Feedback and Complaints Policy

Purpose of this policy

EMPHN welcomes feedback – including complaints – from the community, the health sector, our stakeholders and our employees.

How EMPHN receives and responds to feedback is underpinned by our values – working together, integrity and courage – and the Department of Health and Aged Care's Primary Health Networks Program Complaints Policy 2018.

Scope

This policy defines a range of options for members of the public, EMPHN employees, contractors, consultants, government employees, service providers or stakeholders to provide feedback and resolve issues; and sets out how EMPHN receives and manages feedback.

Feedback includes compliments, suggestions and complaints; which can be verbal or written, formal or informal.

What's not covered: evaluations of projects or activities of commissioned services, staff performance-related feedback, or occupational health and safety concerns.

This policy and EMPHN's feedback portals are always accessible on EMPHN's website and our staff intranet.

The Policy

Providing feedback

Wherever possible, we encourage our community and staff to engage informally – providing feedback as part of a conversation with the relevant individual or team. For difficult conversations, that requires leaning in to our values of working together, integrity and courage. The advantage of direct dialogue is that it often improves understanding and delivers immediate results.

However, some circumstances warrant a more formal approach; for instance, a compliment about exceptional contribution that you want to share with the wider organisation, or for complaints about significant failures of process or behaviour. Also, if you feel unsafe, or that previous efforts to address the situation informally have gone unheeded, you can lodge a more formal complaint to someone in a management or executive position at EMPHN, or via the online feedback portals.

Written feedback – compliments, suggestions or complaints – can be provided to EMPHN at any time via our website or staff intranet. This can be done anonymously, but, it is preferred that you leave your contact details so that the organisation can follow-up to get more information, and keep you updated on what is being done about your feedback.

How EMPHN manages feedback

EMPHN is committed to treating each instance of feedback on its own merits; impartially, confidentially and transparently.

Feedback, especially complaints, received verbally or via email by an EMPHN employee must be entered into the risk management system, TICKIT, and allocated to the appropriate senior manager for review and action.

Formal tracking ensures the organisation is aware of resolutions actioned, and can identify emerging trends that warrant additional attention.

EMPHN's initial response to feedback

Compliments are forwarded to the appropriate team managers and posted on the intranet, and suggestions are logged to inform continuous improvement activities.

Specifically, complaints are handled according to the principles in the Department of Health's Primary Health Networks Program Complaints Policy 2018; assessed on their merit, and addressed fairly and objectively.

Complaints are escalated immediately to the Executive Director of the relevant business area, as well as to the Chief Operating Officer if:

- there is a real or perceived conflict of interest
- a complaint is in relation to a manager's (or senior person within EMPHN) conduct
- a complaint involves a risk assessed as moderate or above
- there is an allegation of misconduct, or unethical or illegal activity
- there is a reputational risk to EMPHN, its programs or the Primary Health Network program
- a complaint has not been resolved at the previous level
- the issue affects the financial viability of EMPHN

If the relevant executive or the Chief Operating Officer are implicated in the complaint, they are bypassed, and the complaint is escalated to the Chief Executive Officer.

Where appropriate, the Chief Operating Officer escalates serious concerns raised via a complaint to the Executive Leadership Team and, where there is a notifiable issue (either a breach of our obligation to protect personal information or an unresolved conflict of interest), manages the escalation to the Department of Health and Aged Care.

Complaint investigation and actioning are implemented via the Complaints Handling Procedure.

Communication with providers of compliments or suggestions

Every feedback provider who shares their contact details in the online feedback portal receives a system generated acknowledgement and thanks. Suggestions and compliments that indicate the feedback provider is willing to engage further, an EMPHN representative will use the given contract details to get in touch within 10 working days.

Where feedback is received verbally or via email from a community member or other stakeholder by an EMPHN employee, that employee is to acknowledge and thank the provider for the feedback and let them know what the next steps will be.

Communication with providers of complaints
While anonymous complaints inherently make further communication and follow up with the person who made the complaint impossible, all self-identifying complainants will receive a system-generated acknowledgement, and then be contacted by a senior EMPHN officer (as assigned by the Risk Manager) within 6 working days to open a dialogue and outline the next steps.

Given differences in the nature, complexity and urgency of different feedback topics, some complaints will take longer to investigate and resolve. However, the EMPHN representative is to keep the feedback provider informed of what is being done.

Reporting serious unethical conduct

To report serious concerns such as unethical conduct, individuals connected EMPHN, such as employees or their families, can lodge a whistleblower report. Prior to making a whistleblower report, EMPHN recommends reporters seek independent, professional advice, visit the Australian Securities and Investments Commission (ASIC) website and read EMPHN's Whistleblower Policy to ensure their specific concerns are covered and that they are eligible for protection under the relevant legislation.

Review and learning

All feedback is collated in a quarterly report (with an annual report that includes all feedback from each quarter for easy reference), based on inputs via EMPHN's website and TICKIT by the Risk Manager. The report lists actions taken by management, tracked against the relevant feedback, until the feedback incident is fully addressed and can be closed.

The Chief Operating Officer oversees the Feedback Register and reports to the Executive Leadership Team each quarter, highlighting trends and themes or concerns. Feedback is reported to the Strategy and Risk Committee as part of the quarterly Risk Report.

The Quality, Risk and Safety Steering Team also review the feedback reports to consider relevance for that team's quality projects and the internal quality audit series.

Where trends emerge, further investigation may be required. The Executive Director of each business area is responsible for ensuring understanding of trends is being wrapped back into EMPHN's processes and systems for continuous improvement within their own areas.

Feedback results precipitate better team dialogue and inform:
- decision-making
- program planning, monitoring and evaluation activities
- drafting or amendment of policies and procedures
- audience, content and focus of learning and development programs
- targets and focus of community consultations

Procedure

Complaints are managed via EMPHN's Complaints Handling Procedure. Some complaints raised by employees against other employees will be addressed via the Workplace Grievance Resolution Procedure where that is more relevant to the context.

Related legislation and policies

This policy is compliant with the Corporations Act 2001 and the Australian Charities and Not for-Profits Commission (ACNC) Guidelines; as well as EMPHN's organisational values of integrity, courage and working together.

This policy is supported EMPHN's wider policy suite, including:

- Whistleblower Policy
- Code of Conduct Policy
- Fraud and Corruption Prevention and Control Policy

Policy review

This policy is reviewed every three years in accordance with the Policy Framework, unless legislative or regulative requirements trigger earlier review.

Definitions

Term	Definition
Feedback	Complaints, improvement opportunities or compliments from members of the public, EMPHN employees, contractors, consultants or government employees.
Complaint	An expression of dissatisfaction with any aspect of EMPHN's activities that requires a review, and where appropriate facilitates a resolution
Compliment	An expression of satisfaction with any aspect of EMPHN's activities.
Suggestion	An idea about how something could be improved or conducted differently to affect better outcomes. Where suggestions are recognised as applicable, useful and appropriate, they may be implemented immediately, or logged to inform the next scheduled review of a particular process.

Where to get help?

- For enquires about this Feedback and Complaints Policy, contact the policy owner: t**he Chief Operating Officer**

- You can provide feedback on this policy, or EMPHN's handling of feedback or a complaint by using the feedback option on our website or staff intranet.

Lodging a complaint with the Department of Health and Aged Care

Individuals can lodge a complaint about EMPHN, directly with the Department of Health and Aged Care, according to its Primary Health Networks Program Complaints Policy if there is:

- Suspected fraud against the Commonwealth by a funded organisation
- Misuse of Commonwealth funds or assets purchased with Commonwealth funds
- Non-compliance with the terms and conditions of the funding agreement with the Commonwealth
- Inappropriate or poor handling of conflicts of interest
- Breaches of privacy
- Complaints about the outcome of a departmental assessment

Prior to lodging a complaint with an external body, make sure you visit the relevant organisation's website to ensure the complaint is something they can help with.