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Purpose and Scope

This Policy applies to all current employees, contractors, subcontractors, consultants, agents, students, and volunteers (collectively referred to as team members) as well as clients, customers and visitors.

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.

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.

The following is outside of the scope of this Policy:

- Team member grievances or internal complaints: see Grievances and Internal Complaints Policy
- Quality improvement suggestions raised by TAG team members and processes
- Complaints regarding other service providers, whether raised by TAG team members or by clients, customers, or visitors to TAG
- Management of or disciplinary actions relating to findings of underperformance, misconduct, or serious misconduct arising from feedback or a complaint

Definitions:

Term	Definition
Allegation	A statement claiming that an illegal act has happened. Allegations are always investigated, and sometimes an outside group, such as the Queensland Police Service, will conduct the investigation.
Client's Representative/s	A person who helps provide or coordinate care for a TAG client. This includes people like carers, family members, support coordinators, and advocates.
Complaint	When a person with a disability, their family, carer, or advocate formally says they are unhappy with any part of TAG's service and expects a response or action. A complaint is a formal statement that requires TAG leadership to get involved to find a satisfactory solution. It is different from simply talking about or trying to solve a general concern which any TAG team member can assist with.
Complainant	The person who is making a formal complaint.
Complaints Officer	A staff member from TAG's leadership team who is officially appointed to investigate and respond to a complaint.
Feedback	Information you provide about a product, service, process, or someone's performance. Feedback can be positive, negative, or neutral. Negative or neutral feedback is not considered a complaint unless it meets the definition of a complaint above. This information is used to make improvements or to give positive recognition when a job is done well.
Natural justice	A legal rule that makes sure all decisions are fair. This rule requires that decisions are made without bias (prejudice) and that people affected are given a fair chance to present their side.
Procedural fairness	The practical steps TAG takes to follow the rule of natural justice. It involves the processes that must be followed to ensure a fair hearing, such as giving notice of decisions, allowing a person to respond, and making decisions impartially.

Policy

Therapy Alliance Group (TAG) wants and welcomes feedback, suggestions, ideas, and complaints from clients, children, people with disabilities, their families, carers (helpers), and customers. We value all feedback because it helps us improve our service and make sure everyone is treated fairly when they use our services. Feedback and complaints give us important information that we use to make changes and improve our services and how we work whenever possible.

People with disabilities, including those who have difficulty communicating or learning, often find it hard to complain about their support or services. This is because they might:

- not know their rights as customers
- fear getting in trouble (retribution)
- have had bad experiences with complaining before, such as not being believed
- find it difficult to explain what happened without help

It is often even harder for people to complain when the issue involves violence, neglect, or abuse.

Governing Principles

TAG's management of feedback and complaints follows these principles:

- **Policy awareness:** TAG ensures all clients, including NDIS participants, are informed about this policy at the start of their services. This information is available in the Terms of Service, Service Agreements, and on TAG's website.
- **Right to Complain:** Everyone has the right to give feedback or complain, including children and people with disabilities
- **Encouragement:** TAG actively encourages and asks clients, families, and carers to provide feedback including to complain about any service that does not meet their expectation of quality and professionalism. Complaints and feedback can be raised at any time with any TAG team member.
- **Client Confidence:** TAG supports clients in building the confidence to complain when they have issues.
- **Communication Support:** Any support needed to help the complainant communicate and participate (e.g., translation for languages other than English, braille, audio recording, relay services, and/or AAC) will be identified, and all reasonable steps will be taken to provide it.
- **Support of Advocate Complaints:** TAG encourages other stakeholders, like advocates, to make complaints to ensure issues are addressed when persons with disability cannot or will not complain.
- **No Negative Impact:** A person who complains, or a person with a disability affected by an issue raised in a complaint, will not be negatively affected as a result of making the complaint.
- **Good Faith and Respect:** All persons involved in a complaint, including the complainant, are expected to act in good faith and be respectful of all other parties.
- **Support and Rights:** TAG supports people making complaints to understand their rights and what they should expect from providers.
- **Recognition of External Bodies:** Clients and their representatives will be informed of their right to complain to regulatory bodies, such as the NDIS Quality and Safeguards Commission.

- **Investigation Authorisation:** Only an authorised complaints officer or their delegate will investigate, discuss, resolve, and provide responses or outcomes for complaints.
- **Timely and Fair Resolution:** Complaints are resolved confidentially, fairly, and quickly, while ensuring procedural fairness and natural justice.
- **Confidentiality:** Information in a complaint is kept confidential and is only shared if required or permitted by law or necessary in line with the governing principles of this policy.
- **Continuous Improvement:** The feedback and complaints review process is used to find and address systematic issues and enable continuous improvement.

Ways to give feedback or make a complaint

Clients and their representatives have many ways to share feedback or make a complaint:

- By phone
- In writing using the feedback boxes at each clinic
- By email
- By filling out our complaint form. This is on our website, and QR codes are displayed in each clinic. A link can also be provided to clients by email to further support access.
- In person by speaking to any TAG team member

Anonymous feedback or complaints

Anonymous feedback and complaints may be raised:

- Via electronic form on our website
- In writing via feedback boxes within the clinic
- In person to any TAG team member while requesting that feedback/complaint be shared anonymously

Anonymous feedback and complaints cannot receive any response from the leadership team. Additionally, anonymous feedback or complaints provided in person to a TAG team member will not receive advice regarding the outcome of their feedback or complaints from the TAG team member with whom they raise their feedback/complaint, and the complainant is made aware of this at the time they raise their complaint.

Anonymous feedback is considered within feedback trends, and anonymous complaints are investigated internally as far as possible whilst adhering to principles of procedural fairness and natural justice.

Public feedback or complaints

Complaints which are made publicly (e.g. online or in public forums) may be identified by any TAG team member. Team members who become aware of online or otherwise public feedback should notify an appropriate member of the management team. No team member should respond publicly to a public complaint unless explicitly authorised by a member of the management team.

In considering whether to provide a public response, the manager should consider the following:

- Reputational impacts
- Legal considerations
- Privacy and confidentiality
- Professionalism

- Governing body standards including advertising standards

At a minimum, any public response should always include an invitation to reach out to TAG directly to resolve their concerns.

Public feedback or complaints are considered within feedback trends, and public complaints are investigated internally as far as possible whilst adhering to principles of procedural fairness and natural justice.

Receiving and acknowledging feedback and complaints

If a client or client representative shares feedback or makes a complaint directly to a TAG team member, they will offer to submit it on the client's behalf. If the client or representative prefers to fill out the form themselves, the team member can support access to the electronic form.

When feedback is received, TAG does not need to send a written reply.

When a complaint is made, the client or their representative will receive an email:

- Confirming that the complaint was received.
- Giving information about the expected next steps and timeframes.

This confirmation will be sent within 5 business days of TAG receiving the complaint.

All TAG team members are trained on and understand the Feedback and Complaints Policy. This training covers how to receive, manage, resolve, and properly pass on (escalate) feedback and complaints, appropriate to their job role.

Receiving allegations, reportable complaints, or reports of potential misconduct

If a client or their representative tells a TAG team member about something illegal or something that must be reported to an external governing body, team members must urgently notify a member of the executive team.

If a client or their representative tells a TAG team member about something that could be misconduct (including serious misconduct), the team member must urgently notify a member of the management team.

Team members must independently report any such matter, even if the client asks to use the electronic feedback form (which can still be provided). Failing to report may be considered misconduct or serious misconduct.

Resolving negative feedback

1. When a client or their representative first raises an issue or concern (negative or neutral feedback), the TAG team member will try to understand the exact nature of the problem. If the team member is able to solve the problem as part of their role, they will do so.
2. If the problem cannot be resolved immediately, or if the client or their representative is not satisfied with the attempted/proposed solution, the team member speaking with the client

(or representative) will give information about ways to escalate the issue, including information about how to make a complaint.

3. The team member must fully document the conversation and concerns including all necessary details, such as the names of the people involved and the date the issue first arose. If the issue was resolved, they will record when and how the problem was solved. Team members share this record with TAG leadership for monitoring and review.

Investigating and resolving complaints

All complaints are overseen by the Clinical Manager and their delegate/s, with coordination support as delegated.

1. When a complaint is submitted, the Clinical Manager or their delegate will:
 - Ensure the complaint is appropriately recorded
 - Within 1 business day of TAG receiving the complaint, select and assign the appropriate Complaints Officer to handle the investigation and response.
 - Within 5 business days of TAG receiving the complaint, send an acknowledgement email to the person who complained (the complainant).
2. The Complaints Officer will do the following:
 - Assess and investigate the complaint, involving the complainant as appropriate
 - Endeavour to resolve the complaint in a fair, efficient, and timely manner
 - Ensure that procedural fairness is afforded to all involved in the complaint
 - Complete all relevant documentation and record keeping
 - Take appropriate action in relation to the issues raised in the complaint, or refer for appropriate action if required
 - Notify the complainant of the outcome of the complaint investigation. Outcomes notified might include, but are not limited to:
 - i. referral for external investigation,
 - ii. quality improvements identified,
 - iii. individual changes appropriate to the client and their care, and any
 - iv. restorative actions or actions taken in recompense.

TAG does not provide details of any disciplinary actions taken as a result of any complaint investigation.

 - Notification of outcomes may occur via phone, and a written confirmation of the outcomes should always be provided.
 - Provide appropriate information, support, and assistance for the client/their representative to contact governing agencies such as the NDIS Quality and Safeguards Commission if they are not satisfied with the outcome of the complaint
3. Complaint outcomes will be provided within 21 business days of complaint receipt wherever possible.

Investigating and Resolving allegations, reportable complaints, and potential misconduct

All allegations, reportable complaints, and potential misconduct identified through client complaints are overseen by the Executive team.

- Investigation and resolution of allegations is conducted only by a member of the executive team. The CEO is directly notified of all allegations relating to Child Safe Organisations legislation, and referred for external investigation.

- Investigation and resolution of externally reportable complaints and potential misconduct is conducted by a Manager or Executive.
1. Once notified by a TAG team member, the manager or executive must do the following immediately:
 - Determine the nature of the complaint (i.e. allegation vs externally reportable vs potential misconduct). This may involve speaking with the complainant directly.
 - Where a TAG team member is a subject of the complaint, assess the risk to clients, team members and/or the organisation of the team member continuing to fulfill their role duties during investigation.
Any team member can be stood down without notice and without pay pending investigation of an allegation which poses a risk to client safety.
 - Where an allegation has been made, determine whether the allegation is to be investigated internally, or whether it requires referral to an external agency, including reporting for criminal investigation if indicated. Where external referral for investigation is indicated, the executive must determine the investigating agency and make the relevant referral or report.
 - Where any element may be reportable to an external governing agency, determine the applicable reporting timeframes and determine a plan to ensure that TAG remains compliant with those standards.
 - Identify and assess any organisational risk/s which require immediate management
 2. The manager or executive must do the following within 1 business day
 - Ensure the complaint is appropriately recorded and documented
 - Document organisational risk as appropriate to the specific matter
 - Provide an acknowledgement of the complaint
 - Complete 24hr/ 1 business day reporting obligations with respect to the relevant timeframes
 3. The manager or executive will then do the following as appropriate to the situation:
 - Assess and investigate the complaint, involving the complainant as appropriate, and coordinate and facilitate externally conducted investigations.
 - Endeavour to resolve the complaint in a fair, efficient, and timely manner
 - Ensure that procedural fairness is afforded to all involved in the complaint
 - Ensure accurate, thorough, and timely documentation and record keeping is maintained throughout
 - Take appropriate action in relation to the issues raised in the complaint, or refer for appropriate action if required
 - Complete any follow-up reporting actions required
 - Notify the complainant of the outcome of the complaint investigation. Outcomes notified might include referral for external investigation, quality improvements identified, individual changes appropriate to the client and their care.
TAG does not provide details of any disciplinary actions taken nor details of external investigation. This notification may occur via phone or face to face, and a written confirmation of the outcomes should always be provided.
 - Provide appropriate information, support, and assistance for the client/their representative to contact governing agencies such as the NDIS Quality and Safeguards Commission if they are not satisfied with the outcome of the complaint
 4. Complaint outcomes will be provided within 21 business days of complaint receipt wherever possible.

Whistleblowers

Under the NDIS rules, TAG clients who have a disability have the right to report serious wrongdoing that breaks the rules of the NDIS Act (called a "protected disclosure") to a senior member of the TAG team. This special type of report must only contain information showing that an NDIS provider, such as TAG, has or might have broken a rule in the NDIS Act. These reports are more significant than most complaints, even those which might be reportable to external governing agencies.

The people who can make this kind of disclosure are:

- a client of TAG who is a person with a disability
- their nominee
- their family member
- their carer
- their independent advocate
- their significant other

The TAG team members who can receive these kinds of disclosures are:

- Any member of the executive team (the CEO, CCO, or CFO)
- The Clinical Manager
- The Finance Manager
- The Administration Manager

Protected disclosures can also be made to The Commissioner of the NDIS Quality and Safeguards Commission, or to the National Disability Insurance Agency.

Under the NDIS rules, to make a protected report, the person reporting must:

- Tell the senior staff member their name before they make the disclosure.
- Make the report in good faith, which means they must be acting honestly and sincerely, and not trying to lie or cause harm.

Monitoring and reviewing feedback and complaints

Monitoring and review of feedback and complaints, including reporting to the management and executive teams, is coordinated by the Clinical Manager.

The Clinical Manager will monitor, review, and report on the following:

- Trends in feedback and complaints across the organisation
- Trends in resolution and escalation of feedback to complaints
- Themes of feedback and complaints
- Systemic issues
- Compliance with this policy

Management and Executive team reporting and review occurs at regular intervals, consistent with the Quality Assurance and Improvement Policy. This review seeks to identify systemic or other quality improvements indicated, policy change/s indicated, training and support needs across the TAG team.

Breach of Policy

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

A breach of this policy by clients or their representatives may result in conditional or withdrawal of services in order to protect other clients, their representatives, the organisation and its team members from potential harm.

References and Relevant Documents

TAG Policies and Supporting Documents

- Receiving Feedback and Complaints Action Tree
- Quality Assurance and Improvement Policy

Legislation/Codes

- National Disability Insurance Scheme Act 2013
- Child Safe Organisations Act 2024