

COMPLAINT MANAGEMENT PROCESS



Heather Hill Group (HHG) has an ongoing commitment regarding formal complaints. The following process is used to ensure complaints are actioned accordingly and positive outcomes are achieved.

- For these reasons, any complaints received from clients (facilities) should be treated with politeness, courtesy and an appreciation of their seriousness. Complaints should be followed through until the complaint has been resolved.
- Heather Hill Group is committed to working together with all personnel who provide services at the facility to ensure the fair, efficient and swift resolution of all complaints at all levels of Heather Hill Group.
- Feedback from client surveys and anecdotal comments are not to be confused with formal complaints about the services provided by Heather Hill Group.

Complaints handling approach

Commitment	There must be commitment to efficient and fair resolution of complaints through all levels of Heather Hill Group, not only from the management team but at practice level.
Resources	There must be adequate resources for complaints handling with sufficient levels of delegated authority.
Visibility and access	Clients should be made aware of the complaints handling process, which should be accessible to all and be easily understood.
Be responsive	You should try to understand client complaints and take actions to rectify or limit the problem identified. Most complaints can be responded to and resolved at the time the complainant makes them known to you.
Be courteous	You should try to resolve a complaint as soon as possible, treating with courtesy the person making the complaint.
Be fair / equitable	It is important that in handling a complaint you are fair to both the facility making the complaint and Heather Hill Group, the member against whom the complaint is made.
Provide assistance	Heather Hill Group staff members should be helpful in providing assistance to the facility making a complaint. This may involve helping that person formulate the complaint (preferably in writing when possible) and lodging the complaint with the appropriate person.
Anonymity and confidentiality	A facility will not be allowed, where possible, to make a complaint anonymously.
Be discreet and confidential	All complaints should be handled discreetly and in confidence. Any verbal complaints should be discussed in a private manner; the details should not be repeated to other staff members except where necessary to investigate the complaint.
Reviews and accountability	This complaint handling policy should be reviewed regularly. There should also be reporting on the operation of the policy. Systemic or recurring problems should be identified and rectified.

ISSUE DATE	REVIEWED DATE	REVIEWED DATE	REVIEWED DATE	AUTHORISED BY:
17.04.2023	14.04.2023	16.11.2022	26.08.2020	Hayley Clarke

Complaints handling procedure

▪ Statements of claim / summons

All Statements of Claims/Summons or other court documents served on Heather Hill Group must be **immediately** referred to CEO or delegate.

The CEO or delegate will then notify Heather Hill Group's insurers and retain lawyers as appropriate.

If the Statement of Claim/Summons or other court document also names an independent contractor, staff member or contractor as a defendant, a copy of the court document **must** be **immediately** given to the relevant personnel.

All Subpoenas to Produce or Non-party writs of discovery should be referred to Heather Hill - CEO.

▪ Solicitors' letters, Medical Boards, Health Insurance Commission, Health Departments / Commissioners, Office of the Federal Privacy Commissioner, etc.

If you receive a copy of a letter from a solicitor, Medical Board, the Health Insurance Commission, a Health Department/Commissioner, Office of the Federal Privacy Commissioner, making a complaint or investigating a complaint on behalf of a person against Heather Hill Group as defendant, **immediately** notify the CEO. Do not send a formal response until directed to do so.

Correspondence from the Office of the Federal Privacy Commissioner or complaints regarding a breach of privacy should be referred also to the Privacy Officer.

The resolution of such complaints may need to be in accordance with relevant legislation.

▪ Other Written Complaints made for or on behalf of Residents

The appointed Heather Hill Group Complaints officer (this is not a full-time role and is an additional responsibility of a Heather Hill Group staff member), will investigate, attend to and report in relation to complaints.

Wherever possible, facilities should be asked to provide complaints in writing to the Call Centre Manager. Where you are given a written complaint, you should arrange for a copy of the complaint to be provided to the Manager. Should staff directly be involved in complaint resolution then the Manager should be updated as to the events and the resolution of such occurrences.

Ensure that you have the name and contact details of the complainant, except where the complaint is being made anonymously.

Please ensure that the Manager is made aware of all complaints, which have been made. If the complaint is of a medical nature, it should be referred to a relevant medical practitioner.

Inform the Manager and CEO, immediately if you think there is the potential issue of litigation.

If the complaint is resolved at the time it is made, you should prepare a brief description of the complaint, the time and date, and a description of how the complaint was resolved. Please be sure to include details of whether the facility was satisfied as to the resolution of the complaint, or whether further follow-up is required.

The Manager will record all complaints and a description of their resolution on an Incident management system for quality assurance and control purposes. For this reason, it is important that you swiftly provide details of all complaints and any updates of the resolution of complaints.

In relation to litigated matters or potentially litigated matters, all incident forms and investigation reports should be created for the dominant purpose of obtaining legal advice and kept separately from the service records of the facility.

Where a complaint cannot be resolved on the spot, you should keep the complainant updated as to the progress of the complaint. You should acknowledge receipt of the complaint letter and inform the complainant that the matter is being investigated. This may be done by a telephone call or by letter.

▪ Verbal Complaints made by or on behalf of Residents (by facility representative)

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Where the complainant is unable to or prefers not to put the complaint into writing (eg. the person does not speak or write English), prepare your own written statement of the complaint at the time. Verbal complaints should be recorded on an incident management system for review, assignment and investigation.

When dealing with a person making a complaint:

- a) Re-assure the resident that Heather Hill Group is always happy to receive facility feedback and they will not suffer any adverse effect in their future dealings with Heather Hill Group
- b) Ensure that you make the facility feel comfortable and that you are treating the complaint in confidence.
- c) Make sure that you listen attentively to the person as they are speaking.
- d) Acknowledge the facility's perception of the issue.
- e) Ask the necessary questions in a polite and even-handed manner, in order to obtain the most detailed response.
- f) Invite the client to suggest a resolution of their complaint, but do not make any promises. If appropriate, suggest ways in which the complaint may be resolved and seek the client's feedback.
- g) Do not pass any judgment about the complaint or the person about whom the complaint is being made.
- h) Do not be defensive, attempt to lay blame or make excuses.
- i) Do reassure the client that the complaint will be investigated, and they will be informed of the result.
- j) Provide a suggested timeframe in which they will hear back from you or someone else from Heather Hill Group.
- k) If the resident requests, enable the resident to have present a support person. If the support person will be a lawyer, seek legal advice prior to the meeting.
- l) Do not make any admissions of guilt. / Stay in contact with the facility, especially if the investigation takes longer than anticipated.

▪ **Follow up of lodged complaints**

Once the investigation is concluded, the CEO or delegate of Heather Hill Group will contact the facility or complainant and provide a verbal / written summary. Any questions will be responded to and dealt with whilst on the call. If requested, this summary may be provided in writing, at the discretion of the CEO.

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