

## **Complaints and Feedback Policy**

Kambu Aboriginal and Torres Strait Islander  
Corporation for Health  
(Kambu Health)

**Authorised: Board of Directors**

### **1.0 Purpose**

Kambu Aboriginal and Torres Strait Islander Corporation for Health (Kambu Health) is committed to providing culturally safe, respectful, and high-quality services. Any person using Kambu Health services, or affected by Kambu Health operations, has the right to make a complaint or provide feedback and to have their concerns managed fairly, consistently, and in a timely manner.

This policy and the relevant procedure support a complaints and feedback management approach that:

- is accessible and easy to use
- is available to clients, patients, members, carers, families, and stakeholders
- ensures complaints and feedback are acknowledged and managed promptly
- applies procedural fairness and principles of natural justice
- protects confidentiality and privacy
- supports continuous improvement
- meets relevant legislative, quality, and governance requirements
- is fair and impartial

Kambu Health also recognises the right of children and young people who access or are affected by its services to raise concerns or complaints in a way that is safe, culturally appropriate, and supportive.

### **2.0 Scope**

This policy applies to complaints and feedback made by or about:

- clients, patients, carers, family members, visitors, community members, children and young people, partners, contractors, and other external stakeholders
- any aspect of Kambu Health services, programs, facilities, communication, decisions, or staff conduct

This policy does not replace employee grievance processes. Workplace concerns raised by workers about employment matters will be managed under Kambu Health People and Culture processes, unless the concern relates primarily to service delivery to a client or patient.

### 3.0 Definitions

#### **Affected Person**

A person who is directly affected by an action of Kambu Health.

#### **Complaint**

An expression of dissatisfaction about Kambu Health services, actions, decisions, staff conduct, or the quality of service received, where a response or outcome is expected.

#### **Feedback**

Comments, suggestions, or compliments that do not require investigation or a formal outcome but may inform improvement.

#### **Review Request**

A request by a complainant for the complaint outcome to be reviewed because they believe the process was unfair or the outcome was unreasonable.

#### **Anonymous Complaint**

A complaint made without identifying details. Anonymous complaints are accepted. Investigation may be limited if insufficient information is provided.

#### **Children and Young People**

For the purpose of this policy, children and young people refers to individuals under the age of 18 who access, participate in, or are affected by Kambu Health services or programs.

#### **Business day**

A day other than a weekend or public holiday in Queensland.

#### **High Risk Complaint**

A complaint that involves, or may involve, immediate or serious risk, including:

- safety concerns
- child safety matters
- clinical risk
- privacy breach or suspected breach
- allegations of serious misconduct or criminal conduct
- threats, aggression, or intimidation
- matters likely to involve a regulator or external agency

#### **Conflict of Interest**

A situation where a person involved in managing the complaint is the subject of the complaint, was involved in the decision being complained about, or may reasonably be perceived as biased.

### 4.0 Policy Statement

Kambu Health aims to provide a level of customer service that does not attract complaints, but acknowledges the right of persons to provide feedback, both positive and negative on its services and/or to lodge a complaint about a decision or action taken.

Kambu Health recognises that children and young people have the right to raise concerns or complaints about services, safety, or the conduct of staff. Where complaints are raised by or on behalf of children or young people, Kambu Health will ensure the matter is handled in a manner that

is respectful, culturally safe, and appropriate to the age and understanding of the child or young person.

Kambu Health encourages feedback to assist with improving its business and customer service processes. Consequently, the complaints resolution process will be readily available and written to be easily understood. However, if a complaint is determined to be frivolous and vexatious, or lacking in substance or detail, Kambu Health may decide to take no further action in relation to the matter; providing the complainant with written advice of the decision and the reasons for it.

Complaints are to be managed in accordance with Kambu Health's *Complaints and Feedback Procedure*, which sets out the procedures for receiving, recording, acknowledging, investigating and responding to complaints.

Kambu Health's *Complaints and Feedback Procedure* will require that all complaints are:

- i. Accepted only when provided in writing, including by email, letter or online form. If received by phone or in person, the receiving staff member will record the complaint in writing and, where possible, ask the complainant to confirm the written record. Anonymous complaints may be accepted with minor exceptions as set out in Kambu Health's *Complaints and Feedback Procedure*;
- ii. Acknowledged, assessed and resolved in a timely manner;
- iii. Dealt with fairly, confidentially and objectively;
- iv. Where appropriate, referred to external agencies.
- v. Included in regular reporting to Kambu Health's Board, Finance Audit and Risk Management (FARM) committee and Executive.
- vi. Tracked and monitored;
- vii. Resolved by mediation, negotiation and informal resolution where possible.

Kambu Health acknowledges the inherent difficulty in investigating and resolving complaints made by unknown persons. Nevertheless, anonymous complaints, or complaints from people who wish their names to be held in confidence, will be accepted for investigation, provided there is sufficient information to enable an investigation to be conducted.

Kambu Health will use the *Complaints and Feedback Procedure* to assist in the delivery of excellent customer service, encourage open and honest communication, improve community confidence in its management of complaints and pursue continuous improvement.

### **5.0 Reports, Comments, Requests and Complaints not dealt with by this Policy**

Each of the following are not considered complaints and are therefore not dealt with in this policy or under the *Complaints and Feedback Procedure*:

- i. Customer requests for a service not usually provided by Kambu Health.
- ii. A suggestion for proposed service improvement;
- iii. Complaints which do not relate to the actions, including decisions, of the agents of Kambu Health including Board Members, employees, volunteers and contractors, undertaken on the part of Kambu Health.

Complaints about or directed to the CEO, Board members or senior executives are managed under this policy. Where the feedback is relevant to the Board it will be managed and addressed by the Board. Where a conflict of interest exists, the matter will be escalated to the Board Chairperson or an appropriately independent delegate.

## 6.0 Timeliness of Complaints

Complaints will be dealt with in a timely manner and a response will be provided to the Complainant as soon as practicable following the conclusion of any investigation. Complainants may not be provided with details of findings.

## 7.0 Unreasonable Customer Conduct

All complaints received by Kambu Health will be given serious consideration and all complainants will be treated equitably and with courtesy.

Notwithstanding the above, Kambu Health recognises that customers may behave in a manner which may result in a waste of Kambu Health resources if accepted.

If a complainant has demonstrated a pattern of lodging complaints which is repetitive or of a frivolous nature; or if a complainant's behaviour is unreasonable, argumentative or threatening; Kambu Health may decide to warn a complainant that it may apply restrictions on staff contact and communication should the behaviours continue. Alternatively, Kambu Health may decide to apply such restrictions.

While Kambu Health encourages individuals to raise concerns or complaints in good faith, the organisation may take appropriate action where a complaint is found to be deliberately false, malicious, or made with the intent to cause harm or disruption. Any such determination will be made carefully and only after appropriate assessment of the available information.

Kambu Health will also ensure that allegations raised through the complaints process are managed responsibly and confidentially. The lodgement of a complaint does not in itself establish that wrongdoing has occurred, and information relating to complaints will only be shared with those who have a legitimate need to know in order to properly assess and respond to the matter.

## 8.0 Legislative and Reference Documents

- *Privacy Act 1988 (Cth)* and Australian Privacy Principles
- *Health Ombudsman Act 2013 (Qld)*
- *Child Safe Organisations Act 2024 (Qld)* and *Child Safe Standards* (where applicable)
- *Human Rights Act 2019 (Qld)* (where applicable)
- ISO 9001:2015 clause 9.1.2 monitoring customer satisfaction
- RACGP Standards for general practices complaints handling requirements, where applicable
- Human Services Quality Standards (Queensland) Standard 5 feedback, complaints and appeals

## 9.0 Related Policies and Documents

- Code of Conduct Policy
- Privacy and Confidentiality Policy
- Workplace grievance and People and Culture procedures
- Incident management procedure
- Clinical governance processes
- Child safety policies and procedures
- Records management and document control procedures
- Risk management framework