

4.1 Customer Feedback Framework

Feedback & Appeals Management

Purpose & Scope

breakthru's Customer Policy covers customer/learner engagement, with the Customer Feedback Framework being one aspect. We focus on listening to our customers and understanding what is important to through this feedback. Our Customer Feedback Framework covers:

- Feedback & Appeals Management - compliments, complaints and suggestions for improvement or where a customer or learner is dissatisfied with a decision;
- Participation - customer engagement in assisting us learn and grow;
- Impact - ensuring that we are meeting the needs of our customers and learners.

This procedure covers the ways in which the Customer Feedback Framework is embedded in the organisation along with our Customer Reference Group ensuring our feedback processes are transparent and responsive.

Responsible Officer: Chief Operating Officer

Definitions: taken from Definitions Document and reproduced here due to this procedure being publicly available on breakthru's website.

Appeal	where a stakeholder disputes a decision arising from a complaint or decision or in instances involving the RTO, an assessment decision
Complaint	an expression of dissatisfaction with an action or service provided.
Compliment	an expression of satisfaction with an action or service provided.
Feedback	includes complaints, compliments and suggestions for improvement
Natural Justice	concerned with ensuring procedural fairness. It includes: <ul style="list-style-type: none"> • decisions and processes are free from bias; • all parties have the right to be heard; • all parties have the right to know how and what they are involved in or accused of; • investigating the matter appropriately before a decision is made; • all parties informed of any decision and the reasons for any decision.
Person or Stakeholder	can include a customer/learner, carer, family member, trainers, employers or other interested third parties
Suggestion for Improvement	an improvement identified by a stakeholder regarding an action or service.

Process:

Any person raising a concern with breakthru is encouraged to do so in the first instance informally where appropriate or formally in line with the process outlined below.

Where a person has raised a concern, this is done without prejudice, fear of reprisal, victimisation and impact on services or supports. Should the complaint relate to illegal activity, such as theft, assault, etc, these will be immediately referred to the appropriate authority.

This procedure is available to the public and all stakeholders via the breakthru website and upon request. Information about breakthru's Feedback and Appeals Management is also contained in our Learner Handbook and Customer Handbook along with information of all external parties who may be involved.

1. Informal Feedback and Appeals

Wherever possible, we encourage any concerns to be raised informally with a breakthru staff member that the person is most comfortable with. We expect that many concerns will be resolved in the first instance to the satisfaction of all involved. We expect that all involved will act in good faith in resolving concerns so that breakthru maintains a respectful relationship without impact on supports or services provided.

All breakthru staff are trained in recording and managing feedback with a focus on improving our services and supports. Where a concern can not be resolved informally, breakthru staff will assist a person to escalate the concern formally.

2. Lodging Formal Feedback and Appeals

Feedback can be lodged via:

- breakthru staff member the person is most comfortable with (in the instance of customers or learners); or
- phone or in person at a breakthru office;
- email - feedback@breakthru.org.au
- mail - 2 Palmer Street, Parramatta, NSW 2150
- via the Feedback Toolbox which is outlined in the Customer Feedback Framework

All feedback received by breakthru will be acknowledged in writing (email or letter) as confirmation of entry into breakthru's Feedback Register. At times, your feedback may have been fully resolved before the confirmation is received.

Any appeal involving a decision made by breakthru's Registered Training Organisation which hasn't been able to be resolved informally as outlined in the Learner Handbook, must be submitted within 10 working days of the informal discussion via email to training@breakthru.org.au. Any appeal will be acknowledged within 2 working days of receipt.

3. Timeframes for Resolution

breakthru will endeavour to resolve any feedback or appeal in the shortest time possible taking into account all factors to allow for a reasoned and just resolution. Generally the timelines below should be allowed:

- immediate resolution where this is possible, or referral to an external agency where required;
- within 7 days, develop an action plan which includes investigations and interviews (as required)
- finalise or advise of any delay within 20 days of receipt of feedback.

Where an RTO Appeal has been lodged, the time frames below should be followed:

- immediately resolution, where possible - informal approach;
- formal written notification via email within 10 working days of informal request;
- formal review undertaken within 10 working days with any delays or additional information requests advised. Notification will be in writing.

4. Resolution of Feedback and Appeals

breakthru will manage all complaints and appeals fairly, equitably and as efficiently as possible. breakthru will encourage the parties to approach the complaint or appeal with an open mind, and to resolve problems through discussion and conciliation.

Should a person have feedback or would like to appeal a decision the following steps should be followed:

- where possible, discuss the issue directly with the person/s involved and try to resolve concerns informally as described in Section 1 - Informal Feedback and Appeals;
- where no resolution is reached, discuss the issue with the person's manager or another breakthru staff member who will be able to advise further;
- a formal feedback or appeal is to be lodged as described in Section 2 - Lodging Formal Feedback and Appeals;
- timeframes for resolution are provided in Section 3 - Timeframes for Resolution;
- where there is still no resolution, the person will have the option to escalate the feedback or appeal to the Executive Leadership Team for an internal review or an external independent review as described in Section 5 - Independent Review
- should a person choose not to request an Independent Review, they are able to take their concerns to the appropriate external party as detailed in Section 6 - External Complaint Avenues.

6. Independent Review

Should breakthru be unable to make a determination or the person lodging the feedback or appeal is dissatisfied with the outcome they can request an independent review of the decision.

In the first instance, an internal review of the decision will be managed by a member of the Executive Leadership Team and involve relevant people who were not part of the original determination/decision. The Executive Leadership Team member will make contact with the person to review the details and make a decision based on the information available.

Should the person not wish to have the decision reviewed internally as an independent review, breakthru will make arrangements for an independent party (external to breakthru) to resolve the issue and outline any costs that may be involved for this to occur (where relevant). The person engaged will provide details of any investigations, information required or interviews including timeframes which should not exceed 30 days. Any delays will be advised along with any reasons for the delay.

7. External Complaint Avenues

breakthru will cooperate in good faith with any complaints handling mechanisms or processes established by the external bodies below for the purpose of resolving complaints or other issues in relation to breakthru.

Complaints can be made via the following External Complaint Bodies:

- **Disability Employment Services (DES)**
 - Complaints Resolution & Referral Service (Job Access) - 1800 464 800 or www.jobaccess.gov.au/people-with-disabilities/making-complaint
- **National Disability Insurance Scheme (NDIS)**
 - NDIS Quality & Safeguarding Commissioner - 1800 035 544 or <https://www.ndiscommission.gov.au/>
- **Federally Funded Services (FMHSS, PHaMs)**
 - Department of Social Services Feedback - 1800 634 035 or complaints@dss.gov.au
- **Registered Training Organisation (RTO)**
 - National Training Complaints Hotline - 13 38 73 or ntch@education.gov.au
 - Australian Skills Quality Authority (ASQA) - <https://www.asqa.gov.au/complaints>

8. Records of Feedback and Appeals

breakthru will maintain a record of all feedback and appeals received along with their outcomes in our Feedback and Appeals Register. In instances where an appeal is lodged with the RTO, these records will also be kept in the learner record.

These records will only be accessible by those staff with appropriate authorisation. All records will be kept securely in line with breakthru's Privacy Policy.

All feedback and appeal outcome information will be used to assist breakthru with their continuous improvement activities with any corrective action implemented to reduce or eliminate the likelihood of recurrence. In these instances, information used will be de-identified to identify any themes or patterns. Any improvements as a result of these reviews will be included in breakthru's Continuous Improvement Register and publicly displayed at sites/internet.

Legislation & Standards:

Legislation:

Health Records & Information Privacy Act 2002 (NSW)
Information Privacy Act (Qld) 2009
Privacy Act (Cth) 1988
Privacy & Data Protection Act 2014 (Vic.)
Privacy & Personal Information Protection Act 1998 (NSW)

Standards:

QIC 7th Edition - 1.9 Feedback Management

Vic. Human Services:

- Standard 1 Empowerment

National Standards for Mental Health

- Standard 1 Rights & Responsibilities

National Standards for Disability Services

- Standard 4 - Feedback and Complaints

Registered Training Organisation

- Standard 6 - Complaints Management

NDIS Practice Standards:

- *(Core):* Provider Governance and Operational Management - Complaints management and resolution