

Feedback and Complaints Management Policy and Procedures

POLICY

Statement

At Do it with Purpose Occupational Therapy, we value feedback as it assists us to continually improve our clinical services and customer service. We certainly appreciate feedback about how we have provided a service that meets or exceeds our clients' needs and expectations. We always want to do more of this! If, however, someone is dissatisfied, we aim to make it easy for people to make a complaint and we will treat all clients making a complaint equally.

Do it with Purpose Occupational Therapy is committed to consistent, fair, and confidential complaint handling and to resolving complaints as quickly as possible. All feedback and complaints are documented, and changes made, as required, to improve service delivery and procedures to improve participant satisfaction. We ensure our complaints management and resolution system provides procedural fairness when dealing with a complaint.

Those with concerns or complaints, (if they feel comfortable) are encouraged to raise their concern or complaint with Do it with Purpose Occupational Therapy first, as this is often the best way to have their issue resolved quickly. If we are unable to resolve the concern or complaint, then further support to resolve the matter can be sought.

Everyone (participants and their families, workers and other providers) at Do it with Purpose Occupational Therapy is encouraged to provide feedback or make a complaint through multiple mechanisms including conversations with clinicians, phone calls, emails, websites and third parties such as funding bodies.

In line with the focus on participant rights and person-centred care, we inform and encourage participants to provide feedback or make a complaint through the Service Agreement and conversations with their provider.

- Information on how to make a complaint is provided to participants before services commence and reinforced during support delivery.
- The participants and their families are provided with the opportunity to provide feedback or make a complaint at the time of their reviews but also at any time during service delivery.
- Workers are informed on this policy at time of induction and then annually.
- Other providers and external stakeholders are informed on how to make a complaint via engagement letters and contracts.

All feedback, both positive and negative, is used by Do it with Purpose Occupational Therapy to evaluate services and to make changes to ensure everyone is safe and satisfied. Where appropriate, clients who have had a complaint resolved will be contacted at a later date to see if they are happy with how their complaint was handled

Complaints will be managed as per the:

- [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#) ,
- [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#) ,
- [NDIS Effective Complaint Handling Guidelines for NDIS Providers](#), and
- [National Disability Insurance Scheme \(Procedural Fairness\) Guidelines 2018 \(legislation.gov.au\)](#)

Purpose

This policy has been designed to assist both clients and staff. We commit to providing this policy to all staff and displaying it in our business for clients. We readily make available, our complaint handling policy and procedure so that:

- Clients are aware of their rights and opportunities to provide feedback.
- Everyone is aware of how they can provide feedback or make a complaint.

- Everyone has their concerns satisfactorily addressed, feels supported through the feedback and complaints process and is kept informed of progress with their own issue and of any changes made.

Definitions

Complaint - A statement that something is unsatisfactory.

NDIS Commission “A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.” [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019 p8](#)

Feedback - Information about reactions to a service, a person's performance of a task, a product etc. which is used as a basis for improvement. Feedback can be positive or negative.

Procedural fairness - the principle of fairness in the processes that resolve disputes. It is concerned with procedures applied by the decision maker, instead of the actual outcome reached. It requires that a fair and proper procedure be followed.

Recording complaints

All complaints made, verbal or written, will be recorded in a secured excel spreadsheet at the time the complaint is made, or as soon as possible afterwards. Complaints reports and all related documents are to be kept for 7 years from the date the record was made. Recorded complaints will also be monitored for any ongoing trends and efforts made to resolve any ongoing issues as a matter of urgency.

Do it with Purpose Occupational Therapy will keep and maintain appropriate records of all complaints received. This will include, where appropriate:

- information about the complaint (the name and contact details of the client will be recorded, as well as full details of the complaint including the date)
- any action taken to remediate or resolve complaints including details of all communication with the client
- the outcome of any action taken.

Confidentiality

Information provided in individual complaints be kept confidential. If there is a need to involve other persons or agencies, clients' personal details or details of their complaint will not be divulged to third parties unless we have their written consent.

We are mandated by law to report [notifiable conduct](#) relating to a registered practitioner or student.

Review

Do it with Purpose Occupational Therapy is committed to continuous improvement and this policy will be reviewed regularly (at least annually) for effectiveness and updated.

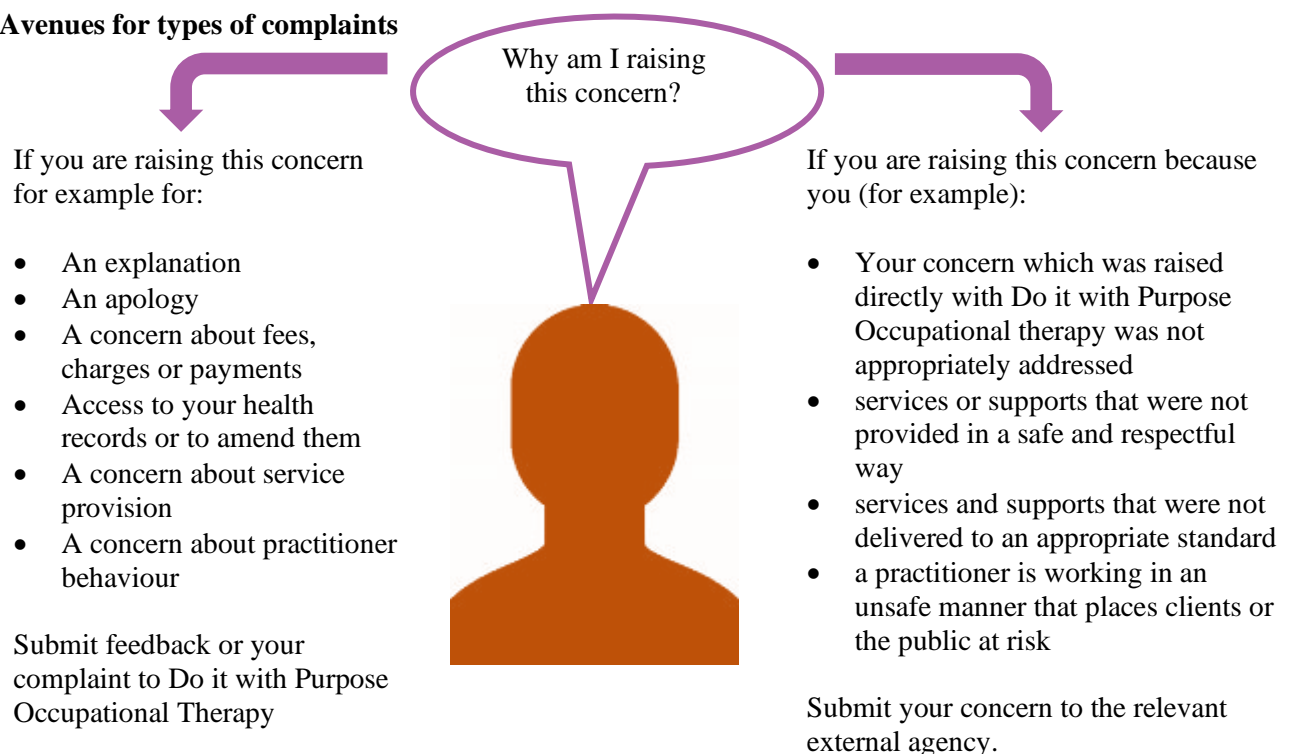
Outcomes

As per the definitions in the Incident Management Policy, a complaint or negative feedback about the service is also a type of **incident**. Hence, the complaint will be followed up as per incident management.

Clients will be informed of any changes to our services as a result of their complaint.

Procedures

Avenues for types of complaints



Making participants aware that feedback, including complaints, are welcomed

- Participants are provided with information on how and where to provide feedback / make a complaint before services commence through provision of information:
 - In the *NDIS Service Agreement*
 - On the Do it with Purpose Occupational Therapy website
- Participants have the opportunity to provide feedback / make a complaint at any time and more particularly at the time of reviews and participant surveys
- Participants can complain directly to the Contact the NDIS Quality and Safeguards Commission
 - via phone 1800 035 544
 - by filling in an [online complaint form](#).

Making workers aware that feedback, including complaints are welcomed

- Workers are provided with information at induction on how to provide feedback or make a complaint and then through annual training.
- Workers have the opportunity to provide feedback or make a complaint at any time and do not need to wait till formal reviews / supervision.
- In the event the complaint is about the Participant, the Worker will report to their direct manager.
- In the event the complaint is about internal grievances the Worker should refer to Managing a Grievance in the Human Resource Management Policy and Procedures.

Management of a Complaint

Management of a complaint will be handled as per any incident as follows. There are also **additional** steps to be taken and issues addressed.

- All people making a complaint will be treated with courtesy.
- Where possible, complaints will be resolved at the first point of contact with Do it with Purpose Occupational Therapy. Complaints will still be recorded.
- If the complaint can not be resolved immediately, the client will be given a timeframe, a contact person and details of our complaint handling process. A Director will be the contact person.

- d. If a participant is making the complaint confirm if they wish to use an independent advocate to assist in making the complaint. This may be a family member, friend, trusted decision-maker or appropriate advocacy service. If / as required, assist the participant to access an advocate as required by referral to appropriate service such as, [Disability Advocacy Finder](#) [Advocacy Queensland Incorporated](#);
- e. It is critical that the complainant (participant or their family member, Worker or other provider) feels the complaint has been adequately acknowledged and they are given time to express how it has affected them and what actions they would like to see taken.
- f. If possible, clinician, taking the complaint from the participant, will talk fairly, sensitively and confidentially to the person making the complaint in a way which reflects their individual, cultural and linguistic needs.
- g. Obtain as much detail as possible about what happened and why the complaint has been made.
- h. Person who receives the complaint will discuss complaint with Director who will then contact the complainant as soon as practically possible, but at least within 24 hours.
- i. Do it with Purpose Occupational Therapy strives to resolve all complaints within 2 business days. Written complaints will be acknowledged promptly.
- j. Clients will be given an approximate timeframe for resolving the issue at the time they make their complaint.
- k. Clients will be informed of the progress of their complaint regularly, especially if there are any delays or changes to what has been agreed.
- l. Person who receives the complaint is to complete an Incident and Complaint Report form and provide this to the Director. The report must include all necessary factual details, immediate actions that have been taken and any identified / planned follow-up actions.
- m. The incident is recorded in the Do it with Purpose Occupational Therapy Incidents and Complaints Register by the Director / senior allocated staff member. Access to the register and any completed forms is limited to senior staff only.
- n. The Director will, in collaboration with the complainant, decide on the course of action. The actions include or address:
 - How to resolve the complaint. This could include acknowledgement, an apology, answers and / or action
 - Where appropriate, seeking feedback from others e.g. other clients / Participants, workers
 - When, how and through whom (e.g. advocate) complainant will be kept informed of progress
 - How to improve the service if / as required. This could include:
 - Further training of staff / others involved
 - Reviewing and enhancing policies and / or procedures
 - Change of personnel
 - Changes to the environment / delivery mode for AHP services.
- o. If the complaint is of a serious nature (e.g. mandatory reporting required, could lead to litigation), a formal incident investigation will be conducted (use the *Incident Investigation* form) to explore what led to the complaint and if any steps are required to prevent it occurring again.
Note: If police are involved in the incident, no internal investigation is to commence until the police investigations are complete
- p. Start implementing agreed actions, keeping the complainant informed.
- q. Actions will be monitored by the Director or Business Owner and updates on progress will be added to the register until the incident is satisfactorily concluded

Escalation of complaints

If the complainant is not satisfied with the outcomes of the initial discussions, a third party (e.g. colleague, HR professional) will be called in to assist with discussions.

If we cannot resolve the complaint to the client's satisfaction, we will inform them about where they can take further action. This may depend on the nature of their concern.

A complaint can be made to the National Disability Insurance Scheme (NDIS) Commission by:

- Phoning: 1800 035 544 (free call from landlines) or TTY 133 677. Interpreters can be arranged.

- [National Relay Service](#) and ask for 1800 035 544.
- Completing a [complaint contact form](#).

The NDIS Commission can take complaints from anyone about:

- NDIS services or supports that were not provided in a safe and respectful way
- NDIS services and supports that were not delivered to an appropriate standard
- How an NDIS provider has managed a complaint about services or supports provided to an NDIS participant

A complaint can be made about any health service, health service provider, or health support service in Queensland to the [Office of the Health Ombudsman](#) via its website or by phoning 133 OHO (133 646).

Members of the public may make a complaint or raise a concern (notification) to [Australian Health Practitioner Regulation Agency \(AHPRA\)](#) who works in conjunction with the Occupational Therapy Board about the [conduct](#), health or performance of a practitioner or the [health](#) of a student.

If the complainant is still not satisfied with the way the complaint has been handled or the outcomes achieved, they can contact the [NDIS Quality and Safeguards Commission, National Disability Neglect & Abuse Hotline](#).

Positive Feedback / Compliments Management

Do it with Purpose Occupational Therapy values positive feedback or compliments. These assist us to continually improve our clinical services and customer service, and replicate where we have provided a service that meets or exceeds our clients' needs and expectations. These can facilitate discussions on how to continuously improve our services.

We record the details of the feedback in the Do it with Purpose Occupational Therapy Feedback Folder.

Training Workers on Feedback / Complaints Management

All staff will receive initial and refresher training on Feedback and Complaints Management. This is to include examples of how to assure participants that feedback is welcome, what may constitute a 'complaint' and tips on being open to feedback. Refer to *Annual Training Plan*.

Related Policies / Documents

Internal

- Incident Management Policy and Procedures
- Risk Management Policy and Procedures
- Risk Management Register
- Service Delivery Model
- Incident and Complaint Report form
- Incident and Complaint Register
- Incident Investigation Form
- Human Resource Management Policy and Procedures /Grievance
- Client Survey Form

External

- [National Disability Insurance Scheme \(Complaints Management and Resolution\) Rules 2018](#) ,
- [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#) ,
- [NDIS Effective Complaint Handling Guidelines for NDIS Providers](#) – includes a valuable approach to managing complaints extracted from [Victorian Disability Services Commissioner booklet 'Everything you wanted to know about complaints...'](#) , - refer to Appendix. and
- [National Disability Insurance Scheme \(Procedural Fairness\) Guidelines 2018 \(legislation.gov.au\)](#)

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Appendix: How to respond to a complaint

The following is an extract from the NDIS Quality and Safeguards Commission's *Effective Complaint Handling Guidelines for NDIS Providers*

In responding to a complaint, the Four A's of successful resolution is a useful approach developed by the [Victorian Disability Services Commissioner in their booklet 'Everything you wanted to know about complaints...'](#):

The approach recognises that people who make a complaint are generally seeking one or more of these four outcomes:

- Acknowledgment
- Answers
- Action
- Apology

Acknowledgement

In many ways this is the most important step as it sets the tone for the rest of the process. Making a complaint can be difficult for people. It is important that people feel that their concerns have been understood and that the impact on them is recognised.

Acknowledgment can include:

- genuinely listening to the person without interrupting
- empathising
- making sure the person feels comfortable talking to you, and being aware of whether you are feeling defensive and how this may be perceived
- acknowledging how the situation has affected the person
- rectifying by asking the person what a good outcome would look like for them, and
- notifying the person regularly and promptly of the steps that will be taken in response to their complaint, ensuring commitments aren't made that can't be fulfilled.

Answers

People want to know why something has or has not happened, or why a decision was made. People need to understand what has happened in order to better understand how they can move on to resolving their concern. Answers should include a clear explanation that is relevant to the concern raised but ONLY if you know the facts.

Actions

People want you to fix or take steps to address their concerns. This may be in relation to their specific complaint, or more broadly around systems to ensure that similar issues won't occur for other people. Sometimes you won't be able to fix the issue raised, but you can initiate actions to prevent it from happening again. Taking action to prevent recurrence may validate the concern for the person making the complaint. A good way to approach actions is to use an action plan, which includes:

- what will be done
- who will do it
- when it will be done by
- how the progress of the complaint and outcomes will be communicated to the person making the complaint and the participant, and
- how the progress of the complaint actions and implementation will be oversighted.

The action plan may be formulated with the person who raised the complaint and any participant affected by an issue raised in the complaint. It is really important to follow up with the person who made the complaint, and any affected participant, to make sure they are satisfied with the actions being undertaken, and that the actions relate appropriately to their concerns. This is also a good opportunity to seek their feedback on the complaints resolution process.

Apology

An apology may be part of, or the sole outcome a person is seeking when they make a complaint. It is important to consider who should provide the apology and the form of the apology. A genuine apology can be a meaningful step; however a poorly provided apology can make the situation worse. An apology should often come from the person complained about, as well as a more senior member of the organisation, in order for the person complaining to be satisfied that their concerns were taken seriously.

When providing an apology, it is helpful to consider:

- timeliness
- sincerity
- being specific and to the point
- accepting responsibility for what occurred and the impacts caused
- explaining the circumstances and causes (without making excuses), and
- summarising key actions agreed to as a result of the complaint.

A genuine and timely apology is a powerful healing force and a way to separate the past from the future, to put things to rest and get on with any agreed new arrangements.

After a complaint has been dealt with

It is important that you have systems in place to allow the organisation to reflect on the complaints process and any outcomes. This includes ensuring that you are checking in with the person who made the complaint for feedback around the finalisation of their complaint, and their response to any follow up or implementation of actions.

Things to consider:

- What was the complaint about? What service, policy or procedure did it call into question?
- What was the experience for the person who made the complaint, or for any affected participant? Were the issues resolved for them?
- What information did the complaint provide that will allow you to identify and improve those services, policies and procedures and your organisation as a whole?
- How effectively did you communicate with the person who made the complaint, any affected participants, affected staff and other stakeholders?
- Do people using your services, their families, carers and friends require more or improved information about their rights and the complaints process? Does the person who made the complaint feel more comfortable about speaking up in the future?
- Does anything need to change in your complaints handling system or approach to dealing with complaints?
- Do staff require further training?
- Did the handling of the complaint reflect your stated values and expectations for complaint handling? Or, was the complaint perceived as something negative that needed to be dealt with as quickly as possible?

Next Review Date: June 2022