Policy Directive: compliance is mandatory

Consumer Feedback Management Policy Directive

Objective file number: eA490276
Policy developed by: Public Health and Clinical Systems
Approved at Portfolio Executive on: 1 December 2011
Next review due: 31 December 2019

Summary
The purpose of the Consumer Feedback Management Policy Directive is to establish a uniform approach to consumer feedback management across the public health care sector. The policy provides governance which clearly outlines the responsibilities of individuals and health service in relation to the management of consumer feedback. It also outlines the standards and principles for the management of consumer feedback.

Keywords
Consumer feedback, complaints, compliments, suggestions, advice from consumers, Consumer feedback management policy directive, policy directive

Policy history
Is this a new policy? N
Does this policy amend or update an existing policy? Y
Does this policy replace an existing policy? Y
If so, which policies? Consumer Feedback and Complaints Management Policy

Applies to
All Local Health Networks and SAAS

Staff impact
All Staff, Management, Admin, Students; Volunteers

PDS reference
D0255

Version control and change history

<table>
<thead>
<tr>
<th>Version</th>
<th>Date from</th>
<th>Date to</th>
<th>Amendment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0</td>
<td>17/12/2009</td>
<td>01/12/2011</td>
<td>Original version</td>
</tr>
<tr>
<td>2.0</td>
<td>1/12/2011</td>
<td>16/09/2012</td>
<td>Amended version</td>
</tr>
<tr>
<td>3.0</td>
<td>17/09/2012</td>
<td>23/06/2014</td>
<td>Update to reflect the restructures within the portfolio and are not material in nature</td>
</tr>
<tr>
<td>3.1</td>
<td>23/06/2014</td>
<td>21/11/2014</td>
<td>Updated review date</td>
</tr>
<tr>
<td>3.2</td>
<td>22/11/2014</td>
<td>08/04/2015</td>
<td>Updated review date</td>
</tr>
<tr>
<td>3.3</td>
<td>08/04/2015</td>
<td>19/04/2016</td>
<td>Updated review date</td>
</tr>
<tr>
<td>3.4</td>
<td>20/04/2016</td>
<td>31/03/2017</td>
<td>Updated review date.</td>
</tr>
<tr>
<td>3.5</td>
<td>01/04/2017</td>
<td>Current</td>
<td>Desktop review with no changes. Updated review date</td>
</tr>
</tbody>
</table>
1 Policy statement

1.1 SA Health is committed to creating and maintaining a sustainable, high-quality care environment in which consumers and their carers are encouraged and enabled to provide feedback about the service provision.

1.2 SA Health believes consumer feedback (advice, compliments, complaints and suggestions) provide an opportunity to observe the quality of health care from the perspective of consumers and their carers. Consumer feedback also provides information that, when used effectively, can assist in directing improvement in the quality of these services.

1.3 SA Health is committed to facilitating the management of consumer feedback in a manner consistent with the principles of natural justice and equity of access. The process must:
   1.3.1 ensure that the consumer feedback mechanism is accessible to all
   1.3.2 ensure that issues raised by complainants can be effectively addressed
   1.3.3 ensure the HCSCC Charter of Health and Community Services Rights (the HCSCC Charter) guiding principles are incorporated into the service delivery philosophy
   1.3.4 ensure that all parties are given the opportunity to be heard and any comments taken into consideration when determining the final decision
   1.3.5 be fair to all parties and provide just outcomes
   1.3.6 ensure identified risks are managed appropriately and action is taken to minimise or eliminate those risks
   1.3.7 enable staff to receive positive feedback as well as being made aware of issues that may need to be addressed.

2 Scope

All SA Health employees or persons who provide health services on behalf of SA Health must adhere to this policy.

3 Definition

3.1 **Carer** – a family member, guardian or friend who has an interest in, or is responsible for the care of a consumer.¹

3.2 **Consumer** – an individual who has used or may use health care services now or in the future.

3.3 **Complaint** – an expression of concern, dissatisfaction or frustration with the quality, or delivery of, services, policies, procedures or conduct.

3.4 **Seriousness Assessment Matrix (SAM)** – a numerical score applied to a complaint, based on the type of event that triggered the complaint, its likelihood of recurrence and its consequence which is used to determine the risk associated with a complaint (see Appendix 3).

3.5 **Consumer/Patient Adviser** – a staff member who is responsible for ensuring the effective management of consumer feedback at a local or whole of service/unit level.

3.6 **Feedback** – a general comment, a suggestion, a positive statement, a request for assistance or a complaint. In the Safety Learning System feedback is listed as advice, compliments, complaints or suggestions.

3.7 **Formal complaint** – a more complex matter that may need to be referred to a supervisor, manager or Patient/Consumer Adviser.²

3.8 **Incident** – any event or circumstance that resulted, or could have resulted in unintended and/or unnecessary mental or physical harm to a person and/or a complaint, loss or damage.

3.9 **Informal complaint** – a straightforward matter that can be addressed and resolved at the point of service by staff.³

3.10 **Natural justice** – the minimum requirements of natural justice or procedural fairness as it is often termed are satisfied if the decision-maker acts fairly, without bias and upholds the right of all parties to be heard.⁴

3.11 **Safety Learning System** – an electronic system for reporting and managing new incidents and consumer feedback. SLS includes data which can be used to identify trends and areas of risk and record outcomes for consumers.

³ Ibid.
4 Policy rationale

4.1 The purpose of this policy is to:

4.1.1 ensure a consistent approach to the management of consumer feedback across SA Health and consistent with the HCSCC Charter guiding principles

4.1.2 provide a system that facilitates the management of consumer feedback in a timely, sensitive and effective manner

4.1.3 increase awareness of consumer feedback management requirements and related legislation

4.1.4 provide a framework of clear governance that outlines individual and health service responsibilities in the management of consumer feedback

4.1.5 enable the establishment of a mechanism for using consumer feedback to improve services.

4.2 With the implementation of this policy, SA Health will ensure the following standards are met:

4.2.1 consumer feedback is utilised to drive improvement in the quality of health care services provided

4.2.2 statutory and other requirements for reporting consumer complaints to external organisations and bodies are fulfilled

4.2.3 consumer feedback is reported into the Consumer Feedback Module of the Safety Learning System in an accurate and timely manner in accordance with supporting SA Health guideline and local procedures.

5 Responsibilities

5.1 Chief Executive – SA Health is responsible for:

5.1.1 ensuring the management of consumer feedback across SA Health is in accordance with this policy.

5.2 Executive Director – Public Health and Clinical Systems through the Director, Safety & Quality will support the Chief Executive by:

5.2.1 establishing, maintaining and periodically reviewing the effectiveness of the SA Health Consumer Feedback Management Policy and Guideline

5.2.2 reviewing reports accessed via the Safety Learning System on feedback data, conducting trend analysis and developing statewide strategies for system improvement

5.2.3 disseminating lessons learned from the management of consumer feedback

5.2.4 providing advice to health services in response to specific enquiries about consumer feedback management and legislative requirements

5.2.5 coordinating information regarding reporting to external bodies, including the community, ensuring that relevant timescales are adhered to.

5.3 Local Health Network and SA Ambulance Chief Executive Officers will:

5.3.1 encourage an environment where consumer feedback is handled seriously and thoroughly, including the dissemination of positive feedback

5.3.2 ensure sufficient resources are in place to enable effective systems for the management of consumer feedback

5.3.3 ensure health services within their area of control have systems in place to receive consumer feedback, investigate and respond to complaints, implement the actions necessary to reduce the likelihood of similar complaints reoccurring and record this information in the Safety Learning System

5.3.4 ensure recommendations derived from complaint investigations are appropriately addressed and their effectiveness evaluated

5.3.5 ensure all complaints with the potential to result in substantial liability and/or with the potential to attract significant media attention are immediately escalated to the Chief Executive – SA Health

5.3.6 ensure the day-to-day responsibility for establishing and monitoring the implementation of this policy is delegated to the relevant senior managers.
5.4 General Managers, Executive Directors, Directors, Heads of Service/Departments and other senior managers will:

5.4.1 manage consumer feedback within areas of their control, ensuring that learning gained from any investigation process is fully implemented and monitored

5.4.2 develop, implement and monitor local processes that support employees and other persons providing health services on behalf of SA Health, to achieve effective consumer feedback management. These processes should include training in the effective management of consumer feedback, encouraging a climate where consumer complaints are treated seriously, suggestions are considered and positive feedback is acknowledged appropriately

5.4.3 ensure timely notification and investigation of consumer complaints in accordance with the accompanying guideline.

5.5 Consumer/Patient Advisers will:

5.5.1 promote the Consumer Feedback Management Policy and Guideline

5.5.2 ensure all consumer feedback is recorded in the Consumer Feedback Module of the Safety Learning System in accordance with the Consumer Feedback Management Guideline

5.5.3 confirm all reported complaints have been given the correct Seriousness Assessment Matrix (SAM) score

5.5.4 ensure the effective management of consumer feedback referred by front-line staff, managers and consumers

5.5.5 ensure all complaints related to incidents that require reporting into the Incident Management Module of the Safety Learning System have been appropriately recorded

5.5.6 provide support, advice and education to staff managing consumer-related feedback.

5.6 All SA Health employees will:

5.6.1 adhere to the principles and aims of this policy and ensure they operate in accordance with its associated guideline

5.6.2 where appropriate, respond to front-line feedback received from consumers by referring it to a line manager

5.6.3 ensure all consumer feedback received is reported, in keeping with local health services procedures.

6 Relevant legislation

> Aged Care Act 1997 (Cth)
> Commonwealth Human Rights and Equal Opportunity Act 1986 (Cth)
> Health and Community Services Complaints Act 2004 (SA)
> HCSSC Charter of Health and Community Services Rights (the HCSSC Charter)
> Health Care Act 2008 (SA)- see especially S93, and Part 8
> Health Care Regulations 2008 (SA)
> Mental Health Act 2009 (SA)
> Ombudsman Act, 1972 (SA)
> Whistleblowers Protection Act 1993 (SA)
> Equal Opportunity Act 1984 (SA)
> Carers Recognition Act 2005 (SA)
7 Relevant SA Health policies, procedures and guideline

- SA Health Aboriginal Policy, 2007-2010
- SA Health, Your Rights and Responsibilities – A Charter for Consumers of the South Australian Public Health System (revised June 2008)
- Protocol between the Department of Health and the Health and Community Services Complaints Commissioner (November 2005)
- SA Health Incident Management Policy (ref no D0162, October 2011)
- SA Health Incident Management Guideline Incorporating Open Disclosure Response (ref no G0075, October 2011)
- SA Health Open Disclosure Policy (ref no D0247, October 2011)
- SA Health Informed Consent (under development)
- SA Health Consumer Feedback Management Guideline
- SA Health Disability Action Plan 2008-2013
- SA Health Prevention and Management of Workplace Violence and Aggression Policy (ref no D0154 May 2009)
- SA Health Complaint or Concern about the Clinical Competence of a Clinician Management Policy and Guideline (under development)
- SA Health Consumer and Community Participation Policy (ref no D0166)
- SA Health Consumer and Community Participation Guideline (ref no G0078)
- Policy for Payment of Financial Compensation arising from Complaints in the Public Health System in South Australia, October 2008
- Public Hospitals Retention Disposal Schedule
- General Disposal Schedule No 15
- SA Health Safety Learning System Consumer Feedback User Guide

8 Other relevant documentation

- Australian Health Care Agreement 2009-2012
- Australian Charter of Healthcare Rights
- Customer Satisfaction Guideline for Complaints Handling in Organisations, AS ISO 10002-2006, Standards Australia
- Australian Commission on Safety and Quality in Health Care (formerly known as the Australian Council for Safety and Quality in Health Care), Better Practice Guideline on Complaints Management for Health Care Services (July 2004)
- Australian Commission on Safety and Quality in Health Care, Complaints Management Handbook for Health Care Services (July 2005)
- Department of Human Services Risk Management Services, Better Practice Guide: Complaint Management (April 2003)
- Strategy for Planning Country Health Services in SA, December 2008
- National Standards for Mental Health 2010, Australian Government Department of Health and Ageing