

Feedback Management POLICY

SERVICE AREA

ORGANISATION WIDE

1 PURPOSE

This policy provides guidance to our staff and community who wish to provide feedback, on the key principles of our feedback management system.

This policy is intended to ensure that Rumbalara Aboriginal Cooperative (Rumbalara) and its related entities (including Rumbalara Housing Ltd) handles feedback fairly, efficiently and effectively. It outlines the actions taken by staff and other involved parties in reporting, responding to and investigating feedback.

When we refer to feedback, this includes complaints.

This policy document is for both internal and external use and is available on request from our staff.


2 SCOPE

This policy applies to all staff (paid and volunteer), contractors and our governing body, receiving or managing feedback from the community made to or about us, regarding or products, services and staff, or our feedback handling process. It also covers internal feedback made by staff.

Some matters are not covered by this policy including:

- where the person has a legal right to seek review of a decision (for example, through the Fair Work Commission or the Administrative Appeals Tribunal)

Sometimes feedback may encompass issues that are the subject to specific investigative process including:

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- allegations of fraud
 - serious allegation of misconduct (criminal offence)

3 POLICY STATEMENT

The objective of this policy is to define a clear feedback management policy that is transparent, accessible and consistent. We recognise properly managing feedback is important in helping us to deliver on our services, to evaluate and make continuous improvement in our delivery.

The right of the community to provide feedback is a fundamental component of Rumbalara’s commitment to promote the rights of all people.

Persons providing feedback can expect to receive a response from Rumbalara in a reasonable timeframe and have a right to an internal and/or external review if they are unhappy with the decision made.

4 GUIDING PRINCIPLES

Our feedback handling system addresses the principles of integrity, visibility and accessibility, responsiveness, assessment and investigation, appropriateness, feedback and improvement focussed.

FACILITATE FEEDBACK

4.1.1 COMMUNITY FOCUS

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

Any concerns raised in feedback will be dealt with within a reasonable time frame.

People providing feedback, including complaints, will be:

- provided with information about our feedback handling process and how to access it



- listened to, treated with respect by our staff and actively involved in the feedback process where possible and appropriate, and
- provided with reasons for our decision and any options for review.
- offered alternative methods of providing feedback if they are dissatisfied with the way their feedback has been handled.

4.1.2 NO DETRIMENT TO PEOPLE PROVIDING FEEDBACK

We will take all reasonable steps to ensure that people providing feedback are not adversely affected because feedback has been made by them or on their behalf.

4.1.3 ANONYMOUS FEEDBACK

We accept anonymous feedback if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

4.1.4 ACCESSIBILITY

We will ensure that:

- We make it simple for you to provide feedback, including lodging complaints. You can easily find Information on how and where to give feedback, at our locations and on our website.
- There are multiple ways to provide feedback, including our feedback form, phone, email, letter, in person, website, the use of an interpreter, support person or advocate.
- Our systems to manage feedback are easily understood and accessible to everyone, particularly those who may require assistance.
- Information about how to get help from an advocate or an external service to give feedback or make a complaint, is available at our locations and on our website.



If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their feedback, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to provide feedback with their consent.

There is no charge in providing feedback.

4 RESPONDING TO FEEDBACK

4.1 EARLY RESOLUTION

Where possible, feedback will be resolved at first contact with us. Where appropriate we may offer an explanation or an apology to the person providing feedback.

4.2 RESPONSIVENESS

We will promptly acknowledge receipt of feedback where they are not resolved at first contact.

We will assess and prioritise feedback in accordance with the urgency and/or seriousness of the issue raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

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

- The feedback process
- the expected time frames for our actions
- the progress of the feedback and reasons for any delay
- their likely involvement in the process, and
- and the possible or likely outcome of their feedback.

We will advise them as soon as possible when we are unable to deal with any part of their feedback and inform them of where the issue or feedback may be directed (if known and appropriate).



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

5 OBJECTIVITY AND FAIRNESS

In applying this policy, we will have full regard to legislation, standards and rules that govern Rumbalara.

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

We will ensure that the person handling the feedback 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 feedback was managed will be conducted by a person other than the original decision maker.

6 RESPONDING FLEXIBLY

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

We will assess each feedback on its merits and involve people providing feedback and/or their representatives in the process as far as possible.

7 CONFIDENTIALITY

All Rumbalara staff are to comply with their obligations under the *Privacy Act 1988* and Rumbalara's Privacy Policy when dealing with feedback under this policy. Staff are required to ensure that personal information is protected from unauthorised access, misuse, interference, loss, or disclosure.



We will only disclose the person providing feedback, personal information in accordance with the law and to individuals who have an operational need to know the relevant personal information, or where the person providing feedback has consented to the disclosure.

As feedback made about Rumbalara will at times mention specific individuals (such as a staff member), the personal information about that individual will be de-identified when filing general information about the handling of the feedback. If that is not practicable, access to the identifying information will be stored in a secure manner and restricted to only Rumbalara personnel who have a legitimate need for that access.

8 APPROPRIATENESS

When feedback including complaints, is received, we will assess the feedback for severity, safety, complexity, impact, and the need for immediate action. From this assessment, we will determine by whom and at what level the feedback should be dealt with.

We will handle feedback proportionately, reasonably and in a manner appropriate to the feedback.

Where a person remains dissatisfied with the handling or resolution of feedback, they may request an internal review, where the feedback will be escalated to the next level.

The three levels of feedback handling:



Level 1

Where possible, feedback will be resolved by the staff who first receives the feedback unless the nature or seriousness of the issues raised should be dealt with by a manager. Staff will be adequately equipped to respond to feedback, including being given appropriate authority, training, and supervision.

Level 2

Where resolution at Level 1 is not possible, we may decide to escalate the feedback to a manager. This second level of feedback handling will provide for the following internal mechanisms:

- assessment and possible investigation of the feedback and decision/s already made, and/or facilitated resolution (where a person not connected with the feedback reviews the matter and attempts to find an outcome acceptable to the relevant parties).
- feedback that are automatically escalated to Level 2 are those that pose a risk to a staff member or the community and should be dealt with by a manager.



Level 3

Where resolution at Level 2 is not possible, we may decide to escalate the feedback to an executive manager.

Feedback that are automatically escalated to Level 3 are those that pose a significant risk to a staff member or the community, or reputational risk to Rumbalara and must be dealt with by an executive manager.

In a case where there is concern for the wellbeing or safety of a staff or community member, executive managers should immediately prioritise the feedback as appropriate depending on the particular circumstances, to ensure the safety of that individual.

Where providing feedback is dissatisfied with the outcome of our review of their feedback at Level 3, they may seek an external review of our decision.

9 ANSWERS

Once an investigation has been resolved, we will explain what happened and why, what will be done to fix the issue, who will do it, how we will communicate our progress and how we will check things are on track. When appropriate, we will provide an apology, accept responsibility for what occurred and the impact.

We will follow up with people providing feedback to determine the effectiveness of the outcome, where appropriate.

10 MANAGING PARTIES TO FEEDBACK

10.1 FEEDBACKS INVOLVING MULTIPLE AGENCIES OR AREAS WITHIN RUMBALARA

Where feedback involves multiple organisations, we will work with the other organisations where possible, to ensure that communication with the person providing feedback and/or their representative is clear and coordinated.



Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the feedback.

Where feedback involves multiple areas within Rumbalara, responsibility for communicating with the person making the feedback and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive feedback management system. We take feedback not only about the actions of our staff but also the actions of our service providers.

11 EMPOWERMENT OF STAFF

All staff managing feedback are empowered to implement our feedback management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our feedback management system.

12 MANAGING UNREASONABLE CONDUCT BY PEOPLE PROVIDING FEEDBACK

We are committed to being accessible and responsive to all people who approach us with feedback. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible,
- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the feedback we receive.



13 ALTERNATIVE AVENUES FOR DEALING WITH FEEDBACK

Requesting an internal review of the outcome

The complainant can request a decision or outcome of the feedback including complaints, be reviewed by Rumbalara where the complainant believes it to be incorrect.

The review will be conducted by the Chief Operating Officer, who has not had any prior involvement with the complaint. Rumbalara will inform the complainant of the outcome of the internal review and provide reasons in writing within 14 calendar days of the request.

A complainant can request copies of documentation related to their feedback including complaints, as well as copies of relevant policies. Rumbalara will respond to a request for documentation related to the complaint with copies of documents or clear reasons why any documents have not been provided (e.g. documents belong to a third party, or documents contain another person's private/sensitive information).

We will inform people providing feedback to us or about us about any external review options available to them.

13.1 RECORDING FEEDBACK

We will ensure that feedback including complaints, are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the board of directors. We will gather and record feedback to meet any statutory, policy or procedural reporting requirements.

We will run regular reports on:

- the numbers of feedback received,
- the outcome of the feedback, including matters resolved at the frontline (Level 1)
- issues arising from feedback,
- systemic issues identified, and



- the number of request we receive for internal and/or external review of our feedback 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, executive managers and the board of directors at least annually.

14 MONITORING OF THE FEEDBACK MANAGEMENT SYSTEM

We will continually monitor our feedback management system to:

- ensure its effectiveness in responding to and resolving feedback,
- identify and correct deficiencies in the operation of the system, and
- monitoring may include the use of audits, feedback satisfaction surveys and online tools.

15 CONTINUOUS IMPROVEMENT

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

- support the making and appropriate resolution of feedback
- implement best practices in feedback handling
- recognise and reward exemplary feedback handling by staff
- use the information received from feedback to improve the training and capabilities staff to receive feedback and respond to feedback,
- regularly review the feedback management system and feedback data, and
- implement appropriate system changes arising out of our analysis of feedback data and continual monitoring of the system.



16 ROLES AND RESPONSIBILITIES

16.1 CHIEF EXECUTIVE OFFICER

The Chief Executive Officer is responsible for:

- promoting a culture that values feedback and their effective resolution, and
- reporting to the board on feedback handling.

16.2 CHIEF OPERATING OFFICER

The Chief Operating Officer is responsible for:

- reporting to the Chief Executive Officer on feedback handling,
- regularly reviewing reports about feedback trends and issues arising from feedback, and
- supporting recommendations for service, staff and feedback handling improvement arising from the analysis of feedback data.

16.3 EXECUTIVE MANAGERS

Executive managers are responsible for:

- demonstrating a commitment to fostering and supporting a positive feedback culture which includes welcoming feedback and viewing feedback as an opportunity to improve,
- be accountable for their respective business areas delivering on the feedback response timeframes set out in this policy,
- support the regular review of work practices and developing new ways of doing our work,
- provide support for staff with complex and sensitive feedback management issues, and



- encourage staff to make recommendations for system improvements.

16.4 MANAGERS

All managers are responsible for:

- encouraging staff to be alert to feedback,
- providing adequate support and direction to staff responsible for handling feedback to resolve them promptly,
- ensuring staff who are the subject of a feedback are supported appropriately throughout the process,
- developing staff to improve capability in feedback handling and service delivery,
- supporting staff in identifying and understanding systemic issues in feedback to improve practices and procedures.

16.5 ALL STAFF

All staff are responsible for:

- understanding and complying with Rumbalara's feedback handling practices,
- treating all people with respect, including people who provide feedback,
- assisting people who wish to provide feedback, of our feedback policies and procedures,
- providing regular feedback to their manage on issues arising from feedback,
- providing suggestions to management on ways to improve our feedback management system,
- accurately recording all feedback investigation and outcomes.
- implementing changes arising from individual feedback.



17 BREACH OF POLICY

If a person believes that their feedback was not dealt with in accordance with this policy, they can make a complaint about the handling of their feedback (as per this policy).

If the board or executive management has reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to deal with a feedback in accordance with this policy (such as not investigating feedback impartially, or not advising a person providing feedback of their review rights), the board or executive management may take action against them.

18 EXTERNAL REPORTING

The following complaints must be reported to the relevant external funding body:

- Privacy breach – within one business day to the Department of Families, Fairness and Housing (DFFH)
- Reportable conduct as defined in the Child Wellbeing and Safety Act 2005. The CEO is required to notify the Commission for Children and Young People of any allegation deemed as reportable conduct within three business days. Refer to website: [CCYP – Notify and update reportable allegations](#).



19 DEFINITIONS

Key work/abbreviation	Definition
Rumbalara	Rumbalara Aboriginal Co-Operative Ltd.
Staff	Includes employees, contractors and people otherwise engaged for example, on a volunteer basis.
Feedback	<p>An expression of dissatisfaction made to or about us, our services, staff or the handling of feedback where a response or resolution is explicitly or implicitly expected or legally required (AS/NZ 10002:2014).</p> <p>As well as feedback being made directly to our organisation, remember that some feedback (or at least negative comments may be made on social media).</p>
Complaint	An expression of dissatisfaction made to or about the organisation (either written or verbal) related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.
Complainant	Someone who makes a complaint
Feedback handling/management system	All policies, procedures, practices, staff, hardware and software used by us in the management of feedback.
Dispute	An unresolved feedback escalated either within or outside of our organisation.
Feedback	Opinion, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about



	our services or feedback handling system where a response is not explicitly or implicitly expected or legally required.
Grievance	A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

20 INFORMATION

Supporting procedures	<i>Feedback Management Procedure</i>
Associated policies	<i>Child Safety Policy</i> <i>Privacy Policy</i> <i>Code of Conduct</i>
Related legislation	<ul style="list-style-type: none"> ▪ Australian Standard AS/NZS ISO 10002:2024 Guidelines for Complaint Management ▪ <i>Health Complaints Act 2016 (Vic)</i> ▪ National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 ▪ <i>National Disability Insurance Scheme Act 2013 (Cth)</i> ▪ <i>National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (the Rules) (Cth)</i> ▪ <i>Ombudsman Act 1973 (Cth)</i> ▪ <i>Privacy Act 1988 (Cth)</i> ▪ <i>Privacy and Data Protection Act 2014 (Vic)</i> ▪ <i>Health Records Act 2001 (Vic)</i>



	<ul style="list-style-type: none"> ▪ <i>Health Services Act 1988 (Vic)</i> ▪ <i>Mental Health Act 2014 (Vic)</i> ▪ <i>Children, Youth and Families Act 2005 (Vic)</i> ▪ <i>Commission for Children and Young People Act 2012 (Vic)</i> ▪ <i>Charter of Human Rights and Responsibilities Act 2006 (Vic)</i> ▪ <i>Child Wellbeing and Safety Act 2005 (Vic)</i>
Category	<i>Governance</i>
Approval	<i>RAC and RHL Board</i> <i>20/07/2023</i> <i>Meeting Number / Agenda Item (as applicable)</i>
Endorsement	<i>CEO</i> <i>27/03/2024</i> <i>Meeting Number / Agenda Item (as applicable)</i>
Policy owner	<i>Chief Operating Officer</i>
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