

## Background

All staff in our organisation encourage and support consumers to give feedback and make complaints when they need to.

We do what we can to make sure consumers and/or representative/s:

- feel safe to raise a complaint or other feedback to any staff member
- understand the methods to raise and resolve complaints
- trust they will be contacted promptly after the feedback or complaint.

We strive to improve the quality of care and services by adopting a positive, blame-free approach to resolving complaints. This encourages feedback and complaints from everyone, including staff. The blame-free approach says the system, rather than individuals, causes errors.

A blame-free, resolution-focused complaints culture is also recommended by NSW Ombudsman, Section 3.1 Developing a culture that values complaints, page 5, and Department of Health Ageing and Aged Care Section 1, A positive approach to complaint handling, page 4. <sup>2 3</sup>

- As part of this culture, we emphasise to staff and consumers and/or representative/s that our focus in complaint handling is fixing issues and improving systems, not blaming.
- Any compliments we receive tell us what we are doing right.
- We see complaints as an opportunity for improvement and take all feedback seriously.
- By managing complaints promptly and efficiently, we foster a positive, cooperative relationship with consumers, representatives, visitors, volunteers and staff.

Applicability
<ul style="list-style-type: none"><li>● all categories of employees</li><li>● governing body</li><li>● all volunteers</li><li>● contractors and consultants, whether or not they are employees</li><li>● all other service providers</li></ul>



## Consumer outcome

I feel safe and am encouraged and supported to give feedback and make complaints. I am engaged in processes to address my feedback and complaints, and appropriate action is taken.

## Organisation statement

Our organisation regularly seeks input and feedback from consumers, carers, the workforce and others and uses the input and feedback to inform continuous improvements for individual consumers and the whole organisation.

## Policy commitment

Garden Village is committed to ensuring our residents, consumers, their representatives and all stakeholders are positively supported and enabled to lodge a complaint or appeal a decision of the organisation and have their concerns addressed using a process that ensures a timely response, ease of access, equity, accountability, transparency and fairness. We ensure all complaints are confidential and the complainant is not negatively impacted by lodging the complaint.

## Process

Through the process below, our organisation demonstrates that consumers feel safe and are encouraged and supported to give feedback and make complaints. We support and enable consumers to provide feedback and complaints, and take appropriate action.

### 1 Consumer support in complaints / compliments management

- At the start of service, we inform consumers, family members and/or representatives about our feedback and complaints process. We follow three principles of fair investigation of complaints:
  - Impartiality. Approach each complaint with an open mind and weigh objectively the facts and contentions in support of it.
  - Confidentiality. Investigate the complaint in private and take care when disclosing to others any identifying details.
  - Transparency. Tell the complainant about the steps in the complaint process and give them an opportunity to comment on adverse information, or before dismissing a complaint.
- We make available to consumers information about the complaints process, including internal and external pathways and advocacy, in an information booklet, on posters in public areas and discussion at consumer meetings.
- Complainants are encouraged to lodge their complaint in writing. This will assist with understanding the nature of the complaint and to ensure the facts provided are correct.
- We encourage anyone with a complaint to speak to a staff member or one of the management team before going to an external body about it.
- We tell consumers the process for complaint and compliments:
  - Write down the complaint and put it in suggestion boxes throughout the service or send to our address in writing by mail to:

- Lisa Cutajar, Quality Manager, email [lisa.cutajar@gardenvillage.com.au](mailto:lisa.cutajar@gardenvillage.com.au) and by telephone on (02)6582 8923, 7 Garden Crescent, Port Macquarie, NSW 2444
- Complaints can be made in person, to any staff member by phone, email or post.
- Expect us to address complaints promptly.
- Complainants have the right to lodge their complaint with an external agency, including the Aged Care Quality and Safety Commission, the NDIS Quality and Safeguards Commission and the NSW Ombudsman; information is available to support people to access these services.
- Complainants have the right to seek assistance from aged care advocacy services for raising a complaint; information is available to support people to access these services
- Management are responsible for addressing complaints and, if a complainant is not happy with the outcome, we can discuss an internal review of our decision.
- If a concern or complaint is minor and was addressed at the point of service, staff should document the action and outcome of this.

## How to lodge a complaint

Garden Village is committed to ensuring all of our residents, consumers and their representatives are positively supported and enabled to lodge a complaint or appeal a decision of the organisation and have their concerns addressed using a process that ensures a timely response, ease of access, equity, accountability, transparency and fairness. We ensure all complaints are kept confidential and the complainant is not negatively impacted by lodging the complaint.

### Complaints may be made verbally or in writing to:

- any staff member
- any of the suggestion boxes located in the following places: Reception, Westerweller, Winter Garden, Garden Lodge and outside the Garden Village General Store
- Lisa Cutajar, Quality Manager [lisa.cutajar@gardenvillage.com.au](mailto:lisa.cutajar@gardenvillage.com.au)
- Taryn Robinson, Executive Manager of Clinical Care [taryn.robinson@gardenvillage.com.au](mailto:taryn.robinson@gardenvillage.com.au)
- Marsha Blackbell, Residential Aged Care Facility Manager [marsha.blackbell@gardenvillage.com.au](mailto:marsha.blackbell@gardenvillage.com.au)
- Sarah Ogilvie, Retirement Living Manager [saraho@gardenvillage.com.au](mailto:saraho@gardenvillage.com.au)
- Mashana Law, Community Services Manager [mashana.law@gardenvillage.com.au](mailto:mashana.law@gardenvillage.com.au)
- Craig Wearne, CEO [craigw@gardenvillage.com.au](mailto:craigw@gardenvillage.com.au)
- the Board of Directors (via the Garden Village contact details below)
- the Aged Care Quality and Safety Commission
- the NDIS Quality and Safeguards Commission
- the Retirement Living Code Administrator
- the NSW Ombudsman

**Contact details:**    **Garden Village**  
7 Garden Crescent,  
Port Macquarie NSW 2444  
Ph: (02) 6582 8923  
[reception@gardenvillage.com.au](mailto:reception@gardenvillage.com.au)

- **Aged Care Quality and Safety Commission: 1800 951 822**  
[www.agedcarequality.gov.au](http://www.agedcarequality.gov.au)
- **NDIS Quality and Safeguards Commission: 1800 035 544**  
[www.ndiscommission.gov.au/participants/complaints](http://www.ndiscommission.gov.au/participants/complaints)
- **Retirement Living Code Administrator: (07) 3225 3000** [complaints@rlcode.com.au](mailto:complaints@rlcode.com.au)
- **NSW Ombudsman: 1800 451 524**    [www.ombo.nsw.gov.au/complaints](http://www.ombo.nsw.gov.au/complaints)

## Advocacy

It is your right to use an advocate of your choice to negotiate on your behalf. An advocate is a person who, with your authority, represents your interests. Advocates may be used during assessments, reviews, and complaints or for any other communication between the resident/consumer and Garden Village. They may be a family member, friend or advocacy service.

If you wish to appoint an advocate let us know in writing, the name of the person you wish to be your advocate. You can use the *A028 Authorised Representative form*. You can change your advocate at any time by altering this form.

**Advocacy Services:      Senior Rights Advocacy Service : 1800 424 079**  
**Disability Advocacy NSW : 1300 365 085**

## How Garden Village manages complaints

Action		Timeline
1	The complaint is received by a Garden Village staff member or representative. Staff will record verbal complaints on a <i>Q001 Feedback Form</i> or <i>Q002 What do you think?</i> .	
2	<b>ACKNOWLEDGE THE COMPLAINT</b> Initial acknowledgement of receipt of the complaint is made to the complainant. An apology is provided to the complainant (if required) and assurance we will address the complaint. <b>ASSESS THE RISK LEVEL</b> The level of risk to the resident/consumer, other people and the service is assessed. Staff will try to resolve the complaint before escalating the complaint to the next responsible person. If the complaint is not resolved or is of a higher risk it is escalated to a manager.	Within 2 working days of receiving the complaint
3	<b>PLAN</b> The manager contacts the resident/consumer and or their representative by telephone or in a face to face meeting to advise and discuss: the complaint is being investigated the options available to resolve the complaint the complainant's desired response to the complaint	Within 10 working days (2 weeks) of

	<p>the process that is being followed - a copy of this document <i>Q004 Garden Village Complaint Management</i> is provided to them.</p> <p>the timeline (determined by the type of complaint)</p> <p>the complainant's right to an advocate and advocacy agency support</p>	receipt of complaint.
4	<p><b>INVESTIGATE</b></p> <p>Manager gathers relevant information to resolve the complaint then consults with appropriate staff to determine the action to be taken. Manager will provide regular updates to the complainant and involve the complainant in the resolution where possible.</p> <p>Manager will remain impartial, confidential, transparent and timely in their approach.</p> <p>Executive management is advised and consulted (if not already involved.)</p> <p>Complaint is escalated to CEO and Board Chair if high risk and at complainant request.</p>	
5	<p><b>RESPOND</b></p> <p>Response to the complaint is actioned. Complainant is advised of the following:</p> <ul style="list-style-type: none"> <li>● Open disclosure of all investigation results and any action taken</li> <li>● Reason for Garden Village's decision</li> </ul> <p><b>FOLLOW UP</b></p> <ul style="list-style-type: none"> <li>● Ensure the complainant is satisfied with the resolution process and outcomes achieved</li> <li>● Provide the options the complainant has for an internal or external review /appeal of the decision and response.</li> </ul>	
6	<p>Internal Review:</p> <p>If the complainant wishes to appeal, the complaint is reviewed by the CEO whose decision is final.</p>	Within 10 working days of appeal notification
7	<p>External Review: The complainant has the option to go to the Aged Care Complaints Scheme, NDIS Quality and Safeguards Commission or other relevant body.</p>	
8	<p><b>CONSIDER</b></p> <p>Garden Village will document the complaint details (confidentially) in our Quality Management System (MOA) and analyze complaints to action process reviews and identify opportunities for improvements within the service.</p>	

## 2 Management team responsibilities

- Contact the complainant to advise receipt of the complaint
- Enter compliments and complaints into MOA to help improve our activities.
- Analyse feedback trends to keep our focus on continuous improvement.
- Report regularly to our governing body on matters arising from complaint handling.
- Discuss any recommendations from analysing complaint data at the quality committee / staff meeting and put into practice.
- Encourage staff to provide suggestions on ways to improve our complaint management system.
- Encourage staff to be alert to complaints from consumers and/or representative/s and help to promptly resolve them.
- Make sure all staff can accept complaints, know what action they can take, or who to refer the complainant to, for resolving them.
- Communicate with the complainant openly and regularly while we work to resolve the complaint.
- Acknowledgement of complaint within 2 days of receipt.
- High risk complaints to be escalated by CEO to Chairperson.
- Aim to provide a formal response within 2 weeks of receiving the complaint.
- If we can, include the complainant in resolving the matter.
- Use Open Disclosure to resolve complaints.
- Once a decision about the complaint is made, we talk to the complainant to make sure they are satisfied with the outcome:
  - - results of the investigation and any action we have taken
    - reason/s for our decision
    - how we propose to remedy the issue
    - options the complainant has for an internal or external review.
- Extra to responsibilities described herein, Management will advise NDIS Participants of their ability to make a complaint to the NDIS commission via the following methods;
  - Phone 1800 035 544 (a free call from land lines) or TTY 133 677. An interpreter can be arranged.
  - Use the National Relay Service and ask for 1800 035 544.
  - Complete a Complaint Contact Form to let the NDIS commission know how to best contact you.
- Complaints (de- identified and in confidential settings) are tabled for review by executive managers, at Quality Committee Meetings and at the governance level by the Board sub committee- Clinical Governance Committee. Complaints are escalated to Board level if of a higher risk to the organisation.
- From these meetings and during the course of complaint investigation, corrective actions and quality improvements are made and tracked/recorded in MOA.

## 3 Staff responsibility

- Demonstrate they encourage and support consumers and/or representative/s to provide feedback and complaints.
- Report any feedback and complaints to their supervisor before the end of their shift.
- If the complaint is serious, e.g. report of abuse of any type, or an injury, report the complaint immediately.
- Treat all consumers and/or representative/s with respect, including those who make complaints.
- Help consumers and/or representative/s to make a complaint, if needed. Engage interpreter services,
- Provide suggestions to management on ways to improve our complaints management system.
- Make any changes arising from individual complaints and analysis of complaint data, as directed by management.
- If a staff member receives a complaint, they:
  - acknowledge and listen to the complaint
  - offer an apology if warranted
  - reassure the complainant that their complaint will be treated seriously and confidentially involving only those required to resolve the issue and document it.
  - assist the complainant or their representative with recording the complaint on a Feedback form
  - encourage the complainant to discuss their concerns with the clinician or other staff
  - manager speaks to the clinician or manager on their behalf
  - advise the complainant of the complaint management process (on notice boards around Garden Village)
  - take action on the complaint, if possible.
  - know when to refer the complaint to their supervisor/ manager

### **Workforce awareness**

- The organisation educates staff and volunteers about inviting feedback and complaints and being available to consumers and/or representative/s or others who want to provide feedback or make a complaint.
- Open Disclosure education is provided and staff work with management to follow this process.

### **Related Documents**

Q001 Feedback Form

Q006 Retirement Living Feedback Form



Q002 What do you think? Feedback form- Easy Read

Q007 How to give feedback- Easy Read

Q004 How to Lodge a Complaint/ How Garden Village Manages Complaints

RC/HC/NDIS/RL Feedback Management Policy

RC/HC/NDIS/RL Open Disclosure Policy

RC/HC/NDIS/RL Incident Management and Mandatory Reporting Policy

## References

- NDIS\_ Code of Conduct
- NDIS Practice Standards
- Effective Complaint Handling Guidelines for NDIS Providers , October 2018
- ARVAS Standards
- Retirement Living Code of Conduct
- Retirement Living Code of Conduct Complaint Handling Guidelines
- Aged Care Act
- Quality Care Principles 2014
- Aged Care Charter of Rights

Name	Source
<a href="#">Better practice guides</a>	Commonwealth Ombudsman
<a href="#">Seniors legal services</a>	Seniors Rights Services
<a href="#">State and local government guidelines</a>	Ombudsman NSW
<a href="#">Creating a “no blame” culture: have we got the balance right?</a>	BMJ Journals
<a href="#">Better practice guide to complaint handling in aged care services</a>	Department of Health
<a href="#">Aged care quality standards</a>	Aged Care Quality and Safety Commission