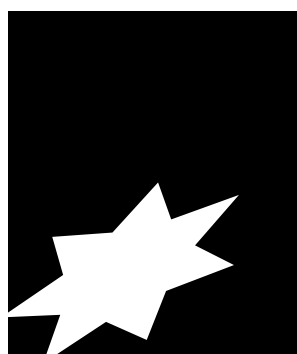


Policy Statement on Complaints, Compliments and Queries



**PROFESSIONAL
STANDARDS
COUNCIL**

Policy Statement on Complaints, Compliments and Queries concerning the Australian Capital Territory, New South Wales, Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia Professional Standards Councils

Essential Summary

This policy prescribes processes for dealing with feedback – that is, complaints, compliments and/or queries – received by the Councils and/or the Office of the Professional Standards Councils (OPSC).

Feedback can come from various sources, and all stakeholders should be provided with encouragement and assistance (where required) to send feedback, particularly negative feedback. This is an essential element of quality and risk management.

Feedback must be dated on receipt, filed and assigned. Receipt of complaints or urgent queries should be acknowledged within 2 working days; feedback not requiring immediate action should be acknowledged within 7 working days. A copy of every complaint should be given to the Executive Officer.

Positive feedback should be responded to with recognition and appreciation, under the signature of the Executive Officer. Consider requesting consent for “testimonial”.

Complaints or queries that are outside the scope of Councils'/OPSC's work should be referred appropriately. Stakeholders requiring legal advice must be informed that the OPSC and Councils are unable to provide this.

Queries relating to the work of the Councils and/or OPSC should be resolved within 7 working days of their receipt, except for complex matters or matters requiring expertise of absent staff, which should be resolved within 14 days. Consider adding to an FAQ as part of quality management.

Dealing with complaints involves: identification of issue/s; resolution of all consequential actions; risk identification and mitigation; and progress updates.

Communication of outcome to the stakeholder is required; for negative feedback this may not include details of all actions taken, but must address stakeholder issues.

Contact details of the responsible officer should be provided to the stakeholder.

Stakeholders dissatisfied with the outcome may have the matter reviewed by another officer, and/or the Executive Officer; escalation to Council/s may be appropriate.

Data should be collected on all feedback, and reported regularly. Utmost care must be taken to protect the privacy of all stakeholders involved.

This policy should be reviewed and/or audited regularly.

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1 Scope

This document sets out a policy for dealing with complaints and other feedback received by the Professional Standards Councils. This includes complaints and feedback received by the OPSC, or by any of the Councils or their members.

This policy covers complaints and feedback concerning the work of the Councils and the OPSC. This policy also includes directions for dealing with complaints and feedback that the Council and OPSC cannot answer substantively.

This policy applies to officers of the OPSC, who are also employees of the NSW Department of Justice & Attorney-General (NSW DJAG). Thus it should also be borne in mind that the conduct of the OPSC needs to remain consistent with the requirements of the NSW DJAG. This document has been written so as to be so consistent; however officers of the OPSC should ensure they are also familiar with the document "Making a Complaint", available on the website of the Community Relations Unit of the NSW DJAG.

This policy has also been written to be consistent with the recommendations of the NSW Ombudsman's *Complaint Handling Systems Survey 2007 Report*. It is also designed to comply with Australian Standard 10002:2004, *Customer satisfaction-Guidelines for complaints handling in organisations* (noting that compliance with this Standard was a key outcome for the Ombudsman's Survey).

Unless specifically adopted, this policy does not cover, nor apply to, other Crown Employees, Occupational Associations generally or members of Occupational Associations, whether or not a Professional Standards Scheme applies to them.

Feedback relating to specific Councillor/s should be handled in accordance with this policy. The main distinction to be made between feedback, particularly complaints, regarding the work of the Councils and OPSC, and the conduct of specific Councillor/s, is that, if matters escalate, in the case of the former this would be to the Deputy Director-General of the NSW DJAG, and in the case of the latter this would be to the relevant Minister.

Exclusions

This document excludes the following matters, which may bear upon the conduct of officers dealing with feedback:

- Personal strategies for dealing with stakeholders, e.g. "Dealing with difficult people", managing expectations, writing in plain English etc. These aspects of stakeholder communication and relationship building, while critical to the success of this policy's implementation, are covered by NSW DJAG policies and training opportunities.
- Complaints regarding the substantive outcome of Council decisions.

2 Purpose

The Professional Standards Councils consider it good practice to establish and implement a transparent system for dealing with complaints and other feedback.

This document is intended to establish such a system, in order to achieve the following aims:

- Encourage stakeholders to express feedback, both positive and negative,
- Provide a second chance to provide service satisfaction to otherwise dissatisfied stakeholders,
- Inspire stakeholder confidence in the ability of the Councils and OPSC to respond to complaints and other feedback,
- Provide a robust, open and transparent mechanism for the receipt of, response to, and reporting of, complaints and other feedback,
- Provide a Quality Assurance mechanism for constant improvement of the operation of the Councils, the OPSC and *Cover of Excellence*® Schemes,
- Contribute to the risk management activities of the Councils and OPSC,
- Allow for measurement, collation and reporting of data regarding complaints and other feedback regarding the work of the Councils and the OPSC, and
- Demonstrate real improvement in the work of the Councils and the OPSC, leading to a reduction in the number of complaints (or complaints of a particular type).

This policy is intended to avoid:

- Ignorance of conduct that is the cause of legitimate complaint,
- Repetition of conduct that is the cause of legitimate complaint,
- Alienation of stakeholders who have complaints or other feedback,
- Failure to grasp opportunities for improvement of the service provided by the Councils and/or OPSC (that is, a failure properly to implement a key Quality Management process),
- Unnecessary escalation of complaints,
- Negative publicity for the Councils and/or OPSC, to the public, to members of schemes, to potential members of schemes, to occupational associations and/or the relevant State or Territory Attorneys-General,
- Embarrassment to the Councils, their members, and/or the relevant Attorneys-General,
- Loss of corporate knowledge within the Councils and OPSC (as when complaints are dealt with in an *ad hoc* or piecemeal manner), and
- Inability to assess or report on the performance of the Councils and OPSC in terms of stakeholder satisfaction.

This policy is intended to address the deficiencies identified in the NSW Ombudsman's *Complaint Handling Systems Survey 2007 Report*:

“While many complaint handling systems include processes for receiving and processing individual complaints, ... there is still much room for improvement in how agencies then use complaint information. It seems many agencies are

diligent about dealing with individual complaints but are failing to benefit from the opportunity presented by the information that can be gathered from complaints to make systems changes and prevent further recurrences of the same problems.”

3 Definitions

Complaint

Expression of dissatisfaction with the work done, or any product or service provided, by the Councils and/or OPSC.

Compliment

Feedback that is wholly positive regarding the OPSC and/or Councils. Often not made in expectation of any particular response.

Councils

The Professional Standards Councils of the Australian Capital Territory, New South Wales, Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia.

Executive Officer

The Executive Officer of the OPSC.

Feedback

Any form of communication directed towards the OPSC and/or Councils that provides comment, opinion, judgement, suggestion for improvement or enquiry regarding the work done by the Councils and OPSC, generally made in expectation of a response. This includes compliments, queries and complaints.

NSW DJAG

New South Wales Department of Justice & Attorney-General, which provides the staff of the OPSC.

Query

Enquiry regarding the work of the OPSC and/or Councils, that does not include comment, opinion or judgement regarding the quality of that work; generally made in expectation of a response.

OPSC

The Office of the Professional Standards Councils of the Australian Capital Territory, New South Wales, Northern Territory, Queensland, South Australia, Tasmania, Victoria and Western Australia.

Stakeholder

Any individual or organisation that is affected by the work of the Councils and/or OPSC. This includes members of schemes, occupational associations and consumers.

4 Sources of Complaints and Other Feedback

It is important to recognise that complaints and other feedback can come from a variety of sources, some of which may not be immediately obvious. Sources of feedback may include:

- Letter received by an Attorney-General (although one of the stated aims of this policy is to reduce the likelihood of stakeholders feeling the need to express their feedback through this avenue),
- Email generated by the feedback form on the Councils' website,
- Email, phone call, letter or fax to an officer of the OPSC, specifically delivering a complaint or other feedback,
- Email, phone call, letter or fax to one or more Council members, specifically delivering a complaint or other feedback,
- Implicit feedback contained in stakeholder communication to Council member(s) or the OPSC,
- "Off the cuff" feedback communicated to an officer of the OPSC or a Council member, by a stakeholder in the course of other business, and other forms of anecdotal feedback,
- Notes from a Council, or Council member, to the OPSC,
- Issues identified or raised by officers of the OPSC,
- Difficulties experienced by a stakeholder that are recognised as worthy of feedback by an officer of the OPSC.

Stakeholders should be provided with encouragement and assistance, where required, to send formal feedback. **In particular, whenever negative feedback becomes apparent to an officer, the stakeholder should be encouraged to pursue queries or complaints.** This will help to establish and maintain a culture of openness regarding feedback; and also maximise opportunities for quality and risk management.

For feedback received verbally, either in person or by phone, the officer receiving the feedback should make a contemporaneous file note of the conversation. As this will be an ongoing record of the original issue as articulated by the stakeholder, it is important to check the content of the file note with the stakeholder as it is being written. This can become critical later, particularly where the stakeholder does not follow up immediately in writing.

In general, feedback can only be acted upon when it is from a named individual (person and/or organisation), although the OPSC and/or Councils may, at their discretion, act upon feedback provided anonymously.

When feedback is received from a member or representative of an organisation (such as an occupational association or an industry peak body), it is important to determine whether the views expressed are those of the organisation, or only of the person from whom it was received.

It is critical that complaints and other feedback, from any source, be centralised in their treatment at any early stage, so that all feedback is treated in a fair and transparent manner, from receipt to resolution, and to maximise opportunities to capture information that will allow us to improve our services.

5 Initial Receipt of Complaint/Feedback

5.1 Receipt and Acknowledgement

All feedback must be marked with the date of its receipt by the OPSC. For feedback received by way of phone call or first- or second-hand verbal communication (eg from a Council member), a dated file note should be made. Emails should be printed out and date stamped or hand-noted to indicate the date on which the email was first read.

For feedback received verbally (including by phone), the stakeholder should be encouraged to follow up with a written statement (letter or email) articulating their concerns or issues. For future reference it will always be advantageous to have the stakeholder's original sentiments on record, in their own words.

Filing

All received feedback should be filed, along with all follow-up correspondence and notes, in the appropriate Unclassified NSW DJAG file. Files should remain open until either the stakeholder is satisfied, or all avenues of review/appeal have been exhausted.

Time Frames

Any specific complaint or urgent query from a stakeholder should be acknowledged within 2 working days of its receipt. The acknowledgement should come from the officer who has taken responsibility for carriage and resolution of the matter.

Other forms of feedback not requiring immediate action (including general queries, referrals and positive feedback) should be acknowledged within 7 working days of receipt. The acknowledgement should generally be signed off by the Executive Officer.

Content

Communication of acknowledgement should include:

- Thanking the stakeholder for the time they have taken to provide valuable feedback (or, in the case of a simple query, just thanking them for their query),
- Statement of the issue/s raised in the feedback – it is important to articulate our understanding of what the feedback is telling us, firstly so that the stakeholder appreciates that they have been listened to, and secondly so that the stakeholder has an opportunity to correct our understanding or re-state their position,

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- Acknowledgement of any requested remedy (even if it is already apparent that this remedy is not available),
- Any request for clarification that will assist us in dealing with the feedback,
- A firm timeline for what the stakeholder can expect next (eg, that a query will be answered within 7 days), and
- The name and contact details of the officer handling the feedback (not relevant to positive feedback).

The form of the acknowledgement (i.e. letter/email/phone call with file note) should generally reflect the form in which the feedback was received.

5.2 Assignment of Responsibility

Feedback requiring investigation and/or more a complex response than a simple acknowledgement should be assigned to a specific officer. This can be done in general according to: expertise; interest; availability; existing priorities etc.

Any perceivable conflict of interest with a particular officer should be formally noted, and the feedback assigned so as to obviate the involvement of that officer.

A copy of each complaint should be given to the Executive Officer, so that she is always aware of current matters of contention and in a position to respond if the matter escalates at any time.

6 Investigation/Review

Once the feedback has been assigned to an officer of the OPSC, that officer should conduct sufficient initial investigation and/or review such that it is possible to prepare (at least) a preliminary response within 7 days of the receipt of the original feedback by the OPSC.

Clearly it is possible for there to be a wide range of variation in terms of the seriousness and/or complexity of complaints and other feedback. In some cases it will be possible to send a complete response within 7 days. Other matters may take much longer to resolve.

The following sections deal with general processes applicable to four kinds of feedback: positive feedback, referrals, queries and complaints.

6.1 Positive Feedback

Positive feedback includes any occasion on which a stakeholder has taken the time to compliment the work of the Councils and/or OPSC. This can be in the form of a letter, email or phone call to the OPSC or a Council member.

When feedback is wholly positive, a letter of recognition and appreciation should be drafted, for the Executive Officer's signature, within 7 days of receipt of the feedback by the OPSC. While responding to praise or compliments may seem to be an "easy

case”, it is still important to write a response that accurately identifies the particular issue raised by the stakeholder.

One final thing to consider when dealing with wholly positive feedback is whether it may be useful to include by way of “testimonial”, for instance on the Councils’ website or in an Annual Report. In this case you should raise the possibility with the Executive Officer and, if approved, seek explicit written consent for this from the stakeholder.

6.2 Referral of Complaints/Queries

There are two types of feedback that the OPSC and Councils will be unable to answer directly: questions or complaints relating to areas of regulation outside the scope of the Councils; and questions or complaints relating to the Councils that we are unable to respond to substantively, the most common example of which is when a stakeholder is requesting or needs legal advice. While it is clearly within the Councils’ and OPSC’s interests to respond properly to the latter, doing so for the former is a matter of good public service (and, at best, perhaps an opportunity to work towards reduction of such mistaken feedback in the future).

Referrals

Referral to other organisations should be done promptly and courteously. Referrals that are clearly outside the area of regulation of the Councils can be done by any officer, without sign-off from the Executive Officer. However, guidance should be sought, from other officers and the Executive Officer if necessary, if you are uncertain as to the proper avenue for the stakeholder to pursue.

The most common misdirected query received by the OPSC is by people requiring referral to Standards Australia. At the time of writing the phone number for referral was 1800 035 822. These referrals are sufficiently numerous, and sufficiently unrelated to the work of the OPSC and Councils, for these referrals to be made directly, by whomever is asked, without further discussion or record keeping.

Another common area of enquiry that is outside the scope of the OPSC and Councils is queries or complaints about individual professionals – for example, a complaint about a lawyer or accountant’s “unprofessional conduct”. These enquiries should be re-directed to the relevant occupational association. This should be straightforward to do for professionals who are represented by an occupational association that has a Scheme; but is also an appropriate response for enquiries regarding members of other professions.

Demurrals

It is critical to identify when a stakeholder is in fact seeking legal advice, because this is one thing the OPSC is not able to provide. The appropriate response to a request for anything amounting to legal advice is to:

- Point the stakeholder in the direction of the relevant section(s) of PS legislation;

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- Remind the stakeholder that the OPSC (and indeed the Council) is unable to provide legal advice, and that this should be sought from an independent legal practitioner, by them or on their behalf.

6.3 Investigation of Queries

A query, as distinct from a complaint, is a request for information or clarification that does not include criticism or suggestion for improvement of the Councils and/or OPSC.

In the absence of exceptionally complex concerns, all queries relating to the work of the Councils and/or OPSC should be resolved (i.e. an answer to the query communicated to the stakeholder) within 7 days of their receipt.

Complex matters, or matters requiring the expertise of staff who are absent, should be resolved within 14 days of receipt of the query.

The officer handling the query should also investigate whether similar issues in the future can be addressed by way of adding to the “Frequently Asked Questions” document available on the Councils’ website.

6.4 Investigation/Review of Complaints

A complaint includes any form of feedback that includes:

- Negative appraisal of the work of the Council/s and/or OPSC,
- Any stated difficulty a stakeholder has experienced in the course of working with the Council/s and/or OPSC,
- Suggestion/s for improvement in the work done by the Council/s and/or OPSC.

Identification of Issue/s

The initial response to the complainant should have identified the main issue/s in contention (with possible clarification or re-statement from the stakeholder). The officer handling the complaint then needs to determine whether the matter requires one or more of the following:

- Remedial response from a particular officer (eg regarding a miscommunication or difficulty with a specific step in the application process),
- Remedial response from the Executive Officer (eg regarding a more serious or complex miscommunication, or more general difficulties with the application process),
- Change in approach to a specific case (eg regarding one particular application),
- Change in approach to a general case (eg regarding the way a particular part of the application process is dealt with, across the board),

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- Change in internal processes within the OPSC,
- Change in internal processes within the Council,
- Change in the way issues are dealt with between Council and the OPSC,
- Change to the way information is presented, eg on the PSC website,
- Amendment of the Council/s (and/or OPSC's, once we have one) risk treatment plan.

The officer's assessment of what action is required fully to deal with the issue/s raised by the complaint should be file noted. The officer is then responsible for ensuring that the matter brought to the attention of all relevant officers/Councillors, and for ensuring effective resolution of all outstanding issue/s arising from the complaint.

Quality Management

In terms of risk management, negative feedback presents a prime opportunity for identifying (or confirming potential) risks, and should also provide the impetus for applying remedial action to ameliorate that risk.

Therefore, while investigating/reviewing the issues raised in the complaint, the responsible officer should also note the relevant risk and proposed mitigation of risk – which may be in accordance with suggested improvement by the stakeholder, or may involve a more lateral problem-solving approach.

This element of Quality Management should also be file noted, and monitored in accordance with the resolution of the complaint.

Progress Updates

Where a complaint requires investigation that takes more than 7-10 days, the complainant should be advised of this, and given a reason (e.g. the complaint involves a number of issues, or external resource issues, such as an upcoming Council meeting). The officer handling the complaint should maintain regular, scheduled contact with the complainant, so as to avoid the impression that the complaint is being ignored, forgotten or delayed for no good reason. Anticipated time frames should be given, wherever possible; where this is not possible, again a reason for this should be given.

6.5 Multi-disciplinary Feedback

Often feedback will not be easily classifiable as purely positive, or simply a query, with no element of criticism or suggestion for improvement. In these cases, each element of the feedback should be responded to in the appropriate manner, as set out above.

For instance, when a stakeholder poses a query, for instance about completing an application for a scheme, and at the same time complains about how difficult it is to comply with the application process, then both aspects should be answered. A response to the query should be communicated within 7 days, while at the same

time acknowledgement of the complaint and initiation of Quality Management processes should proceed.

7 Outcome/Recommendations

7.1 Positive Feedback

The only outcome that should be required of positive feedback is a note of appreciation (in whatever appropriate form) from the Executive Officer, and a decision by the officer handling the feedback as to whether it is worth seeking to use the feedback by way of “testimonial” for the OPSC’s reporting & marketing functions.

7.2 Queries

The outcomes required of queries are:

- Complete response to the query within 7 days of its receipt (14 days for especially complex matters, or in the short term absence of staff with relevant expertise),
- Consideration given to whether the query can be covered by an addition to the “Frequently Asked Questions” on the Councils’ website,
- Consideration given to whether the content of the query indicates an area of potential improvement, i.e. a possible source of Quality Management feedback. If so, this should be noted and treated in a similar way to negative feedback.

7.3 Complaints

The officer handling the complaint should prepare a document summarising the content of the complaint and detailing the recommended remedies. This should be circulated throughout the OPSC, so that all officers are aware of the Quality Management implications.

7.4 Privacy

It is critical to remember that all outcomes and/or recommendations must respect the privacy of all stakeholders involved or implicated in the feedback. For instance, testimonials can only be used with the author’s consent; additions to any “Frequently Asked Questions” document must be carefully written in the general case; similarly any Quality Management alterations to internal policies or procedures should be dealt with in an “anonymised” way.

8 Communication of Outcome

For positive feedback and queries, “communication of outcome” and “outcome” are synonymous –refer above for details.

For negative feedback, however, a Quality Management approach should ensure that there are outcomes directed at both the Council and/or OPSC, and the stakeholder from whom the feedback originated.

That is, there should be outcomes in terms of Quality Management of Council dealings and OPSC policies and procedures; as well as communication of this to the stakeholder.

The process of dealing with any complaint should conclude with a formal letter to the complainant, that:

- Thanks them for their feedback, referring specifically to the issue/s they raised,
- Summarises all previous communications regarding the complaint,
- Details the outcome/s of the feedback process, including actions taken.

Note that it will not always be appropriate to provide all details of Quality Management outcomes, particularly when these relate to internal Council and/or OPSC processes; however it should always be possible to give the complainant satisfaction that their issue/s have been recognised and any agreed deficiencies have been dealt with.

Like any other stakeholder communication, this should be couched in terms that align with the way the complaint was framed – even when the outcomes in terms of Quality Management may depart somewhat from the original complaint, what the stakeholder wants to know is how this relates to their specific difficulties.

The letter should include the name (and contact details) of the officer who handled the complaint, and provide the opportunity for the complainant to respond regarding the resolution of the complaint. This will usually mean advising the stakeholder that they may write to the Executive Officer if they are unhappy with the outcome and request a review of the complaint and action taken on it.

It is also important to reassure the stakeholder that their privacy will continue to be respected and that their feedback, and any outcomes of that feedback, will remain “anonymised” in all future dealings.

9 Opportunity for Response/Review of Outcome of a Complaint

As stated in the Australian Standard:

If the complainant rejects the proposed decision or action, then the complaint should remain open... The organisation should continue to monitor the progress of the complaint until all reasonable internal and external options of recourse are exhausted or the complainant is satisfied.

NSW DJAG policy states that a dissatisfied complainant may have their complaint reviewed by “another officer of the same or higher grade, to see if it was handled fairly and that reasonable steps were taken to try to resolve the issue”, and that this should take no longer than 21 days.

For complaints handled by the OPSC, this means a review by another officer of the OPSC, or escalation to the Executive Officer, should occur if this is requested by the complainant in response to the final communication of the outcome (as per section 8, above).

Escalation to the Council/s and/or the Chair/s may be appropriate where the complaint relates to:

- The performance of the OPSC in providing services to Council/s,
- The actions of one or more officers relating to a scheme,
- The actions of one or more Councillors, and/or
- The actions of the Council/s.

Escalation to the Council/s and/or the Chair/s is less likely to be appropriate for matters that are wholly (or largely) operational, and thus best dealt with at the Departmental level.

Table 1: Summary of time frames for action

Action	Deadline
Date stamp receipt of feedback	Same day
Acknowledge receipt of any complaint or urgent query	2 working days
Acknowledge receipt of non-urgent queries	7 working days
Letter of appreciation re positive feedback	7 working days
Preliminary response to complaint or complex query	7 working days
Complete response to simple query	7 working days
Complete response to complex query	14 working days
Substantive/complete response to complaint	Within deadlines stipulated in preliminary response
Progress update re complaint handling	Whenever action will take more than 7-10 days
Completion of review of handling of complaint by another officer	21 working days

10 Reporting

Data collection and data reporting are crucial for several reasons:

- Maintaining the ability to demonstrate how well the Councils and OPSC are providing customer service, as perceived by our stakeholders,
- Providing the ability to map areas of deficiency in customer service,
- Providing avenues for Quality Feedback and Quality Management,
- Preventing the repetition of conduct that is cause for legitimate complaint.

Data collected for each piece of feedback should include:

- Date of receipt,
- Nature and source of feedback,
- Responsible officer,
- Issue/s,
- Requested remedy,
- Stakeholder demographic,
- Time frame (duration) of response/resolution,
- Results and action taken,
- Any future or ongoing implications.

Data should be reported regularly, as follows:

- At regular OPSC team meetings, for the purposes of internal consistency and maintaining currency of corporate knowledge,
- Monthly, to the Executive Officer,
- Quarterly and/or by exception, to the Councils,
- In the PSC Annual Report,
- By category (i.e. positive/referrals/queries/complaints), and
- Including summary details of the implementation of quality feedback/quality management on the basis of feedback received, including how this has been fed back into risk management and risk treatment.

Hard copy records of each feedback incident should be kept in the relevant Unclassified NSW DJAG registry file.

10.1 Privacy

At all times when dealing with any kind of feedback, it is of paramount importance to protect the privacy of the stakeholder who has provided the feedback. This means that the identity of the author of the feedback and the nature and content of the feedback should be considered (the equivalent of) commercial in confidence, unless specific consent is given.

An example of this may be where the OPSC seeks consent to use some positive feedback in the form of a “testimonial”, or any other kind of feedback for illustrative or anecdotal purposes when reporting on feedback.

When reporting publicly on the different forms of feedback, for example in the Councils' Annual Reports, all identifiers should be removed from the data.

11 Reviewing/Auditing Implementation of this Policy

The Councils' Policy Statement on Complaints & Discipline Systems states that:

an "aspirational strategy" is to develop a regular audit that checks the consistency of decisions, the steps taken to avoid recurrence of behaviours that have led to legitimate negative feedback, treatment of any systemic problems, operation of mechanism to feed results of complaints into risk management plan, and accuracy of reporting.

While it is not possible to set out a realistic audit strategy at the outset of designing this policy (i.e. before ascertaining the consequences of its implementation in terms of quantity and nature of feedback dealt with), this is something that should be addressed in the future, for instance upon the first anniversary of implementation of the policy, or earlier if warranted by the quantity and/or nature of feedback encountered.

Any audit or other form of review of this policy should evaluate at least the following:

- The approach and details of this policy in terms of its alignment with the current work and business planning of the OPSC and Councils,
- Accessibility of feedback processes,
- Proportion of feedback captured,
- Consistency of record keeping
- Conformity to timelines,
- Effectiveness of quality feedback processes,
- Any trends in quantity and/or nature of feedback, and
- Stakeholder satisfaction with the implementation of this policy.

This evaluation should cover both the current level of conformity to this policy and its processes; and the current level of suitability of this policy and its processes in achieving its stated objectives, with a view to identifying opportunities for improvement to the policy, its objectives and/or its processes.