



Canadian Mental  
Health Association  
Waterloo Wellington

Association canadienne  
pour la santé mentale  
Waterloo Wellington

## All Services General

Policy Title: <b>COMPLAINTS, COMPLIMENTS and FEEDBACK POLICY</b>	Policy # DSG P 100	Page 1 of 8
Author: Chief Privacy Officer & Manager HIM RISK	Reviewed/Revised: June 2015	
Approved by: Heather Eddy, Senior Director, People, Culture and Quality	To be reviewed/revised: June 2017	
	Revised: October 2017	
Effective Date: March 1, 2019	First Approved: March 2015	

### POLICY STATEMENT (INCLUDING SCOPE)

The purpose of this policy is to ensure that clients, family members, health service providers and all other users of Canadian Mental Health Association Waterloo Wellington (CMHA WW) services have their complaints dealt with fairly and appropriately. CMHA WW will ensure complaints, compliments, and feedback are followed up in keeping with CMHA WW values and commitment to service.

CMHA WW has responsibility to ensure the provision of the highest quality care, treatment, level of services and facilities to the local community within the financial resources available, and therefore has a responsibility to monitor the quality of CMHA WW services.

### INTENDED OUTCOME

This policy is intended to address complaints, compliments and feedback. The process of receiving and managing feedback is a vital function through which people engaged with CMHA WW can express their complaints, compliments and feedback. An effective, timely response affirms our commitment to client, family service delivery and helps us improve the care and support we provide.

### DEFINITIONS

#### Complaint

A complaint is defined as being a written or verbal expression of dissatisfaction that requires a response.

#### Compliment


A compliment is a positive experience communicated to the organization thereby creating a client and family-centered system. By recording this positive experience, the organization can help to reinforce the kind of care that clients value.

#### Feedback

Information provided about reaction to a service or a person's performance of a service which is used as basis for improvement.

#### Persistent/Vexatious Complainants

A person who persists in pursuing a complaint when the procedures have been fully and properly implemented and exhausted; do not clearly identify the precise issues they wish to be investigated despite reasonable efforts by staff and relevant advocacy supports; change the

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substance of complaint or introduce new issues; continually make excessive demands in terms of process and fail to accept explanation of the process; make unnecessarily excessive demands on time and resources; harass, threaten or are personally abusive or verbally aggressive on more than one occasion; repeatedly focus on conspiracy theories and/or will not accept documented evidence as being factual; deny receipt of an adequate response despite correspondence specifically answering their questions and/or complaint.

### Informing People of the Process

People complain for many different reasons. Majority of people receiving CMHA WW services do not set out to become complainants so when they do it is recognized that it is usually a highly significant thing for them to do. When members of the public raise matters with CMHA WW we commit to the following:

- Inviting the individual/family to have a say in how the situation is handled and how things are to be put right;
- Providing an honest and open response to all feedback provided;
- Providing a thorough and detailed explanation concerning events leading up to the complaint;
- Providing an apology when things have gone wrong;
- Providing a report to the complainant sharing the outcome of their complaint and where appropriate what CMHA WW will learn from this experience with the reassurance that other clients will have a better outcome as a result;
- Exploring all possibilities in an attempt to resolve the complaint positively.

The complaints, compliments and feedback process will be posted on CMHA WW's website and paper copies available in site offices. A feedback process will also be visible in offices, with written materials available to people at their first visit. Outreach staff may offer their clients a feedback postcard linking them to various ways of providing feedback.

### Compliments and Feedback Process/Procedure

It is important to share the good news. When a stakeholder tells us that their experience was positive, CMHA WW can learn from it. Positive feedback is just as useful as a complaint to create a client and family-centered system. When staff are provided with positive feedback they can encourage the stakeholder to provide feedback in the following ways:

- Complete a paper survey at any CMHA WW office location
- Online by going to our website [here](#)



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- Email: [feedback@cmhaww.ca](mailto:feedback@cmhaww.ca)
- Call: 1-844-CMHA-WW3 (2642-993) ext. 1800 to complete a survey over the phone

### Complaints from Clients or Someone Else on Behalf of Client/Family

Where clients find it difficult to complain, or are unable to complain, CMHA WW accepts complaints from a family member or a client advocate in appropriate circumstances. When someone complains on behalf of the client, CMHA WW will need to ensure the client has given verbal, documented consent to their information being shared for the purposes of investigation and resolution of the complaint.

### Persistent/Vexatious Complaints

CMHA WW is committed to treating all complaints equitably and recognizes that it is the right of every individual to raise a complaint. Our aim is to provide staff with a clear and fair process for dealing with situations where a complainant might be considered to be vexatious and to recommend ways of handling these situations. The term persistent covers those people considered persistent, habitual and prolific complainants. In applying this policy it is important to distinguish between those people who are simply being unreasonable and those who may have a disability that may be impacting their approach. This component of the policy should only be implemented following careful consideration by and authorization of the CMHA WW Executive Director and Senior Leadership Team.

The following process is intended for use as a last resort and after all reasonable measures have been taken to try to resolve a complaint contained in this policy.

- CMHA WW is committed to communicating with individuals in a respectful, professional and civil manner. Similarly, the same is expected from our clients and families.
- It is understood that the circumstances and the issues they are bringing forward are stressful to them.
- CMHA WW will not accept abusive, harassing or violent behaviour towards CMHA WW stakeholders. This would include threats, vexatious or harassing comments or conduct, sexual harassment, intimidation, yelling or screaming, or obscene, racist or discriminating statements.
- CMHA WW is required by law to protect staff from abusive, harassing or violent behaviour and will not tolerate such behaviour against staff.



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- Repeated behaviour of this nature may result in CMHA WW communicating to such complainants only in writing or otherwise restricting future communications and if warranted may involve legal action.

### **Confidentiality of Complaint/Feedback Provided**

Information received from a complainant and/or other(s) advocating on their behalf will remain confidential and be communicated only to those people who need to know. Specific personal health information will be anonymized where appropriate.

### **Areas Not Covered by This Policy**

Exceptional circumstances this policy does not apply, may include:

- Cannot be used by other mental health and addictions organizations and local authorities to make a complaint about another health organization or local authority;
- Cannot be used by staff working within CMHA WW or contracted to it to complain about employment, contractual or benefit issues;
- Complaints about privately funded healthcare;
- If a complaint is also part of an ongoing police investigation or legal action it will be discussed (if legislatively permissible) with the relevant police authority or legal advisor and only continue as a complaint if it does not compromise the police or legal action;
- Matters that have already been investigated by any of the Regulated Health Professions Act, 1991; the Ontario Information Privacy Commissioner (IPC).

CMHA WW will document and explain the reasons for not investigating the complaint.

### **Complaints Process/Procedure**

Complaints may be received in the following methods:

- Complete a paper survey at any CMHA WW office location
- Online by completing the complaint [form here](#)
- Email: [complaint@cmhaww.ca](mailto:complaint@cmhaww.ca)
- Call: 1-844-CMHA-WW3 (2642-993) ext. 1801 to leave a message.

CMHA WW's complaint process for people receiving services has four stages. All complaints received, whether in person, by phone, email, social media or fax will initially be dealt with at Stage 1 of the process.



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### Stage 1

1. Relevant staff receiving the complaint will make contact with the person/family within a seven day period depending upon urgency.
2. People with complaints about CMHA WW are encouraged to speak with the staff involved in their care.
3. Staff will listen, document, and attempt to resolve the complaint.
4. Emails, correspondence, transcribed phone messages will be used to document complaint.
5. The CMHA WW Complaint Form may be used to document complaints.
6. Complaint Form or other documentation is to be attached to an RL 6 (computerized incident reporting tool) which alerts relevant Leadership automatically.
7. If unable to resolve the complaint to the satisfaction of the person/family, the relevant Leadership staff will prompt the Senior Leadership staff to review RL6 incident for follow-up.

### Stage 2

1. Relevant Leadership receiving the complaint will make contact with the person/family within seven days to review and document their complaint.
2. Relevant Leadership staff will investigate the complaint by connecting with all relevant stakeholders and document the information in RL6.
3. Relevant Leadership staff will report to the person/family any findings, and a recommended solution to the complaint.
4. If unable to resolve the complaint to the satisfaction of the person/family, the relevant Leadership staff will prompt the Senior Leadership staff to review RL6 incident for follow-up.

### Stage 3

1. Relevant Senior Leadership staff or delegated leader will contact the person to review the complaint within seven days to collaborate with the person/family on obtaining a satisfactory resolution to the complaint.
2. The response to the complaint will be documented and/or attached in the RL6 complaint file.
3. If the relevant Senior Leadership person is unable to resolve the complaint to the person/family's satisfaction, Senior Leadership will bring forward the actions taken to date (documented in RL6 and attached to RL6 complaint file) to the Executive Director for follow-up.

### Stage 4

1. The Executive Director will contact the person to review the complaint within the next business day after receiving the RL6 communication and attachments from the Director.



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- The response to the complaint will be further documented and attached to the RL6 complaint file and follow-up communication will be forwarded to the person and/or family and copies of the response will be attached to the RL6 complaint file.
- Once resolution has been achieved or Stage 4 has been completed, the relevant Leadership staff will document in the RL6 complaint file any internal and system learnings determined through the process and recommendations for improvement of CMHA WW services and follow-up plans. Once these recommendations have been achieved and/or adjusted, the RL6 complaint file will be closed.

### Stage 5 (Board, Funder and/or Legislative Authority)

- If the issue remains unresolved after involvement of the Executive Director, the person and/or family will have the option of having their complaint be reviewed by the Board Executive Committee. Turnaround time is dependent upon Board schedule and timing will be communicated to the complainant(s).
- The Executive Director and/or delegate will prepare a written summary for the Executive Committee describing efforts made to bring the complaint to a satisfactory conclusion and any viable options, if any, that remain for resolving the complaint.
- After reviewing the report, the Executive Committee may contact the complainant(s) to review the report and receive further input.
- The Executive Committee and/or delegate will provide a written response to the person outlining any additional action that will be taken in response to the complaint. Alternatively, if no further action is warranted the original decision will remain in effect and documented.
- The communication will provide the person with the contact information of the appropriate funder or legislative authority should they remain unsatisfied and wish to take the complaint beyond the agency.

The following is a list of CMHA WW funders and legislative authorities and their contact Information and may not be exhaustive of all entities.

#### LHIN

Local Health Integration Network Waterloo Wellington (LHIN)

Contact information is as follows: 310-2222 (in Ontario without dialing an area code)


1-888-883-3313 (toll free)

TTY: 519-883-5589

#### Ministry of Children Community and Social Services

<http://www.children.gov.on.ca/htdocs/English/contact/index.aspx>



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This website will direct an individual to the specific area governed by this Ministry when filing a complaint.

Ministry of Health and Long-Term Care

Housing, Forensic Mental Health & Community Services Unit  
Mental Health and Addictions Branch | Strategic Policy and Planning Division  
8th Floor - 80 Grosvenor Street, Hepburn Block, Queen's Park  
Toronto, ON M7A 1R3  
Tel: 416-327-8828

Ministry of Training, Colleges and Universities

14th Floor, Mowat Block, 900 Bay Street  
Toronto Ontario M7A 1L2  
Tel: 416-325-2929  
Toll Free: 1-800-387-5514 / TTY: 416-325-3408

County of Wellington (Special Needs Resource program, Seniors at Risk)


County of Wellington  
15 Douglas Street  
Guelph ON N1H 2S7  
www.wellington.ca

Information Privacy Commissioner of Ontario (IPC)

2 Bloor Street East, Suite 1400  
Toronto, ON M4W 1A8  
Tel: 416-326-3333  
Toll Free: 1-800-387-0073 / TTY: 416-325-7539  
Fax: 416-325-9195  
ipc.on.ca

**APPENDICES**

Complaint, Compliment and/or Feedback Process for staff by Client  
Complaint, Compliment and/or Feedback Process for Client and Families  
Client Experience Survey (form # RHP F 1015)  
Complaint Form (form # RHP F 1016)

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#### **ASSOCIATED DOCUMENTS**

[Understanding Your Personal Health Information and Privacy Rights](#)

[DSRHP P 018 Privacy Breach Policy](#)

[CAIT P 200 Mobile Device Use](#)

[RHP F 001 Confidentiality Pledge](#)

[RHP F 022 Incident Reporting Policy \(RL6\)](#)

[CMHA WW HIM Release of Information Procedures](#)