

## OT Group - Feedback and Complaints Management Policy

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### 1. Policy

In line with the focus on participant rights and person-centred care, Occupational Therapy Group encourages people to provide feedback through multiple mechanisms including conversations with Allied Health Professionals (AHPs), phone calls, emails, websites and third parties such as funding bodies.

Information on how to make a complaint is provided to participants before services commence and reinforced during support delivery.

Complaints will be managed as per the under the [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#) and the [NDIS Effective Complaint Handling Guidelines for NDIS Providers](#)

All feedback, both positive and negative, is used by Occupational Therapy Group to evaluate services and to make changes to ensure our participants are safe and satisfied.

### 2. Outcome

Participants are aware of how they can provide feedback both positive and negative about the services they receive from Occupational Therapy Group.

Participants have their concerns satisfactorily addressed, feel supported through the complaints / feedback process and are kept informed of progress with their own issue and of any changes made.

Involved Workers have their concerns satisfactorily addressed, feel supported through the complaints / feedback process and are kept informed of progress with their own issue and of any changes made.

All feedback is documented, and changes are made as required to improve service delivery and procedures to improve participant satisfaction.

### 3. Definitions

**Complaint:** Is a statement that something is unsatisfactory.

NDIS Commission "A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required."

[NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, updated 08/08/2023](#)

**Feedback:** Information about reactions to a service, a person's performance of a task, a product etc. which is used as a basis for improvement.

Feedback can be positive or negative.

Note: As per the definitions in the Incident Management Policy, a complaint or negative feedback about the service is also a type of **incident**.

### 4. Related Policies / Documents:

#### Internal

- Incident Management Policy
- Safe Management and Environment (WHS) Policy
- Risk Management Policy
- Risk Management Register
- Service Delivery Model
- Incident and Complaint Report
- Incident Investigation Form

#### External

- [NDIS Quality and Safeguards Commission: Complaints Management and Resolution Guidance, Version 2.1 - September 2019](#)
- NDIS *Effective Complaint Handling Guidelines for NDIS Providers* – includes a valuable approach to managing complaints extracted from [Victorian Disability Services Commissioner booklet 'Everything you wanted to know about complaints...'](#), - refer to Appendix.

## 5. Procedures

### Making participants aware that feedback, including complaints, are welcome

- a. Participants are provided with information on how and where to provide feedback / make a complaint before services commence through provision of information:
  - In the *NDIS Service Agreement*
  - On the website
- b. Participants have the opportunity to provide feedback / make a complaint at any time and more particularly at the time of reviews and participant surveys.

### Management of a Complaint

Management of feedback / a complaint will be handled as per any incident as follows. There are also **additional** steps to be taken and issues addressed.

- a. It is critical that the complainant feels the complaint has been adequately acknowledged and they are given time to express how it has affected them and what actions they would like to see taken.
- b. If possible, the AHP will talk fairly, sensitively and confidently to the person making the complaint in a way which reflects their individual, cultural and linguistic needs.
- c. Obtain as much detail as possible about what happened and why the complaint has been made.
- d. Discuss complaint with Director who will then contact the complainant as soon as practically possible, but at least within 24 hours.
  - Person who receives the complaint is to complete an Incident and Complaint Report form and provide this to the Director. The report must include all necessary factual details, immediate actions that have been taken and any identified / planned follow-up actions.
- e. The incident is recorded in the Occupational Therapy Group Incidents and Complaints Register.
- f. The Director will, in collaboration with the complainant, decide on the course of action. The actions should include / address:
  - How to resolve the complaint. This could include acknowledgement, an apology, answers and / or action.
  - Where appropriate, seeking feedback from others eg other clients / Participants, workers.
  - When and how complainant will be kept informed of progress.
  - How to improve the service if / as required. This could include:

- Further training of staff / others involved.
  - Reviewing and enhancing policies and / or procedures.
  - Change of personnel.
  - Changes to the environment / delivery mode for AHP services.
- g. If the complaint is of a serious nature (eg mandatory reporting required, could lead to litigation), a formal incident investigation will be conducted (use the *Incident Investigation* form) to explore what led to the complaint and if any steps are required to prevent it occurring again.
- Note:** If police are involved in the incident, no internal investigation is to commence until the police investigations are complete
- h. Start implementing agreed actions, keeping the complainant informed.
- i. Actions will be monitored by the Director and updates on progress will be added to the register until the incident is satisfactorily concluded
- If the complainant is not satisfied with the outcomes of the initial discussions, a third party (e.g. colleague, HR professional) will be called in to assist with discussions.
- j. The complaint is to be followed up as per incident management.
- k. If the complainant is still not satisfied with the way the complaint has been handled or the outcomes achieved, they can contact the NDIS Quality and Safeguards Commission, National Disability Neglect & Abuse Hotline and /or the Victorian Ombudsmen. Contact details will be provided to the participant.
- l. Complaints reports and all related documents are to be kept for 7 years.

### **Positive Feedback / Compliments Management**

It is useful to keep a record of positive feedback / compliments received to review with colleagues / mentors. These can facilitate discussions on how to continuously improve. Record the details of the feedback / compliment in the Occupational Therapy Group Feedback / Compliments Folder kept in the office.

### **6. Appendix: How to respond to a complaint**

The following is an extract from the NDIS Quality and Safeguards Commission's *Effective Complaint Handling Guidelines for NDIS Providers*

In responding to a complaint, the Four A's of successful resolution is a useful approach developed by the Victorian Disability Services Commissioner in their booklet 'Everything you wanted to know about complaints': [http://www.odsc.vic.gov.au/wp-content/uploads/Booklet\\_everything\\_youwantedtoknow\\_.pdf](http://www.odsc.vic.gov.au/wp-content/uploads/Booklet_everything_youwantedtoknow_.pdf)

The approach recognises that people who make a complaint are generally seeking one or more of these four outcomes:

- Acknowledgment
- Answers
- Action
- Apology

### **Acknowledgement**

In many ways this is the most important step as it sets the tone for the rest of the process. Making a complaint can be difficult for people. It is important that people feel that their concerns have been understood and that the impact on them is recognised.

Acknowledgment can include:

- genuinely listening to the person without interrupting
- empathising
- making sure the person feels comfortable talking to you, and being aware of whether you are feeling defensive and how this may be perceived
- acknowledging how the situation has affected the person
- rectifying by asking the person what a good outcome would look like for them, and
- notifying the person regularly and promptly of the steps that will be taken in response to their complaint, ensuring commitments aren't made that can't be fulfilled.

### **Answers**

People want to know why something has or has not happened, or why a decision was made. People need to understand what has happened in order to better understand how they can move on to resolving their concern. Answers should include a clear explanation that is relevant to the concern raised but ONLY if you know the facts.

### **Actions**

People want you to fix or take steps to address their concerns. This may be in relation to their specific complaint, or more broadly around systems to ensure that similar issues won't occur for other people. Sometimes you won't be able to fix the issue raised, but you can initiate actions to prevent it from happening again. Taking action to prevent recurrence may validate the concern for the person making the complaint. A good way to approach actions is to use an action plan, which includes:

- what will be done
- who will do it
- when it will be done by
- how the progress of the complaint and outcomes will be communicated to the person making the complaint and the participant, and
- how the progress of the complaint actions and implementation will be oversighted.

The action plan may be formulated with the person who raised the complaint and any participant affected by an issue raised in the complaint. It is really important to follow up with the person who made the complaint, and any affected participant, to make sure they are satisfied with the actions being undertaken, and that the actions relate appropriately to their concerns. This is also a good opportunity to seek their feedback on the complaints resolution process.

### **Apology**

An apology may be part of, or the sole outcome a person is seeking when they make a complaint. It is important to consider who should provide the apology and the form of the apology. A genuine apology can be a meaningful step; however a poorly provided apology can make the situation worse. An apology should often come from the person complained about, as well as a more senior member of the organisation, in order for the person complaining to be satisfied that their concerns were taken seriously.

When providing an apology, it is helpful to consider:

- timeliness
- sincerity
- being specific and to the point
- accepting responsibility for what occurred and the impacts caused
- explaining the circumstances and causes (without making excuses), and
- summarising key actions agreed to as a result of the complaint.

A genuine and timely apology is a powerful healing force and a way to separate the past from the future, to put things to rest and get on with any agreed new arrangements.

### **After a complaint has been dealt with**

It is important that you have systems in place to allow the organisation to reflect on the complaints process and any outcomes. This includes ensuring that you are checking in with the person who made the complaint for feedback around the finalisation of their complaint, and their response to any follow up or implementation of actions.

Things to consider:

- What was the complaint about? What service, policy or procedure did it call into question?
- What was the experience for the person who made the complaint, or for any affected participant? Were the issues resolved for them?
- What information did the complaint provide that will allow you to identify and improve those services, policies and procedures and your organisation as a whole?
- How effectively did you communicate with the person who made the complaint, any affected participants, affected staff and other stakeholders?
- Do people using your services, their families, carers and friends require more or improved information about their rights and the complaints process? Does the person who made the complaint feel more comfortable about speaking up in the future?
- Does anything need to change in your complaints handling system or approach to dealing with complaints?
- Do staff require further training?
- Did the handling of the complaint reflect your stated values and expectations for complaint handling? Or, was the complaint perceived as something negative that needed to be dealt with as quickly as possible?