

Feedback and Complaints Policy

Ashfield Baptist Homes actively encourages and seeks feedback from all stakeholders. This includes Residents, their families and visitors, representatives and carers, workers (including contractors and volunteers) and health professionals.

Feedback enables the Service to:

- improve the quality of care and services provided to Residents
- gain insights into the needs and wants of Residents and their families, representatives and carers
- address minor issues before they become complaints
- build positive relationships with Residents, and their families, representatives and carers.

Feedback Accessibility

Residents, their families, representatives and carers, workers, contractors, volunteers, health professionals and visitors are informed of internal and external feedback and complaints mechanisms through:

- handbooks
- brochures
- newsletters
- meetings
- Resident and contractor agreements
- posters and signage
- our website
- workforce training.

For further information about our broader practices and procedures for Resident engagement, refer to our Resident Engagement Statement.

Mechanisms for Providing Feedback

- Feedback can be provided through:
- hard copy feedback forms
- confidential suggestion boxes located at reception
- speaking with staff directly
- contacting the GM - Care Services or Chief Executive in person or in writing
- responding to questionnaires and surveys
- attending meetings and care conferences
- directly through our online Feedback Form.

Assessing Feedback

Ashfield Baptist Homes categorises feedback using the “three C’s” – whether it is a compliment, comment or complaint.

A **compliment** is any positive feedback that we, or a member of our workforce receives.

A **comment** is a neutral statement of feedback that can neither be categorised as positive or negative, where a response or resolution is not expected or required.

A **complaint** is an expression of dissatisfaction related to our care, services, workers or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

All compliments, comments and complaints (no matter how they are received) are recorded using our Feedback Form, [available here on our website](#), and analysed to ensure we are continuously improving our care and services.

Feedback and complaints received may be indicators of other incidents that may have occurred such as those related to Resident care or services. Where feedback or complaints identify areas for improvement, an Improvement register should be used.

Managing Compliments and Comments

All compliments and comments are recorded using our Feedback Form to ensure that we are capturing positive and neutral feedback. Positive or neutral feedback such as compliments and comments are shared back with staff, contractors and volunteers as appropriate. Sharing these compliments and comments can serve to boost morale and work satisfaction amongst the workforce.

Managing Complaints

All complaints are managed through our Complaints Handling Program which takes into account our Open Disclosure obligations.

Complaints Handling Program

Standard 2 of the strengthened Aged Care Quality Standards requires Ashfield Baptist Homes to have a system to resolve complaints. The system must be accessible, confidential, prompt and fair. It should also support all Residents to make a complaint or give feedback. Resolving complaints within the Service can help build the relationship between the Resident and the Service. It can also lead to better outcomes.

Our Commitment to Complaints Handling

Our ability to identify, manage and promptly resolve complaints, received from Residents, their representatives and other key stakeholders, is an important aspect of our management practices. Our Board of Directors and Chief Executive and Management team are committed to handling complaints effectively and efficiently. This commitment is demonstrated through:

- the establishment, implementation and maintenance of this Program
- the appointment of a Complaints Officer to oversee this Program
- the appointment and training of senior staff to act as Managers
- training of our workforce about our complaints handling procedures
- ensuring our complaints handling procedures are accessible to all Residents, their representatives and other key stakeholders
- the establishment of our online complaints management system
- regular analysis of complaints received, and the implementation of rectification action where deficiencies in our internal systems and procedures are identified.

Guiding Principles for Handling Complaints

To manage complaints effectively, we have established a Complaints Handling Program in line with both the international complaints handling standard (ISO 10002:2018), and the Australian complaints handling standard (AS/NZS 10002:2014) (collectively referred to as the Complaints Handling Standards), and the Better Practice Guide to Complaint Handling in Aged Care Services.

When managing a complaint or an appeal, we always aim to apply the following Guiding Principles as set out in the international complaints handling standard (ISO 10002:2018).

These principles are mirrored in the Australian complaints handling standard (AS/NZS 10002:2014) in more detail, however, in the interests of ensuring that complaints handling at the Service is as simple and efficient as possible, we use the (ISO 10002:2018) Guiding Principles.

Commitment	We are actively committed to defining and implementing a complaints handling process.
Capacity	<p>We make sufficient resources available for, and are committed to, complaints handling, and we manage those resources effectively and efficiently.</p> <p>Transparency Our complaints handling process is communicated to staff, volunteers and contractors, Residents, their representatives and other relevant interested parties. We provide individual complainants with adequate information about the handling of their complaint.</p>
Accessibility	We aim to make the complaints handling process simple and easily accessible to all. We make information available in relation to the details of making and resolving complaints and all complaints handling information is easy to understand and use. This is particularly important where Residents may have barriers to using the complaints system, such as diversity of culture or language.
Responsiveness	We address the needs and expectations of potential complainants with respect to complaints handling.
Objectivity	<p>We address each complaint, on its merits, in an equitable, objective, and unbiased manner through our complaints handling process, applying principles of procedural fairness and natural justice.</p> <p>Charges Access to our complaints handling process is free of charge to the complainant.</p>
Information Integrity	We ensure that the information about our complaints handling process is accurate and not misleading, and that data collected is relevant, correct, complete, meaningful and useful.
Confidentiality	<p>Personally identifiable information about complainants is only made available for the purpose of addressing the complaint within the Service and, unless the complainant consents, actively protected from disclosure.</p> <p>Complainant Focused Approach We aim to put ourselves in the shoes of the complainant and understand the complaint from their point of view. We adopt a complainant-focused approach with respect to handling complaints and are open to feedback on our complaints handling process.</p>
Accountability	<p>We have established, and maintain, accountability for, and reports on, the Service decisions and actions with respect to complaints handling.</p> <p>Improvement One of the Service's permanent objectives is the increased effectiveness and efficiency of our complaints handling process.</p>
Competence	Our workforce has the personal attributes, skills, training, education and experience necessary to handle complaints.
Timeliness	The Service handles complaints as quickly as possible given the nature of the complaint and the process used.

We have adopted the definition of "complaint" from the Australian complaints handling standard (AS/NZS 10002:2014) which defines a complaint as 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 or legally required."

The term "complaint" is used to refer collectively to any enquiry, comment, complaint or dispute raised by a person expressing dissatisfaction as to a particular circumstance, or situation, related to our services or operations.

A "person" includes Residents, their representatives, strategic partners, regulators, and can even extend to competitors and members of the public generally. A person may be a natural person, an organisation, or a representative of an organisation.

Frontline Complaints and Formal Complaints

Complaints can be generally classified as either frontline complaints or formal complaints.

A Frontline Complaint is a complaint that can be resolved either at the time the complaint is made and received, or very shortly after it's received. The majority of complaints are frontline complaints – addressed by frontline or first point of contact workers.

A Formal Complaint is a complaint that requires further investigation and/or a written acknowledgement and response.

Staff grievances are not "complaints" for the purpose of this Program
Internal grievances (complaints) received from staff are not managed through this Program.
These are managed through our Internal Grievance Resolution Procedures.

Our Open Disclosure Obligations

Where a complaint relates to an incident where something has gone wrong that has harmed or had the potential to cause harm to a Resident, we are required under Standard 2 of the strengthened Aged Care Quality Standards to apply open disclosure.

Open disclosure is the open discussion that a provider of care or services has with Residents when things go wrong, that have harmed, or had the potential to cause harm, to a Resident. This may also involve the Resident's family, carers and other support people, when a Resident would like them to be involved.

Open disclosure involves an expression of regret by the provider and a factual explanation of what happened, the actual and potential consequences and what steps are being taken to manage this and prevent it happening again.

Our online feedback form is designed to capture complaints that require the application of open disclosure and has workflow embedded that requires the person managing the complaint to consider the application of open disclosure principles and implement them accordingly. For more information refer to Open Disclosure.

We Have a Legal Obligation to Manage Complaints

The legislative and regulatory obligation to provide effective complaints handling stems from several sources.

Aged Care Act 2024 (Cth) - Section 165

Complaints resolution mechanisms

The approved provider must:

- establish a complaints resolution mechanism for the *aged care service; and
- use the complaints resolution mechanism to address any complaints made by or on behalf of a person to whom care is provided through the service; and
- advise the person of any other mechanisms that are available to address complaints, and provide such assistance as the person requires to use those mechanisms; and
- comply with any requirement made of the approved provider under rules made for the purposes of subsection 21(2) of the *Quality and Safety Commission Act.

If the *aged care service is a residential care service, the complaints resolution mechanism must be provided for in the *resident agreements entered into between the care recipients provided with care through the service and the approved provider (see paragraph 59-1(1)(g)).

Aged Care Quality Standards

Organisations providing Commonwealth subsidised aged care services are required to comply with the strengthened Aged Care Quality Standards. Providers will be assessed and must be able to provide evidence of their compliance with and performance against the Quality Standards. Standard 2 focuses on feedback and complaints management and requires Ashfield Baptist Homes to have a complaints management system in place to receive, record, respond to, and report on complaints.

Older people, their families, friends, carers, workers, and others must be encouraged and supported to provide feedback and make complaints.

To ensure accessibility, Residents must be informed about and have access to advocates, language services, and other methods for raising and resolving complaints. When complaints are made, timely action must be taken to resolve them, and an open disclosure process should be followed when things go wrong.

In addition, feedback and complaints must be collected, analysed, and reported to the governing body, older people, and workers. These insights should inform Ashfield Baptist Homes quality system to continually improve care and services. To maintain effectiveness, the complaints management system should be regularly reviewed and improved.

Statement of Rights

Under the Statement of Rights, all Residents have the right to open communication and support from registered providers when issues arise in the delivery of funded aged care services, complain free from reprisal, and to have their complaints dealt with fairly and promptly.

Why We Want to Know About Complaints

Complaints Identify Opportunities for Improvement

Encouraging feedback from parties external to Ashfield Baptist Homes, including complaints from Residents, their family, carers, representatives and advocates, and members of the wider community, can offer opportunities to improve our care practices, service levels and operations.

Complaints are a common indicator of low Resident satisfaction, but their absence does not necessarily imply high Resident satisfaction.

Encouraging complaints, and having an effective system to receive and manage them:

- encourages constructive feedback
- improves the quality of our care and services provided to Residents
- provides insights into the needs and wants of Residents and their families, representatives and carers
- builds positive relationships with Residents and their families, representatives and carers
- enhances our ability to capture and resolve complaints in a consistent, systematic and responsive manner
- enhances our ability to identify systemic and recurring problems and to continually improve our internal systems and controls
- assists us to develop a Resident-focused approach to resolving complaints and assists workers to improve their skills in working with Residents as well as other external parties
- ensures that we comply with our legal and regulatory obligations
- assists our workforce in dealing with difficult and/or aggressive people.

The increased growth and speed of communications through social media make it more important than ever that we capture complaints early and manage them effectively. Our reputation is one of our greatest assets, and our ability to effectively manage complaints relates directly to our ability to maintain our reputation.

Resolution-Focused Complaints Handling

All complaints received by Ashfield Baptist Homes provide the opportunity to analyse why something has happened, and how it can be improved or prevented in the future. This does not mean that complaints handling should be blame-focused, but rather resolution-focused.

Ashfield Baptist Homes takes a resolution-focused, continuous improvement approach to complaints handling that:

- encourages regular, ongoing feedback from Residents about the quality of care and services that they receive
- uses a collaborative approach with complainants to find timely resolutions to complaints through open communication and transparent processes, including open disclosure processes
- allows Ashfield Baptist Homes and its workforce to learn from complaints by considering feedback and complaints in the development of risk management, service delivery and staff development systems, and in the development of Improvement registers.

How Do We Encourage Feedback? (Transparency and Accessibility)

It is important that information about how to provide feedback and make a complaint is made publicly available.

Refer to our Feedback Policy and Procedures for more information about how we provide opportunities for all stakeholders to provide feedback.

We have implemented the following steps to encourage feedback, and to make it easy for people to lodge a complaint:

- publishing our Feedback and Complaints Handling Procedures directly to Residents and their representatives, in a manner that can be easily understood
- ensuring the availability of information with respect to feedback and complaints in the Resident's language and appropriate formats
- the promotion of Resident advocacy services within the Service and supporting diverse and vulnerable groups to give feedback about their care and services
- a short form Complaints Handling Policy with information on how to make a complaint is available on our public website
- where we identify that a complainant has limited literacy skills, we give them help in expressing their complaint or dispute more clearly
- our workforce is made aware of the importance of capturing and recording critical feedback many complaints are received via telephone, in person, or via email, and the ability of our workforce to recognise a complaint, and to capture it effectively, is a central feature of our Complaints Handling Program

- we have developed a Complaints Handling Guide, which includes details of how to make a complaint. This plain English guide is provided to complainants to assist them during the complaints resolution process. It may be translated into different languages as required.
- providing translation services and other communication and hearing support services to help Residents give feedback and make complaints.
- using an online Feedback Form to capture complaint details
- having regular Resident and/or representative/family case meetings
- appointing Managers who are available to hear complaints at all times
- providing regular reminders from the Management team to workers about the value of feedback and complaints
- training workers to be proactive in listening for potential and actual complaints using our L.E.A.R.N.™ Complaints Handling Technique: Listen, Empathise, Acknowledge, Respond and Notify
- promoting the Aged Care Quality and Safety Commission's complaints system
- support Residents and their representatives to access services that can support them by discussing any concerns about the care that they or someone else is receiving. The available services include:
 - Advocacy Service – Older Persons Advocacy Network (OPAN) on 1800 700 600
 - Translating and interpreting services
 - National Relay Service if you have a hearing or speech impairment.

Further information, including contact information is available [here](#).

We also encourage feedback by providing the option to make an anonymous complaint, or make a complaint using a pseudonym, in accordance with [Australian Privacy Principle 2](#).

Complaints Handling Responsibilities

Our Complaints Officer

We have appointed a Complaints Officer,

Chief Executive in conjunction with the GM - Care Services & Quality Advisor who's responsible for:

- ensuring that our workforce is educated about our Feedback Policy and Procedures and Complaints Handling Program
- investigating and, where necessary, escalating complaints when requested by the complainant liaising with complainants and Managers
- maintaining accurate records in the Complaints Register

- regularly reporting to the Management team about complaints
- ensuring systemic complaints are identified and rectified
- monitoring the effectiveness of, and continually improving, our Complaints Handling Program.

Our Managers

We have appointed several key senior staff members to act as Managers. These individuals are authorised to investigate and manage Formal Complaints once they have been logged.

Managers are responsible for:

- investigating and, where necessary, escalating complaints to the Complaints Officer liaising with complainants
- maintaining accurate records in the Complaints Register.

Our Managers are:

- Care Managers
- Registered Nurses
- Other Service Managers

Our Workforce

Complaints may be received by any member of the workforce, at any time, either over the telephone, email, or during face-to-face meetings. So that complaints can be handled properly, it is important for all workers to be trained in our complaints handling processes, and, in particular,

- be familiar with our policies for Receiving and Logging Complaints
- be aware of their roles, responsibilities and authorities with respect to complaints be aware of what information to give to complainants
- report all complaints they receive
- treat complainants in a courteous manner
- demonstrate good interpersonal and communication skills.

All workers are authorised to deal with Frontline Complaints. Where a person makes a Formal Complaint, this must be referred to a manager.