

Good Prospects  
Speech Pathology  
**Communication is the Key**

Prospect – Salisbury – Port Adelaide - Gawler - Berri

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# Good Prospects Speech Pathology Pty. Ltd.

## Complaint Management and Resolution System

<b>Authorised by</b>	Diana Bleby - Director
<b>Approval Date</b>	19 <sup>th</sup> October 2018
<b>Next Scheduled Review</b>	19 <sup>th</sup> October 2019 (Updated 14/06/2019)
<b>Document location</b>	Shared drive: Policies and Procedures
<b>Description</b>	This policy sets out the principles, objectives and responsibilities for Good Prospects Speech Pathology to manage Complaints as they may arise

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## 1.1 Introduction

Persons with disability 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 substantial barriers to making a complaint.

Feedback provided can be used by the Practice to drive change and improvements in the service provision.

## Policy

The Good Prospects Practice Complaint Management and Resolution System will:

- Support all clients (including NDIS participants) to understand their rights and what they should expect of providers,
- Supports clients to have the confidence to complain when they face issues,
- Enable other stakeholders (such as advocates and workers) to make complaints and ensure issues can be addressed when persons with disability are unable or unwilling to make a complaint,
- Support the resolution of complaints when possible and provide an escalation pathway where required,
- Enable the identification of systemic issues and drive improvements (including by providers reporting on complaints).
- Identify and report on any complaints or issues that are reportable (as per the Incident Management and Reportable Incident System Policy and Procedure document).

## Procedure

1.0 All clients and NDIS participants receiving services from the Practice will be provided with information regarding the Complaint Management and Reportable incident system when they commence services (See Appendix 4: Sample Letter).

Information will also be available on e.g. the Practice's website, in the waiting room, within the Service Agreement template.

Complaints may be received via telephone, in writing, electronic mail (e-mail) or in person by the client, client advocate or client's representative in person by a member of staff of the Practice and/or anonymously.

1.1 When a complaint is received and/or an incident which needs to be reported is identified, any supports required to facilitate communication and participation by the participant (e.g. supports in languages other than English, braille, audio recording and/or AAC options) will be identified and all reasonable steps taken to have these available.

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- 1.2 All reasonable steps will be taken to ensure that:
  - A person who makes a complaint, or a person with a disability affected by an issue raised in a 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 staff at the Practice will be trained to refer client complaints in a polite, prompt, consistent, positive and constructive manner.
- 1.3 The Complaints and Incidents Record document will be completed by the staff member who initially receives the complaint.
- 1.4 Complaints will be referred to the practice owner or manager, Diana Bleby (or delegate), within 24 hours of receipt.
- 1.5 The practice owner or manager Diana Bleby (or delegate) will ensure appropriate support and assistance is provided to any person who wishes to make, or has made, a complaint. This may include facilitating communications in languages other than English, or the use of a communication support such as AAC or braille using available publicly funded options. The person receiving the complaint or reporting the incident may assist the client to complete the form, for example by writing the details on the complaint form as verbalised by the client/ their representative.
- 1.6 Documentation or a record of the person's agreement with the report should be gained e.g. by signing the document, or video-recording verbal agreement, or videoing the persons non-verbal responses.
- 1.7 Once a client has given an indication of an issue/concern, there will be an immediate attempt to determine the exact nature of the concern/problem and where possible correct or resolve the issue.
- 1.8 If a concern/problem cannot be resolved immediately, and/or the client or their representative is not satisfied with the outcome, the practice owner or manager Diana Bleby (or delegate), will provide the client with the *How to make a Complaint Brochure* (refer to Appendix 4). This will provide the client with the process for making a complaint and options available to them.

If they would like to proceed, the person making the complaint will be provided with a *Complaint Form* (refer to Appendix 1).
- 1.9 The practice owner or manager Diana Bleby (or delegate), will:
  - Provide the person with an acknowledgment of the complaint (refer Appendix 2 Acknowledge Receipt of Complaint) within 5 business days of receiving the complaint,
  - Record the complaint on the Complaints Register (refer Appendix 7),
  - Assess and investigate the complaint,
  - Ensure that procedural fairness is afforded to all involved in the complaint,
  - Complete the Complaints Action Form (refer Appendix 3)
  - Endeavour to resolve the complaint in a fair, efficient, and timely manner.

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- Take appropriate action in relation to the issues raised in the complaint,
  - Report back to the client/their representative regarding the decision and the reason for the decision of the complaint ideally within 21 business days of receiving the complaint.
  - Provide appropriate support and assistance for the client/ their representative, to contact the Commissioner if they are not satisfied with the outcome of the complaint.
- 1.10 The practice owner or manager Diana Bleby (or delegate), must ensure the person making the complaint is:
- Appropriately involved in the resolution of the complaint; and
  - 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.
- 1.11 Once a decision/outcome has been concluded (ideally within 21 working days), the practice owner or manager Diana Bleby (or delegate), is to phone the client and advise them of the findings and the reason for any decision being made. If the client is satisfied with the outcome, the practice owner or manager must record the details on the Complaint Action Form, complete a client letter (see Appendix 5: *Outcome in Favour of Client*), take a photocopy and post the original to the client. A copy of the letter with the other supporting documents should be filed in the Practice's Complaints folder and the Complaints Register should be updated as complete (include: date finalised).
- 1.12 If the complaint is not resolved to the client's satisfaction, the practice owner or manager Diana Bleby (or delegate), will advise the client that they have the right to contact the Commissioner of the NDIS Quality and Safeguards Commission or the Office of the Health Ombudsman. They should provide the person making the complaint with the contact details for the relevant organisation.
- The practice owner or manager Diana Bleby (or delegate), will also complete a client letter (Appendix 6 *Outcome not in Favour of the Client*), take a photocopy/scan and then post the original to the client. They must attach a copy of the letter with the other supporting documents and store this in the client's file.
- The client's letter will need to detail the reasons why he/she is not satisfied with the complaint resolution proposal and should set out his/her expectations and desired outcomes for the dispute to be satisfactorily resolved.
- Record the client's dissatisfaction with the complaint outcome on the Complaints Action Form and Complaints Register. File a copy of all the relevant documentation in the Complaints folder.

## 2.0 Documentation

- 2.1 The practice owner or manager Diana Bleby (or delegate), must provide copies of this Complaints and Management System to:
- All clients and participants and their families, carers and advocates;
  - each person employed or otherwise engaged by the practice.

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## 3.0 Monitoring, and Reporting Complaints

- 3.1 All **records** in regards to the Complaints and Management System must be kept for 7 years from the day the record is made.
- 3.2 It is important to record the complaints information on the Complaints Register to assist management in measuring effectiveness in a number of areas. The information can be used to:
  - identify and address recurring, or systemic issues,
  - identify training requirements, and
  - highlight product or internal control weaknesses, and
  - report information relating to complaints to the Commission, if requested.
- 3.3 The practice owner or manager Diana Bleby (or delegate), will analyse complaints data regularly to identify any trends in the complaints received by the Practice and then make changes to policies and procedures as required to reduce the possibility of repeat complaints.

## 4.0 Roles, Responsibilities, Compliance and Training of Staff

- 4.1 The practice owner or manager Diana Bleby is responsible for ensuring that all persons engaged in the practice to provide services to NDIS clients have been trained and comply with this Complaints Management and Resolution System.

## 5.0 Complaint Management and Resolution System Review

- 5.1 The practice owner or manager, Diana Bleby, will review this Complaint Management and Resolution System regularly to ensure its effectiveness.

## 6.0 Referring Complaints

- 6.1 Complaints will be referred or notified to any other bodies in accordance with any requirements under relevant Commonwealth, State or Territory laws.

### **In South Australia,**

Please see the Consumer Feedback Management Toolkit produced by the Government of South Australia

<https://www.sahealth.sa.gov.au/wps/wcm/connect/524dd100438747c69bf8dfbc736a4e18/ConsumerFeedbackGuidelineContentPage-PHCS-1209.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-524dd100438747c69bf8dfbc736a4e18-mHVezgT>

SA Complaints Ombudsman <https://www.ombudsman.sa.gov.au/complaints/what-is-your-complaint-about/>

### **Nationally**

**Speech Pathology Australia** [www.speechpathologyaustralia.org.au](http://www.speechpathologyaustralia.org.au)  
**ACCC** - <https://www.accc.gov.au/consumers/complaints-problems/make-a-consumer-complaint>

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## Appendix1 - Complaint Form

**Good Prospects Speech Pathology**

**Date:** \_\_\_\_\_

**Client Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**Person Making the Complaint:** \_\_\_\_\_

**Contact details:**

\_\_\_\_\_

**Phone**

**Email**

**Details of Complaint (please attach copies of documents if applicable)**

**Has this matter been brought to our attention previously?:** No / Yes

**If Yes: To whom?** \_\_\_\_\_ **and when?** \_\_\_\_\_

**We will advise you of the outcome of your complaint with 10 working days.**

**Client/Representative Signature:** \_\_\_\_\_

**Client/Representative Name:** \_\_\_\_\_

**Client/Representative Contact details:** \_\_\_\_\_

(Please return this complaint form back to the Practice Manager on [admin@prospectspeech.com](mailto:admin@prospectspeech.com) or 26 Ann St. Salisbury SA 5108)

## Appendix 2 – Sample Acknowledgement letter of receipt of complaint

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## Good Prospects Speech Pathology

(Insert date)

**Addressee name:**

**Address line one:**

**Address line two:**

**Address line three:**

**Suburb STATE Postcode:**

**RE:** Subject Line

Dear

Re: Your complaint dated \_\_\_\_\_

Good Prospects Speech Pathology acknowledges receipt of your complaint regarding  
.....

The management of Good Prospects Speech Pathology is concerned that you are experiencing dissatisfaction and want you to know that this matter will be fully investigated and you will be contacted again by \_\_\_\_\_.

At that time, you will be advised of the outcome of these enquiries or the expected date for completion of our enquiries. In the meantime, should you require further assistance or can provide the Practice with further information that may help to resolve your concerns, please contact XXXX on: \_\_\_\_\_.

Yours sincerely

Name

Position Title

## Appendix 3 - Complaint Action Form

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## Good Prospects Speech Pathology

Date: \_\_\_\_\_

Client Name: \_\_\_\_\_

Other details as per Client Complaint Form or client letter (attached) dated  
\_\_\_\_\_

Outline action taken to attempt to resolve the complaint (attach copies of documents if applicable)

Recommended action required

Completed By: \_\_\_\_\_ Practice Manager  
Signature: \_\_\_\_\_

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Date resolved: \_\_\_\_\_

Resolved by: \_\_\_\_\_

Client advised of outcome: \_\_\_\_\_.

## Appendix 4 - Complaints Management



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## Good Prospect Speech Pathology

At Good Prospects Speech Pathology, we strive to provide high quality services to our clients. Client feedback - both positive and constructive is an essential part of helping us to continue to grow quality services and when necessary, learn from our mistakes. We encourage your feedback by sending us suggestions to improve our service at [admin@prospectspeech.com](mailto:admin@prospectspeech.com)

If you are dissatisfied with a service we have provided to you or are concerned about any aspect of our care however, we encourage you to let us know as soon as practicable so we can address it. If addressing it directly with your therapist/provider is not successful or not something you feel comfortable with then please see the following steps.

**Advocacy:** Should you require support to make your complaint, please go to <https://disabilityadvocacyfinder.dss.gov.au/disability/ndap/> and search for an Advocate in your area

## How to make a Complaint about your NDIS Service Provider

The first thing you should do is talk to the Practice Manager at our office **IF** you have been unable to or do not feel comfortable to talk directly to your provider/therapist about the issue:

**Good Prospect Speech Pathology**  
26 Ann St, Salisbury, SA  
Ph: 83121518 [/admin@prospectspeech.com](mailto:admin@prospectspeech.com)

**Wherever possible our aim is to resolve your concerns or problem when you first contact us.**

If you are not satisfied and would like to make a complaint, the Practice Manager will provide and can assist you to complete a Complaint Form. This is merely so that we can ensure we understand and have accurately collected all of the details of your complaint or your area of concern.

**We will complete the following steps in regards to our complaints process:**

- 1) Provide you with an acknowledgement of receipt of your complaint;
- 2) Keep you informed of the progress of the complaint, including any action taken, the reason for any decisions made and options for review of decisions;
- 3) Keep you involved in the resolution of the complaint.
- 4) Advise you in writing of the decision/outcome and the reason for the decision.

If we are not able to resolve your complaint within **10 working days**, we will keep you informed of our progress and how long we expect that it will take to resolve your complaint.

For a full copy of our Complaints Policy please ask or go to [www.goodprospects.com.au](http://www.goodprospects.com.au) where it is uploaded

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## **What to do if you are not satisfied with the outcome of your complaint**

If you feel that your complaint has not been resolved to your satisfaction, we invite you to contact the Commissioner of the NDIS Quality and Safeguards Commission if an NDIS participant or with Ombudsman SA.

**NDIS Clients:** Ph: **1800 035 544** or by email on the NDIS Quality and Safeguards Commission website [www.ndiscomission.gov.au](http://www.ndiscomission.gov.au)

**Non-NDIS clients:** Ph. **(08) 8226 8699** or **1800 182 150** (outside of metro area) or email via website [www.ombudsmansa.gov.au](http://www.ombudsmansa.gov.au)

A person can make a complaint to the Ombudsman or Commission about any issue connected with the support or services provided by a Provider. Complaints can be made orally, in writing, or by any other appropriate means and can be made anonymously. A complaint can be withdrawn at any time.

**If a person makes a complaint, the Commissioner or Ombudsman must decide what to do. The Commissioner or Ombudsman may decide to;**

- Take no action, or defer taking action in some case (for example, if the complaint was not made in good faith or there is not enough information to continue); or
  - Help the complainant and other affected people to work with the NDIS provider to resolve the complaint; or
- Undertake a resolution process.

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## Appendix 5 - (where outcome in favour of the customer)

Date

Name

Address line one

Address line two

Address line three

Suburb STATE Postcode

**RE: Subject Line**

Dear

**RE:** Your complaint dated \_\_\_\_\_

As advised in a previous letter to you dated \_\_\_\_\_ XXXX has been investigating your complaint relating to \_\_\_\_\_.

Good Prospects Speech Pathology has now completed these inquiries and advise that the results are:

We do hope that this resolves the matter to your satisfaction and thank you for bringing it to our attention. Your feedback allows us the opportunity to address your issue for you and also to ensure that, as far as possible, it does not happen again.

Yours sincerely,

Name

Position Title

## Appendix 6 – (where outcome is not in favour of the customer)

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Insert Date

Addressee name

Address line one

Address line two

Address line three

Suburb STATE Postcode

## RE: Subject Line

Dear

**Re:** Your complaint dated \_\_\_\_\_

As advised in our previous letter to you dated \_\_\_\_\_ we have been investigating your complaint relating to

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We have now completed these inquiries and advise that the results are:

Should you wish to discuss this matter further with me or have additional information to provide, please call me on \_\_\_\_\_.

Alternatively, we advise that should you be dissatisfied with our response to your complaint, you may choose to contact **((delete where applicable))** the Commissioner of the NDIS Quality and Safeguards Ph: **1800 035 544** or by email on the NDIS Quality and Safeguards Commission website [www.ndiscomission.gov.au](http://www.ndiscomission.gov.au) / Ombudsman SA Ph: **(08) 8226 8699** or **1800 182 150** (outside of metro area) or email via website [www.ombudsmansa.gov.au](http://www.ombudsmansa.gov.au)

Yours sincerely

Name

Position Title

## Appendix 7 – Complaints Register

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Date complaint received	Complaint details	Name person making complaint	Date acknowledgement letter sent	Is complaint an incident (if yes, refer to incident Management system) Y/N	Date the "How to make a complaint" brochure provided	Support provided to person with disability	Action taken to resolve complaint	Date complaint resolved	Comments	Any changes to made as result of complaint

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**Complaints Register – Good Prospects Speech Pathology**

Date complaint received	Complaint details	Name person making complaint	Date acknowledgement letter sent	Is complaint an incident (if yes, refer to incident Management system) Y/N	Date the "How to make a complaint" brochure provided	Support provided to person with disability	Action taken to resolve complaint	Date complaint resolved	Comments	Any changes to made as result of complaint

26 Ann St, Salisbury SA 5108

W: [www.goodprospects.com.au](http://www.goodprospects.com.au)

Ph: 08 8312 1518

E: [contact@prospectspeech.com](mailto:contact@prospectspeech.com)

Good Prospects Speech Pathology Pty. Ltd. ABN: 58609947506



## Good Prospects Speech Pathology Pty. Ltd

### Staff Grievance Policy & Procedures

<b>Authorised by</b>	Diana Bleby - Director
<b>Approval Date</b>	19 <sup>th</sup> October 2018
<b>Next Scheduled Review</b>	19 <sup>th</sup> October 2019
<b>Document location</b>	Shared drive: Policies and Procedures
<b>Description</b>	This policy sets out the principles, objectives and responsibilities for Good Prospects Speech Pathology to manage staff grievances as they may arise



## Staff Grievance Policy and Procedures

### Policy

The Director of Good Prospects Speech Pathology recognises that from time to time staff employed by or contracted to the practice may have concerns or issues related to their employment, service provision or relationships with other staff members or clients. The practice recognises that each staff member has the right to be heard and to have his or her concern taken seriously with a view to resolution and will support them to be able to do this in an environment of Dignity and Respect

The Director will ensure that all employee issues/complaints will be dealt with in a prompt, fair, consistent, confidential and constructive manner. Issues in relation to Occupational Health and Safety concerns should be resolved in accordance with the practice's Occupational Health and Safety policy. Issues in relation to bullying, harassment and discrimination should be investigated and expeditely dealt with.

All discussions relating to issues, grievances or concerns relating to an employee will be treated with a high level of confidentiality out of respect for the employee and any other person who may be involved or alleged to be involved in the issue. All conversations and actions will take place within the context of the Speech Pathology Australia Code of Ethics

### Procedure

When it is evident that a staff member has a concern or complaint, they should (where possible) take the following steps) in order to resolve the issue:

1. If the issue is related to Occupational Health and Safety then the staff member should proceed according to the practice's OHS&W policy
2. If the issue or grievance is with another person employed within the practice, where possible, the issue or grievance should be raised directly with that person in the first instance with a view to resolving the issue, Failing this;
  - I. To resolve a problem, an employee, should make his / her immediate supervisor aware of the issue and together try to resolve the matter
  - I. If the issue is with someone in leadership, then the staff member can choose another person in leadership to confidentially discuss the issue with
  - II. During any part of this process, an employee may wish to have a colleague or appointed representative accompany him/her to meetings to address the issue
  - III. While the parties are attempting to resolve the matter, work will continue in accordance with the employees' contract of employment



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3. If the issue is related to conditions of employment, the employee should review their contract of employment and then seek to discuss their concerns or issues with their immediate line manager or the Director of the practice.
4. Any agreed actions will be documented in writing
5. Where the issue remains unresolved, the parties may jointly or individually refer the matter to an independent advisor, conciliator or mediator such as the Fair Work Commission and WorkPlacePLUS.