

Feedback & Complaints Policy



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Purpose

Therapy Alliance Group (TAG) genuinely welcomes and encourages feedback, ideas and suggestions from clients, persons with disability, families, carers and customers. All feedback is valued and helps us to develop a better service and ensure people are treated fairly when they use our services.

Persons with disability including communication difficulties may face multiple barriers to making a complaint about their support or services. These include lack of experience asserting their rights as consumers, fear of retribution, negative experiences with complaints systems (including not being believed) and difficulty communicating what happened without support. Additionally, in the case of violence, neglect and abuse, people can face substantial barriers to making a complaint.

Feedback and Complaints are an important source of information and are used to drive change and improvements in our service provision where possible.

Scope

This policy applies to all team members, contractors, consultants, students, and volunteers.

This policy applies to all aspects of TAG service provisions. For the purposes of this policy the following is excluded from the scope of this policy as there is another specific management process and supporting policy:

- Employee grievances – refer Grievance Policy
- Incident related matters – refer Incident and Hazard Management SOP
- Fraud and corruption – refer Code of Conduct Policy

Definitions

Allegation

A claim that an illegal act has occurred. Allegations are always investigated and sometimes an external authority undertakes the investigation such as the police.

Concern

A concern is an issue that a consumer is not necessarily comfortable or happy with or is worried about. A concern is generally able to be addressed at the level at which it arises, through discussion, problem solving or negotiation, without escalating to a complaint.

Complaint

A complaint is an expression of dissatisfaction with any aspect of Therapy Alliance Group services made by a person with disability, their family, carer and/or advocate. A complaint is not typical of regular communication or feedback about services; rather, it is a statement of dissatisfaction to which the person expects a particular action to be taken or the involvement of TAG management to achieve a satisfactory resolution. A complaint is different from talking about or problem-solving around a concern.

Complainant

Refers to the person who is making the complaint or raising a concern.

Complaints Officer

The Complaints Officer is the authorised TAG Team Member trained and authorised to manage and resolve the complaint. The Complaints Officer may differ according to complaint type:

- Relating to Clinical quality and services = Clinical Manager

- Relating to Operational and administrative processes including products, fees, funds and service agreements = Administration Team Leader
- Relating to Governance and Reportable Incidents = Operations and HR Manager

Feedback

Information provided about reactions to a product, service, process, person's performance of a task which is used as a basis for improvement or provides positive reinforcement of high-quality output.

Policy

The Feedback and Complaints Policy is governed under the following principles:

- Everyone has the right to complain
- TAG will actively encourage you (our clients), your family and carers to provide feedback and raise concerns about any aspect of our services that is not meeting your expectation of quality and professionalism.
- TAG will support people making complaints (including people with disabilities) to understand their rights and what they should expect of providers.
- TAG will support clients to have the confidence to complain when they face issues.
- TAG will enable other stakeholders (such as advocates) to make complaints and ensure issues can be addressed when persons with disability are unable or unwilling to make a complaint.
- TAG will support the resolution of complaints in a confidential, fair, and timely manner with personal and cultural views respected.
- You will be informed of your right to make a complaint to a regulatory body or authority such as the NDIS Quality and Safeguards Commission.
- Feedback and Complaints review process is used to inform and identify systemic issues and enable continuous improvement.

Procedure

All clients and NDIS participants receiving services from TAG will be provided with information regarding the Feedback and Complaints Policy when they commence services.

Information will also be available on TAG's website, in each TAG location and within TAG's Terms of Service agreement.

Complaints may be received via telephone, in writing via our feedback box located in each clinic reception, via email, or in person by the client, client advocate or client's representative in person by a TAG Team member. Anonymous feedback is available via TAG's website.

All TAG Team Members will be trained on a regular basis on the Feedback and Complaints Policy and the management, resolution and escalation where necessary of concerns and complaints.

1. When a concern or complaint is received any supports required to facilitate communication and participation by the complainant (e.g. supports in languages other than English, braille, audio recording and/or AAC options) will be identified and all reasonable steps taken to have these available.
2. All reasonable steps will be taken to ensure that:
 - A person who expresses a concern/complaint, or a person with a disability affected by an issue raised in a concern/complaint, is not adversely affected as a result of the making of the complaint; and
 - Information provided in a complaint is kept confidential and only disclosed if required by law or if the disclosure is otherwise appropriate in the circumstance.

Resolving a Concern

1. Once a client has given an indication of an issue/concern, there will be an immediate attempt to determine the exact nature of the concern/problem and where possible correct or resolve the issue.
2. All concerns raised will try to be resolved informally in the manner in which they were received, providing an explanation of the events that occurred, if known at the time and comprehensively recording the conversation and concerns, along with all necessary details (names, date issue first arose, etc)
3. If a concern/problem cannot be resolved immediately, and/or the client or their representative is not satisfied with the outcome, the Administration Team Leader or any staff member will provide the client with details of how to lodge a complaint.

Resolving a Complaint

1. The coordination and referral of all complaints will be conducted by the Administration Team Leader.
2. The Administration Team Leader will refer the complaint to the relevant Complaints Officer within 24 hours of receipt.
3. When a complaint is received in person the Feedback and Complaints Record form will be completed by the TAG Team member who initially received the complaint. The person receiving the complaint may assist the client to complete the form, for example by writing the details on the complaint form as verbalised by the client/their representative.
4. Documentation or a copy of the Feedback and Complaints Record should be printed or provided electronically to ensure agreement of the details of the concern raised.
5. Once a complaint has been received the Administrative Team Member will do the following:
 - Provide the complainant with an acknowledgment of the complaint within 5 business days of receiving the complaint.
 - Ensure the complaint is recorded on the Feedback and Complaints Register
6. The Complaints Officer will do the following:
 - Assess and investigate the complaint.
 - Ensure that procedural fairness is afforded to all involved in the complaint.
 - Complete the Feedback and Complaints register – actions taken section.
 - Endeavour to resolve the complaint in a fair, efficient, and timely manner.
 - Take appropriate action in relation to the issues raised in the complaint.
 - Report back to the client/their representative regarding the decision and the reason for the decision of the complaint ideally within 21 business days of receiving the complaint.
 - Provide appropriate support and assistance for the client/their representative to contact the NDIS Quality and Safeguards Commission (if applicable, i.e. NDIS funded) if they are not satisfied with the outcome of the complaint.
7. The Complaints Officer must ensure the person making the complaint is:
 - Appropriately involved in the resolution of the complaint; and
 - Kept informed of the progress of the complaint, including any action taken, the reasons for any decisions made, and options for review of the decision in relation to the complaint.
8. Once a decision/outcome has been concluded the Complaints Officer (ideally within 21 working days), is to phone the client and advise them of the findings and the reason for any decision being made. A follow-up written letter outlining the outcome, findings and reason for any decision should also follow, with a copy of the correspondence saved in the Feedback and Complaints folder.

Addressing Feedback

1. The coordination of feedback received will be conducted by the Administration Team Leader.
2. Where the feedback is positive this will be shared with the individual TAG Team Member this relates to and their Team Leader
3. Where the feedback is a suggestion or idea for improvement or alternative TAG Service Offering this will be documented on the Feedback and Complaints Register.
4. There is no requirement for acknowledgement of or return correspondence relating to Feedback.
5. All Feedback will be reviewed per the monitoring and review schedule (refer below).

Monitoring and Reviewing Feedback and Complaints

1. All records in regard to Complaints must be kept for 7 years from the day the record is made.
2. It is important to record the complaints information on the Feedback and Complaints Register to assist management in measuring effectiveness in a number of areas. The information can be used to:
 - identify and address recurring, or systemic issues,
 - identify training requirements, and
 - highlight product or internal control weaknesses, and
 - report information relating to complaints to relevant external bodies where requested or required.
3. In conjunction with the Quality Assurance and Improvement Policy, the TAG Leadership team will analyse any feedback and complaints data on a six monthly basis to identify any trends and then make changes to policies and procedures as required to reduce the possibility of repeat complaints and further enhance TAG services.