



## FEEDBACK (INCLUDING COMPLAINTS AND APPEALS) POLICY

<b>Related Policies</b>	Confidentiality Policy Conflict of Interest Policy	Privacy Policy
<b>Related Documents</b>	Feedback Form (for Compliments, Complaints, Appeals and Suggestions) Feedback Register Risk Register	<i>Children and Community Services Act 2004 (WA)</i> <i>Equal Opportunity Act 1984 (WA)</i> <i>Occupational Safety and Health Act 1984 (WA)</i> <i>Racial Discrimination Act 1975</i> <i>Privacy Act 1988 (Cth)</i> <i>Work Health and Safety Act 2020 (WA)</i>

### Purpose

This policy has been developed to manage gathering and responding to Feedback about Noongar Mia Mia (NMM) by all stakeholders.

### Scope

The policies and procedures in this document apply to Board members, employees, contractors, students and volunteers under the direction of NMM, program participants, their families and carers, community members and any other stakeholder, about any aspect of NMM and its operations (including the feedback process itself).

The feedback process includes managing and responding to Compliments, Complaints and Suggestions (see Definitions below).

### Policy Statement

NMM will:

- Actively encourage and support program participants, their families and carers, community members, anyone working with NMM and any other stakeholder to provide Feedback.
- Implement Feedback procedures that are accessible and easy to understand by all stakeholders.
- Listen and respond to Feedback from all stakeholders, including Feedback provided anonymously.
- Encourage stakeholders to find a support person or advocate to assist or represent them when offering Feedback, if this is their preference.
- Provide stakeholders with accessible information, support and a safe environment in which to raise a Complaint and make Suggestions.
- Treat any person who provides a Complaint or Suggestion with respect.
- Investigate all Complaints and Suggestions in a timely, effective and sensitive manner, in line with our [Privacy Policy](#) and [Confidentiality Policy](#).
- Ensure there are no negative consequences for making a Complaint or Suggestion.
- Keep a record of all Feedback received and our responses.
- Regularly review Feedback to analyse trends and issues.
- Use Feedback to inform strategy, continuous improvement, performance targets and risk management.



## Definitions

*Appeal* means when someone asks NMM to review a decision that has been made.

*Complaint* means any written or verbal statement expressing dissatisfaction, a problem or concern in relation to NMM and its operations.

*Compliment* means any written or verbal statement expressing satisfaction or commendation in relation to NMM and its operations.

*Confidentiality* means activities by the people directly involved in gathering, recording and managing Feedback that protect unauthorised access to, or use of Feedback.

*Conflict of Interest* means a situation in which a person is in a position to derive, or may be perceived to derive, personal gain or benefit from actions or decisions made in their official capacity.

*Employee* means any person who is employed under a formal written contract (including on a casual, probationary or permanent basis) by NMM.

*Feedback* means opinions or comments given by a stakeholder, either directly or indirectly, in relation to the charity or its operations, which may be in the form of a Compliment, Suggestion or Complaint.

*Privacy* means activities that protect people from unfair or unauthorised access to, or use of sensitive or private information in relation to gathering, recording and managing Feedback.

*Serious Complaint* means a Complaint that involves any of the following:

- A threat to a person's health or life.
- A threat to NMM's reputation or financial viability.
- A threat of external investigation and/or litigation.
- An allegation of serious misconduct or criminal conduct.

*Suggestion* means any written or verbal statement expressing how the charity could improve its function, which may form part of a Compliment or Complaint, but may also be offered as standalone feedback.

*Volunteer* means a person who provides their time and expertise to support NMM as an organisation or the delivery of a NMM program.

## Roles and Responsibilities

### Board Members

- Review and approval of this policy.
- Establishing a system for gathering and responding to Feedback.
- Monitor effectiveness of this policy.
- Promote a governance culture that values Feedback.
- Provide advice on handling Serious Complaints.
- Handle complaints related to the Managing Director or another Board Member.
- Use Feedback to inform strategy and risk management.

### Managing Director (MD)

- Implement this policy across the organisation.
- Promote an organisational culture that values Feedback.
- Facilitate the Feedback process at an organisational level.



- Encourage all NMM participants, their families and carers, Employees and stakeholders to provide Feedback.
- Investigate and respond to Complaints and Suggestions, seeking advice from the Board where appropriate.
- Manage Confidentiality and Privacy in relation to Feedback.
- Monitor and analyse Feedback (including surveys) across the organisation.
- Analyse and report Feedback trends to the Board.
- Use Feedback to inform improvements, targets, strategy and risk management.

#### **Program Manager, Asset Manager**

- Implement this policy at an operational level.
- Encourage and assist participants, plus their families or carers, to provide Feedback.
- Facilitate the Feedback process at a program level.
- Coordinate Employee and participant surveys.
- Escalate Appeals, Complaints or Suggestions to the MD.
- Participate in investigating Complaints or Suggestions when asked to do so by the MD.
- Use Feedback to inform program improvements, targets and risk management.

#### **Employees, Contractors, Students and Volunteers**

- Understand and comply with this policy.
- Gather and provide Feedback in line with the procedures below.
- Assist other people to provide Feedback when asked to do so.
- Participate in surveys when asked to do so.
- Escalate Feedback to their line manager.
- Maintain Confidentiality and Privacy in relation to Feedback.

## **PROCEDURES**

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### **Promoting Rights**

NMM will promote and safeguard the rights of all stakeholders to provide Feedback by informing them of:

- Their right to provide Feedback;
- No adverse consequences to providing Feedback;
- Protection of their Privacy and Confidentiality;
- Processes in place and support available to provide Feedback.

### **Gathering Feedback**

Feedback may be provided at any time to an **Employee** or **Board member** in person, over the telephone, or in written form (such as via a form, survey, email, letter, or social media comment, etc.).

#### **Feedback Form**

The NMM Feedback Form enables any stakeholder to provide written details of a Compliment, Complaint or Suggestion. Stakeholders should be encouraged to use the form to provide written Feedback and can be offered assistance to do so by an Employee, family member, carer, support person or advocate.



## Surveys

Managers will assist the MD to coordinate an annual, confidential **Employee survey**, but will encourage Employees to provide Feedback at other times as well. Employees have the right to provide Feedback via, or with the support of a NMM colleague.

Managers will coordinate periodic, confidential **support worker surveys** from program participants, but will encourage participants to provide Feedback about any aspect of the program at other times as well. Participants have the right to provide Feedback via, or with the support of, an Employee, family member, carer, support person or advocate.

## Social Media

The staff delegated by the MD will monitor NMM's website and social media channels for comments that include Feedback and direct these to the MD.

## Fundraising and Events

The staff delegated by the MD will promote and gather Feedback during fundraising activities and community or other events.

## Recording Feedback

If Feedback is received **verbally in person or over the telephone**, the receiving NMM Employee must:

1. Listen carefully to the Feedback and clarify any important details;
2. Document the Feedback in written form using the NMM Feedback Form;
3. Determine the type of Feedback (Compliment, Complaint and/or Suggestion); and
4. Follow the appropriate procedures below.

If Feedback is received **in written form**, the receiving NMM Employee must:

1. Document the Feedback on the NMM Feedback Form (even if the Feedback was provided in another written form);
2. Determine the type of Feedback (Compliment, Complaint and/or Suggestion); and
3. Follow the appropriate procedures below.

## Handling Compliments

The key stages in handling Compliments are:



Any NMM Employee who receives a formal or informal Compliment about themselves, other people, the NMM organisation or its operations should:

- **Record** the Compliment using the procedures above.
- **Report** the Compliment by emailing the Feedback Form to relevant line manager and/or MD, so they are aware of it.

The line manager or MD should:



- **Acknowledge** and thank the person offering the Compliment directly (wherever possible).
- **Document** the Compliment and any decisions or actions arising from it in the Feedback Register.

## Handling Complaints

Any NMM representative who receives a formal or informal Complaint must determine whether that Complaint can be handled immediately, or whether it requires further investigation and escalation.

### Immediate Resolution

If a Complaint can be resolved immediately, it does not need to be recorded or entered in the Feedback Register, e.g., a tenant may complain that the oven does not work and this can be immediately remedied by showing them how to switch the oven on.

### Further Investigation

The key stages in handling Complaints are:



If a Complaint cannot be resolved immediately and requires further investigation, the NMM Employee should:

- **Record** the Complaint using the procedures above.
- **Report** the Complaint by emailing the Feedback Form to relevant line manager and/or MD, so they are aware of it.

The Employee must report any **Serious Complaints** to the MD; the MD must report this to the Board Chairperson at the earliest possible opportunity and seek their advice.

The MD may ask a Manager or the Board Chairperson to assist them in investigating a Serious Complaint.

In accordance with the Conflicts of Interest Policy, the MD should not be involved in an investigation where this involves a Conflict of Interest (e.g., they are the subject of the complaint; or they are friends with or related to the person who is the subject of the complaint, or the complainant), in which case, they should ask the Manager or Board Chairperson to act as their proxy. In the same way, the proxy should not hold a Conflict of Interest.

The MD (or their proxy) must:

- Contact the complainant (or their nominated representative) within 2 working days to **acknowledge** receipt of their Complaint (e.g., in person, via email or over the phone).
- Explain the complaints process, expected time frames and support available to the complainant.
- Ask for further details from the complainant (if the Complaint is not clear or requires clarification) and how the matter has affected them.
- Conduct an equitable, objective and unbiased **investigation** as soon as reasonably practicable, gathering all available information and evidence from the parties involved.
- Conclude the investigation as soon as possible and within 2 weeks, or else update the complainant in person and/or in writing about progress.
- Send a written **response** to the complainant outlining the outcome(s) of the investigation, including any appropriate apology, and/or decisions and remedial actions to be taken.



- If the complainant is not satisfied with the outcome(s), invite them to a complaint resolution meeting and inform them of their right to involve a support person or advocate.
- If the complainant is not satisfied with the outcome(s) of the complaints resolution meeting, inform them of their right to take their complaint further with an external body (such as the Australian Charities and Not-for-Profits Commission, Commissioner for Children and Young People, Office of the Public Advocate, Fair Work Commission, Ombudsman) and/or seek legal representation.
- **Document** all critical information, evidence and written correspondence related to the Complaint in NMM's document management system;
- Record the Complaint and the outcome(s) of the complaint process (including any remedial actions) in the Feedback Register.
- Review and update NMM's Risk Register, if appropriate.

If a Complaint has been made about an **Employee**, or **Board Member**, the person investigating the complaint must inform that person of the Complaint, the outcome of the investigation, the decision reached and the reasons for that decision. After the investigation has been concluded, the investigator must record all the details in that person's personnel file.

If a Complaint is made **anonymously**, the MD or their proxy must still conduct an investigation and record the outcome of the Complaint in the Feedback Register.

## Handling Appeals

NMM recognises that all applicants and tenants have the right to appeal against our decisions if they are dissatisfied with the outcome.

All appeals must be lodged within 30 days of being notified of a decision to which the appeal relates.

Decisions that can be appealed:

- rent calculation;
- tenant liability;
- rejection of a transfer application, pet or modification request;
- not eligible for housing assistance;
- allocation of property;
- request for property improvements rejected; or a
- breach or a termination

### Appeals procedure

An applicant or tenant lodges an appeal by contacting the office by email, over the phone or in-person. NMM may need to follow up for additional details or to clarify information about the appeal.

NMM registers the appeal in the Feedback Register

NMM acknowledges the appeal.

NMM reviews the decision made and decides if it is consistent with relevant laws and regulations, NMM policies, procedures and customer service standards, and records this decision in the Feedback Register.

NMM decides on any actions to be taken and records this in the Feedback Register.

NMM contacts the person who lodged the appeal to explain the outcome of the appeal.

NMM carries out any changes if agreed as an outcome of the appeal process.



## Handling Suggestions

Any NMM Employee who receives a formal or informal Suggestion must determine whether that Suggestion can be addressed immediately, or whether it requires further investigation and escalation.

### Immediate Resolution

If a Suggestion can be addressed immediately, it does not need to be recorded or entered in the [Feedback Register](#), e.g., during Supervision with their Manager, a support worker suggests how they will communicate better to the people they support.

### Further Investigation

The key stages in handling more complex Suggestions are:



If a Suggestion cannot be resolved immediately and requires further investigation, the NMM Employee should:

- **Record** the Suggestion using the procedures above.
- **Report** the Suggestion by emailing the [Feedback Form](#) to relevant line manager and/or MD, so they are aware of it.

The MD may ask a Manager or the Board Chairperson to assist them in investigating a Suggestion.

In accordance with the [Conflicts of Interest Policy](#), the MD should not be involved in an investigation where this involves a Conflict of Interest (e.g., the suggestion is to purchase goods or services from a family member), in which case, they should ask the Manager or Board Chairperson to act as their proxy. In the same way, the proxy should not hold a Conflict of Interest.

The MD (or their proxy) must:

- Contact the originator of the Suggestion within 2 working days to **acknowledge** receipt of their Suggestion (e.g., in person, via email or over the phone).
- Explain the process for handling the Suggestions and expected time frames for an outcome.
- Ask for further details from the originator (if the Suggestion is not clear or requires clarification).
- Conduct an objective and unbiased **investigation** in a reasonable time frame, gathering all pertinent data, information and evidence.
- Conclude the investigation within 2 weeks, or else update the originator in person and/or in writing about progress.
- Send a written **response** to the originator outlining the outcome(s) of the investigation, including any decisions and/or actions to be taken.
- If the originator is not satisfied with the outcome(s), invite them to a further meeting and inform them of their right to involve a support person or advocate.
- **Document** all critical data, information, evidence and written correspondence related to the Suggestion in NMM's document management system;
- Record the Suggestion and the outcome(s) of the suggestions process in the [Feedback Register](#).
- Review and update NMM's [Risk Register](#), if appropriate.



## Continuous Improvement

The MD will ensure that Feedback is recorded in a systematic way (including the Feedback Register), so that information can be easily retrieved for reporting and analysis purposes.

The MD will analyse this information and look for trends, evaluate the quality of NMM's activities and operations, prepare reports and identify improvements.

The MD will feedback to Board Members at least annually:

- Summary outcomes from all stakeholder surveys;
- The number, nature and frequency of Compliments, Complaints, Appeals and Suggestions received;
- Systemic issues identified through Complaints and Suggestions;
- The outcome of Serious Complaints, including any external investigations;
- Continuous improvement actions undertaken.

## Version Control

<b>Version</b>	Version 3.0	<b>Approved by MD</b>	Feb - 2024
<b>Drafted by</b>	Jo Kirker, Consultant	<b>Effective Date</b>	Feb - 2024
<b>Reviewed by</b>	Clint Uink, Asset and Tenancy Manager	<b>Review Date</b>	Feb - 2024
<b>Changes</b>	Complaints Policy redrafted as a Feedback Policy, including compliments and suggestions	<b>Next Review Date</b>	July -2024