



Complaints, Feedback and Incident Management Policy

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Related Documents

Document	Name
Policy	
Procedures, Manuals etc	Complaints and Incident Management Procedure, Complispace Manual

Document history

Version/s	Reviewer/s	Version Date	Comments
3	Stephanie Hook, Amy Webster	May 2019	
4	Amy Webster, Jennifer Dally	August 2020	

1. Introduction

1.1 Purpose

This policy is intended to ensure that Lifeline Australia handles complaints fairly, efficiently and effectively.

This policy provides guidance for people who wish to make a complaint and to our staff, on the key principles and processes of our complaint management system.

This policy also provides guidance on the key principles and process for managing critical incidents.

It also provides advice on how general feedback and compliments will be handled.

1.2 Scope

This policy applies to all Lifeline Australia staff (paid and volunteer), contractors and our Board. We / us refers to Lifeline Australia and its wholly owned subsidiary company. The policy refers to the process of receiving or managing complaints from the public and clients made to or about us, regarding our services and staff, or our complaint handling process. This policy also applies to Lifeline Centres delivering services under the auspices of Lifeline and should be used in conjunction with their own internal complaint handling procedures.

Lifeline is a member-based model, encompassing 40 Centres around Australia, all of which operate as separate entities. This means that each Lifeline Centre's individual Board of Governance oversees and has responsibility for all operational matters. Therefore, Lifeline Australia does not have direct control over Member staff or volunteer matters. We do, however, require all Lifeline Member organisations to act in accordance with acceptable complaints and grievance handling processes. We also require all Lifeline Centres to adhere to this policy in relation to our crisis support services (phone and text).

1.3 Organisational commitment

Lifeline Australia expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
CEO	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> • Report to the Board on our complaint handling. • Provide adequate support and direction to • key staff responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage staff to make recommendations for system improvements. • Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.
Staff whose duties include complaint handling	Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> • Ensure those who make complaints are heard and treated with empathy, discretion and respect. Assist people to make a complaint, if needed. Comply with relevant policy and associated procedures. • Provide regular feedback to the Leadership Executive or the Board on issues arising from complaints. Provide suggestions to Leadership Executive on ways to improve our complaints management system. • Implement changes arising from individual complaints and from the analysis of complaint data as directed by management. • Take a supportive, no-blame approach when dealing with staff involved in complaints.

All staff	Understand and comply with our complaint handling practices.	<ul style="list-style-type: none"> • Ensure those who make complaints are heard and treated with empathy, discretion and respect. • Be aware of our complaint handling policies and procedures. Assist people who wish to make complaints to access our complaints process. • Be alert to complaints and assist staff handling complaints to resolve matters promptly.
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2. Terms and Definitions

Complaint

An expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. This includes complaints made directly to us, and complaints made through social media forums.

Complaint handling/management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints and incidents.

Compliment

An expression of praise, gratitude or recognition made about us, our service or staff in relation to a specific event or in general terms.

Critical Incident

An actual or alleged event or situation that creates a significant risk to a help seeker, Lifeline employee (paid or voluntary) or Lifeline's reputation. Includes any breaches to Lifeline's code of conduct.

Dispute

An unresolved complaint escalated either within or outside of our organisation.

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 system where a response is not explicitly or implicitly expected or legally required. Feedback also includes compliments about the service or individuals.

Policy

A statement that sets out how we should fulfil our vision, mission and goals.

Procedure

An instruction that sets out how our policies will be implemented and by whom.

3.Guiding principles

An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.

3.1 Facilitate complaints

We are committed to seeking and receiving feedback, compliments and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback, compliments or complaints will be acknowledged within one working day and feedback to the individual will be provided within 15 working days if requested. (as in AS/NZ 10002).

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

We will ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

Anonymous complaints are welcomed and will be investigated as far as possible, however, a lack of identifying information may hinder our ability to fully investigate the complaint or provide feedback. Regardless of the ability to report back our findings, Lifeline Australia is committed to identifying systemic causes and actioning learnings from our investigations, and investigate all complaints received.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised on our website. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance. We will ensure that multiple avenues are available in which to make a complaint, such as through an online form, in writing and by phone.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

No charge

Complaining to us is free.

Make a complaint, compliment or provide feedback

Feedback, compliments and complaints can be received in several ways:

- Complete an online Complaints & Feedback form on the Lifeline Australia website:

<https://www.lifeline.org.au/about/contact-us/>

- Write a letter to PO Box R1084, ROYAL EXCHANGE NSW 1225 .

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Contact Lifeline Australia National office. The information will be documented on your behalf

- Ask to make a complaint during a call or text with a crisis supporter. The information will be documented on your behalf.

How to record a complaint on behalf of a person

Where a person contacts Lifeline Australia or our 131114/text to make a complaint, the following can be expected:

- The person making the complaint will be listened to without judgment and with compassion
- We will utilise neutral language and will not make assumptions or provide judgments or opinions on the event
- We will acknowledge the distress caused by the event and take down the details for the complaint
- The information will be recorded on behalf of the person by completing the online Complaint & Feedback form on the Lifeline website
- The Feedback number will be provided to the person as a reference
- If the person has requested feedback we will inform them that they will be contacted within 15 days

3.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with us. When attempting to resolve a complaint always ask the complainant if they would like you to submit a complaint form in on their behalf for further review and action. If the complaint is of a serious nature and the complainant does not wish to make a more formal complaint then this should also be logged as a complaint and documented accordingly, noting that the person did not want to make a complaint.

When appropriate we may offer an explanation or apology to the person making the complaint.

Responsiveness

We will promptly acknowledge receipt of complaints, usually within one working day.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised.

We are committed to managing people's expectations, and will inform them as soon as possible of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the likely steps that will be taken to address the complaint

We will advise people as soon as possible when we are unable to deal with any part of the complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will advise people as soon as possible if we require further information to investigate a complaint (such as the date of the event or the phone number used to access the service) and will request such information which the person can choose to provide or not. We will advise of our limitations of being about to fully investigate without such information, or if some information is restricted (such as a blocked phone number).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to the complaint and the reason for our delay.

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Complaint handling will be overseen by the Lifeline Clinical Governance Committee..

Responding flexibly

Our staff are empowered to manage complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage and resolve the complaint

Resolution

We will contact the person who has made the complaint, where this has been requested by the person and listen to their concerns in an engaged and non-judgmental manner. We will provide general information in relation to the complaints handling procedure and possible corrective actions. No information will be disclosed about the identity of persons involved in the complaint, nor specific detail in relation to outcomes for individual members of staff or the organisation.

Complaints involving Lifeline Centre staff member (paid or volunteer)

Where a complaint involves a Lifeline Centre staff member the corresponding centre manager (or equivalent) will be notified of the complaint. They will be provided details of the complaint, the staff member involved and recommendations for feedback and or corrective actions for the staff member.

Ultimately it is the Centre's responsibility to provide feedback to their staff members in relation to complaints as per their internal complaints management policy and procedure. Centre managers are able to contact Lifeline Australia for assistance and guidance in relation to complaint handling.

Centre's may be requested to provide feedback to Lifeline Australia about how the complaint was managed with the staff member. Lifeline Australia are able to contact the Centre if they do not feel the matter was handled adequately and requires further action or management.

Complaints relating to another Lifeline department or retail store

Where a complaint involves another Lifeline department or retail store outside of the 131114/text services, this department or store will be notified of the complaint and will manage it appropriately as per their complaint management guidelines.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. However, we will ensure our staff and volunteers are protected from unfair, unreasonable or abusive behaviour, and if we are unable to work with you directly to resolve your complaint we will refer to an external organisation to facilitate this.

If a response to a person making a complaint is considered to be inappropriate, repetitive or abusive, we will discuss the matter and make a decision regarding the most appropriate action, this may include not responding to a complaint. This decision will be made as a group and looking at a number of factors and will not be made lightly.

Avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them.

The three levels of complaint handling:

Level 1

We aim to resolve complaints at the first level, it is important to let the complaint know that they can make a complaint directly via the website or the first responder can make a complaint on their behalf.

Level 2

Once a form has been submitted this will be handled by the complaints team. This second level of complaint handling will provide the following:

- review and possible investigation of the complaint
- contact the complaint where requested to hear more and gather additional information as needed
- disseminate feedback or suggested actions to the centre managing the volunteer/paid staff involved or other continuous improvement channel

Level 3

If a complainant is dissatisfied with the outcome of the complaint management process then this will be escalated within the team to ensure an appropriate review is undertaken. This will then be communicated with the complainant.

Level 4

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek escalation of the complaint via either the relevant health complaints organisations in their state or territory or by the Australian Charities and Not-for Profits Commission.

Information regarding services for external review can be found here:

<https://www.ahpra.gov.au/Notifications/Further-information/Health-complaints-organisations.aspx>

3.4 Critical Incidents

All incidents that involve significant risk to a help seeker or a “near miss”, Lifeline employee (paid or voluntary) or Lifeline’s reputation are considered a critical incident. Such risks include serious breaches to Lifeline’s code of conduct, allegations of sexual misconduct and incidents resulting in physical or mental harm.

We will act on matters relating to critical incidents in a timely manner. If a Lifeline employee is made aware of an incident that is of a critical nature the following steps are required to be completed as soon as practical:

- Notify their manager
- Complete the online Complaint & Feedback form on the Lifeline website ensuring as much detail as possible is provided
- Send an email to the practice team with high priority informing of a critical incident with the Feedback receipt number

All notifications received of a critical incident will be prioritised as an urgent matter and will be attended to as soon as practical. Review of a critical incident will include:

- Notification to the Clinical Manager, and the Head of Crisis Services and Quality
 - Investigation into the incident
 - Discussion with the centre or line manager of the volunteer or staff member involved, if relevant.
 - Appropriate actions taken including notification to the police where needed
 - Internal review to identify any systemic issues, root cause of the incident and continuous improvements required
- All critical incidents will be taken seriously and will be treated as a matter of priority.

4 Accountability and learning

4.1 Analysis and evaluation of complaints for crisis support services

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by the Leadership group and the Board.

We will run regular reports on:

- the number of complaints received
- issues arising from complaints and general themes
- systemic issues identified for crisis support services
- the number of critical incidents received, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to our CEO, Leadership Group and our Board for review, on a regular basis and no less than twice a year.

4.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system

4.3 Continuous improvement

We are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaint management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

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