

## Policy statement

Therapy Connect is committed to ensuring feedback and complaints about services are welcomed, handled fairly and acted on appropriately. We understand that feedback is essential to ensuring a high quality of service and ensure people are supported to submit a complaint to us in any way.

## Scope

This policy applies to all Therapy Connect representatives, both paid and unpaid, including employees, directors, contractors and board members.

## Responsibilities

It is the responsibility of directors to:

- promote a culture that values complaints and their effective resolution,
- maintain a system to manage, record and resolve complaints,
- make sure that people can easily make a complaint, including people with disabilities,
- make sure that all complaints are dealt with fairly and quickly and in a manner that ensures procedural fairness,
- manage all level 2 and 3 complaints, and
- regularly review complaint trends and issues and support identified improvements.

It is the responsibility of employees and contractors to:

- ensure any person receiving services is aware of their right to, and how to, make a complaint,
- be alert to complaints and help people make a complaint, if needed,
- show commitment to fair, effective and efficient complaint handling,
- treat all people with respect, including people who make complaints, and
- maintain confidentiality when receiving or handling complaints.

## Definitions

**Complaint** – A statement of dissatisfaction about services provided by or through Therapy Connect where it is clear, or can be reasonably assumed, that some sort of action is expected.

**Feedback** – Any form of statement about services provided by or through Therapy Connect that gives information about the quality of service without an expectation that remedial action is needed.

**Procedural fairness** - Ensuring fairness of the procedure by which a decision is made, including: being free from bias by the decision-maker; being rational or based on evidence that is logically capable of supporting the facts; and providing people likely to be adversely affected by decisions an opportunity to present their case and have their response taken into consideration before the decision is made.

## Making a complaint

A person can make a complaint in any way, including by speaking to us in person, sending us a letter or email, phoning us or through another agency.

- Complaints can be made anonymously.
- A person making a complaint can have an advocate, such as another person or an organisation, help them when making or interacting with us about a complaint.
- We will acknowledge all complaints as soon as possible and, at most, within three business days.

We will treat every complaint with integrity and in a fair and unbiased manner and will ensure procedural fairness. We will:

- Keep the identity of people making complaints confidential in line with our *Privacy Policy*;
- Do what we can to make sure a person making a complaint is not adversely affected because they have made a complaint;
- Treat any new complaint on its merits, even if it has been made before; and
- Manage any conflicts of interest responsibly.

If the complaint is about a director or a board member, the complaint will be handled by an external agency to ensure objectivity and procedural fairness.

## Managing complaints

When a complaint is received, we will seek information about the nature of the complaint, the person(s) involved, what outcome(s) the complainant is seeking and any other information required to support an effective investigation.

Where a complaint is straightforward and simple to resolve (level 1), we will seek to manage and resolve it on the day it is received.

We will let the person making the complaint (and their advocate, if relevant) know what to expect from the complaints process including:

- the expected time frames for our actions,
- their likely involvement in the process, and
- the possible or likely outcome of the complaint.

As the complaint resolution progresses, we will keep the person making the complaint (and their advocate) informed.

After investigation, we will let the person making the complaint (and their advocate) know:

- the outcome of the complaint and any action we took or intend to take,
- the reason(s) for our decision, and
- any options for review that may be available, such as an internal review, external review or appeal.

We will ask the person making the complaint (and their advocate) if they are satisfied with the resolution of the complaint.

## Complaint type and resolution timeframes

There are three categories for complaint complexity and handling:

**Level 1** - Single issues that are straightforward and simple to resolve. Managed by the person receiving the complaint. Target resolution time – 7 days.

**Level 2** - More complex or multiple issues where investigation may be required. Managed by a director. Target resolution time – 14 days.

**Level 3** - Complex, serious or sensitive issues including complaints: referred by another agency; where intensive investigation is needed; that allege serious misconduct or unlawful behaviour, or required to be reported or referred to an authorised agency. Managed by a director. Target resolution time – 28 days.

## Other ways to make a complaint

If you are unhappy with the resolution of your complaint, we can provide a further internal review or support you to refer the complaint to an external agency.

Additionally, at any time you can choose to have your complaint dealt with by an external agency, including:

- Australian Human Rights Commission – phone 1800 620 241 (National)
- Commonwealth Ombudsman – phone 1300 362 072
- National Disability Insurance Scheme (NDIS) Quality and Safeguards Commission (except for Western Australia) - phone 1800 035 544 (free call from landlines) or TTY 133 677 (interpreters can be arranged). National Relay Service ask for 1800 035 544.
- (In Western Australia) Health and Disability Services Complaints Office (HaDSCO) - phone 1800 813 583

## Recording and reviewing complaints

We keep confidential records of complaint details, including:

- the nature of the complaint, expected and actual outcomes, complainant satisfaction and resolution times; and
- actions taken or recommended to address identified issues.

All complaints are de-identified and recorded in the *Complaints Register*. De-identified data is used annually to analyse trends and identify and address systemic issues.

Complaint information is securely stored for seven years or longer if required by regulation, legislation or contract.

## Relevant legislation

- Anti-Discrimination Act (1977) NSW
- Disability Inclusion Act (2014) NSW
- Disability Act (2006) VIC
- Disability Amendment Act (2012) VIC
- Disability Discrimination Act (1992) Cth
- Disability Inclusion Act (2014)
- Equal Opportunity Act (2010) VIC
- Ombudsman Act (1974) NSW
- Privacy Act 1988

## Document control

<i>Complaint Policy</i>	<i>Version 1</i>	<i>Approved: October 2019</i>	<i>Review date: October 2021</i>
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