i>
<i>Community Elder/ Leader</i>	<i>A prominent and respected member of a particular community, especially one with an active and specific social or political role or position</i>
<i>Complaints</i>	<i>are expressions of dissatisfaction made by people who come into contact with or use Good Shepherd Australia New Zealand and Good Shepherd Services's programs or services.  are anything that a client thinks is unfair or which makes them unhappy with our service.</i>
<i>Complaint types</i>	<i>include complaints about the quality of services provided, Good Shepherd Australia New Zealand and Good Shepherd Services's physical environment and facilities.</i>
<i>Disciplinary action</i>	<i>will be commensurate with the severity of the offence and may include performance counselling, training, retraining or professional development, supervision, or other disciplinary measures up to and including demotion or dismissal.</i>
<i>Feedback</i>	<i>includes praise, suggestions for improvement, comments, compliments, complaints, allegations and thanks. Feedback may be collected routinely as part of the evaluation and improvement process and spontaneously from individuals.</i>
<i>Feedback collection methods</i>	<i>include end of program or exit surveys and interviews, suggestion boxes, focus groups, client questionnaires, staff surveys, community and/or stakeholder consultation, thank you cards etc.</i>
<i>Forms of feedback</i>	<i>include letters, including email, complaint forms, including hard copy and those received via the GSANZ &amp; GSS website, surveys, evaluation or response sheets, conversations, community consultations, consumer reference groups.</i>
<i>Frivolous Complaint</i>	<i>is one (or a series of many) that has no serious purpose or value</i>
<b>GSANZ</b>	<i>Good Shepherd Australia New Zealand and Good Shepherd Services is the network leaders of a number of other subsidiary organisations including Good Shepherd Services (GSS)</i>
<b>GSS</b>	<i>Good Shepherd Services</i>
<i>Interpreter</i>	<i>a person who interprets, especially one who translates speech orally or into sign language</i>

<i>Malicious complaints</i>	<i>are those complaints which are filed with a malicious intent; i.e., an intention to harm.</i>
<i>Natural justice</i>	<i>is procedural fairness. Under this policy procedural fairness in the resolution of complaints will be achieved by decision makers acting in good faith and granting a hearing, before the decision is made, to any person whose interests will be affected by the exercise of that decision.</i>
<i>Prescribed access</i>	<i>means that access to information is protected and limited to a defined small group to ensure confidentiality and privacy.</i>
<i>Remedies</i>	<i>may include an apology, an explanation, an admission of fault, changes to policies or procedures, changed decisions, disciplinary action, mediation and referral to external body for investigation.</i>
<i>Service Recipient</i>	<i>A person who receives the services of GSANZ &amp; GSS and or our partners or contractors</i>
<i>Vexatious Complaint</i>	<i>is one (or a series of many) that is specifically being pursued to simply harass, annoy or cause financial cost to their recipient</i>
<i>Vulnerable or disadvantaged people</i>	<i>a child or children; or an individual aged 18 years and above who is or may be unable to take care of themselves, or is unable to protect themselves against harm or exploitation by reason of age, illness, trauma or disability, or any other reason. And/or individuals or groups of people who: Face special problems such as physical or mental disability. Lack money or economic support. Are politically deemed to be without sufficient power or other means of influence.</i>
<b>Responsibility</b>	<p>All staff and volunteers have responsibilities to adhere to this policy.  All Managers have responsibilities to ensure that staff and volunteers are adhering to this policy.  Managers will ensure that:</p> <ul style="list-style-type: none"> <li>▪ the feedback and complaints policy information is publicly displayed and promoted</li> <li>▪ feedback and complaint forms are publicly available</li> <li>▪ all staff know and follow this policy and procedures</li> <li>▪ a feedback and complaints register is maintained, with prescribed access and reports provided to the Board annually.</li> <li>▪ feedback (including complaints) data is used in planning and improvement processes at the location.</li> </ul> <p>Program managers will ensure that:</p> <ul style="list-style-type: none"> <li>▪ the feedback (including complaints) procedure is provided to all who use the programs and services, in an appropriate format or mode</li> <li>▪ feedback from those who use the program and services is gathered actively and routinely as part of the program development, evaluation and quality improvement process</li> </ul>

	<ul style="list-style-type: none"> <li>▪ responses to feedback, including complaints is timely and considered.</li> <li>▪ individuals personal information is protected in accordance with GSANZ Privacy policy</li> <li>▪ feedback (including complaints) data is used in planning and improvement processes.</li> </ul>
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## 1 Procedures

### 1.1.1 Good Shepherd Australia New Zealand and Good Shepherd Services will:

- judge all complaints on their merits and facts, acting on any conflict of interest
- investigate and provide an appropriate remedy for any complaint that is substantiated
- provide a clear explanation of what actions have been undertaken, and why, as a result of the complaint
- provide those making complaints with access to the complaints procedure and/or external processes, should they be dissatisfied with the way the complaint process was handled
- manage information obtained through the complaint process according to privacy and confidentiality requirements.

### 1.2 Feedback and Complaints collection, utilisation and reporting principles

- 1.2.1 All people who use GSANZ & GSS programs and services will be informed of the feedback and complaints process at the commencement of service delivery and or as needed using the Client Handbook and via the Good Shepherd website. The information will be in plain English, and where required, communicated through an interpreter or a client's advocate.
- 1.2.2 Feedback is built into GSANZ's planning and review cycle and sought from all people who use GSANZ & GSS programs and services.
- 1.2.3 All feedback collected through this process will be subject to GSANZ privacy and confidentiality policies and procedures.
- 1.2.4 Feedback and complaints are collected in writing via the Complaints and Feedback Form, GSANZ Website, Your Feedback Form, email or verbally. Where a complaint is collected verbally, a GSANZ & GSS staff member will record details of the complaint on a Complaints and feedback form.
- 1.2.5 Feedback is also collected via the Your Say Form. Refer to SER-PRO-023 Your Say (client feedback) Procedure. Results of the Your Say survey are reported to the Quality Review Committee (QRC) monthly by the Quality Risk and Compliance Manager.
- 1.2.6 All feedback and complaints are recorded and reported to Quality Risk and Compliance Manager and logged into the Complaints and Feedback Register.
- 1.2.7 The QRC will monitor the Feedback and Complaints Register and include an analysis with recommendations for change in the bi-annual Quality Management Review.

## 2 Supporting guidelines

### 2.1 Complaints System Overview

- 2.1.1 This complaints system covers complaints by people coming into contact with and/or using GSANZ & GSS programs and services.
- 2.1.2 All complaints will be investigated confidentially, impartially and promptly. Any person involved in resolution of a complaint must be without bias and not identified in the complaint.
- 2.1.3 If a GSANZ & GSS staff member is identified in the complaint, they have the right to be informed of the nature of the complaint, given the opportunity to respond fully and be represented if required.
- 2.1.4 Vulnerable or disadvantaged people who wish to make a complaint will be supported to do so and provided with access to an interpreter, advocate, or representative.

## **2.2 Complaint investigation principles**

- 2.2.1 The wellbeing of service recipients will remain paramount in any complaints process.
- 2.2.2 All people who use GSANZ & GSS programs and services will be informed of the complaint policy and procedures and be aware that, at any time, they may make an informal or formal complaint to GSANZ & GSS about any service or program activity, either in person, on the phone, via the website, or in writing. This information will be in plain English and can be communicated through an interpreter or provided in other appropriate languages or formats where required.
- 2.2.3 Natural justice will be the guiding principle in all complaint investigations. Complaints, complainants and those who may be subject to a complaint will be treated with fairness, objectivity, respect and dignity. Decisions relating to complaints will be made on the weight of evidence and on the balance of probabilities.
- 2.2.4 Complainants and those who may be the subject of the complaint will be supported. Each has the right to a friend, an advocate, an interpreter or community elder or leader as a support person at any stage in the process.
- 2.2.5 The complaint investigation process will be planned, resourced, and explained clearly to the complainant and the subject to the complaint.
- 2.2.6 Complaint investigation processes will be conducted within defined time lines and outcomes clearly explained to the complainant, the subject of the complaint, and any relevant personnel.
- 2.2.7 Complainants dissatisfied with the complaints process will be offered processes to deal with these concerns. This will include appeals procedures or referral to external agencies and authorities.

## **2.3 Complaints register**

- 2.3.1 A complaints register will be maintained centrally by the Quality, Risk and Compliance Manager. The register will be stored securely, with prescribed access.

## **2.4 Informal complaints**

- 2.4.1 'Complaints' may be enquiries or concerns which can be resolved informally, over the phone or in person. All staff have the ability and authority to discuss and resolve the matter directly with the client as quickly as possible.
- 2.4.2 Decisions and actions of the complaint are recorded in the Complaints Register.
- 2.4.3 Informal complaints should be resolved within five (5) working days and the resolution of the complaint recorded in the complaints register.
- 2.4.4 If the complaint cannot be resolved informally, the complainant should make a formal complaint in writing.

## **2.5 Formal complaints**

- 2.5.1 Complainants may make a formal complaint with or without using the informal complaints process.
- 2.5.2 Complaints and feedback can be made via the online form on the Good Shepherd website. Complaints and feedback can also be received via mail, email, or verbally.
- 2.5.3 Online complaints and feedback are directed to the Corporate Services General Manager at Head Office; 6 Paterson Street ABBOTSFORD VIC 3067
- 2.5.4 Formal complaints can be received using the SER-FRM-009 Complaint Form. The form may be filled out by the complainant, an advocate for the complainant, or a GSANZ & GSS staff member where the complaint is made verbally.
- 2.5.5 The completed SER-FRM-009 Complaint Form is to be provided to their manager, unless the complaint is against that manager in which case it should be provided to

another manager. The manager who received the form will determine the appropriate person to investigate the complaint.

2.5.6 It is not appropriate for staff to investigate a complaint made against themselves.

2.5.7 Formal complaints should contain as much detail as possible.

## 2.6 Complaints against the ACFID Code of Conduct

2.6.1 A person wishing to make a complaint against Good Shepherd Australia New Zealand and Good Shepherd Services being in breach of compliance to the ACFID Code of Conduct or not adhering to the ACFID Code of Conduct can make a formal complaint to ACFID via the ACFID Code of Conduct Committee. Full procedures are available on their website: <http://www.acfid.asn.au/code-of-conduct/complaints> and a complaints form or inquiry should be completed and emailed to ACFID: [complaints@acfid.asn.au](mailto:complaints@acfid.asn.au) or by mail to: ACFID Growth and Effectiveness Team, Private Bag 3, Deakin ACT 2600. For further information, please contact ACFID them by telephone: +61 2 6285 1816.

## 2.7 Investigation of formal complaints

2.7.1 The person investigating the complaint should:

- advise the complainant of the process including timelines, confidentiality, fairness and safety from discrimination or retribution
- advise the complainant of the right to an advocate, friend, interpreter or community elder or leader as a support at any stage throughout the process
- ascertain the outcome sought by the complainant
- give the program area/individual identified in the complaint a copy of the complaint and explain the right to support, confidentiality, fairness and the right to respond
- where a complaint is potentially vexatious, malicious, or frivolous, refer to section 2.12 below
- talk with the complainant, program representatives or identified persons, gather any documentation - evidence should be corroborated and stored securely.
- talk with witnesses, assuring them of confidentiality and safety from retribution
- complete the complaint process within 15 working days (using both SER-PLN-005 Complaints Investigation Plan, for planning the investigation, and SER-REP-001 Complaint Investigation Report for documenting what the investigation found)
- explain to the complainant, and any identified person, the findings of the investigation, the reasons for the decision, and the remedy or action to be taken
- explain to the complainant the right to appeal using internal review processes or external review processes
- depending on the complaint type, the person investigating the complaint may consult with the People and Culture Manager or the General Manager of the staff member involved.
- record substantiated and unsubstantiated complaint outcomes in the complaints register.

## 2.8 Internal review processes

2.8.1 The internal review process will be used if the complainant considers the *investigation process* to be unsatisfactory. The internal review/appeal procedure will:

- be available to all complainants
- ensure the complaint is taken seriously

- ensure the complaint is addressed at a senior level, conducted by a manager not previously involved in the complaint or process
- provide a response for the complainant and take remedial action, including an apology if appropriate
- address any systemic issues identified
- complaints escalated to risks are reported to the Executive Leadership Team and the Board, as appropriate.

## **2.9 External complaints processes**

2.9.1 Complainants have the right to complain to the relevant external authorities who are set up to hear such complaints. These authorities may investigate GSANZ's administrative processes but not adjudicate on, for example, the outcomes of professional decision making.

2.9.2 Complaints can also be lodged in the Philippines and Thailand where Good Shepherd carries out work with various producer groups (listed below). Complaints relating to the following producer groups should be lodged to Sisters of Good Shepherd;

### **Philippines:**

- The Welcome House
- Alay Kapwa

Contact: Sister Ailyn Binco  
Email: ailynrgs@gmail.com

### **Thailand**

- The Regina Center
- The Chiang Rai Center
- The Fatima Center
- Hands of Hope

Contact: Sister Supapawn Chotiphon  
Email: su.marie@yahoo.com

## **2.10 Serious Complaints**

2.10.1 Complaints which involve criminal allegations, assault, serious misconduct, fraud and corrupt behaviour must be directed to the police or other bodies. The CEO of GSANZ & GSS will ensure this occurs.

## **2.11 Disciplinary procedures following substantiated complaints**

2.11.1 If, as a result of the investigation, GSANZ's policies were found to have been breached, disciplinary action may be recommended. Disciplinary action will be determined by the Line Manager with consultation with the People and Culture Manager and the relevant National Manager or General Manager. Any disciplinary action must be commensurate with the seriousness of the breach and take mitigating circumstances into account.

## **2.12 Unsubstantiated or vexatious complaints**

2.12.1 If the complaint is not substantiated the outcomes must be recorded and the parties informed.

2.12.2 If after due consideration there are grounds for believing that the complaint is frivolous, malicious or vexatious the complainant will be informed of the decision and the reasons for it.

#### Document history

Version	Reason	Date
1	Version 1 due to the new GSANZ & GSS documentation system. No change to content but updated to new template and new document ID. Document prior was version 2, updated content August 2013.	3/02/2015
2	New title and updated to absorb what was in SER-005 Feedback and Complaints and included NSW legislation.	15/07/2016
3	Complaint form, complaint investigation report, and complaint investigation plan added as appendix Revised in line with current practice of collecting feedback and complaints; via website, in writing and “your say” process. Update of position titles. Addition of terms and their definition	06/09/2017
4	Addition of contact details of individuals where complaints can be lodged in countries where Good Shepherd carries out work (Thailand and Philippines) in line with ACFID Code of Conduct	??/10/2017

## Appendix 1: Complaint Form

<b>Name</b>	
<b>Address</b>	
<b>Phone number</b>	
<b>Mobile phone</b>	
<b>Instructions for contacting me</b> (Please give any special instructions e.g. do not ring at night, do not come to my home)	
<b>I am making this complaint on behalf of:</b> (Please give the name of the person you are complaining for e.g. your child)	
<b>My complaint is:</b> (Please give as much detail as possible: dates, places, names, letters and forms etc.)	
<b>I would like you to...</b> (eg- investigate, review your decision, apologise, etc)	
<b>I need some help with my complaint</b> (please say the help you need: a friend, an interpreter, an elder to come with you)	<b>I need:</b>
<b>Date:</b>	
<b>Signature:</b>	

<b>Possible solutions negotiated with the client:</b>	1.
	2.
	3.
<b>Solution chosen</b>	
<b>Outcome/ Resolution</b>	

- I am satisfied with the way my complaint was handled.
- I am not satisfied with the way my complaint was handled and wish to be provided with an external option.

Name:

Signature:

Date:

## Appendix 2: Complaint Investigation Report

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Focus on the issues, examined, the actions taken and the outcome.

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Executive summary (only for large and detailed reports)

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The complaint

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Introduction/background

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Investigation

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Discussion of evidence

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Conclusions

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Remedy

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Recommendations

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Response

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Appendices

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### Appendix 3: Complaint Investigation Plan

**Complaint/allegation**

**Issue(s) for investigation**

**Standards/tests that apply** (e.g. registration standards, legal requirements, policy etc.)

**Avenues of investigation**

Documents to be obtained	Date

Persons to be interviewed/sites inspected/resources required	Date

**Expert opinion required?**

**Procedural fairness** (report adverse comment to complainant, allow both parties to respond, etc.)

**Other**

Estimated completion	Date