



Feedback and Complaints Policy

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Feedback and Complaints Policy

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

Persons with disabilities, 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 further substantial barriers to making a complaint.

Scope:

This policy applies to all current employees, contractors, subcontractors, consultants, agents, students, and volunteers (collectively referred to as team members).

Team member complaints or grievances are excluded from the scope of this policy as there is another more specific supporting policy in place.

In so far as this policy imposes any obligations on TAG, those obligations are not contractual and do not give rise to any contractual rights. TAG may vary, remove or replace this policy at any time.

Definitions:

Term	Definition
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's service 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 is usually the Clinical Manager or their authorised delegate.
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.



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Policy:

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

- Everyone has the right to give feedback or 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.
- The feedback and complaints review process is used to inform and identify systemic issues and enable continuous improvement.

This policy is reviewed and updated regularly in accordance with TAG's Quality Assurance and Improvement Policy and the NDIS Quality and Safeguards Commission Practice Standards.

When a complaint is raised or received, all reasonable steps will be taken to ensure that:

- Any support required to facilitate communication and participation by the complainant (e.g. supports in languages other than English, braille, audio recording, relay service, and/or Augmentative and Alternative Communication options) will be identified and all reasonable steps will be taken to have these supports available.
- 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.

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 to any TAG team member by the client, client advocate or client's representative. Anonymous feedback is available via TAG's website.

All TAG team members receive induction training on, and are familiar with the Feedback and Complaints Policy and the management, resolution and escalation where necessary of concerns and complaints.

Receiving Feedback

The coordination of feedback received and communication responses to feedback will be conducted by the Clinical Manager (or their delegate). Feedback will be reviewed per the monitoring and review schedule (refer below).

Positive feedback will be shared with the individual TAG team member this relates to and their professional supervisor. Team wide recognition may also be implemented as appropriate to the circumstances.



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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.

There is no requirement for acknowledgement of or return correspondence relating to feedback.

Resolving Concerns

If a client gives an indication of a concern, the team member receiving the concern will attempt to determine the exact nature of the concern, and where possible, to correct or resolve the issue.

All team members are responsible for documenting expressed concerns, including necessary details (names, date issue first arose, etc), and attempts taken to resolve the concern.

If a concern cannot be resolved immediately, and/or the client or their representative is not satisfied with the outcome, the team member will provide the client with details of how to lodge a complaint.

The team member may escalate the concerns as a complaint directly on the client's behalf if the client or their representative requests, by forwarding details of the complaint to feedback@tagclinic.com.au.

Receiving and Acknowledging Complaints

The coordination and oversight of all complaints is the responsibility of the Clinical Manager (or their delegate). The Clinical Manager or their authorised delegate in complaint resolution is responsible to:

- Ensure that procedural fairness is afforded to all involved in the complaint.
- Endeavour to resolve the complaint in a fair, efficient, and timely manner.
- Ensure the complainant is appropriately involved in the resolution of the complaint
- Ensure that the complainant is 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.

Complaints may be received in person, in writing in hard copy or electronically via email, or via website form submission.

Complaints received are recorded on the Feedback and Complaints Register. The complainant is provided with an acknowledgment of the complaint within 5 business days of receiving the complaint. This acknowledgement may take the form of written communication, or a verbal communication acknowledging the complaint received and scheduling further discussion with the Clinical Manager or their authorised delegate.

Resolving Complaints

The Clinical Manager (or their delegate) will then investigate and attempt to resolve the complaint by:

- Collating relevant information regarding the course of events which gave rise to the complaint
- Assessing and investigating the complaint.
- Taking appropriate action in relation to the issues raised in the complaint.
- Documenting actions taken towards complaint resolution.

Once the investigation has been completed and a decision/outcome has been reached, the Clinical Manager (or authorised delegate) is to contact the client and advise them of the findings and the reason for any decision being made. Attempts are usually made for this communication to be verbal via phone in the first instance. A written response outlining the outcome, findings and reason for any decision is usually also provided, and recorded on the feedback and complaints register. All efforts are



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made to try to ensure this resolution and communication are completed within 21 days of the receipt of complaint.

If the complainant is not satisfied with the outcome of the complaint a TAG representative will provide appropriate support and assistance for the client/their representative to contact the NDIS Quality and Safeguards Commission (if applicable, i.e. NDIS funded).

Monitoring and Reviewing Feedback and Complaints

All records in regard to Complaints are kept for 7 years from the day the record is made.

Information from the Feedback and Complaints Register is collated and used to assist management in measuring effectiveness in a number of areas. The information can be used to:

- Identify and address recurring, systemic, or procedural issues
- Identify training requirements
- Highlight quality assurance weaknesses
- Identify indicated quality improvement efforts
- Report information relating to complaints to relevant external bodies where requested or required

In conjunction with the Quality Assurance and Improvement Policy and Grievances and Internal Feedback 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.

Breach of Policy:

A breach of this policy may result in disciplinary action including termination of employment.

References and Relevant Documents:

TAG Policy Documents:

Quality Assurance and Improvement Policy
Grievances and Internal Feedback Policy

Relevant Legislation Documents:

NDIS Quality and Safeguards Commission Practice Guidelines
NDIS Complaints Management and Resolution Rules 2018