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### **Purpose**

ACH Group is committed to fostering a culture where customers, their representatives, and workforce feel encouraged and supported to provide feedback on the care, support, and workplace environment we offer. Every individual has the right to share feedback safely and without fear of intimidation or reprisal. A robust and transparent process for receiving, acknowledging, investigating, and resolving feedback enables ACH Group to better understand the experiences of our customers and workforce, and to continuously improve the quality of our services and workplace.

## Scope

This policy applies to all ACH Group employees who receive, manage, investigate and respond to feedback.

#### **Definitions**

For standard definitions, please see **Business Glossary - Reference** 

For this Policy, the following definitions apply:

Term	Definition
Complaints	An expression of dissatisfaction made to or about ACH Group, and related to care, support, the workforce, or the handling of a complaint, where a response or resolution is explicitly or legally required (AS/NZS 10002:2022).



Term	Definition
Compliment	An expression of positive sentiment made to or about ACH Group that contains praise, admiration or congratulation, and related to care, support or the workforce.
Continuous Improvement	The ongoing improvement of care, support or the workplace through either incremental (small) or breakthrough (major) developments and/or process changes.
Customer	Related to any of these three types of customers:
	a) Active customer: An individual, regardless of funding source, with at least one current service being delivered within the last 12 months. The individual may be referred to as a 'resident' when the individual resides in an ACH Group residential care home or retirement living property.
	b) Previous customer: An individual, regardless of funding source, with no current active services being delivered within the last 12 months (but has in the past).
	c) Prospective customer: An individual who has expressed an interest in becoming an 'Active customer' either explicitly (e.g. by submitting a formal application or joining a waitlist) or implicitly (e.g. by making an enquiry about ACH Group's care or support).
Feedback	A compliment, complaint or suggestion from an individual who is an active, previous or prospective customer of ACH Group, a member of the ACH Group workforce, and/or their authorised representative, regarding any aspect of the care and support provided by ACH Group, or the workplace.
Governing Body	The ACH Group Board and its members, including any ex-officio members.
Representative	An individual to contact in place of the customer, with permission to speak with ACH Group on the customer's behalf, e.g. a relative, carer, advocate, guardian or authorised delegate.
Suggestion	An expression of an idea for improvement made to or about ACH Group, and related to care, support or the workforce.
Workforce	The ACH Group Workforce includes ACH Group Board Members, Employees, Volunteers, Students and Contractors.
Workplace	Any place where work is carried out for ACH Group and includes any place where a member of the ACH Group Workforce goes, or is likely to be, while at work for ACH Group. This may include (but is not limited to) a residential aged care home, a customer's home, an office, or in the community.



### **Policy**

- ACH Group will implement and maintain a complaint and feedback management system to receive, record, respond to and report on complaints and feedback. We will ensure this system is capable of receiving complaints and feedback from customers, representatives, and the ACH Group Workforce.
- ACH Group will encourage and support customers, representatives, and the ACH Group workforce
  to make complaints and give feedback, including supporting access to advocates, language
  services, and other ways of raising and resolving complaints and feedback.
- ACH Group has robust measures in place to protect customers, representatives, and the ACH Group workforce from intimidation or reprisal when making a complaint or raising feedback. This includes (but is not limited to) the ability to raise feedback anonymously.
- ACH Group will take timely action to investigate and resolve all feedback and complaints and uses an open disclosure process to communicate with customers, representatives, or the ACH Group workforce when things go wrong.
- ACH Group will collect, analyse, and review complaints and feedback data. We will use this
  information to provide insights to the Governing Body, and customers, representatives and the
  ACH Group workforce, on complaints and feedback trends, and how ACH Group has used the
  complaints and feedback of customers, representatives and the ACH Group workforce to
  continually improve the care and support we provide, and the employee experience.
- ACH Group will regularly review and improve the effectiveness of the complaints and feedback management system. This includes undertaking regular quality assurance activities to monitor the timeliness and quality of the resolutions provided to all complaints and feedback, to ensure we take meaningful action on the feedback we receive.

## **Roles and Responsibilities**

Role	Responsibility
ACH Group Board	Promote a culture that values complaints and feedback from customers, representatives and the workforce.
	Hold the Chief Executive Officer (CEO) and Executive Leadership Team     (ELT) responsible for using feedback and complaints to deliver continuous improvement in the customer and workforce experience.
	Review reporting on customer and workforce complaints and feedback trends and keep abreast of factors, current and emerging, with the potential to impact the customer or workforce experience.
	Uphold the Governing Body's responsibilities with respect to receiving and responding to complaints and feedback from customers and



Role	Responsibility
	representatives provided through ACH Group's Consumer Advisory Bodies (CABs).
Chief Executive Officer (CEO)	<ul> <li>Provide overall customer and workforce experience leadership consistent with ACH Group's purpose of supporting Good Lives for Older People.</li> <li>Ensure adequate resources are available to the workforce to provide high-</li> </ul>
	quality customer experience and safe, compliant, and reliable care and support.
	<ul> <li>Keep abreast of factors, current and emerging, with the potential to impact the customer or workforce experience and affect the achievement of ACH Group's strategic or operational objectives.</li> </ul>
	Oversees communication and reporting to the ACH Group Board and Committees.
	Hold members of the Executive Leadership Team (ELT) and senior leaders accountable for outcomes resulting from customer or workforce complaints and feedback, including any assigned continuous improvement initiatives to improve the experience or address customer or employee feedback.
	Embody a culture of openness, transparency and receptiveness towards customer and workforce feedback, including holding ELT and leaders accountable for embodying behaviours that provide a safe environment for customers, representatives, and the workforce to provide complaints and feedback.
Clinical & Customer Care (C&CC) Committee	Assist the Board to monitor and review customer and workforce experience outcomes to ensure alignment with ACH Group's strategic and operational objectives.
	Receive regular customer and workforce complaints and feedback reports and discuss current and emerging complaints and feedback trends with Executives and provide comments as appropriate.
	Participate in the Governing Body's engagement with customers and representatives through ACH Group's Consumer Advisory Bodies (CABs).
Customer Experience Team	Provide quality assurance for ACH Group with respect to the identification and management of complaints and feedback from customers, representatives, and colleagues.
	Undertake regular monitoring and reporting on complaints and feedback trends, including open feedback, common themes, and/or customer feedback, quality assurance on the data captured in the feedback





Role	Responsibility
	management system, and the quality of resolutions achieved for customers and representatives.
	<ul> <li>Prepare analysis, insights, and reporting on customer feedback trends (including complaints received from external or regulatory bodies e.g., Aged Care Quality and Safety Commission) for presentation to and inform decision making by the ACH Group Board, C&amp;CC Committee, ELT, and QCAB.</li> </ul>
	Support the Governing Body's engagement with customers and representatives by leading the organisation of ACH Group's Consumer Advisory Bodies (CABs).
	Lead training in the effective use of ACH Group's complaints and feedback management system.
	Identify and escalate customer complaints and feedback when required so they go to a leader with the authority to make a change.
	Regularly review the effectiveness of, and support the implementation of improvements to, the complaints and feedback management system (particularly with respect to customer feedback).
	Update and maintain policy and procedures related to Feedback and Complaints.
Executive Leadership Team	Demonstrate customer and workforce experience leadership consistent with ACH Group's purpose of supporting Good Lives for Older People.
(ELT)	Ensure adequate resources are available to their teams to provide high- quality customer experience and safe, compliance, and reliable care and support.
	Provide visibility to the CEO and Governing Body with respect to ongoing high-risk customer or workforce complaints and feedback, and the strategies being undertaken to uphold the customer and employee experience and their rights.
	<ul> <li>Model behaviours to the workforce consistent with an environment where customers, representatives and the workforce feel safe and encouraged to provide complaints and feedback and hold leaders responsible for the same.</li> </ul>
	Responsible for monitoring and ensuring the successful implementation of continuous improvement initiatives in their customer group resulting from the complaints and feedback received from customers, representatives, and the workforce.



Role	Responsibility
	Take responsibility for the timely action and resolution of any high-risk feedback or complaints escalated to their attention.
People & Culture Team	<ul> <li>Provide quality assurance for ACH Group with respect to the identification and management of complaints and feedback from the workforce.</li> <li>Undertake regular monitoring and reporting on workforce complaints and feedback trends, including open feedback, common themes, and/or employee feedback quality assurance on the data captured in the feedback management system, and the quality of resolutions achieved for employees.</li> <li>Prepare analysis, insights, and reporting on workforce feedback trends for presentation to and inform decision making by the ACH Group Board, C&amp;CC Committee, ELT, and QCAB.</li> <li>Identify and escalate workforce complaints and feedback when required so they go to a leader with the authority to make a change.</li> <li>Regularly review the effectiveness of, and support the implementation of improvements to, the complaints and feedback management system (particularly with respect to employee feedback).</li> </ul>
Quality Care Advisory Body (QCAB)	<ul> <li>Assist the CEO and ELT to monitor and review customer and workforce outcomes resulting from complaints and feedback.</li> <li>Endorse reporting on customer and workforce complaints and feedback trends for presentation to the C&amp;CC Committee.</li> <li>Ensure alignment of customer experience outcomes with high levels of clinical performance.</li> </ul>
Workforce	<ul> <li>Be actively involved in identifying new complaints and feedback from customers, representatives, and colleagues.</li> <li>Escalate complaints and feedback when required so they go to a leader and/or colleague with the authority to make a change.</li> <li>Ensure all feedback and complaints are entered into the complaints and feedback management system in a timely manner.</li> <li>Take prompt action on any complaints and feedback assigned to them so they are resolved in a timely manner and with consideration for the ongoing impact on the customer, representative, or worker.</li> <li>Support and encourage customers, representatives, and colleagues to make complaints and give feedback, including support with accessing advocacy or language services.</li> </ul>



Role	Responsibility
	Uphold behaviours that make customers, representatives and colleagues feel safe to provide complaints and feedback, including a zero tolerance for unacceptable behaviours including intimidation or reprisals.
	Attend and complete training in the use of ACH Group's complaints and feedback management system.
	Contribute suggestions and ideas for continuous improvement initiatives that elevate the customer and workplace experience.

## **Strategic Goals**

This Policy aligns with the following pillars in ACH Group's Strategy:

- Elevate Customer Voice: We listen and act.
- Advocate Good Lives: We amplify the customer stories to shape the future of aged care.

Please refer to the <u>ACH Group Strategy</u> for further information.

### **Effective Indicators**

- Feedback Acknowledgement: ACH Group acknowledges at least 80 per cent of all complaints and feedback received from customers, representatives and the workforce within two (2) business days of receipt.
- Complex Complaint Resolution: ACH Group resolves at least 80 per cent of all complex complaints within 20 business days of receipt.
- Routine Complaint Resolution: ACH Group resolves at least 80 per cent of all complex complaints within 10 business days of receipt.

## **Related Legislation and Standards**

- Aged Care Act and Principles
- Aged Care Quality Standards
- Australian Privacy Act 1988
- Australian Privacy Principles (APPs)



### **Related Documents**

Code of Conduct

Complaints Advocacy Interpreting & Translating Resource - Reference

Advocacy - Work Instructions

Complaints to the CEO - Procedure

Customer Feedback - Form

<u>Critical Incident Reporting - Procedure</u>

**Encouraging Feedback - Work Instructions** 

Feedback and Complaints - Procedure

Complaints Management - Work Instructions

Open Disclosure - Procedure

Open Disclosure - Form

Logging Feedback - R2S Work Instructions

Report 2 Support Incident, Hazard & Feedback Guide (Knowledge Base)

What Happens to Your Feedback - ACH Group Flyer

#### Records

The Feedback and Complaints Policy will be reviewed at least annually by the ACH Group Board.

Document Owner DMS Executive Manager Brand & Customer Engagement

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Revision History 7.0 Minor review for Board Approval on 28 July 2025

6.0 Major review in line with current requirements

5.0 Removed hyperlinks & updated Related information only

4.0 Revised in line with current practice R2S

Created hyperlinks and added other relevant NDIS Rules

2.0 Added reference to NDIS Act and Rule on Complaints Management and

Resolution

1.0 New Policy Aligned to Quality Standards adapted from AAHQI Lead

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