



Client Feedback and Complaints Policy

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Overview

Purpose

This policy establishes The Salvation Army (TSA) Australia Territory's commitment to its clients to:

- Encourage and provide opportunities for feedback
- Manage feedback in a consistent, transparent and effective manner
- Use feedback to continuously improve its mission and service delivery

Feedback includes (internal and external):

- Complaints
 - Compliments
 - Suggestions
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Who does this apply to?

This policy applies to:

- All personnel of TSA Australia Territory
 - Anyone who engages with TSA
 - Implementing partners overseas (SAID)
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Effective date

01/06/2022

Definitions

Definitions are located in the [Glossary of Terms and Definitions](#) (GO_LR_GUI-03_TPMP).

| Term | Definition |
|-----------------------------------|--|
| Feedback Method | The various ways feedback is communicated to The Salvation Army. Examples include, but are not limited to, face to face, telephone, letter, email, social media, webpage, suggestion box, and survey. |
| Feedback Owner | The person within TSA tasked with ensuring the feedback is managed to the required standard and in accordance with this policy and the associated procedure. |
| Feedback Submitter | Person or organisation providing feedback to TSA by any method. |
| Gender Expression | The ways in which a person expresses their gender identity. This can include appearance, behaviour and mannerisms such as how someone dresses, wears their hair, if they use make-up, their body language and their tone of voice. A person's name and pronouns are also common ways of expressing gender, and this is the case for transgender people as well as cisgender people. |
| Gender Identity | Refers to a person's internal, deeply felt sense of being either man, woman, non-binary, or a range of other gender identities. Because gender identity is internal and personally defined, it is not always visible to others and therefore should not be assumed. |
| Intersex | People born with physical sex characteristics that don't wholly or solely fit into the binary medical definitions of male or female. This includes naturally occurring and very normal differences of chromosomes, gonads (ovaries and testes), hormones, and/or genitals. There are more than 40 intersex variations. |
| Natural Justice | Also referred to as 'procedural fairness'. A process that is accessible, fair, transparent and consistent where all participants receive: <ul style="list-style-type: none"> ▪ Equitable treatment ▪ Written notice of complaint and details of the complaints process is provided ▪ The right to be heard and to respond to complaints ▪ The right to make submission and present material and information Decisions made on the balance of probability |
| Open Disclosure Principles | The eight guiding principles of Open Disclosure are: <ul style="list-style-type: none"> ▪ Open and timely communication ▪ Acknowledgement of the event ▪ Apology or expression of regret ▪ Supporting, and meeting the needs and expectations of people receiving a service from TSA, their family and carers ▪ Supporting, and meeting the needs and expectations of workers involved in the care or provision of the service or product ▪ Risk management and systems improvement ▪ Good governance and accountability ▪ Confidentiality |

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| Respondent | <p>The person who is the subject of a complaint or the person against whom a complaint is made.</p> <p>Where the complaint concerns a mission expression or mission enabler, rather than an individual, the complaint is 'owned' by the relevant Senior TSA Representative (or their appointed delegate):</p> <ul style="list-style-type: none"> ▪ Corps (Church) – Corps Officer (Minister) ▪ Social Program – Manager ▪ Headquarters – Relevant Department Head ▪ Mission Enterprise – Relevant National Director |
| Sexual Orientation | <p>Sexual orientation refers to a person's sexual and relationship preferences as it relates to gender. For example, whether they are attracted to people of the same or opposite sex, to both men and women or to people who are non-binary. Others may describe themselves as not experiencing sexual or romantic attraction.</p> |
| Status Update | <p>Information provided to a feedback submitter at key stages.</p> <p>E.g. acknowledgement of feedback receipt, change of feedback ownership, closure or resolution.</p> |
| Suggestion | <p>Feedback that has an improvement idea or plan for consideration. Suggestions can be accepted or rejected.</p> |
| Vexatious Feedback | <p><u>Repeated</u> submissions of feedback by an individual where the feedback:</p> <ul style="list-style-type: none"> ▪ Is false, malicious and/or groundless; and/or ▪ Relates to matters that have previously been assessed by TSA and closed and where there is no material change to the facts; and/or ▪ Relates to trivial matters |

Policy Statement

General Principles

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| Our Commitment | <p>TSA is committed to:</p> <ul style="list-style-type: none">▪ Encouraging both external and internal feedback▪ Ensuing our feedback and complaints process is safe, accessible, fully inclusive and responsive to all people regardless of their ethnicity, cultural background, language, disability, religious beliefs, marital status, sexual orientation, gender identity, gender expression and intersex status. TSA is committed to the safety and wellbeing of people of all ages, particularly children, and welcomes, supports and creates opportunities for them to provide feedback about our people, services and products▪ Receiving feedback and complaints from all:<ul style="list-style-type: none">○ Clients, participants, beneficiaries, donors and members of the public○ Advocates, support person/s or other substitute decision makers acting on behalf of and with the consent of a client○ Organisations, groups, international partners (both direct and indirect partners), and other entities that TSA works with▪ Encouraging, supporting and creating opportunities for clients, their families/carers, advocates and other client representatives to provide feedback and complaints▪ Receiving feedback, including anonymous reports, in any form (including verbal) to support ease and accessibility▪ Managing feedback in a consistent, transparent and effective manner and in accordance with open disclosure principles▪ Using feedback to continuously improve our mission delivery▪ Ensuring feedback and complaints policy and procedures comply with legislation, regulation and contract obligation▪ Ensuring all TSA personnel understand their role and responsibilities in receiving and managing feedback and complaints |
| Respect and fairness | <p>TSA commits to incorporating the principles of diversity and inclusion in all interactions with parties participating in a feedback process. All parties participating in a feedback process must always be treated with respect and fairness. The feedback process:</p> <ul style="list-style-type: none">▪ Does not discriminate against a client on the basis of personal characteristics such as age, race or ethnic background, gender identity, gender expression or sexual orientation, physical or mental disability.▪ Is culturally safe and respectful to Aboriginal and Torres Strait Islander peoples, children and young people, people living with disability, LGBTIQ+ people and people from culturally and linguistically diverse communities. |
| Privacy | <p>All personal information collected or used within the feedback or complaint management process must be managed in accordance with TSA Privacy Act Compliance Policy (GO_LR_POL_TPAC).</p> |
| Confidentiality | <p>TSA must maintain confidentiality throughout the feedback process, unless:</p> <ul style="list-style-type: none">▪ The individual/s involved in the matter have indicated their consent for release of information to other parties▪ The disclosure is necessary for the safety of any person or to prevent harm▪ The submitter has indicated that confidentiality is not required▪ The sharing of the information is compelled by law |
| Continuous Improvement | <p>TSA will continually work to improve the effectiveness of its feedback and complaints management processes.</p> <p>Measurable indicators must be developed to aid understanding of feedback and complaints received by TSA and the outcomes of the respective management process.</p> |

Concealed, fabricated and vexatious feedback

Deliberate concealment or fabrication of feedback or a complaint by TSA personnel will be regarded as a breach of policy.

A vexatious 'complaint' is a groundless or false complaint or allegation that is a deliberate abuse of the complaint process and made with intent to cause annoyance, distress, detriment, harassment, reputational harm or pursue a private/malicious agenda. These matters are rare and should not be considered as complaints.

Submission of vexatious feedback or complaint is considered unethical and will be treated as a breach of policy if submitted by TSA personnel.

Management Process

Receipt of feedback and complaints

All feedback and complaints must be:

- Acknowledged, assessed and resolved in a fair, efficient and timely manner
 - Recorded, assessed and managed within defined timeframes as per the Client Feedback and Complaints Procedure (GO_QA_PRO-01_TFBK)
 - Assessed, even if the submitter has not provided contact information and/or where multiple types of feedback/complaint are received in the same submission, each component of the feedback/complaint must be addressed
 - Assigned to a feedback or complaint owner in a timely manner
 - Appropriately notified in compliance with relevant contractual, legislative, regulatory and mandatory reporting requirements
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Status Updates to Feedback Submitters

The feedback or complaint owner must ensure that the submitter is provided with status updates throughout the process, unless:

- The submitter elects not to receive updates
 - The submitter has chosen to remain anonymous or provided insufficient contact information
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Notifications

Feedback and complaint procedures must clearly identify when and in what timeframes Senior TSA Representatives and/or other Mission Expressions or Mission Enablers must be notified of feedback or complaint received. An individual Mission Expression or Mission Enabler may have further notification requirements.

Complaints

Complainant Rights

TSA supports the complainant's right to:

- A safe and accessible approach to the complaints process
- Receive support throughout the complaints process, with attention given to children, people experiencing vulnerability and disadvantage, including but not limited to Aboriginal and Torres Strait Islanders, LGBTIQ+ people, people from culturally and linguistically diverse backgrounds, people with disability and older people
- Be kept informed and supported throughout the complaints process
- A timely, fair and efficient response from TSA
- Withdraw the complaint at any point in the process
- Have their identity protected throughout the complaint management process
- Access and receive support from an advocate or other representative of their choice
- Be informed of, provided with information about and supported to raise a complaint or issue with an appropriate external authority/agency/tribunal at any point in the complaint management process, e.g. Health Services Commissioners, Children's Guardian, NDIS Commissioner
- Not be victimised by any person or adversely affected as a result of lodging a complaint and/or raising the matter with an appropriate external authority/agency/tribunal
- Access or continue to receive support and service from TSA at a level that is not diminished or compromised as a result of making a complaint. This may include direct provision or referral to support services
- An internal review of the original decision made by TSA where the complainant is dissatisfied with the outcome

Withdrawal of a Complaint

Where a complainant has withdrawn a complaint, TSA reserves the right to continue to review a complaint where it believes this is in the best interests of the complainant and/or TSA.

External Agent

TSA reserves the right to implement a review or investigation using an external agent or agency where it believes this is in the best interests of the complainant and/or TSA.

Legislative and regulatory reporting obligations

TSA is committed to compliance with all applicable legislation, government regulation and/or mandatory reporting requirements associated with the management of complaints, in addition to TSA's internal complaint notification requirements.

Contractual obligation

All complaint notification obligations required as part of contractual arrangements must be in addition to TSA's internal complaint notification requirements.

Related Policies

This policy exists alongside other TSA Policies.

Complaints must be assessed using Feedback Categorisation Table (GO_QA_CHA-01_TFBK) to determine whether they must be managed under another TSA Policy.

Roles and Responsibilities

The roles associated with execution of this policy are indicated in the table below.

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| Executive Manager Continuous Improvement | <p>Must:</p> <ul style="list-style-type: none">▪ Promote awareness of the policy package▪ Support implementation and improvement of this policy within TSA▪ Establish and improve systems and processes to collect, analyse and report feedback metrics▪ Support TSA to learn from and reduce complaints |
| Senior TSA Representatives | <p>Must ensure that, for all operations under their span of control:</p> <ul style="list-style-type: none">▪ TSA personnel understand their obligations under this policy and comply with the policy▪ Feedback metrics and reports are submitted to the Executive Manager Continuous Improvement as required |
| Personnel | <p>Must:</p> <ul style="list-style-type: none">▪ Promote feedback processes to all clients▪ Support clients who would like to provide feedback or make a complaint▪ Understand their roles and responsibilities with respect to client feedback and managing complaints▪ Take appropriate action when they receive feedback▪ Consult with their line manager if they are unsure what, if any action, to take |

Accountability

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| Obligation | All personnel under the terms of their service, employment, engagement or contract must comply with all TSA policies, procedures and supporting documents. |
| Consequences of non-compliance | Failure to comply with this policy may result in disciplinary action and, in serious cases, termination of employment or engagement with TSA. |

Location

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| Repository | Territorial Policy Hub |
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Feedback

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| Feedback is encouraged | Feedback is used to improve and enhance the impact of this policy and will be considered when reviewing and updating the document. |
| Who is feedback provided to? | Feedback on this policy and related documents should be sent to the Executive Manager, Continuous Improvement via policy@salvationarmy.org.au . |

Related Documents and References

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|---------------------------------------|---|
| Policy Document | <p>Client Feedback and Complaints Policy (GO_QA_POL_TFBK)</p> <p><u>Procedures</u></p> <p>Client Feedback and Complaints Procedure (GO_QA_PRO-01_TFBK)</p> <p><u>Charts</u></p> <p>Complaints Process Chart (GO_QA_CHA-02_TFBK)</p> <p>Compliments Process Chart (GO_QA_CHA-03_TFBK)</p> <p>Suggestions Process Chart (GO_QA_CHA-04_TFBK)</p> <p>Feedback Categorisation Table Salvos Stores (GO_QA_CHA-05_TFBK)</p> <p>Feedback Categorisation Table Employment Plus (GO_QA_CHA-06_TFBK)</p> <p>Feedback Categorisation Table Social Mission (GO_QA_CHA-07_TFBK)</p> <p>Feedback Categorisation Table Community Engagement (GO_QA_CHA-08_TFBK)</p> <p>Feedback Categorisation Table Salvation Army Housing (GO_QA_CHA-09_TFBK)</p> <p>Feedback Categorisation Table SAID (GO_QA_CHA-10_TFBK)</p> <p>Feedback Categorisation Table Corps and Divisions (GO_QA_CHA-11_TFBK)</p> <p>Feedback Categorisation Table Salvos Funerals (QA_QA_CHA-12_TFBK)</p> <p><u>Guides</u></p> <p>SolvSafety User Guide - Report a Complaint (GO_QA_GUI-01_TFBK)</p> <p>SolvSafety User Guide - Report a Compliment (GO_QA_GUI-02_TFBK)</p> <p>SolvSafety User Guide - Report a Suggestion (GO_QA_GUI-03_TFBK)</p> <p>SolvSafety User Guide - Manage Complaints, Compliments and Suggestions (GO_QA_GUI-04_TFBK)</p> <p>Audit and Compliance Guide – to be developed</p> <p><u>Forms</u></p> <p>Feedback and Complaints Form (GO_QA_FOR-01_TFBK) to be developed</p> <p>Compliant Report Form (GO_QA_FOR-05_TFBK)</p> <p><u>Checklist</u></p> <p>Audit and Compliance Checklist – to be developed</p> |
| Related Policy Documents | <p>Code of Conduct Policy (GO_LR_POL_TCOC)</p> <p>Diversity and Inclusion Policy (GO_LR_POL_TDAI)</p> <p>Enterprise Risk Management Policy (GO_LR_POL_TERM)</p> <p>Fraud Policy (GO_LR_POL_TFRC)</p> <p>Incident Management Policy (GO_QA_POL_TCIM)</p> <p>Information Security Policy (BS_IT_POL_TISP)</p> <p>Knowledge, Information and Data Management Policy (GO_LR_POL_TKID)</p> <p>Lived Experience and Participation Policy (GO_SR_POL_TCSP)</p> <p>Privacy Act Compliance Policy (GO_LR_POL_TPAC)</p> <p>Quality Management Policy (GO_QA_POL_TQCI)</p> <p>Safety and Wellbeing of Children and Young People Policy (GO_LR_POL_TSWC)</p> <p>Whistleblower Protections Policy (GO_LR_POL_TWBP)</p> <p>Work Health and Safety Policy (GO_WH_POL_TWHS)</p> <p>Workplace Relations Policy (BS_HR_POL_TWPR)</p> |
| Related Legislation | <p><i>Privacy Act 1988</i></p> <p><i>Australian Privacy Principles</i></p> |
| Funding Agreement Requirements | <p>N/A</p> |

**Governance/
Accreditation/
Certification
Standards**

Accreditation Standards as at May 2020 include, but are not limited to:

- Aged Care Quality Standards (2018)
- Australian Service Excellence Standards (ASES) Award (Version 6, 2018)
- Australian Service Excellence Standards (ASES) Certificate (Version 6, 2018)
- ISO 9001: 2015 Quality Management Systems
- National Standards for Disability Services (2013)
- National Standards for Mental Health Services (2010)
- NDIS - Practice Standards
- QIC Health and Community Services Standards (2010 – 6th Edition)
- QIC Health and Community Services Standards (2017 – 7th Edition)
- QLD Human Services Quality Standards (HSQS) - Common Requirements (Version 5.0, 2019)
- Rainbow Tick Standards (2016 Edition)
- TAS Quality and Safety Standards (2016)
- VIC Human Services Standards (2015)
- Australian Children’s Education & Care Regulatory Unit - ACECQA
- Education Standards Authority Accreditation (NSW)
- Non-State Schools Accreditation Board Accreditation (QLD)
- National Community Housing Standard
- National Standards for Mental Health Services
- Australian Council for International Development (ACFID) Code of Conduct
- Department of Foreign Affairs & Trade (DFAT) Accreditation

**Audit Report
Findings**

N/A

**Other Relevant
Documents
/Resources**

N/A

Document Control Information

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|---------------------------|--|----------------------|---|
| Document ID | GO_QA_POL_TFBK | | |
| Theme | Governance | | |
| Category | Quality Assurance | | |
| Policy Owner | Assistant Chief Secretary | | |
| Policy Implementer | Head of Quality and Safeguarding | | |
| Approval Authority | Australia Territory Board | | |
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| Next Review Date | May 2025 | | |
| Previous Documents | AUE - N/A AUS - CMP Complaints Management Policy NAT – Feedback and Complaints Policy | | |
| Document History | Version | Date Approved | Summary of Changes |
| | 1-0 | 08/08/2019 | Inaugural policy |
| | 1-1 | 20/01/2020 | Update to Related Policies p.8 |
| | 1-2 | 09/10/2020 | Procedure developed into three procedures: <ul style="list-style-type: none"> ▪ Complaints ▪ Compliments ▪ Suggestions |
| | 1-3 | 2/12/2021 | Content included for SAID Accreditation and assurance from Rainbow Tick Accreditation working group |
| | 2-0 | 4/02/2022 | Finalisation of initial review |
| | 2-1 | 26/05/2022 | Revised to include: NDIS, ACFID requirements; revised process for management of suggestions; |