

Complaints Policy

Introduction

Therapy Connect welcomes feedback and ensures people are clearly informed and supported when submitting a complaint and throughout the resolution process. We understand feedback is essential to providing a high quality service and we are committed to ensuring feedback and complaints are handled confidentially, fairly and acted on appropriately.

Purpose

The purpose of this policy is to outline how people are able to provide feedback and make complaints about any aspect of service, and the process that we will take to address and resolve the complaint. We treat all complaints seriously and in accordance with the NDIS Complaints Management and Resolution Rules 2018.

Scope

This policy applies to all stakeholders of Therapy Connect, including: participants, families and carers, contractors, other service providers and members of the community.

Note: Issues raised by staff would generally be dealt with under our Staff Grievance and Dispute Resolution policy, however from time to time staff may raise issues or provide feedback that is best dealt with under this policy.

Responsibilities

It is the responsibility of management 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,
- regularly review complaint trends and issues and support identified improvements.

It is the responsibility of employees and contractors to:

- Be aware of and understand the policy and procedures and seek clarification if they do not understand.

- View all feedback and complaints as an opportunity to improve the organisation's service and processes.
- Respond to all complaints in line with this policy.
- 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 the complaint.
- Maintain confidentiality when receiving or handling complaints.

Definitions

Complaint – A statement of dissatisfaction about services provided by or through Kinela or 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 Kinela or 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.
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We will treat every complaint with integrity, fairness, without bias, and will ensure procedural fairness. We will:

- Keep the identity of people making complaints confidential in line with our *Privacy Policy*;
- Support people to make a complaint
- 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 board member, the complaint will be handled by an external agency to ensure objectivity and procedural fairness.

Managing complaints

The majority of complaints will be managed by the staff directly involved with the support of a direct supervisor as required. More serious or unresolved complaints will be referred to Management.

Complaints that require investigation or a more formal review will be managed by the supervisor or Management if necessary. Investigation of complaints will not be conducted by a person about whom a complaint has been made. We will ensure that sufficient resources are allocated as a means to ensure that complaints are proficiently managed and investigated. We will only allocate suitably skilled and qualified employees or external consultants to investigate and manage complaints of a serious nature. If required, the organisation will refer to, or seek guidance from external agencies, such as the NDIS Commission or the Commonwealth Ombudsman.

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 if required.

Where a complaint is straightforward and simple to resolve, 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.

Information will be provided in a format that is easily understood, in an appropriate language, in an appropriate communication method and considered effort will be provided to ensure the complainant is fully informed regarding the complaint management process.

As the complaint resolution progresses, we will keep the person making the complaint (and their advocate) informed of progress within agreed intervals (e.g. weekly). If it is perceived that a delay may be experienced, this delay will be clearly articulated in writing to the complainant.

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 resolution timeframes

Complaints should be resolved as soon as practicable, and within 30 days where possible.

Other ways to make a complaint

Individuals or parties with a complaint may make contact with the following bodies should the complaints remain unresolved or at any time in the complaints process.

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

All complaints are de-identified and recorded in the Complaints Register. management will have access to and update the register.

De-identified data is used by management **quarterly** to identify and analyse trends and address any 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

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