



Feedback and Complaints Policy

Contents

Overview	1
Definitions	2
Policy Statement.....	5
General Principles.....	5
Management Process	6
Complaints	6
Roles and Responsibilities	7
Risk and Compliance.....	7
Location	7
Feedback.....	7
Related Documents and References.....	8
Document Control Information.....	9

Overview

Purpose

This policy establishes The Salvation Army (TSA) Australia Territory's commitment 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



The Feedback and Complaints Policy Referral Matrix (GO_QA_FOR-01_TFBK) provides guidance to feedback recipients to decide whether feedback is managed under this policy or under another policy or procedure.

Who does this apply to?

This policy applies to:

- All personnel of TSA Australia Territory
 - Anyone who engages with TSA
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Effective date

26 September 2019

Definitions

Term	Definition
Advocate	A person who speaks or writes in support or defence of another person, cause or policy.
Balance of probability	Following an investigation and based on corroborated, convincing evidence, it seems reasonable to conclude a person has behaved as alleged, or an incident has occurred.
Complainant	The person or organisation that initiates the complaint.
Complaint	An expression of dissatisfaction or concern with respect to an experience with TSA personnel, or with a service or product provided by TSA.
Compliment	An expression of praise and/or congratulation with respect to an experience with TSA personnel, or with a service or product provided by TSA.
Engaged	Any individual or entity with a formal or informal relationship with TSA including but not limited to suppliers, service recipients and members of the community.
Equity and Diversity	<p>Equity ensures everybody has an equal opportunity, and is not treated differently or discriminated against because of their characteristics.</p> <p>Diversity takes into account the differences between people and respects the diversity of perspective and contribution of all people.</p> <p>TSA values the diverse skills and perspectives people bring to its operations, mission expressions, and the workplace through their gender, gender identity, age, language, ethnicity, cultural background, disability, religious belief, sexual orientation and marital status.</p>
Feedback	<p>Feedback can be a Complaint, Compliment, or Suggestion.</p> <p>Feedback may be received from individuals or from organisations and provides an opportunity for improvement of services, products or processes.</p>
Feedback Method	<p>The various ways feedback is communicated to The Salvation Army.</p> <p>Examples include, but are not limited to, face to face, telephone, letter, email, social media, webpage, suggestion box, and survey.</p>
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 Register	A document or system for recording feedback managed by TSA.
Feedback Submitter	Person or organisation providing feedback to TSA by any method.
Incident	<p>An unplanned, undesired event that adversely affects an individual, an organisation or a task.</p> <p>An incident requires an organisational response in a timeframe that is typically determined by its severity.</p>
Line Manager	An individual who has personnel reporting to them and is responsible for their supervision and day to day performance.
Mission Expression	<p>Ministries or services of The Salvation Army that provide holistic mission and serve people in local communities.</p> <p>This includes Corps, Social and Community programs, Chaplaincy and Mission Enterprises.</p> <p>Examples include but are not limited to Corps meetings and programs, accommodation services, Doorways and Salvo Stores.</p>

Term	Definition
Natural Justice	<p>Also referred to as 'procedural fairness'. Natural justice is afforded when the complaints management process is accessible, fair, transparent and consistent and all participants receive:</p> <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	<p>The open discussion of incidents that result in harm to anyone who engages with TSA and while receiving care and support from TSA.</p> <p>The elements of open disclosure are:</p> <ul style="list-style-type: none"> ▪ An apology or expression of regret, which should include the words 'I am sorry' or 'we are sorry' ▪ A factual explanation of what happened ▪ An opportunity for the person, their family and carers to relate their experience ▪ A discussion of the potential consequences of the adverse event ▪ An explanation of the steps being taken to manage the adverse event and prevent recurrence. <p>Open disclosure is a two-way discussion and an exchange of information that may take place over several meetings guided by the eight guiding principles.</p> <p>Open Disclosure is a care and quality improvement process. It is not a legal process and does not imply or contribute blameworthiness to any party.</p>
Open Disclosure Principles	<p>The eight guiding principles of Open Disclosure are:</p> <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
Personal Information	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> ▪ Whether the information or opinion is true or not ▪ Whether the information or opinion is recorded in a material form or not <p>Information/opinion may be in hardcopy and/or electronic format</p>
Personnel, TSA	<p>A person who may be an officer, territorial envoy, aux-lieutenant, cadet, candidate, person serving under officer conditions, employee, volunteer, a contractor or subcontractor, employee of a contractor or subcontractor, employee of a labour hire company, trainee or student on placement that is engaged in any TSA delivery or mission expression or is a Board or Board Committee member.</p>

Term	Definition
Policy Owner (PO)	<p>The Policy Owner is the role to ensure that all policies, procedures and supporting documents are developed, amended, rescinded, implemented and reviewed according to the Policy Lifecycle Policy (GO_LR_POL_NPLP) and the Policy Lifecycle Procedure (GO_LR_PRO_NPLP).</p> <p>The Policy Owner is responsible for managing the following four stages of the Policy Lifecycle:</p> <ol style="list-style-type: none"> 1. Identify and Plan 2. Develop, Consult and Approve 3. Implement 4. Monitor and Review
Procedural Fairness (Complaint)	<p>Procedural fairness requires that the person(s) conducting the investigation will:</p> <ul style="list-style-type: none"> ▪ Inform the respondent of the substance of the allegations made against them, with as much detail as possible (subject to the complainant's express wishes concerning privacy) ▪ Provide the respondent with a reasonable opportunity to put their case, either in writing, at a hearing or otherwise ▪ Make reasonable inquiries or investigations before making a decision ▪ Consider all relevant evidence, including evidence that supports and does not support the allegations ▪ Ensure that they do not decide on a case in which they have a conflict of interest ▪ Act fairly and without bias; and ▪ Conduct the investigation without undue delay
Respondent (Complaint)	<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 enterprise, 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 Programme – Manager ▪ Headquarters – Relevant Department Head ▪ Mission Enterprise – Relevant National Director
Senior TSA Representative	<p>A Senior Manager or above in your direct line of management authority or equivalent.</p> <p>A Senior Manager, as defined by the Approved Authorities Policy (GO_LR_POL_TAAP) is a position that reports to a Head of Department, National Director of a Mission Enterprise or a Divisional Commander.</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>
The Salvation Army (TSA)	<p>The Salvation Army in Australia inclusive of all mission expressions.</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 or malicious; 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

Our Commitment	<p>TSA is committed to:</p> <ul style="list-style-type: none">▪ Encouraging both external and internal feedback▪ Encouraging and creating opportunities to provide feedback▪ Receiving feedback 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 its feedback policy and procedures comply with legislation, regulation and contract obligation
Respect, fairness and privacy	<p>All parties participating in a feedback process must be treated with respect and fairness at all times.</p> <p>All personal information collected or used within the complaint management and feedback 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 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 the feedback management process.</p> <p>Measurable indicators must be developed to aid understanding of feedback received by TSA and the outcomes of the feedback management process.</p>
Concealed, fabricated and vexatious feedback	<p>Deliberate concealment or fabrication of feedback by TSA Personnel will be regarded as a breach of policy.</p> <p>Submission of vexatious feedback is considered unethical and will be:</p> <ul style="list-style-type: none">▪ Treated as a breach of policy if submitted by TSA personnel▪ Managed in accordance with Vexatious Feedback Procedure (GO_LR_PRO-02_TFBK) if submitted by non-TSA personnel

Management Process

Receipt of feedback

All feedback must be:

- Recorded, assessed and managed within defined timeframes. See Feedback and Complaints Procedure (GO_LR_PRO-01_TFBK)
 - Assessed, even if the submitter has not provided contact information and where multiple types of feedback is received in the same submission, each component of the feedback must be addressed
 - Assigned to a feedback 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 owner must ensure that the feedback submitter is provided with status updates unless:

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

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

Complaints

Complainant Rights

TSA supports the complainant's right to:

- A timely response from TSA
 - Receive support through the complaints process
 - Withdraw the complaint at any point in the process
 - Access and receive support from an advocate of their choice
 - Access external bodies/tribunals at any point in the complaints management process
 - Not be victimised by any person as a result of lodging a complaint
 - 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
 - An internal review of the original decision made by TSA where the complainant is dissatisfied with the outcome
 - Make a complaint via a third party e.g. a government department
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Withdrawal of a Complaint

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

External Agent

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

Related Policies

This policy exists alongside other TSA Policies.

Complaints must be assessed using the Feedback and Complaints Policy Referral Matrix (GO_LR_FOR-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.

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">▪ Take appropriate action when they receive feedback▪ Consult with their line manager if they are unsure what, if any action, to take

Risk and Compliance

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

Repository	Territorial Policy Application
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Feedback

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

Related Policy Documents

Policy Documents:

Feedback and Complaints Procedure (GO_QA_PRO-01_TFBK)
Feedback and Complaints Policy Referral Matrix (GO_QA_FOR-01_TFBK)
Feedback and Complaints Register Template (GO_QA_FOR-02_TFBK) – to be developed
Feedback and Complaints Form (GO_QA_FOR-03_TFBK) – to be developed
Feedback and Complaints Register Requirements (GO_QA_FOR-04_TFBK)
Incidents and Complaints System Work Instructions – to be developed
Vexatious Feedback Procedure – to be developed
Investigation Procedure – to be developed
Investigation Reporting Template – to be developed
Audit and Compliance Checklist – to be developed
Audit and Compliance Guide – to be developed

Related Policies:

Consumer/Stakeholder Participation Policy (GO_SR_POL_TCSP) – to be developed
Code of Conduct Policy (GO_LR_POL_TCOC)
Incident Management Policy (GO_QA_POL_TCIM) – to be developed
Duty of Care Policy (GO_LR_POL_TDOC)
Fraud Control Policy (GO_LR_POL_TFRC)
Knowledge, Information and Data Management Policy (GO_LR_POL_TKID) – to be developed
Privacy Act Compliance Policy (GO_LR_POL_TPAC)
Risk Management Policy (GO_LR_POL_TERM)
Quality Management and Continuous Improvement Policy (GO_QA_POL_TQCI) – to be developed
Safety and Wellbeing of Children and Young People Policy (GO_LR_POL_TSWC)
Territorial Information Security Policy (BS_IT_POL_TISP)
Whistleblower Protections Policy (GO_LR_POL_TWBP)
Work Health and Safety Policy (GO_WH_POL_TWHS)
Workplace Relations Policy (BS_HR_POL_TWPR)

Related Legislation

Privacy Act 1988
Australian Privacy Principles

Funding Agreement Requirements

N/A

Governance/ Accreditation/ Certification Standards

N/A

Audit Report Findings

N/A

Other Relevant Documents /Resources

N/A

Document Control Information

Document ID	GO_LR_POL_TFBK		
Theme	Governance		
Category	Legal, risk and Compliance		
Policy Owner	Assistant Chief Secretary		
Policy Implementer	Head of Professional Standards and Quality		
Approval Authority	Australia Territory Board		
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Next Review Date	July 2020		
Previous Documents	AUE	N/A	
	AUS	CMP – Complaints Management Policy	
Document History	Version	Date Approved	Summary of Changes
	1-0	TBD	Inaugural policy