

2021

IN GOOD HANDS OCCUPATIONAL THERAPY PTY LTD

(ABN – 27647567897)

Policy & Procedure Manual



IGH

Occupational Therapy

**National Disability Insurance Scheme
(NDIS) Operations**



1.10 Feedback and Complaints Management

Policy and Procedure

This policy and procedure is intended to provide workers and on request participants, information on how they can provide feedback, compliments, and complaints about any aspect surrounding In Good Hands Occupational Therapy Pty Ltd. The discussion will be had to determine the most appropriate method to address or respond to it. However, any issue that arises from a In Good Hands Occupational Therapy Pty Ltd worker, it will be the responsibility the CEO/Director or Management, to conform to a solution strategy. If required, In Good Hands Occupational Therapy Pty Ltd may refer to the Disputes and Grievances Policy and Procedure for further assistance.

This extends to all employees and meets relevant laws and regulations and standards.

Definitions

Grievance	A real or imagined formal complaint, especially unfair treatment.
Complaint	A statement that something is unsatisfactory or unacceptable. – in this policy and procedure, a complaint will be identified as a minor issue, that can be settled promptly and will not involve a detailed investigation.
General Complaint	An expression of dissatisfaction with In Good Hands Occupational Therapy Pty Ltd's actions, policies, procedures, processes, charges, employees, agents or services.
Notifiable Complaint	A complaint that alleges a breach of the Education and Care Services National Law Act and/or Regulations.
Compliment	A polite expression of praise or admiration.
Feedback	Information about reactions to a product, a person's performance of a task, etc. which is used as a basis for improvement.

Policy

In Good Hands Occupational Therapy Pty Ltd abides by the Human Resource Policy and Procedure, ensuring workers are aware of rights and appropriate workplace behaviour. This is crucial to attempt to uphold an environment flooding with positive feedback and compliments and limited complaints. This policy and procedures encourage In Good Hands Occupational Therapy Pty Ltd's workers and participants to voice any concerns or positive comments they may have regarding individuals, facilities, services etc. Any comments made in relation to In Good Hands Occupational Therapy Pty Ltd will be utilised to improve their overall company.



The purpose of this policy is to ensure all workers of In Good Hands Occupational Therapy Pty Ltd understand and acknowledge what is expected of them when delivering services of care. Workers should aim to adhere to and enforce the rights and responsibilities of the participants. This ensures the operations implemented within In Good Hands Occupational Therapy Pty Ltd's framework reflect the best interests of the participant.

In addition to this, this policy aims to ensure all workers of In Good Hands Occupational Therapy Pty Ltd have adequate knowledge, skills and resources to manage feedback, complaints and compliments, accordingly effectively.

CEO/Director Responsibilities –

- Primary accountability for this policy and procedure.
- Performing internal/external audits.
- Internal reviews.
- External audit schedule.

Worker Responsibilities –

- Record feedback, complaints or compliments.
- Receive constructive criticism where required.
- Observe and monitor overall operation as well as personal operation.
- Remain honest and truthful when completing a complaint form, survey or feedback form.
- Encourage participants to complete a complaint form or feedback form when required.
- Provide any personnel wishing to complete a form with the correct and most up to date document at In Good Hands Occupational Therapy Pty Ltd.
- When corrective actions are put into place, ensure full endorsement.
- Ensure privacy and confidentiality is always upheld.
- Maintain respect to all persons filing a complaint or feedback form.
- If the worker receives the form, pass it onto In Good Hands Occupational Therapy Pty Ltd's CEO/Director in an appropriate and timely manner.

Management Responsibilities –

- Implementing training for this policy and procedure.
- Undertake performance reviews annually.
- Recognise future needs.
- Review efficiency of In Good Hands Occupational Therapy Pty Ltd.
- Ensure privacy and confidentiality is always upheld.
- Promote acknowledgement of all complaints quickly (within 1 working day).
- Ensure consultation with participant regarding acknowledgement and desired outcome if named.
- Respect anonymous complaint or feedback forms and conduct Management in the same manner as a named form.



- Respond to participants with a clear outcome or decision.
- Implement any Correct Action Requests if required.
- Should any systemic issues arise, conduct a thorough internal assessment or review.
- Priorities complaint form resolution in lieu of harm and risk reduction.
- Begin the resolution pathway or nominated to another personnel.
- Investigate any brought forth issues.
- Review alteration in service provision or care.
- Praise workers or Management when positive feedback is provided.

Procedure

In Good Hands Occupational Therapy Pty Ltd understands and recognises the importance of ensuring all participants, families, advocates, representatives and other relevant personnel obtain the essential information in a way that is easily comprehensible to the participants and others. In Good Hands Occupational Therapy Pty Ltd will offer all persons a variety of ways to access the information documented in In Good Hands Occupational Therapy Pty Ltd's Participant Handbook, Participant Charter and the Feedback, Compliments and Complaints Form. These documents will contain all the relevant information on how to effectively manage feedback and complaints, as well as information on how participants should lodge feedback, compliments or complaints.

In addition to this, In Good Hands Occupational Therapy Pty Ltd will ensure to display the relevant information within the facility of In Good Hands Occupational Therapy Pty Ltd to ensure it is easily accessible to all persons. Workers are able to obtain a copy of these documents upon request. All complaints, compliments and feedback will be addressed during team meetings, in which the Continuous Improvement Plan will be utilised to make the necessary modifications that would better suit the participants, workers and operations of In Good Hands Occupational Therapy Pty Ltd.

Feedback and complaints will be treated confidentially and will only be addressed directly with the individuals involved. All details regarding feedback and complaints will be maintained in a secure manner in accordance with In Good Hands Occupational Therapy Pty Ltd's Records and Information Management Policy and Procedure. The Disability Act 2006 requires In Good Hands Occupational Therapy Pty Ltd to report yearly to the Commissioner for Disability Services in the manner required by the Commissioner for Disability Services and verify the number of complaints obtained and how the complaints were handled.

Management of In Good Hands Occupational Therapy Pty Ltd will encourage good quality practice, continuous improvement, and an honest, supportive, respectful philosophy that supports and encourages workers, participants, and all other individuals to make complaints and report matters without concern of retribution. This will be evaluated in yearly Performance Reviews of management and workers. A participant who wishes to submit feedback, compliment or complaint will be presented with the information involving this policy. If the participant's consent has been given, feedback, compliments and complaints can be submitted on behalf of the participant.

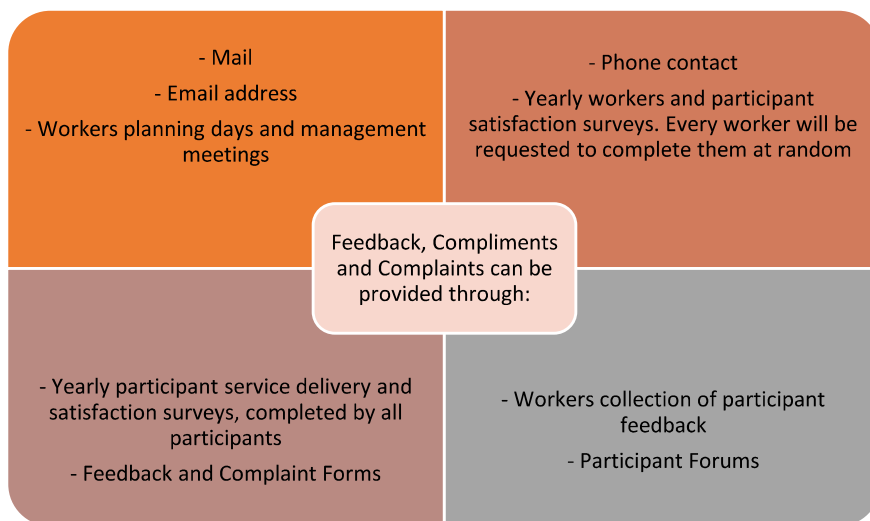


Feedback and complaint records will be tracked and examined to detect any continuing concerns. This will be reported on a three-monthly basis to the Director, as part of the report on Continuous Improvement. The personal details gathered in order to manage feedback or complaints will be treated in compliance with the privacy legislation and In Good Hands Occupational Therapy Pty Ltd's Privacy and Confidentiality Policy and Procedure.

In Good Hands Occupational Therapy Pty Ltd will utilise the standard 5-step guideline to managing feedback, compliments and complaints as outlined below:



There are a variety of ways participants of In Good Hands Occupational Therapy Pty Ltd can provide feedback, compliments or complaints. Below outline the ways in which participants will be able to share their suggestions and provide feedback, compliments or complaints to In Good Hands Occupational Therapy Pty Ltd:



Receiving Complaint or Feedback Documents

In Good Hands Occupational Therapy Pty Ltd utilises a variety of forms in order to analyse complaints or feedback from relevant personnel. Should any individual of In Good Hands Occupational Therapy Pty Ltd wish to file a complaint, they are encouraged to discuss the matter personally to any preferred worker of In Good Hands Occupational Therapy Pty Ltd beforehand. This is offered in order to attempt to resolve the concern before a reference to the complaints or grievance process.

In Good Hands Occupational Therapy Pty Ltd provides the opportunity for any participant who wishes to file a complaint to utilise an advocate to speak on their behalf. Any complaint received will be treated with respect and confidentiality.



Should a complaint allege real or perceived criminal acts, injustice, abuse or neglect, it is instantly addressed to the CEO/Director. The CEO/Director must record the case and seek to resolve the allegation or issue with the appropriate authority immediately.

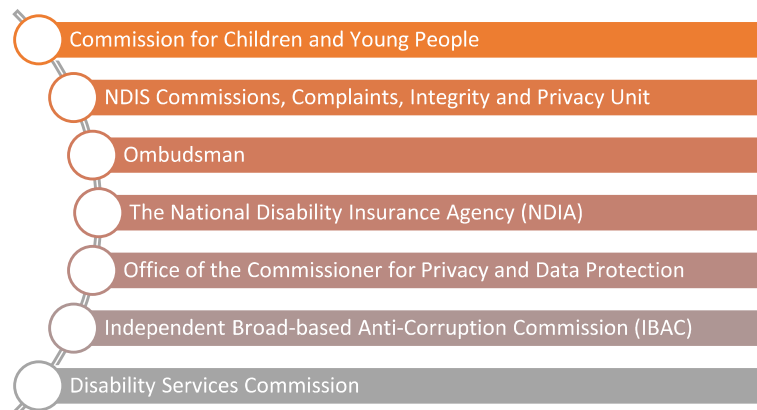
All complaints and grievances shall be forwarded to the Management for resolution. As a first measure towards resolution, minor concerns will be discussed with the appropriate individuals. If the issue cannot be settled within 24 hours, this should be handled by Management in a timely and appropriate manner.

Management is responsible for ensuring diligence when handling complaints and feedback forms.

Grievances may be lodged immediately either in writing by filling out a Feedback and Complaints form or verbally. They can be lodged through:

- In writing to:
355 Wellington St, South Launceston TAS 7249
- By email to:
subha@ingoodhandsot.com.au
- By phone on
0415 846 334

Individuals can make a complaint directly to the following agencies at any time they wish to:



Recording Complaint or Feedback Forms

In Good Hands Occupational Therapy Pty Ltd's Management will record and document any filed complaint or feedback forms in liaison with the Information and Record Keeping Policy and Procedure. All documentation and outcomes will be retained for a minimum of 7 years, should the issue escalate to external agencies such as police, documents will be achieved indefinitely. In Good Hands Occupational Therapy Pty Ltd maintains a Complaint Register and Feedback Register to assist with this process. Documentation will be stored in both hard copy and soft copy format in order to minimise the opportunity for theft, misuse, loss and error. Hard copy files will be retained at In Good Hands Occupational Therapy Pty Ltd's main office in a lockable and safe filing cabinet.



Soft copy files will be kept at In Good Hands Occupational Therapy Pty Ltd's main office on the CEO/Directors computer under a lockable and password protected document. Management and the CEO/Director will be the only persons who are able to access these documents. The person filing the complaint or feedback will be provided with a copy upon submission for their personal reference.

Acknowledgement of a Complaint or Feedback Form

In Good Hands Occupational Therapy Pty Ltd's workers or Management will acknowledge any named complaints or feedback forms submitted by liaising with the person/s providing the form. Acceptance of the claim will be conducted within 1 working day as a preference; however, this can be conducted within 2 working days if the non-conformity or issue is seen as minor. This is done in order to establish a therapeutic relationship of confidence and cooperation with the individual filing the form.

In Good Hands Occupational Therapy Pty Ltd will provide the individual with an opportunity of anonymity. This is conducted if the individual has not nominated a preference when filing the form to In Good Hands Occupational Therapy Pty Ltd. Should the individual wish to remain anonymous, this suggests they may not be willing or expected to communicate, and therefore the issue should be resolved within In Good Hands Occupational Therapy Pty Ltd accordingly.

Should the individual remain named, the worker or Manager of In Good Hands Occupational Therapy Pty Ltd will employ direct communication in the individuals preferred method in order to establish a favourable outcome. In Good Hands Occupational Therapy Pty Ltd will hold realistic expectations and if required, present the case or issue to other organisations where it has been identified as being more effective to deal with.

In Good Hands Occupational Therapy Pty Ltd will provide the individual filing the complaint or feedback form with an appropriate time frame and the resolution plan. Acceptance and acknowledgement need to be given from the individual to ensure they approve of the plans for improvement or resolution.

Resolving Complaints or Feedback Forms

When settling a complaint or grievance, Management will continuously involve the individual filing the form, by keeping the individual informed of the complaint's development which gives the possibility for the individual to address any gaps found in the information supplied.

In Good Hands Occupational Therapy Pty Ltd provides the opportunity for the individual to request further information upon request as In Good Hands Occupational Therapy Pty Ltd recognises the importance of including the individual in order to promote trust and transparency.

In Good Hands Occupational Therapy Pty Ltd should document the outcomes of the resolution method and aim to improve their practices to avoid similar complaints or negative feedback.



Should a Corrective Action Request be required, Management of In Good Hands Occupational Therapy Pty Ltd will complete, monitor and review accordingly. Upon notification of a complaint from the NDIS Commission, it is immediately forwarded to In Good Hands Occupational Therapy Pty Ltd's CEO/Director and nominated Management Personnel for action; this requires a Corrective Action Request Form to be completed immediately with appropriate monitoring and reviews.

Communication of Resolution from Complaints or Feedback Forms

In Good Hands Occupational Therapy Pty Ltd's Management will tend to all complaints, grievances and feedback forms as quickly and efficiently as possible. Issues or non-conformities will be resolved within 28 days from receiving the form. Should a complaint or grievance be unresolvable within 28 days, the complainant will be provided with a notification of the process completed so far; including the plan for the near future. The notification will also provide the expected date for a full response. The notification of the update will be provided verbally and then validated in writing.

Should the issue or non-conformity be resolved, In Good Hands Occupational Therapy Pty Ltd's Management will verbally discuss the outcome with the individual filing the complaint. Following the discussion, Management will deliver the outcome in a written format allowing them the opportunity to make further contact should they require. Should the individual be happy with the outcome, In Good Hands Occupational Therapy Pty Ltd will request feedback on the complaint handling process to ensure, all appropriate measures were taken.

Assistance will be given to support complainants' knowledge of correspondence concerning complaints and grievances where required, for example, interpreters, referral to advocates opportunities for measures responding to a complaint include but are not limited to:

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- Explanation of procedures
 - Resolving a concern
 - Presenting an expression of regret
 - Continuing monitoring of the issues
 - Providing training regimes, development and education to workers

In Good Hands Occupational Therapy Pty Ltd's Registry of Complaints and Grievances will be used by the CEO/Director to register each complaint, track the progress and results of the inquiry and how the findings were conveyed to the participants.



Reviewing Feedback and Complaints

To ensure In Good Hands Occupational Therapy Pty Ltd effectively responds to feedback and complaints, In Good Hands Occupational Therapy Pty Ltd's workers and Management will regularly review and act upon the complaints and feedback given to improve their practices when delivering quality services of care.

In Good Hands Occupational Therapy Pty Ltd and its workers understand the importance of recognising the specific issues identified through complaints and feedback, as well as implementing the certain measures and strategies to improve the practices of In Good Hands Occupational Therapy Pty Ltd.

When reviewing complaints and feedback, it is important for workers and Management to consider the probable causes of the issue, and how to minimise or eliminate these causes. In Good Hands Occupational Therapy Pty Ltd will also ensure to consider the development of improvement as a result of taking action, and the progress the implementation of new strategies. All improvements should be documented in In Good Hands Occupational Therapy Pty Ltd's Quality Improvement Register.

Dispute Resolution Contacts and Extended Cases

If an individual continues to be unhappy with the result of their complaint or grievance, they will be given the details of other organisations they can use to support them to achieve a solution.

In the Complaints and Grievances Register escalated complaints will be tracked in the same manner as other complaints, and the same communication processes will be applied as set out above. The Director will communicate with the complainant, instead of the In Good Hands Occupational Therapy Pty Ltd Coordinator, if necessary.

Complaints to the NDIA can be lodged:

- By phone on 1800 800 110
- By email to feedback@ndis.gov.au

Complaints can be made through the NDIS Commission

- Complaints made to the NDIS Quality and Safeguards Commission can be made via:
 - Telephone: 1800 035 419
 - Online: www.ndiscomission.gov.au



Complaints to the Ombudsman can be lodged:

- Victoria
 - By phone on 03 9613 6222 or (regional areas) 1800 806 314
 - Online at www.ombudsman.vic.gov.au
- Tasmania
 - By phone on 1800 001 170
 - Online at <https://www.ombudsman.tas.gov.au/>

Complaints to the Commission for Children and Young People can be lodged:

- Victoria
 - By email to childsafes@ccyp.vic.gov.au
 - By phone on 1300 78 29 78
- Tasmania
 - By email to childcomm@childcomm.tas.gov.au
 - By phone on 03 6166 1366

Complaints to the Office of the Commissioner for Privacy and Data Protection can be lodged:

- Victoria
 - By email to enquiries@vic.vic.gov.au
 - By phone on 1300 006 842
- Tasmania
 - By email to enquiries@oiac.gov.au
 - By phone on 1300 363 992

Supporting Documents

- Complaints and Grievances Register.
- Privacy and Confidentiality Policy and Procedure.
- Information and Record Keeping Policy and Procedure.
- Continuous Improvement Plan.



Policy Review

In Good Hands Occupational Therapy Pty Ltd may make changes to this policy and procedures from time to time to improve the effectiveness of its operation. Generally, this entire policy will be reviewed in consultation with people using the service, their families and carers and workers every year.

All service planning, delivery and evaluation activities will include workers, participants and other stakeholders and their feedback.

All activities related to service planning, delivery, and evaluation will include workers, participants, and other stakeholders, and their feedback.

By signing this document, I acknowledge that I have read and understood the Feedback, Compliments and Complaints Policy and Procedure. I need to comply with this policy and procedure, and that In Good Hands Occupational Therapy Pty Ltd can change or update the policy at any time.

Signed: _____

Version	Endorsed	Endorsee	Reason/Section Update	Next Review
1.0		Subha Perumal	Initial Release	16/06/2022