

## THE GOOD SHEPHERD POLICY MANUAL

**DEPARTMENT:** Continuous Quality Improvement

**NUMBER:** CQI-02

**TOPIC:** Complaints Management

**PURPOSE:** To ensure a standard of acceptable conduct and accountability to clients and ensure fair, respectful dealing with all those with whom we come into contact. Good Shepherd staff and management are provided with a standard approach for the timely and effective management of complaints and to ensure that Good Shepherd staff are aware of their responsibilities and are empowered to manage complaints.

**POLICY:** Good Shepherd is committed to the delivery of quality services/care that is responsive to the needs of our community. This includes building an organizational culture that recognizes the benefits of effective complaint handling. Good Shepherd will ensure prompt, efficient management of any complaints submitted while ensuring fair and respectful treatment of each complainant.

### RESOURCES:

Good Shepherd's Brochure "Please share your experience with us"

Good Shepherd's Poster "Please share your experience with us"

Good Shepherd's Compliment / Complaint Form

H.E.A.R.T. Training Information

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### 1.0 PROCEDURE

#### 1.1 What is a complaint?

A complaint is any expression of dissatisfaction with the care/services that Good Shepherd offers in the course of fulfilling its Mission. There are three categories of complaints:

- a) complaints about decisions made by Good Shepherd and/or its programs,
- b) complaints about the quality of care/service provided to clients by Good Shepherd and/or its program staff, volunteers.
- c) tenancy matters for programs providing housing

#### 1.2 Principles of Complaint Management

The Complaint Management Policy and procedures are guided by following principles:

- 1.2.1 Clients, staff, volunteers and external stakeholders are encouraged and enabled to provide feedback about the service and care, including complaints.
- 1.2.2 All complaints are acknowledged and responded to promptly.
- 1.2.3 Complaints shall be handled in a way that is culturally appropriate and responsive to any special needs of all individuals involved. Staff will make appropriate and reasonable efforts to ensure individuals who have specific language preferences, e.g., French, are accommodated. Interpretation and Translation Services are available.
- 1.2.4 Complaints are assessed by considering risk factors, the known facts, the wishes of the complainant and accountability of staff.
- 1.2.5 All complaints are dealt with in a manner that is effective and complete, providing reasonable outcomes to all parties.
- 1.2.6 Complaint information is openly communicated while protecting confidentiality and personal privacy.
- 1.2.7 All complaints are recorded to enable review of individual cases, to identify trends and risk and report on aggregated complaint information.

- 1.2.8 Complaint management policy, practices, and data are regularly evaluated and the information is used to improve services.
- 1.2.9 An annual written analysis of all formal complaints will include trends, areas requiring improvement, actions planned and implemented to address required improvements, and whether these actions accomplished intended results.

### **1.3 Benefits of Complaints Management Program**

- 1.3.1 Complaints identify service/care issues. If clients do not make organizations aware of concerns they experience in their service/care, other clients will experience the same problems.
- 1.3.2 Complaints challenge the status quo. They challenge the way things are done within an organization. Complaints can be a reality check for organizations and help them identify ways to grow, develop and improve.
- 1.3.3 Complaints test internal systems and processes. A complaint and the management oversight of how that complaint is handled is a test to the system. It can test the client service skills of trained employees and can help identify areas that may be weak for future training.
- 1.3.4 Complaints are an opportunity to improve what we do and how we do it. They will be analyzed and taken into consideration for future improvements or enhancements to the organization.
- 1.3.5 Complaints offer the opportunity to reinforce the Mission of Good Shepherd to clients.

### **1.4 Visible and Accessible**

The complaint management process must be visible and accessible in order to serve our clients and accomplish our program goals. Management and staff shall cooperate to make the complaint system accessible to clients. How you proceed once a complaint is brought to your attention depends largely on the nature and severity of the client's complaint.

#### **1.4.1 How to publicize the complaint management system:**

- a) on posters and signs in service areas
- b) on contract forms
- c) in account mailings
- d) on web site
- e) pamphlets in programs
- f) clear communication of client and staff roles and responsibilities can help avoid misunderstandings and unnecessary complaints

#### **1.4.2 Point of Service Complaints**

- a) Ideally, most complaints will be dealt with directly and quickly at the point where the concern arises.
- b) Escalation of complaints may be avoided when staff has clear authorization to resolve complaints at first contact.
- c) Often, no changes to procedures are required as many complaints involve an acknowledgement of the complainant's perspective, an explanation of events and validation of the complainant's satisfaction with the explanation.

#### **1.4.3 Anonymous complaints**

- a) Anonymous complainants should be advised that an investigation is made more problematic if they do not divulge identities as this severely limits Good Shepherd's ability to obtain information.
- b) The complainant needs to be informed:
  - there will be disclosure of information to any respondents identified;
  - there is "nothing off the record" in information provided;

- what will happen with the information given.
- c) However, the complainant’s wishes should be respected, stating an assurance of absolute confidentiality cannot be given.
- d) Anonymous written complaints may reveal the identity of the complainant or it may be apparent from the complaint details.
- e) An inquiry may still be possible and may be warranted if the complaint raises public health and safety concerns or where external agencies may need to be notified

**1.4.4 Staff Training**

- a) Staff will be trained on how to accept and handle complaints received by them.
- b) Every client will be encouraged to provide us with their feedback, whether it’s a compliment or a complaint.
- c) Staff will be encouraged to understand feedback as an opportunity to learn and improve the services and care provided to clients.
- d) Using Good Shepherd’s Values as guide posts, staff will ensure all clients are:
  - Provided with appropriate and easily understood information regarding our complaints process.
  - Be non-judgmental when receiving a concern and ensure it is properly investigated.
  - Deal with concerns professionally, efficiently and impartially.
  - Include clients whenever possible in decisions relating to the resolution of their concern
  - At all times, treat clients with courtesy and respect.
- e) Staff training will be focused on a set of skills (HEART) that will enable them to identify and respond to dissatisfied clients. The use of these best practices can help them turn difficult client situations into positive interactions. All staff will be trained on using the **HEART** skills (appendix B) during orientation and an annual review for current staff.

**HEAR THEM OUT**

Listen and empathize with the client. Be a good listener. Take time to hear the clients’ side of the story and why the client is upset. When staff takes the time to listen to the problem and empathize, that goes a long way toward defusing the situation. Clients then feel like you are on their side.

**EMPATHIZE**

Remain patient and diplomatic always. The words, "I understand" go a long way toward resolving client issues.

**APOLOGIZE**

A brief but sincere apology is highly effective in calming down the client and getting the conversation off to a good start. It also shows professionalism and humility on behalf of the organization.

**RESOLVE**

Take action and tell the client clearly what you plan to do to resolve the issue.

**THANK YOU**

Follow up in person or by phone which personalizes the experience and makes the client feel cared for. It’s an added measure that tells the client, "We care, and if you are having any other problems, please let us know and we will resolve them right away."

**H**ear them out;  
**E**mpathize;  
**A**pologize;  
**R**esolve;  
**T**hank you.

**1.4.5. Complaints should be referred immediately to a member of management if they:**

- a) remain unresolved,

- b) involve serious consequences,
- c) involve complex issues or a number of different staff, programs/departments
- d) need action that is beyond the responsibility of the staff at point of service,
- e) require escalation or reporting to an external body, e.g. police

#### **1.4.6 Escalation process**

- a) In cases where the complainant does not feel comfortable in making a complaint to those directly delivering the service/care, the appropriate Supervisor or Program Manager should be sought to speak to the complainant.
- a) If the complainant will not speak with a Program Manager, they must be offered alternative ways to make their complaint to the Program Director.
- b) The recipient of the complaint must then inform the complainant of the course of action that will be taken next.
- c) For more serious matters or those with broader implications for Good Shepherd, the Chief Operating Officer must be notified and participate in the resolution.
- d) Depending on the type of complaint, it may be necessary to alert Good Shepherd's insurer or obtain legal advice. This should not interfere with the aim of resolving the complaint quickly and amicably.

#### **1.4.7. Response**

- a) Verbal or written complaints to management about the service/care of a client or the operation of the program should be responded to as quickly as possible, but no later than 5 business days.
- b) If unable to investigate and resolve the complaint in 5 business days, let the client know that you have received the complaint and give the date when it is expected that the complaint will be resolved.
- c) When Good Shepherd staff/management responds to a complaint, the response must explain: what you have done to resolve the complaint or why, in Good Shepherd's view, there is no cause for the complaint.
- d) If the resolution offered to the complainant does not satisfy them, the complainant should be advised of the reasons for the decision as well other resources that may be able to assist them with their concerns.

#### **1.4.8 Unresolved Complaints**

- a) Complainants have the right to pursue their complaint until it is resolved to their satisfaction. If a complainant remains dissatisfied following the service's response, they have the option to appeal the decision to the appropriate Chief Operating Officer.
- b) The Chief Operating Officer may initiate reasonable limits in terms of dealing with continued contact and correspondence with dissatisfied complainants and matters that might be frivolous or vexatious complaints.

**1.5.** The procedures set out above may need to be adapted to suit the individual program/department's requirements. The underlying principles and the overarching aims will apply and staff within the program/department should be made aware of those procedures.

#### **1.6 No Retaliation**

Any form of retaliation against a complainant or a witness will be considered a serious violation of this policy and will not be tolerated. Such actions will be subject to disciplinary action, up to and including dismissal.

#### **1.7 Trending Complaints**

Directors will be responsible for reporting all complaints received in their programs/departments via monthly directors reports. An annual trending and analysis of all complaints and the complaints

management process will be conducted at the end of each fiscal year. Collecting complaint data will provide the information needed to resolve systemic issues that may not be evident without supporting data. Where system changes are necessary, Directors will ensure policies and procedures are reviewed and revised as necessary, make the appropriate changes in the program/department work processes and communicate the changes to staff and train staff as necessary to prevent recurrences.

## **2.0 REFERENCE SOURCES**

Ontario Human Rights Code  
Administration Policy Anti-Racism and Anti-Oppression  
Human Resources Policy Code of Conduct  
Administration Policy Accessibility

## **3.0 DOCUMENTATION**

- 3.1 Clients are encouraged to complete the Compliment/Complaint form and submit for follow-up. See appendix A.
- 3.2 For scenarios where the client does not or is unable to complete the Compliment/Complaint form and a staff member/manager connects with said client, that staff/manager will complete the Compliment/Complaint form for Managers. See Appendix B.
- 3.3 Records of complaints, including contents of meetings, interviews, letters, results of investigations and all other material relative to the claim, shall be collected and maintained in a separate confidential file in the Program Director's Office.
- 3.4 All complaints requiring the Chief Operating Officers participation shall be collected and maintained in a separate confidential file in the Human Resources Department.

<b>APPROVED BY:</b>	Staff Director's Meeting
<b>EFFECTIVE DATE:</b>	September 16, 2016
<b>REVIEW/REVISION DATE:</b>	September 15, 2023
<b>SUPERCEDES:</b>	August 19, 2022

Appendix A

**GOOD SHEPHERD  
COMPLIMENT / COMPLAINT FORM**

(Please use this form for all general concerns, complaints and compliments)

<b>Your Name:</b>		<b>Date:</b>
<b>How would you like to be contacted?</b>		
<b>Home Phone:</b>	<b>Cell Phone:</b>	<b>E-mail:</b>
<b>Please tell us about your concern, complaint and compliment. Place completed form into the box provided.</b>		
<b>Complaints can also be :</b>		
<b>Phoned</b> to the Program Manager at _____ if we are unavailable to take your call, please leave a detailed message and your call will be returned within two business days.		
<b>In writing:</b> Attn: Program Manager, _____		
<b>By e-mail:</b> _____		
<b>In Person:</b> The Program Manager is available Monday through Friday (excluding holidays) 8:30 am to 4:30 pm or call to arrange an appointment.		
<b>For Management use only:</b>		
<b>Date Received:</b>	<b>Action Initiated:</b>	<b>Signature:</b>

Appendix B

**GOOD SHEPHERD**

**COMPLIMENT / COMPLAINT FORM FOR MANAGERS**

(Please use this form for all general concerns, complaints and compliments)

<b>Client Name:</b>		<b>Date:</b>
<b>Other Staff involved:</b>		
<b>How were they contacted?</b> (in-person, phone, email)		
<b>Home Phone:</b>	<b>Cell Phone:</b>	<b>E-mail:</b>
<b>Stated concern, complaint and compliment:</b>		
<b>Follow-up required: Y/N</b>		
<b>If yes, what:</b>		
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<b>Received by:</b> _____ <b>Position:</b> _____ <b>Signed:</b> _____		

## Appendix C

### H.E.A.R.T. TRAINING INFORMATION

Staff will receive training on a set of skills (HEART) that will enable them to identify and respond to dissatisfied clients. The use of these best practices can help them to turn difficult client situations into positive interactions. All staff will be trained on using the **HEART** skills during orientation and an annual review for current staff.

<p><b>H</b>ear them out; <b>E</b>mpathize; <b>A</b>pologize; <b>R</b>esolve; <b>T</b>hank you.</p>
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### HEAR THEM OUT

Listen and empathize with the client. Be a good listener, take time to hear the clients' side of the story and why the client is upset. When staff takes the time to listen to the problem and empathize, that goes a long way toward defusing the situation. Clients then feel like you are on their side.

1. Complaining clients may have a perception that somehow their needs and expectations were not met.
2. Acknowledging their concern is the first step in diffusing the emotion of an upset client.
3. The first, and most important, step to take when dealing with a complaining client is to be quiet and listen.
4. Often clients feel the need to vent frustration with service before even considering a proactive solution.
5. "Acknowledge" the client's emotional state.
6. Take extra time, if needed, to help clients with special needs, such as language barriers.

### EMPATHIZE

Remain patient and diplomatic always. The words, "I understand" go a long way toward resolving client issues.

1. Acknowledge the client's emotional state.
2. Remember that a good empathy statement does not imply ownership of the problem. Try some of these phrases such as "I understand... I am sorry... I can appreciate...".
3. Empathy is also conveyed by your tone of voice and body language.
4. Arguing will only serve to escalate emotions.
5. Staff must remember that, although the client may not always be right, they are always our client. Even if they are wrong, they deserve our utmost respect, which means that we find areas to agree on, not disagree.

### APOLOGIZE

A brief but sincere apology is highly effective in calming down the client and getting the conversation off to a good start. It also shows professionalism and humility on behalf of the organization.

1. Quickly take ownership of the problem by apologizing. An apology does not always imply an admission of guilt but rather a desire to make right a wrong, whether it is actual or implied. "I'm sorry you feel that way, how can I help you."
2. One of the most difficult aspects of listening to complaints is the ability to separate yourself from the issue. **Don't Take it Personal.**
3. Remember the complaint is not about you; it is about a perception of a need that was not met.
4. Apologizing with sincerity can do a lot to help ease the tension of high emotions.
5. Look the client in the eye, smile and sincerely apologize and communicate that their issue is important and that you want to make things right for them.



## **RESOLVE**

Take action. Plan a course of action and tell the client clearly what you plan to do to resolve the issue.

1. Ask open-ended questions that involve the client. This technique will not only divert focus from emotional frustration but also generate copious information about the problem at hand and help you arrive at the appropriate solution.
2. This is a good time to try and gather all the details of the situation and try to find out where the breakdown happened.
3. Sometimes there are minor misunderstandings or breakdowns in communication that can create an emotional response to a situation. Find out the facts and then try to find out what the client wants.
4. A particular four-letter word usually does the trick when seeking a solution to a client's complaint: fair. "One of the key phrases, which not a lot of people use, is: *what would you think would be fair?*" That word *fair* does seem to bring out in people a sense of, *OK, this is reasonable*.
5. An upset client is not interested in what you can't do so focus on what you can do.
6. You probably won't always be able to do exactly what the client wants but there is always something you can do.
7. Focus on what you can offer the client.
8. Clients don't necessarily want to hear the why behind an issue; they just want their problem solved.
9. Try to offer a couple options of things you can do to fix the situation for them.
10. Seek satisfaction. Ask the question "are you satisfied with this outcome?"
11. Ask if there is anything else you can do.

## **THANK YOU**

Follow up in person or by a phone call which personalizes the experience and makes the client feel cared for. It's an added measure that tells the client, "We care, and if you are having any other problems, please let us know and we will resolve them right away."

1. Check back with client to see if they satisfied with the resolution.
2. Thank the client for giving you and Good Shepherd a chance to make things right and for taking the time to make a difference, to solve this and thus future problems.