

## FEEDBACK AND COMPLAINTS POLICY

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### REVISION HISTORY

Version No.	Approved by	Amendments summary	Revision date
V2.0	Executive 12 November 2013	Reviewed to reflect - reflect Australian Council for International Development (ACFID) Code of Conduct - incorporate Compliments, Complaints and Suggestions Register	November 2018
V3.0	Executive 22 November 2016	Revised to reflect requirements of course participants and incorporate feedback from ACFID 11 May 2016	November 2021
V4.0	CEO and Board Chair	Refined to reflect feedback from ACFID 16 November 2016 including use of in-country suggestion box	November 2021
V5.0	Executive 23/10/2018	Aligned to reflect requirements from the Complaints Management and Resolution NDIS rules 2018	October 2023
V6.0	Executive 06/08/2019	Updated to include guidelines for a child complaints friendly policy	August 2024
V7.0	Executive 11/08/2020	Policy and procedure separated in different documents.	August 2025
V8.0	Executive 22/3/2022	Updated to ensure clarity for international (prevention of sexual exploitation, abuse and harassment, and child protection)	March 2027
V9.0	Executive 03/06/2025	Updated to reflect ACFID guidance on Feedback and Complaints management	June 2030

## POLICY STATEMENT

Family Planning Australia (FPA) seeks feedback, of all types, from all our stakeholders as an opportunity to maintain and improve the quality of its services. We seek feedback from:

- clinic clients
- course participants
- research participants
- donors
- people in countries where we deliver international development projects
- partners and others affected by our work

Feedback provides FPA with an opportunity to reflect and review our processes and engagement across the breadth of stakeholders we engage with. As such, individuals making a complaint will be reassured that the service values feedback as an opportunity to inform improvements.

## PURPOSE

The purpose of this policy is to ensure FPA addresses feedback and complaints in a professional manner. The management of complaints and feedback at FPA acknowledges requirements outlined by the following guidelines and bodies:

- NHMRC- National Statement on Ethical Conduct in Human Research 2023
- NSW Health Open Disclosure PD2023\_034
- Australian Open Disclosure Framework, ACSQHC 2013
- Complaints Management Handbook for Health Care Services ACSQHC 2005
- Standards for Registered Training Organisations (RTOs) 2015
- The Royal Australian College of General Practitioners Accreditation standards for training sites and supervisors 2025
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- NSW Health PD2019\_013 Administration of NSW Health Grant Funding for Non-Government Organisations Policy
- Australian Council for International Development Code of Conduct
- Australian Department of Foreign Affairs and Trade NGO Accreditation Guidance Manual March 2021
- FPA Whistleblower Policy

## SCOPE

This policy applies to all FPA staff, volunteers and in-country partners.

Note, specific policy requirements related to international programme's prevention of sexual exploitation, abuse and harassment and child protection should refer to the Prevention and Safeguarding Policy, noting the principles within this Policy apply.

## DEFINITIONS

Term	Meaning
ACFID	Australian Council for International Development
Complaint	Complaint means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected. Complaints may be made by a friend or advocate on behalf of the complainant. Complaints may be verbal or written, either by letter or email. Complaints have potential legal, financial, industrial or ethical implications for the organisation. Any complaint about a clinical procedure should be regarded as a potential medico-legal issue.
Complainant	Complainant means a person, organisation or its representative, making a complaint.
Feedback	Feedback refers to responses received from internal and external stakeholders about the quality, cost, timeliness and relevance of services provided in relation to their expectations. Feedback is valuable as it often identifies opportunities for improvement and informs risk management.
Inquiry	Inquiry means a request for information or an explanation. An inquiry may evolve into a complaint, once information is shared.
NDIS	National Disability Insurance Scheme
Open Disclosure	Open Disclosure is the process of providing an open, consistent approach to communicating with the consumer/participant/client and their families following an incident. This includes expressing regret for what has happened, keeping the consumer/participant/client informed, and providing feedback on investigations, including the steps taken to prevent a similar incident occurring in the future. It is also about providing any information arising from the incident or its investigation relevant to changing systems of care in order to improve patient safety. <i>NSW Health Open Disclosure PD2014_028 September 2014</i>

## POLICY DETAILS

In managing feedback and complaints, FPA adopts the following principles:

### Principle 1: Visibility

We clearly publicise information about how and where to submit feedback or lodge a complaint to ensure all FPA stakeholders have a mechanism for making or communicating any form of feedback. Information about how to submit feedback and complaints is provided and received through multiple channels, acknowledging the different ways our stakeholders receive information and to protect the safety and anonymity of stakeholders, for example information about how to make a complaint is provided to our stakeholders and clients verbally by our staff, visually, on posters, consent forms and other written materials and on the FPA website to facilitate sending feedback electronically.

Feedback and complaints can be made via

- Email: [feedback@fpnsw.org.au](mailto:feedback@fpnsw.org.au)
- Phone: 1300 372 372
- In writing: address letters to FPA Feedback and Complaints, 8 Holker Street, Newington, NSW, 2127
- In person: to one of FPA's employees

FPA will ensure the privacy and confidentiality of the complainant. We will work with the complainant as best we can to resolve the issue whilst respecting their right to remain anonymous if they so choose.

FPA acknowledges that promoting our willingness to receive complaints and feedback makes clear our preparedness to work to continually improve our performance.

### **Principle 2: Accessibility**

We ensure that our complaint handling process is as easy and accessible as we can practically make it to all complainants. We ensure our staff are equipped to receive complaints verbally and notate a complaint on behalf of the stakeholder to submit through our incident management system, reducing barriers related to access to technology, literacy, language.

We ensure we include a range of opportunities for feedback and complaints, for example through formal evaluation, client satisfaction surveys, participant satisfaction surveys, partner meetings and in-country de-briefs.

For further information specific to the needs of children and young people and international program partners making a complaint, please see Appendix One.

### **Principle 3: Responsiveness**

We respond to complaints in a fair, efficient and timely manner. FPA provides appropriate management of complaints through the complaints and incident management process, involving the appropriate roles and personnel relating to the nature of the complaint (e.g. Work Health and Safety, clinical experts, ethics manager). FPA's complaints procedure outlines the ways in which complaints are triaged and managed.

FPA will acknowledge the feedback or complaint received within five working days. We will aim to review and resolve the complaint within 30 business days and will inform the complainant of the outcome.

As appropriate, a complaint may be referred to a relevant body such as ACFID, NDIS commissioner or NSW Health Care Complaints Commission.

### **Principle 4: Objectivity**

We address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process.

### **Principle 5: Minimised costs to complainant**

Access to the complaint handling process is free of charge to complainants.

### **Principle 6: Confidentiality**

We observe strict confidentiality in complaint handling.

### **Principle 7: Consumer/client-focused approach**

The interests of our consumers/clients/partners/participants are foremost in our approach to complaint handling. As far as possible, FPA endeavours to adopt the principles of transparency and open disclosure in managing complaints. FPA acknowledges the vulnerability of making a complaint, especially to those who are disadvantaged and how that may impact a person's perceived safety in lodging a complaint. FPA will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

### **Principle 8: Accountability**

We ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.

### **Principle 9: Continual improvement**

In order to continually improve the complaint handling process we:

- maintain the Incident Report Register which includes documentation of complaints received and action taken to resolve complaints
- review the register to identify trends and improve services
- undertake specific training and retraining of staff to foster a consumer/client-focused approach and better complaint handling practices

## **Appeals and escalation**

If you are unsatisfied with FPA's response to your complaint, you may seek a review of the response.

### **Internal appeal**

The relevant Director will review all information pertaining to the complaint to determine whether due process was followed and the resolution. If they were involved in the initial investigation, then the appeal will be reviewed by another Director. This will be completed within 30 days of the request and the outcome communicated to the person who lodged an appeal.

### **External escalation**

If you are not satisfied with our response to your complaint, you may wish to raise your concerns with the relevant body such as:

- [NSW Health Care Complaints Commission](#) in relation to our clinical services

- [Australian Skills Quality Authority](#) (ASQA) in relation to our vocational education programs
- [Royal Australian College of General Practitioners](#) (RACGP) in relation to our medical education programs
- [Australian Council for International Development](#) (ACFID) in relation to our International Program. Complaints regarding alleged breaches of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee via [www.acfid.asn.au](http://www.acfid.asn.au).

## RELATED DOCUMENTS

- Complaints Management Handbook for Health Care Services ACSQHC 2005
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- ACFID Code of Conduct
- FPA Feedback and complaints procedure
- FPA Incident management policy
- FPA Prevention and Safeguarding Policy
- FPA Whistleblower policy
- FPA ethics committee standard operating procedures and terms of reference

## COMPLIANCE STRATEGY

Item	Audit frequency /evidence	Person responsible
Trends in number and type of incidents and complaints	Reporting trends in the number and types of complaints, and factors that may have influenced trends, such as specific quality improvement initiatives, levels of complainant, clinician and staff satisfaction with the processes and outcomes of complaints.	Quality Management and Risk Coordinator

## **Appendix One: Guide to a child friendly complaint handling process\***

Children and young people have the right to voice a complaint. FPA is committed to develop appropriate ways to listen, be responsive and accessible to children and young people.

### **GUIDELINES**

Children communicate in a different way to adults and need to know that:

1. the complaint is treated with respect
2. the process is clear and accessible for children
3. the procedures are responsive and flexible
4. there is an advocate available
5. there will be action taken

The main elements of a child friendly complaints process are appropriate access and response, such as:

- ensure that complaints can be made in a number of different ways (face-to-face, telephone, online, in writing)
- allow complaints to be made anonymously when the complainant sends it through a friend or the beneficiary reference group
- recognise that children and young adults may feel more comfortable with face-to-face complaints, and are heard by someone with a respectful and patient manner
- make sure the child or young person's comments are wanted and ensure a relaxed open environment
- make sure the person dealing with the child or young person's complaint is an active listener who is helpful, understanding and responsive
- make sure that you respond to the child or young person as soon as possible, even just to acknowledge receipt of the complaint
- give the child or young person the option to choose how and whether they will be kept informed of the progress of their complaint and how often they would like to be kept up to date

### **PARTNERS**

- Have a complaint's officer who is appropriately trained to facilitate child friendly complaint handling procedures and to raise awareness with local community stakeholders and children of the procedures and how to implement them

- Local staff receive training in the proposed child friendly processes and procedures, interviewing children, facilitating feedback sessions with children and adults and recording of complaints
- Ensure an environment that guarantees confidentiality of any complaint.

\*Adapted from ADRA Australia complaints policy in line with ACFID Code of Conduct requirements