Stakeholder feedback policy

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1 Purpose

The purpose of this policy is to:

- affirm CCQ's commitment to community responsiveness, which includes inviting, engaging meaningfully with, and responding effectively to stakeholder input and feedback
- establish the principles that CCQ brings to managing **Stakeholder Feedback**, and
- acknowledge CCQ's responsibilities under the *Privacy Act 1988* to respond to complaints from individuals who consider that their privacy has been interfered by the organisation.

This policy should be read in conjunction with the:

- *Unsolicited Stakeholder Feedback and Complaints Procedure* which outlines how CCQ receives, processes, investigates and responds to unsolicited feedback, including complaints, and
- *Grievance Policy* which outlines how CCQ responds to and investigates employee grievances.

2 Scope

2.1. Application

This policy applies to all CCQ employees and contractors (**Workers**).

2.2. Stakeholders

CCQ recognises a wide range of **Stakeholders** – both those in the community whom we serve directly (our **Customers**) and those with whom we partner to achieve our vision and mission (**Partners**). **Table 1** provides a (non-exhaustive) summary of key stakeholder groups.

Table 1.   CCQ's Stakeholders

Customers	Partners

• Primary health care practitioners across the region including:
  ○ General Practitioners
  ○ allied health professionals including mental health practitioners
  ○ community pharmacies
  ○ nurses in primary care and residential aged care, and
  ○ Aboriginal Community Controlled Health Organisations (ACCHOs) and other First Nations primary health service
• Department of Health and Aged Care (DoHAC) – currently our primary funding source.
• Other funding bodies, and
• Clients of health and other services that CCQ delivers directly.
	Essential partners and contributors to CCQ's business whose engagement is key to achieving our vision and mission:
	• CCQ employees
	• health service providers in the region, including CCQ-Commissioned Services
	• third party health consumers (i.e. the clients of CCQ-Commissioned Services)
	• residential aged care facilities (RACFs)
	• Hospital and Health Services (HHSs) in our region
	• community service providers (e.g. aged care, disability, youth, homelessness, family and domestic violence, child protection, youth mental health, financial counselling, etc.)
	• state, Commonwealth and local government agencies involved in health and human service policy, funding and service delivery
	• universities and researchers
	• First Nations health and human services policy, advocacy and community-controlled organisations
	• health and human service peak bodies and professional associations
	• health regulatory agencies
	• other regulatory and accreditation bodies
	• key vendors, suppliers and consultancy services, and
	• news media.

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2.3.   Stakeholder Feedback

For the purposes of this policy, **Stakeholder Feedback** is defined broadly as *input from customers or other stakeholders that informs our business and helps us achieve our objectives or improve our effectiveness*.

Stakeholder Feedback includes, but is not limited to:

- solicited and unsolicited input provided by Stakeholders in relation to CCQ activities, resources, services and processes, including complaints, compliments and suggestions for improvement
- solicited and unsolicited input provided by Stakeholders in relation to CCQ-Commissioned Services, including complaints, compliments and suggestions for improvement
- input provided by Stakeholders into formal consultations (for example, our regional health needs assessment, consultations involved in the co-design of service models, etc.)
- input provided by Stakeholders through participation in advisory councils, forums, working groups, CCQ-facilitated conferences, events and networks
- input from CCQ-Commissioned Services, vendors and suppliers in contract review meetings and other formal/informal communications
- input provided by CCQ Workers in the course of their employment (via the Continuous Improvement Register, pulse surveys, contributions to internal advisory committees, completion of employee/workplace culture surveys, and by raising formal complaints and grievances)
- feedback from CCQ funders in contract review meetings and other communications, and
- views, opinions and experiences reported by Stakeholders in research and program evaluations conducted by or on behalf of CCQ or in relation to improving primary health care in the region.

Stakeholder Feedback may be communicated:

- *in writing* (e.g. completion of surveys, feedback forms and CCQ's online feedback portal, making social media posts, sending emails or letters), or
- *verbally* (e.g. in-person or via phone or videochat), and/or
- *with the support of a third party* or in a group setting (e.g. focus groups).

CCQ also regards *changes in stakeholder behaviour towards the organisation* as forms of **Implied Feedback** that can inform our business, such as changes to the frequency with which news media or politicians approach CCQ to provide input into policy or news, or changes in website engagement or Stakeholder participation in CCQ events or activities.

3   Policy statement

3.1.   Commitment

3.1.1.   Community responsiveness

CCQ is an independent not-for-profit organisation with a vision to "support our region to live their healthiest lives" and a mission to "work with our community to deliver leading primary health."

We believe that to achieve this vision, and to maintain and enhance our reputation as a high-performing organisation delivering quality services that meet the needs of customers and other key stakeholders, it is essential for us to invite, engage meaningfully with and respond effectively to the views, concerns, ideas, complaints and needs of our community.

Effective management of Stakeholder Feedback including complaints is also a key pillar of our continuous improvement approach. It helps us understand what we are doing successfully and where

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we need to improve. It also helps us better understand and meet the challenges involved in delivering leading primary health in our region.

3.1.2. Privacy

CCQ acknowledges its responsibility under the *Privacy Act 1988* to respond to complaints from Stakeholders regarding our management of their **Personal Information** (i.e., a **Privacy Complaint**). Privacy Complaints should be lodged, wherever possible, via CCQ's online feedback portal and will be managed in accordance with the *Unsolicited Stakeholder Feedback and Complaints Procedure* which reflects the requirements of the Act and the best practice principles of the Office of the Australian Information Commissioner (OAIC).

3.2. Principles

The following principles underpin our approach to managing Stakeholder Feedback:

3.2.1. Active listening

CCQ Stakeholders are our partners in achieving the vision of a healthy region and to this extent we will invite and actively listen for their views and insights, even if these are critical or negative or only implied.

3.2.2. Accessibility

We recognise that different Stakeholders need or prefer different mechanisms or modalities to communicate their feedback to us about different issues. Accordingly, we will engage with our community and seek/recognise input and feedback provided via a wide variety of mechanisms and modalities (refer to **Section 2.3**).

3.2.3. Fairness and transparency

We will manage Stakeholder Feedback, especially complaints, fairly and with as much transparency as possible while ensuring people's privacy, confidentiality and safety are protected.

3.2.4. Risk and responsiveness

We will promptly acknowledge receipt of Stakeholder Feedback, especially complaints, and comply with the response timeframes we set out in our *Stakeholder Feedback Procedure*, or in the case of employee grievances, the *Grievance Policy*. Where these timeframes cannot be met, we will be upfront about the reasons for this. Where the safety or wellbeing of individuals may be affected, we will escalate the priority of our response.

3.2.5. Proportionality

We will respond to Stakeholder Feedback in a way that is proportionate and appropriate to the matter being addressed.

3.2.6. Confidentiality

In managing Stakeholder Feedback, we will ensure that **Personal** and **Sensitive Information** is always treated confidentially and respectfully, and in accordance with the Australian Privacy Principles with regard to collection, storage, use and disclosure.

3.2.7. Continuous improvement

We will use Stakeholder Feedback to drive improvement of our products, services, systems and processes.

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4 Roles and responsibilities

Role/Position	Responsibility
CEO and Executive Leadership Team	• Promote a culture that values Stakeholder Feedback. • Champion continuous improvement across the organisation.
Quality, Risk and Compliance Team	• Review Stakeholder Feedback processes regularly as part of the organisation's Quality Management System in consultation with ELT. • Reporting and records management.
CCQ Workers	• Invite, facilitate and manage Stakeholder Feedback in line with the principles outlined in this policy.

5 Definitions

Term	Definition
Customers	Individuals, groups and organisations in the community that CCQ provides services to directly.
Implied Feedback	Opinions or views that are implied by changes in Stakeholder behaviour, such as attendance at CCQ events, social media or website engagement.
Partners	Individuals, groups and organisations in the community with whom CCQ works to achieve its vision.
Personal Information (as per the Privacy Act 1988)	Information that could be used to identify an individual. For example, a person's name, signature, address, phone number, date of birth, sensitive or health information, credit information, employee record information, photographs, internal protocol (IP) addresses, voice print and facial recognition biometrics, location from a mobile device (because it can reveal user activity patterns and habits).
Privacy Complaint	A complaint in relation to acts or practices on the part of CCQ that may constitute an interference with the privacy of an individual, including: • breaches of the Australian Privacy Principles (APPs) which specify how Australian Government agencies and certain private sector organisations (including PHNs) are required to collect, store, use and disclose personal information, and • breaches of rules under s17 in relation to tax file number information.
Sensitive Information (as per the Privacy Act 1988)	Sensitive Information is Personal Information that includes information or an opinion about an individual's: • racial or ethnic origin • political opinions or associations • religious or philosophical beliefs • trade union membership or associations • sexual orientation or practices • criminal record • health or genetic information • some aspects of biometric information. Generally, Sensitive Information has a higher level of privacy protection than other Personal Information.
Stakeholder Feedback	Input from Stakeholders that informs CCQ's business and helps it achieve its objectives or improve its effectiveness.
Stakeholders	CCQ's Customers and Partners.

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Term	Definition
Workers	CCQ employees and contractors.

6 Associated documents

6.1. Legislation, standards, practice codes, regulatory requirements

- *Privacy Act 1988* (Cth)
- ISO 9001:2015 Quality management system – Requirements

6.2. CCQ policies, procedures, frameworks

Document number	Document name
GUI-CQI-002	Guidelines for managing stakeholder feedback and complaints
POL-CQI-001	Risk management policy
POL-CQI-002	Quality policy
POL-HR-004	Grievance policy
POL-PHC-001	Stakeholder engagement remuneration policy
POL-PRI-001	Privacy policy
PRO-CQI-001	Unsolicited stakeholder feedback and complaints procedure
PRO-CQI-002	Risk management procedure
PRO-CQI-004	Continuous improvement procedure
PRO-WHS-001	WHS consultation procedure