

Policy and Procedures

POLICY NAME	COMPLAINTS MANAGEMENT POLICY
POLICY NUMBER	13
START DATE	5.7.24
REVIEW DATE	5.7.26

Definition - A complaint is any expression of dissatisfaction or concern made to an organisation by a client, customer or from an employee or contractor that relates to the organisation's products or services, or the performance, behaviour and conduct of staff, or the complaints handling process itself.

Policy - Function Focused Therapy considers that a complaint may be made in person, by phone, fax, email or in writing. Function Focused Therapy will document details of the complaint so that there is a full understanding of the issues, and also an understanding of what the complainant would like to see as a resolution. Function Focused Therapy will endeavour to resolve complaints, if possible, within five (5) business days.

Where a client, staff member or contractor raises a complaint, they have the right to have that complaint:

- received and addressed in strict confidence;
- addressed in a spirit of helpful cooperation and sensitivity; and
- resolved promptly.

If a complaint is raised by a staff member or contractor against another staff member or contractor, both parties have certain rights, including the right to have the complaint investigated, be provided with appropriate feedback and communication on work performance, have fair and consistent treatment and reasonable avenues of redress.

The Directors will manage dealing with complaints themselves, or alternatively, may decide to have an external party investigate the complaint.

Objectivity

Each complaint will be addressed in an equitable, objective and unbiased manner through the complaints handling process (Grievance Procedure). The principles of objectivity include:

Openness; to ensure both the complainant and respondent understand the complaints handling process (Grievance Procedure).

Impartiality; to ensure a balanced consideration of all information/evidence is undertaken before a complaint can be resolved without fear or favour, with procedural fairness applying.

Confidentiality; to ensure the complainants and other parties are protected.

Accessibility; to ensure all parties concerned are aware of the complaints handling process (Grievance Procedure) and the lodged complaints progress.

Completeness; to ensure all available information/evidence has been collected from both sides.

Equity: to ensure equal treatment to all people.

Sensitivity; to ensure each case is considered on its merits, paying due care to individual differences and needs.

Complaints & Grievance Procedure

Purpose and Objectives

The objective of this procedure is to ensure complaints and grievances are resolved by negotiation through procedural fairness and discussions between the parties are conducted in a respectful, confidential manner.

Function Focused Therapy is committed to the maintenance of good working relationships with its clients, employees and contractors, and between employees and contractors in the workplace. It is, however, recognised that from time to time a client, an employee or a contractor may have a grievance which needs to be resolved in the interests of good relationships. The procedures described in this document are designed to assist parties involved with a complaint or grievance in maintaining good working relationships and also in resolving any conflicts or issues which arise that have a negative impact on client or working relationships.

The procedures for dealing with grievances have the following objectives:

- To provide all parties with the opportunity to have their concerns addressed in relation to any alleged incidents of unlawful discrimination, harassment or other offensive behaviour in a fair, equitable and prompt manner.
- To achieve constructive outcomes for conflict situations in the Practice.
- To ensure all parties have equal access to the procedures.
- To ensure complaints and grievances are resolved with minimum stress to all concerned.
- To ensure that confidentiality is maintained.
- To have a strong emphasis on problem solving.
- To consider and pursue alternative outcomes where appropriate.
- To ensure compliance with the NDIS Practice Standards, particularly in relation to the management of complaints and incidents, ensuring that all complaints are handled in a manner that is consistent with the principles of fairness, transparency, and accountability.

Application, Steps and Process

- In the first instance, the person making the complaint are encouraged to seek resolution of the grievance informally between the immediate parties concerned. A simple apology may finalise the matter at that point.
- If a complainant is not satisfied with the outcome or is not comfortable completing the process they may refer the complaint onto an external agency such as NDIS or AHPRA.

- The party making the complaint or has a grievance shall inform a Director of the nature of the complaint/grievance. The Director shall establish a clear understanding of what the party making the grievance is wanting as an outcome, and then attempt to resolve the issue between the parties by interviewing each party to the grievance separately, and then if appropriate, have a meeting with all of the parties in an attempt to resolve the grievance. The Director handling the grievance is to document the substance of any meetings held, and document the process undertaken.
- If the complainant feels that resolution has not occurred, they are required to advise a Director accordingly. The Directors will refer the matter for professional external mediation (NDIS).
- The full process should occur within seven (7) working days.
- Where a Director is a party to the grievance or dispute, then that person will not be involved in the process as an arbitrator.

Note:

- All parties must co-operate to ensure that these procedures are carried out as quickly as reasonably possible.
- Work must continue as normal whilst the complaint or grievance is being resolved through these procedures, unless he or she has a reasonable concern about an imminent risk to his or her health or safety. Where the grievance involves an employee or contractor, that employee/contractor must comply with a direction given by Function Focused Therapy to perform other available work at the same workplace, or at another workplace, unless the work is not safe, applicable work health and safety legislation would not permit the work to be performed, the work is not appropriate for the employee or contractor to perform, or there are other reasonable grounds for the employee or contractor to refuse to comply with the direction.
- Legitimate attempts to resolve the problem must be made at each level by all parties at Function Focused Therapy and referrals to an external body should be regarded as a last resort.

Responsibilities

The Directors are responsible for:

- Managing complaints/grievances in a timely, respectful and private manner.
- Engaging in external professional meditation where appropriate.
- Ensuring this policy and procedure is understood by clients, staff and contractors
- Adherence to the process detailed above.
- Providing the process in a timely, respectful, private and confidential manner, where procedural fairness applies.
- Supporting all parties appropriately through this process.

Staff are responsible for:

- Raising any grievance matter in a timely manner to avoid undue escalation of issues.
- Adhering to this policy and procedure.

- Aligning behaviour to the Occupational Therapy Australia Code of Ethics.

Clients need to raise their concerns at the earliest possible time in order for the matter to be resolved quickly, and client service and treatment can proceed.

Overall, Function Focused Therapy requires parties keep matters raised as being confidential.

Link to NDIS Practice Standards

This policy aligns with the NDIS Practice Standards by ensuring that all complaints are managed in a manner that is consistent with the principles of fairness, transparency, and accountability. The policy supports the NDIS Practice Standards' commitment to maintaining good working relationships and resolving conflicts in a respectful and confidential manner.

REVIEW OF THE POLICY

This policy will be reviewed on a two yearly basis. However, if at any time the legislative, policy or funding environment is so altered that the policy is no longer appropriate in its current form, the policy will be reviewed immediately and amended.