

# Compliments, Complaints and Feedback Policy and Procedure

## 1. Purpose

- Wellsprings for Women values individual feedback and concerns. Wellsprings for Women consider proper consideration and resolution of complaints and feedback from our service users to be essential to best practice service delivery.

## 2. Scope

- This Policy and Procedure applies to all Wellsprings for Women service users and stakeholders with an interest in Wellsprings for Women and its services.
- This procedure does not apply to staff, contractors or volunteers who are themselves making a complaint. Wellsprings for Women has a separate grievance resolution procedure (refer to HR Employee Manual) for managing grievances/complaints from staff members, contractors or volunteers.

## 3. Policy and Procedure

- Wellsprings for Women welcomes and values feedback as this helps the organisation to identify what is working within the organisation and what Wellsprings for Women could continue to do to improve our services.
- Wellsprings for Women considers compliments, complaints and other feedback, both formal and information as part of its continual quality improvement regime and defines all as constructive feedback. A critical feature is the analysis of all constructive feedback in a systemic and systematic manner.

### Complaint Handling

- This Policy and Procedure outlines the steps Wellsprings for Women follows when receiving and resolving a complaint. Wellsprings for Wellsprings understand that anyone making a complaint or anyone affected by the complaint, has the right to be treated with dignity and respect and in a culturally responsive way.
- Wellsprings for Women's complaints handling process facilitates fair treatment of complaints and their resolution in a safe supportive manner without undue delay.

### Making a Complaint

- When they are initially engaging with our services, Wellsprings for Women ensures that all service users are made aware of how to submit a complaint and provide feedback upon the services Wellsprings for Women provide.
- Anyone can make a complaint to us. A service user may be affected by an issue raised in a complaint but may not necessarily be the person making the complaint directly. Neither the person making the complaint nor the service user affected by the complaint will be disadvantaged in any way as a result of the complaint being made.

<b>Doc #:</b>	PP05	<b>Doc Owner:</b>	CEO
<b>Version:</b>	6	<b>Review:</b>	February 2025
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- Wellsprings for Women encourages the person making the complaint to resolve the complaint, if possible and safe, when and where it occurs, directly with the person involved.
- If it is not possible to resolve the complaint at the first point of contact, the person can submit a complaint to the Chief Executive Officer (CEO).

## Submitting a Complaint

- Wellsprings for Women will ensure appropriate support and assistance are provided to any person who wishes to make a complaint. Wellsprings for Women will provide the complainant with advocacy information, should they require assistance to raise the complaint.
- The person making the complaint may submit their complaint openly or anonymously.
- A complaint may be submitted in person, by phone, in writing (post or email) and online via an open or anonymous e-Form, using Wellsprings for Women's Feedback Form (Informal) in the first instance.

### ***Open complaint***

- An open complaint is the preferred option as this allows the person making the complaint to provide their name and details and Wellsprings for Women can inform them about the progress of the complaint. Wellsprings for Women may also request further information to understand the facts and to clarify the outcome being sought. Wellsprings for Women will inform the person making the complaint of their review rights if they are not satisfied with the resolution outcome.

### ***Anonymous complaint***

- An anonymous complaint may limit what Wellsprings for Women can do to resolve the complaint. An anonymous complaint will not allow us to inform the complainant about the complaint's progress or outcome nor inform the person making the complaint of their review rights.

## Responding to a Complaint

- The CEO is the point of contact for complaints, the CEO will acknowledge the complaint, normally within 48 hours of receipt of the complaint.
- The CEO will arrange a time to talk to the person making the complaint to understand the facts and concerns around the complaint.
- The complainant will be asked their desired outcome from making the complaint. They will also be asked how they would like the final outcome of the complaint to be communicated to them.
- The complaint will be documented in the Wellsprings for Women's Compliments, Complaints and Feedback Register, which is the responsibility of the CEO and the

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Compliance Officer to maintain up to date and ensure that both resolution and improvement actions are completed in a timely manner. This is a discreet Register that is only accessible by the CEO and the Compliance Officer through a secure password.

- The CEO will communicate with the person making the complaint and the person affected by the complaint throughout the process in a way that meets their needs and complies with any legal obligations.
- The person making the complaint, and the person affected by the complaint, will be involved in the resolution and be kept informed of the progress of the complaint by the CEO.

## Resolving Complaints

- The CEO will aim to resolve the complaint quickly, normally within five days of the acknowledgement of receipt of the complaint.
- An investigation and assessment will be undertaken of the issues that have been raised in the complaint. Further information may be requested to enable the CEO to understand the issue and the outcome that the person making the complaint is seeking.
- The investigation process will be conducted and assessed based on the principles of fairness and natural justice.
- For more complex complaints, it may take up to 28 days to resolve the complaint. The CEO will notify the person making the complaint if there is a delay in the decision-making process.
- Where there is any level of risk involved in the complaint, the CEO will take appropriate action to ensure the person is safe. Where required, Wellsprings for Women will protect the health and safety of others and take emergency action, if necessary, to mitigate any immediate risks. This could mean contacting the police or other emergency services.
- The person making the complaint and the person affected by the complaint will be informed of the outcome of the investigation by the CEO outlining any action taken and the reasons for the decision. Where possible the outcome will also be communicated verbally or in person.

The outcome will be recorded in the Compliments, Complaints and Feedback Register.

## Complaints about the Chief Executive Officer

- When a complaint relates to the CEO, the individual may complain directly to the Chairperson of the Board.
- The Chairperson will follow the complaints process outlined above and references to the CEO will be read as references to the Chairperson.

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## Reviewing Complaints

- In the case of a complaint handled by the CEO, if the person making the complaint disagrees with the outcome, they may seek a review by the Board.
- In the case of a complaint handled by the Chairperson of the Board, if the person making the complaint disagrees with the outcome, they may seek a review by Kildare Ministries.
- A request for a review must:
  - be submitted in writing (post or email); and
  - set out any new information in support of the request; and
  - be made within two weeks after the person making the complaint is informed of the outcome.
- A request for a review may be refused if there is no new information regarding the complaint.
- The option of mediation is available at any time to the person seeking a review, including if the request for review is refused.
- The CEO will advise the individual of any relevant external agency that may be able to investigate the matters raised.

## Privacy

- Wellsprings for Women complies with its Privacy Policy and Procedure with regards to the management of information and will only collect and use personal information, including sensitive information, that is necessary to fulfil the functions and activities of Wellsprings for Women as determined by the nature of the individual's interaction with us and where Wellsprings for Women have a lawful basis to do so.
- Wellsprings for Women are committed to the protection and proper handling of personal and health information in accordance with the Privacy Act 1988 (Cth).

## Decision to End a Complaint

- Wellsprings for Women can make the decision to end a complaint resolution process for the following reasons:
  - the complaint is withdrawn/the person lodging the complaint does not wish to continue
  - the complaint is subject to legal proceedings
  - the information provided was not in good faith
  - insufficient detail or evidence of the complaint has been provided, or
  - the complaint is better handled by an external agency (for example, a government department or agency, Victoria Police).

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## Various Services' External Complaints Handling Agencies/Departments

- If a Wellsprings for Women client/participant believes that Wellsprings for Women has failed to follow its service requirements, they have the right to complain to the relevant external agency or department. This information is provided to all clients/participants as part of their on-boarding eg, within the PP01.01 Rights and Responsibilities Information Sheet.

## Victims' Charter

- If a Wellsprings for Women client/participant believes that Wellsprings for Women has failed to follow the Victims' Charter principles (refer to PP25 Victims of Crime Policy Addendum), they are able to make a complaint to the Victorian Victims of Crime Commissioner.
- A complaint may be made from:
  - a victim of crime
  - a family member of a victim of crime who has died as a result of that crime
  - a family member of a child who is a victim of crime, and/or
  - a family member of a victim of crime with a mental impairment.
- It is important that any individual intending to lodge a complaint with the Victims of Crime Commissioner, has lodged a complaint with Wellsprings for Women first. to the agency first. This gives Wellsprings for Women a chance to address the complaint, following its procedures outlined in this Policy and Procedure.

## ***How can a Complaint be made to the e-Commissioner?***

- Call: 1800 010 017 or
- Email: [enquiries@vocc.vic.gov.au](mailto:enquiries@vocc.vic.gov.au) or
- Mail: Victims of Crime Commissioner  
GPO Box 4356  
Melbourne VIC 3000

## ***What happens after a Complaint is made?***

Each complaint is acknowledged and assessed by the Commissioner within 28 days.

Once assessed, the complaint will either be:

- Accepted for investigation by the Commissioner and both parties are notified, or
- Referred to another organisation if the complaint is outside the Commissioner's authority, or
- Declined by the Commissioner and the complainant will be advised of the outcome.

A complaint can be withdrawn at any stage however it must be in writing.

## **Service Improvement through Compliments and Feedback**

- Wellsprings for Wellsprings for Women encourages feedback from service users through evaluation of our strategic directions and programs.

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- Where feedback is encouraged, the organisation acknowledges that not everyone prefers to provide feedback and accordingly:
  - ensures that all feedback requests and communication are culturally responsive and take into account the best way of asking for and receiving feedback from a target group including from Aboriginal and Torres Strait Islander people. For example, organising focus groups rather than issuing written surveys and/or organising translators and interpreters to be present, and
  - never coerces anyone to provide feedback.
  
- Feedback activities include but are not limited to:
  - ongoing informal strategies, for example, the Feedback Form (Informal) available on the organisation’s website, Suggestions Boxes available at Reception as well as canvassing feedback through direct stakeholder communication, such as initiating feedback about Wellsprings for Women’s strategic agenda
  - formal end of service milestone, unique to each service (refer to specific Service Practice Manuals, for example, through the Women’s Support Program’s Case Closure Form and the Education and Training’s Learner Plan Review and wherever relevant, address funding requirements,
  - SCORE assessments for Settlement Engagement and Transition Services (SET) clients, and
  - from time to time, Wellsprings for Women will organise and execute a formal feedback strategy about a specific activity or occurrence, e.g. the impact of COVID on its service users and communities.
  
- As part of Wellsprings for Women’s commitment to continuous improvement (refer to Continuous Quality Improvement Policy and Procedure), Wellsprings for Women has set KPIs for each service area and collects as a minimum feedback against these KPIs. The mode of collecting the feedback is approved by the CEO for each service area and can always include formal and informal feedback however, it must be recorded and transparent. Where a service area does not have a formal Feedback Form and is seeking to use a written mechanism for collecting service user feedback, it may opt to use the Feedback Form (Informal). Attachment A specifies the range of formal feedback mechanism in place as well as the service area’s KPIs where feedback is not automatically gathered through the formal mechanisms.
  
- It is at the discretion of the Service Manager to provide a reduced number of feedback against the set monthly KPIs where:
  - it was not applicable to a given service eg no service users exited in that month
  - there is evidence that the Service Manager attempted to receive feedback to the KPI target and it was not forthcoming from the service users during that month.
  
- In turn, Wellsprings for Women reviews and address issues raised through all compliments, complaints and other feedback and identifies opportunities for systematic improvements, including improvements to this Policy and Procedure.

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- This is achieved through the following phases:

## ***Encouraging Feedback Mechanisms in Place Phase***

These include, but are not limited to:

- (formal) issuing to the service user and encouraging completion of the relevant Service or activity Feedback Forms and SCORE for SETS clients
- (formal) completing Wellsprings for Women written surveys OR
- (formal) organising focus groups with specific and prepared ‘open’ questions to gather qualitative feedback OR
- (informal) communicating through other means, e.g. group stakeholder emails and encouraging feedback OR
- (informal) encouraging the completion and submission of the Feedback Form (Informal) available on the website and at Reception OR
- (informal) lodging any written suggestion in the Suggestion Boxes, located at Reception)
- (informal) through conversation or other communication means directly with a Wellsprings for Women staff member – the staff member must complete a Feedback Form (Informal) on behalf of the service user/stakeholder and lodge in one of the Suggestion Boxes at Reception so as to record the feedback.

## ***Collation of Feedback Phase***

These include, but are not limited to:

- (formal) where service specific and for the purposes of reporting to the relevant funding body/ies, the Service Manager will collate the feedback and submit it in the form required by the funding body/ies and in a timely manner against reporting timeline obligations. The Service Manager provides the feedback to the Compliance Officer, specifically the report issued to the funding body/ies
- (formal) where service specific and no funding obligations are in place, the Service Manager will provide the feedback to the Compliance Officer on a monthly basis, e.g. the Supervision (Volunteer) template
- (formal) the outcomes of activity consultations (e.g. COVID survey) will be provided to the Compliance Officer in the form collated by the relevant Service Manager
- (formal) through items lodged in the Compliments, Complaints and Feedback Register, and
- (informal) any Feedback Form (informal) and all other forms of informal feedback about the organisation as well as specific services, are provided to the Compliance Officer directly (not collated), together with the Compliance Officer clearing the Suggestion Boxes on a fortnightly basis.

## ***Analysis of Feedback by Wellsprings for Women Managers Phase***

- The Revenue and Impact Strategist is responsible for preparing the quarterly Managers’ Feedback Summary Report for consideration at the next available Managers’ meeting after its completion, against the (typically) February; May; August, November schedule. This Report is also submitted to the Board for their consideration.
- At the meeting, any emerging trends will be identified with recommendations for improvement identified. Where the recommendations are approved by the appropriate delegate, ie. the CEO, the action is lodged on the Continuous Improvement Register and followed through until execution by the Compliance Officer.

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Where recommendations are not approved, the proposed action will be minuted on the relevant meeting documents, so that should a trend emerge, that it is re-considered.

## ***Analysis of Feedback by Wellsprings for Women Board Phase***

- The CEO is responsible for providing information about continuous improvement to the Board on a monthly basis, through the Quality and Compliance Reports, prepared by the Compliance Coordinator.
- This includes but not limited to:
  - any complaints received in the previous month
  - recommendations for improvement identified through the quarterly Managers' Feedback Summary Report and which require Board approval, and/or
  - emerging trends and what action is planned to mitigate their occurrence.
- Where the recommendations are approved by the Board, the action is lodged on the Continuous Improvement Register and followed through until execution by the Compliance Officer. Where recommendations are not approved, the proposed action will be minuted on the Board meeting documents, so that should a trend emerge, that it is re-considered.

## **Sharing Feedback with External Stakeholders**

- Once the quarterly Managers' Feedback Summary Report is completed, a summary is prepared oversighted by the Revenue and Impact Strategist, for inclusion in Wellsprings for Women's Newsletter.
- The feedback outcomes are also shared with internal and external stakeholders through team meetings, events and collated for the purposes of presenting annual outcomes within Wellsprings for Women's Annual Report.

## **Complaints Record Keeping and Statistics**

- Wellsprings for Women keeps all relevant records of the complaint for up to seven years from the date the record is made including information about the complaint, actions taken and the outcome of the action taken.
- The storage of all documentation related to the complaint is held in a password protected folder on the organisations' system drive, with access by the CEO and Compliance Officer.
- All other feedback documents, eg Service specific Feedback Forms and other informal feedback documents are kept in line with any funding requirements.
- Should there not be any funding obligations, Wellsprings for Women will keep the feedback documentation for up to two years.
- All managerial and Board documents are held in accordance with Wellsprings for Women's

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Constitutional requirements.

## 4. Related Standards/ Legislation

- Victims of Crime Act 2006
- Victims of Crime Charter
- the United Nations' Declaration of Basic Principles of Justice for Victims of Crime
- Social Services Regulation Act 2021 (VIC)
- Social Services Regulations 2023 (VIC) and accompanying Social Services
- Refugee and Humanitarian Entrant Settlement and Integration Outcomes Framework
- Privacy Act 1988 (Cth)
- Australian Consumer Law and Fair Trading Act 2012

## 5. Definitions

- A complaint is an issue of concern or an expression of dissatisfaction raised by or involving a person using our services.
- Compliance Officer – if there is no Compliance Officer, means the CEO.
- Service user – mean any person that avails themselves of a Wellsprings for Women service. May also be referred to as a client or participant and vice versa.
- A victim of crime is an individual who has suffered injury from a criminal offence.

## 6. Responsibilities

- The CEO is responsible for approval and oversight of this Policy and Procedure.
- The various Service Managers are responsible for implementation and maintenance approval of this Policy and Procedure.
- All Service Managers are responsible for the day-to-day oversight of this Policy and Procedure as it applies to their areas of responsibility.
- All other staff members are responsible for ensuring that they comply with the requirements found in this Policy and Procedure and for immediately advising the CEO should they believe breaches of this Policy and Procedure are in occurrence.

## 7. Related Documents

- Feedback Form (Informal)
- Various Formal Feedback Forms, Templates and Reports x Service Area (refer to Attachment A)
- Compliments, Complaints and Feedback Register
- Continuous Improvement Register
- Victims of Crime Policy Addendum
- Managers' Feedback Summary Report Template
- CEO Report (to the Board) Template
- HR Employee Manual
- Service Practice Manuals (various)
- Service Planning Policy and Procedure
- Service Delivery Policy and Procedure
- Service Closure and Re-Entry Policy and Procedure
- Privacy Policy and Procedure
- Continuous Quality Improvement Policy and Procedure.

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## 8. Policy Review and Authorisation

- This policy will be reviewed in line with Wellsprings for Women’s internal audit and Policy and Procedure review schedule (refer to PP14.01 Policy and Procedure Master List with Internal Audit Schedule) in consultation with Managers, the CEO. Where significant changes are required, Board approval will be sought prior to distribution.

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ATTACHMENT A

## Feedback Forms and Reports used to Populate the Managers' Feedback Summary Report

Service Area	Formal	Informal
Women's Programs: Family Violence	<ul style="list-style-type: none"> <li>Case Closure Form (end of service) *</li> </ul>	Feedback Form (informal)*
Women's Programs: Case Management	<ul style="list-style-type: none"> <li>Case Closure Form (end of service) *</li> </ul>	Feedback Form (informal)*
Women's Programs: Settlement Engagement & Transition Services (SETS)	<ul style="list-style-type: none"> <li>SCORE (end of service)</li> </ul>	Feedback Form (informal)*
Education & Training: Non-Accredited Training (ACFE)	<ul style="list-style-type: none"> <li>Learner Review (end of course)</li> </ul>	Feedback Form (informal)*
Education & Training: Students on Placement		Feedback Form (informal)* with KPI of 1 every 6 months
Education & Training: Women's Health and Safety	<ul style="list-style-type: none"> <li>Evaluation Form (end of session) *</li> </ul>	Feedback Form (informal)*
Education & Training: Mental Health & First Aid		Feedback Form (informal)* with KPI of 5 per month
Employment		Feedback Form (informal)* with KPI of 2 per month
Volunteers	<ul style="list-style-type: none"> <li>Supervision (Volunteer) Report (quarterly)*</li> </ul>	Feedback Form (informal)*
Staff		Feedback Form (informal)* with KPI of 2 per month
Other Stakeholders	<ul style="list-style-type: none"> <li>Consultation with Women Survey (annual)*</li> <li>Board Focus Group (annual)</li> </ul>	Suggestion Box with Feedback Form (informal)* with KPI of 5 per month

\* Includes question:

*Please tick the following – currently, Wellsprings for Women has:*

- exceeded my expectations
- met my expectations
- not met my expectations.

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