

# Consumer Feedback Management Policy

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**This document is relevant to all WH sites, including Bacchus Marsh, Melton and Caroline Springs**

## 1.1. Intent

The intent of this policy is to ensure that there is an active feedback management system implemented across Western Health. This system supports:

- The prompt and comprehensive resolution of complaints.
- The prompt acknowledgement and response to enquiries and compliments.
- Promotion of better health care outcomes.
- Improved risk management, by limiting the number of complaints that may become formal legal claims.
- Improved quality system management, and assurance.
- Improved consumer experience.

## 2.2. Outcomes

### 2.1 Policy Statement

Western Health implements a comprehensive feedback management system. Every member of staff has a role to play in the consistent management of consumer feedback.

Western Health recognises that consumer (patient, carer, client, resident, family member and/or patient's significant other) feedback provides unique and valuable information that can assist with quality improvement and risk management.

Western Health proactively promotes feedback as an opportunity for consumers to provide the organisation with information about their experience and to assist in the review and improvement of services. Feedback can take the form of a complaint (negative feedback), enquiry (neutral feedback) or compliment (positive feedback).

In accordance with the Australian Charter of Healthcare Rights in Victoria, consumers have a right to complain and have their complaints handled in a prompt and effective manner. All complaints are treated confidentially, with sensitivity and handled according to the requirements of the *Health Records Act 2001*, *Information Privacy Act 2000* and *Health Complaints Act 2016*.

In addressing negative feedback, Western Health is committed to comprehensively addressing complaints from consumers.

In managing and responding to positive feedback, Western Health aims to further enhance the consumer experience by utilising this feedback to drive further good practice.

Enquiries should be responded to promptly and with accurate and full information. This approach aims to support consumers as they navigate the health system.

### 2.2 Policy Details

A formal feedback management system is active throughout Western Health. This system is supported by the following guiding principles:

#### 2.2.1 Quality Improvement

Feedback management is an integral part of the quality improvement system of Western Health:

- Quality and Safety meetings are in place to analyse feedback data and inform organisational change. Details of complaints breaching the target closure of within 30 days of receipt are included in the bi-monthly Best Care Report.
- Information relating to feedback from consumers is regularly reported to senior management and Advancing Best Care staff.
- Lessons learnt from feedback is used to drive system improvement.
- Feedback trends are reviewed regularly by Advancing Best Care staff and through Western Health's clinical governance system.

#### 2.2.2 Risk Identification

Risk Identification:

- Quality and Safety meetings are in place to analyse data and identify risk from feedback themes.
- Information relating to feedback from consumers is regularly reported to the Senior Leadership Group and Advancing Best Care staff.

- Lessons learnt from feedback and complaints are used to develop strategies for managing risk.
- Feedback trends are reviewed regularly by Advancing Best Care staff and through Western Health's clinical governance system.

### 2.2.3 Open Disclosure and Duty of Candour

Western Health has a policy of open disclosure in relation to adverse events and feedback:

- Western Health has adopted the national standard on open disclosure in the Western Health procedure: *OP-GC7 Open Communication for Serious Adverse Events*.
- Western Health outlines open disclosure processes in the procedure, *OP-GC7 Clinical Incident Investigation and Governance*, and aligns with the Australian Commission on Safety and Quality in Health Care (2014) Open Disclosure Framework and Statutory Duty of Candour as outlined in the *Health Legislation Amendment (Quality and Safety) Act 2021*
- Staff involved in providing information to patients are fully informed about the issues relevant to open disclosure and Duty of Candour.
- Staff are encouraged and supported to report adverse events.
- Information that arises from the open discussion of adverse events is shared throughout the organisation in a structured manner. This information is used to inform clinical practice and organisational processes improvement where indicated.

### 2.2.4 Commitment

Western Health and its Board and senior management are fully committed to an integrated feedback management system and provide the necessary support for it to operate effectively:

- There are clear procedures in place for adverse events, incident reporting and feedback management.
- There is dedicated Advancing Best Care team to support effective feedback management across Western Health. The team is supported by senior management and reports to the Director of Best Care Operations.
- Staff at Western Health receive appropriate training in feedback management at the point of care.
- Western Health uses the 'Riskman' System to support the reporting and tracking of feedback.
- Staff are encouraged to identify problems and make suggestions for improvement even if a complaint is not made.
- Where possible, the staff dealing with feedback or a complaint must identify, declare and manage any conflicts of interest.
- No person shall experience reprisals because of providing feedback or making a complaint to the health service.

### 2.2.5 Accessibility

Western Health encourages consumers, their families, carers, and staff to give feedback about the service. Western Health supports a system where feedback is encouraged. This system allows compliments (positive feedback), feedback and complaints (formalised negative feedback) to be processed and understood:

- The feedback process is easy for consumers to utilise.
- Consumers are able to register their feedback, twenty-four hours a day, seven days a week.
- Information on feedback is widely available in English and other community languages for consumers.
- There are multiple access and referral points for consumers to provide feedback.

### 2.2.6 Responsiveness

Western Health is receptive and responsive to feedback, treating all feedback seriously:

- Staff are encouraged to have a positive attitude towards dealing with feedback and complaints. Western Health promotes a no blame culture.
- All feedback is seen as a useful means to achieving better patient outcomes
- Complaints are to be acknowledged as soon as practicable or within 3 working days and where possible remedied at the time it is made.
- Feedback is processed and managed in a timely manner. Where possible, complaints are resolved within 30 days of receipt. The aim of resolution is to reach a mutually agreed outcome and provide a satisfactory response to the consumer responsible for lodging the feedback. In situations when this cannot be achieved, alternative options are provided to the consumer to assist them reaching their desired outcome.
- Communication with consumers is open and responsive to their needs.
- Consumers are treated with dignity and respect.
- Consumers are given appropriate assistance to provide feedback or make a complaint, including provision of information on contacting the Health Complaints Commissioner.
- Consumer's rights are upheld in accordance with the Australian Charter on Healthcare Rights.

### 2.2.7 Transparency and Accountability

The feedback process is clearly articulated, open and accountable to both staff and consumers:

- Discussion occurs with the consumer to establish the nature of their feedback and follow-up preferred/required, and the outcome they would like to see.
- If the consumer does not want to hear the outcome or receive follow up, it will be handled as an enquiry via the quality improvement processes.
- Each complaint is received and investigated on its own merit.
- An agreement will be established between staff handling the complaint and the complainant on the frequency and method of communication throughout the complaint handling process.

- Consumers are kept informed of the progress and outcome of complaints.
- Where possible, there is continuity of staff dealing with serious or external complaints.
- Relevant key individuals are promptly informed of complaints that require escalation.
- Principles of procedural fairness are observed.
- Western Health works co-operatively with the Victorian Office of the Health Complaints Commission to resolve complaints that are lodged against Western Health through the Health Complaints Commission.

### 2.2.8 Privacy and Confidentiality

Western Health respects the privacy and confidentiality of consumers and the information received during the feedback process, while at the same time making decisions open and accountable:

- All feedback is handled according to the requirements of the *Health Records Act 2001, Information Privacy Act 2000, the Privacy and Data Protection Act 2014, the Privacy Act 1988 (Cth), the My Health Records Act 2012 (Cth) and, where applicable, the Health Services Act 1988.*
- Information gathered during the process is only used in order to deal with and resolve feedback, or to address any broader issues arising.
- Feedback information is shared with staff only on a 'need-to-know' basis.

### 3.3. Applicability

This policy is applicable to all Western Health employees, contractors, volunteers and students who work on placement.

### 4.4. Accountability

The Director of Best Care Operations has operational responsibility for implementation and ongoing improvement of feedback management systems.

Role	Accountability
<b>Patients/ family/ friends / carers</b>	<ul style="list-style-type: none"> <li>• Provide feedback about their care through the variety of feedback mechanisms available.</li> <li>• Receive information about system and practice improvements as a result of feedback management at Western Health.</li> </ul>
<b>Front Line Staff</b>	<ul style="list-style-type: none"> <li>• Practice according to this policy and participate in learning and improvement opportunities.</li> <li>• Review performance with manager and help implement actions should standards not met.</li> <li>• Escalate feedback with direct line managers where immediate resolution is not possible.</li> </ul>
<b>Managers and Senior Clinicians</b>	<ul style="list-style-type: none"> <li>• Ensure staff obtain the appropriate skills and knowledge to manage feedback.</li> <li>• Knowledgeable and competent in the implementation of this policy.</li> <li>• Monitor performance through review of audits and agreed data.</li> <li>• Implement remedial action should the policy not be met as evidenced through monitoring processes.</li> </ul>
<b>Executive and the Board</b>	<ul style="list-style-type: none"> <li>• Lead responsibility for delivering the policy.</li> <li>• Monitor performance through regular review of audits and agreed benchmarks.</li> <li>• Provide support (mentoring and coaching) to senior leadership to achieve the desired outcomes.</li> <li>• Where outcomes are not being met, take immediate action to senior leadership in identifying root causes and then interventions to address gaps.</li> </ul>

### 5. Training

Skills and training will be supported and delivered by the Western Health Division of Advancing Best Care.

### 6. Evaluation

The Best Care Committee and the Quality and Safety Committee review feedback data and the feedback management system at least annually.

## 5.7. Associated Procedures/Instructions

In support of this procedure, the following Manuals, Policies, Instructions, Guidelines, and/or Forms apply:

Code	Name
	<a href="#">Health Incident Management System</a>
	<a href="#">Consumer Feedback Management</a>
	<a href="#">Behaviour Notifications, Contracts and Not Welcome Notices</a>
	<a href="#">Clinical Incident Investigation and Governance</a>
	<a href="#">Open Disclosure</a>

## 6.8. Definitions and Abbreviations

For purposes of this policy, unless otherwise stated, the following definitions/abbreviations shall apply:

Carer	An individual who regularly looks after another individual.
Complaint	An expression of dissatisfaction by or on behalf of an individual consumer/carer regarding any aspect of a service delivered by a Health Service Provider, where a response or resolution is explicitly or implicitly expected or legally required. A complaint can be made verbally or in writing.
Compliment	An expression of satisfaction and/or gratitude by, or on behalf of, a consumer/carer regarding an aspect of a service delivered by a Health Service Provider
Consumer	Refers to individuals who have used or are current users of a Western Health service. Consumers can be patients, carers, clients, residents, family members and/or patient's significant other.
Duty of Candour	The legislated requirement for a Health Service Provider to apologise to any person seriously harmed while receiving care, explain what went wrong, describe what action will be taken and improvements put in place.
Enquiry	Feedback from a consumer/carer regarding any aspect of service where: a) The contact is inquisitorial in nature rather than an expression of dissatisfaction; and/or b) The consumer/carer states that they do not wish to lodge a complaint; and/or c) The issue(s) are minor and can be resolved immediately without going through the complaint process (e.g. the complainant is satisfied by immediate actions to resolve the issue).
Feedback	Information shared, either positive (compliment), neutral (enquiry) or negative (complaint) by a consumer about their experience of the Health Service Provider or the Health Service Provider's performance, which is used as a basis for improvement. This may include suggestions, advice, ideas, opinions, compliments, comments and expressions of interest or general comments
Local Level Complaint	A complaint relating to a patient currently receiving care from Western Health services.
Open Disclosure	Open disclosure is the open discussion of adverse events that result in harm to a patient while receiving health care with the patient, their family and carers.

## 7.9. References

National Safety and Quality Health Service Standards, Standard 1 – Clinical Governance

Health Complaints Commissioner, Complaint Handling Standards (2016)

Guide to Complaint Handling in Health Care Services, Health Service Review Council (2011)

*Health Records Act 2001 and Information Privacy Act 2000*

Australian Commission on Safety and Quality in Health Care (2014) Australian Open Disclosure Framework  
*Health Legislation Amendment (Quality and Safety) Act 2021*

## 8.10. Document History

Number of previous revisions: 4

Previous issue dates: August 2009, December 2012, January 2016 and September 2019

Documents superseded or combined:

Code	Name
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P-QR3.2	Complaints Management
P-QR3.2	Feedback Management

**9.11. Sponsor**

Executive Director of Nursing and Midwifery

**10.12. Authorisation Authority**

Western Health Board of Directors