

# Feedback Policy and Procedure



**Belconnen  
Community  
Service**

The purpose of this policy is to articulate Belconnen Community Service Inc (BCS) system for the management of feedback including complaints from participants, their representatives and other external stakeholders.

## Scope

This policy provides a means for participants, and or their representatives and external stakeholders to provide feedback about BCS, its employees, volunteers, services or operations in general. All BCS employees and volunteers are to be familiar with and able to forward this policy and associated documents as required.

For complaints made by an employee refer to the [BCS Grievance and Dispute Handling Policy and Procedure](#).

## POLICY

In accordance with our vision, purpose and values, BCS welcomes feedback (general comments, compliments, criticism, concerns and complaints) from participants and or their representatives and external stakeholders as a valuable mechanism for reflecting on the quality and performance of our services and organisational support functions.

BCS will:

- foster a service culture that encourages open and honest communication
- inform participants about the standard of service they can expect
- protect the right of participants and stakeholders to provide feedback and to make complaints about service delivery
- protect the privacy and confidentiality of people and accept and action anonymous feedback
- encourage and make it easy for people to provide feedback
- undertake activities to seek feedback from participants and or their representatives and stakeholders
- record and analyse information arising from feedback and use it to improve services.
- ensure that complainants continuation of services and interactions with BCS are not interrupted as a result of making a complaint, unless the participant and or BCS have a valid reason to do so (i.e. protect the health, safety and wellbeing of an individual or group of people)
- treat participants with respect and integrity in accordance with the BCS Values
- provide participants with an opportunity for appeal and welcome independent review if they are unhappy with any finding or outcome from providing feedback to BCS

Participant feedback is used as part of the BCS Quality Management System and provides our organisation with the opportunity to:

- understand the needs and expectations of participants and stakeholders and the communities in which we work and support
- identify improvements to what we do and how we do it (decisions, processes, systems, trends, actions, behaviours, attitudes)
- record, register, respond and resolve identified issues, and share these to improve practices and explore new solutions, and
- analyse and learn from identified trends and solutions to ensure BCS is proactive and relevant to the communities we serve.

BCS has an overall plan for the different levels of feedback, and the way that the feedback from participants and or their representatives and stakeholders will be collected, recorded and used to assist BCS to make the best use of every opportunity to improve the service and increase the satisfaction of participants. To view the plan please refer to the *BCS Feedback Planning* document.

BCS utilises a mix of different feedback methods, appropriate to the needs of our participants and or their representatives and stakeholders.

The framework of BCS's feedback system is based on five levels of feedback information:

**Level 1: Compliment** or positive Feedback. Comments are positive about the service and or employee and aim to reinforce continuing good service.

**Level 2: General Comment** about the service, or requests for information or clarification. Comments may be either positive or negative or may be suggestions for improvement.

**Level 3: Criticism** or dissatisfaction about the service received, particularly where there is dissonance between the expressed need of the participant and the service delivered.

**Level 4: Concern** or serious objection about the service delivery, where there is a high level of dissatisfaction or a specific grievance.

**Level 5: Complaint** about serious breaches of the service contract, or of rights, policy, or the legislative responsibilities of the service (for example, Anti-discrimination legislation etc.)

All feedback must be managed by employees in accordance with the [BCS Code of Conduct](#), [BCS Privacy and Confidentiality Policy and Procedure](#) and as outlined within this Policy and Procedure.

## Definitions

**Australian Children's Education and Care Quality Authority – (ACECQA) NLO1 Form Notification of Complaints and Incidents**

For the purposes of this policy, NLO1 form to be lodged by Children's Programs when they receive a complaint alleging:

- the safety, health or wellbeing of a child was or is being compromised.
- the Law has been breached

**Complainant:**

Person making a complaint.

**eBMS**

Electronic Business Management System

**Employee:**

Employee includes paid employees and volunteers of BCS who are engaged to undertake work for and on behalf of BCS in a permanent, fixed term/contracted, casual or voluntary capacity.

**Feedback:**

Feedback can be a compliment, general comment, criticism, concern or complaint. A participant or their representative or external stakeholder may wish to provide feedback about an employee, service or the organisation. Five levels of Feedback:

Level 1: Compliment

Level 2: General Comment

Level 3: Criticism

Level 4: Concern

Level 5: Complaint

**National Quality Agenda IT System**

Used by Children's Programs to make reports to regulatory body

**Participant:** a person accessing any BCS program or service.

## PROCEDURE

The following procedure outlines how BCS manages feedback. This procedure outlines the following information:

1. Promoting the Feedback Process
2. Initiating and Collecting Feedback
3. Feedback Documentation
4. Processing Feedback
5. External Reporting
6. Appeal Options

### SECTION 1: Promoting the Feedback Process

The provision of feedback (general comments, compliment, criticism, concern or complaint) is encouraged and welcomed by BCS.

BCS employees and volunteers are responsible for ensuring that participants and or their representative and stakeholders are informed of what they can expect from BCS and how they may provide feedback.

BCS Feedback information will be provided to participants in one or more of the following ways:

- The [BCS Policy and Feedback Record Form](#) is available on the website and intranet.
- A feedback option is provided on the BCS Website. Feedback is sent to the Executive Management Team
- BCS Handbook
- Specific Program Handbooks (e.g. Community Care and Community Transport)
- Parent Handbooks (Long Day Care, School Age Care and School Holiday Programs)
- Participant Surveys
- Program or Service brochures
- Service Agreements

All employees working with participants are responsible for ensuring they (and/or their representatives) are familiar with the procedures for providing feedback, and for:

- accepting and reporting informal feedback
- offering participants and or their representatives with an opportunity to provide formal feedback when appropriate.

Coordinators and Program Managers are responsible for ensuring that Feedback forms are readily available and independently accessible at each program so that no participant, participant representative or their advocate need have to ask for a feedback form. Additionally a [BCS Incident and or Hazard Report form](#) may be required depending on the nature of the feedback.

### SECTION 2: Initiating and Collecting Feedback

Feedback should be received and processed with integrity, respecting the participant and or the participants' representative or stakeholder's rights and feelings about their experiences at BCS.

Feedback (including complaints) can be provided in a variety of ways:

- written
- verbal
- email
- text

- social media
- through our BCS website
- or any other form of correspondence to BCS employees.

No matter the method, any feedback must be treated diligently and as quickly as possible.

When receiving feedback from a participant and or their representative or stakeholder, BCS employees must observe the following practices:

- explain the feedback process
- ask if they would like a copy of this policy and procedure
- **advise** that privacy and confidentiality is a priority and ask if they are happy to have their name and/or contact information recorded on our [Feedback Report Form](#)
- if the feedback is from a participant or their representative, advise that service provision will not be affected because feedback was provided to BCS (unless the participant and or their representative chooses otherwise or BCS is required to cease or suspend services in order to ensure the health, safety and wellbeing of an individual or groups of people or other extenuating circumstance)
- listen carefully to the details provided
- receive the information impartially, and without offering personal opinion
- ask whether the person would like a support person or advocate to be present
- record the details of the feedback and ask what outcome is preferred
- advise that the feedback will be registered with the Executive Team of BCS, reviewed by the Senior Leadership Team and actioned by the relevant line manager within BCS
- advise the person that if the feedback is in the form of a complaint, concern or criticism of a BCS employee, that BCS employee will not be involved in the management of the complaint to avoid any conflict of interest.

## SECTION 3: Feedback Documentation

Feedback will be acknowledged either verbally, electronically or in writing within three working days of receipt, other than anonymous feedback or where the person providing the feedback has noted on the [Feedback Record Form](#) that they do not wish a response from BCS. Please refer to the [BCS Privacy and Confidentiality Policy and Procedure](#) for more information. This will be the responsibility of the relevant line manager.

Where the feedback is of a nature that an investigation is required, the matter must be immediately reported to the Executive Team. The [BCS Workplace Investigation Policy and Procedure](#) must be followed. The complainant should be kept informed of the process and know when to expect a response where relevant (this should be within 21 working days). Communication and keeping all parties informed is paramount in maintaining good process – communication will not occur where the person providing the feedback has asked to remain anonymous or where they have noted that they do not want a response from BCS.

The following processes are required to be followed:

- A [Feedback Record Form](#) must be completed for each piece of feedback received; if the person providing the feedback does not wish to complete a form themselves or if the feedback has been received from social media, text or email then the employee will record the information on the form, attach a copy of the initial feedback received and indicate on the form that they have done so on behalf of the participant, stakeholder or advocate. It is important to ensure that privacy and confidentiality is maintained and that individuals identities are withheld if it is requested that BCS do so.
- Completed forms are to be forwarded to the Executive Manager, People and Culture who will forward the information to the Executive Team for inclusion into the feedback register.
- All feedback is required to be summarised in monthly reports at all levels (ie Coordinator to Manager, Manager to Senior Manager, Senior Manager to Executive Manager, Executive Manager to CEO).

IMPORTANT NOTE: In many circumstances, a written [BCS Incident and/or Hazard Report form](#) may be required to be completed or reported electronically via EBMS *IN ADDITION* to the [Feedback Record Form](#). All employees are responsible for completing [Incident and/or Hazard Record forms](#). For further information, please refer to the [BCS Incident and Hazard Reporting Policy and Procedure](#).

## SECTION 4: Processing Feedback

Once feedback has been received and recorded, it must be assessed for further action.

### Immediate Resolution:

If the feedback is a general comment, compliment, concern or criticism and the matter can be resolved immediately to the satisfaction of the person providing the feedback (within the bounds of BCS Policy) then action should immediately be taken to do so. This should be recorded on the [Feedback Record form](#).

### Requires action:

If the matter requires greater attention, the form is to be referred to the relevant Program Manager for follow up.

If the relevant Program Manager is able to resolve the matter (within the bounds of BCS Policy) then these actions are to be recorded on the [Feedback Record Form](#).

### Escalation to Senior and Executive Management:

Escalation of feedback will occur when:

- The matter is not able to be resolved at a local level i.e. immediate resolution or no resolution was reached with the relevant Program Manager
- The matter is in relation to a Program Manager's conduct
- The matter involves a risk assessed as high or extreme (this must be reported as per the BCS Risk Management Policy and Procedure – Sections 5, 6 and 7)
- There is an allegation of misconduct, unethical or illegal activity. In this case the matter must be immediately referred to the Executive Manager People and Culture and/or CEO.

### Escalation to the CEO and/or the Board

Feedback that must be reported to the CEO and/or Board include:

- Matters with risk assessed as high or extreme
- Matters that include a threat to an individual's life
- Matters that affect a death or potential life threatening situation
- Matters that affect the reputation of BCS assessed as a moderate risk or above
- Any legal or criminal matter either actual or potential
- Matters that have not been able to be resolved at the Senior or Executive Level
- Matters that affect the financial viability of BCS

### Communicating the outcome

During each step of the process the person who provided the feedback is to be kept informed of the progress of their feedback. Where the feedback is not a complaint then this may take the form of providing a response to the feedback via the medium it was presented (i.e. email, letter, or verbal).

Where the feedback is a simple matter that has been quickly and easily resolved then acknowledgment of the feedback and any action taken by BCS should be provided to the person, thanking them for bringing it to our attention.

Where the feedback is a serious complaint that requires investigation, the [BCS Investigation Policy and Procedure](#) will provide the framework for resolution. Progress reports are to be provided to the complainant

on a regular basis. All records and any correspondence (including file or diary notes) must be kept. The complainant will be advised of the outcome of their feedback (where relevant).

## SECTION 5: External Reporting

### *Reporting to Regulatory Authority – Children’s Education and Care Assurance (CECA)*

#### **Reporting Complaints alleging a child/ren’s safety and health is at risk**

In accordance with the Education and Care Services National Regulations 2011, Section 174 (2) (b) requires Children’s Programs to report any complaint made to the service alleging that the safety, health or wellbeing of a child or children was or is being compromised while that child or children is or are being educated and cared for by the approved education and care service. Notifications must be lodged within 7 days of the service becoming aware or being notified of the complaint. Notification is to be made via the National Quality Agenda IT System (NQA ITS) at <http://www.acecqa.gov.au/national-quality-agenda-it-system> via form NLO1 Notification of Complaints and Incidents. If/when the NQA ITS is unavailable NLO1 forms can be downloaded from the ACEQA website: [www.aceqa.gov.au](http://www.aceqa.gov.au)

Directors must report these complaints to the Senior Manager Children’s Programs, the Executive Manager People and Culture and the Chief Executive Officer of BCS within 24 hours. Notification can be made via phone or email and the NQA ITS Confirmation of Notification email response must be emailed to all three.

Injuries and incidents that must be reported to the Regulatory Authority in accordance with Section 174 of the Education and Care Services National Law Act 2010 must also be reported to People and Culture within 24 hours via the lodgement of an eBMS Incident and Hazard Report.

### *Reporting to Police or Statutory Authority*

If BCS have received a complaint of criminal activity by a BCS employee or other activity that should be reported to a relevant statutory authority, the Executive Manager People and Culture and/or the CEO must be immediately made aware and make the report.

## SECTION 6: Using Feedback for Quality Improvement

The Executive Management Team will be responsible for maintaining and managing the feedback register.

All management positions will be responsible for reporting on and preparing a report on feedback received each month within their monthly reports. These reports are fed through each level of management and reported by Senior Managers to the Executive Team. The CEO reports matters relevant to the Board quarterly unless the matters raised are assessed as a high or extreme risk to BCS in which case these matters are reported to the Board within two working days.

Results from feedback are used to:

- inform service planning
- improve policies, procedures and/or safe work guidelines
- inform learning and development programs
- improve service planning, monitoring and evaluation activities
- inform decision making
- inform annual quality audit schedule
- improve customer service
- reduce red-tape

BCS will annually review, monitor and evaluate the BCS Participant Feedback Planner as part of continual quality improvement of the BCS Feedback System.

## SECTION 7: Appeal Options

Where the participant and or their representative, stakeholders or advocate is dissatisfied with the conclusion, they are able to appeal with the following (where relevant)

The Chief Executive Officer of BCS  
Phone: (02) 6264 0200  
PO Box 679, Belconnen ACT 2617  
[Dira.horne@bcsact.com.au](mailto:Dira.horne@bcsact.com.au)

ACT Public Advocate  
Phone: (02) 6207 0707  
[www.publicadvocate.act.gov.au](http://www.publicadvocate.act.gov.au)

ACT Human Rights Commission  
Phone: (02) 6205 2222  
[www.hrc.act.gov.au](http://www.hrc.act.gov.au)

The ACT Human Services Registrar - investigates complaints against a specialist disability service provider relating to compliance under the Disability Services Act, 1991.

Phone: (02) 6205 4608  
Email: [DSA.registrar@act.gov.au](mailto:DSA.registrar@act.gov.au)

## Relevant Legislation, Resources and BCS Policies

- *Belconnen Community Service:*
  - *Privacy and Confidentiality*
  - *Grievance and Dispute Handling Policy and Procedure*
  - *Feedback Form*
  - *Workplace Investigations Policy and Procedure*
  - *BCS Risk Management Policy and Procedure*
  - *BCS Incident and Hazard Reporting*
  - *Code of Conduct*
- *ACT Human Rights Act 2004*
- *Education and Care Services National Law 2011 and Regulations*
- *National Quality Agenda IT System*
- *ACECQA Form NLO1 – Notification of Complaints and Incidents*

## Acknowledgement / Sources

- *Education and Care Services National Law 2011 and Regulations*
- *ACT Human Rights Commission <http://hrc.act.gov.au>*

## Feedback

Feedback on this policy can be submitted to [policy@bcsact.com.au](mailto:policy@bcsact.com.au).

## Review

This policy will be reviewed within three years of the date of CEO endorsement.

## Compliance

Non-compliance to this policy may result in disciplinary action up to and including dismissal.