

COMPLAINTS & FEEDBACK MANAGEMENT POLICY



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Practice: Rosella Care Therapy

Location: Newcastle and Hunter Region, NSW, Australia

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Next Review: 2 March 2027

1. Purpose and Scope

Rosella Care Therapy (“the Practice”, “we”, “our”, or “us”) is committed to delivering safe, ethical, respectful, and inclusive therapeutic services in accordance with applicable **Commonwealth and New South Wales legislation** and relevant professional standards.

The purpose of this Policy is to establish a transparent, accessible, and procedurally fair process for the receipt, management, investigation, and resolution of feedback and complaints relating to the services provided by Rosella Care Therapy.

1.1 Who this Policy applies to

This Policy applies to complaints made by:

- Current or former Clients
- Parents, guardians, or authorised representatives of Clients
- NDIS participants, including self-managed or plan-managed participants
- Support coordinators, referrers, or service providers interacting with the Practice
- Any individual affected by services delivered by the Practice

1.2 What this Policy covers

This Policy covers complaints relating to, but not limited to:

- Delivery of therapeutic services
- Professional conduct or behaviour
- Communication practices
- Fees, invoicing, or billing arrangements
- Privacy, confidentiality, and information management
- Accessibility, cultural safety, or inclusion
- NDIS service delivery obligations
- Administrative or operational processes

1.3 Limitations of Scope

This Policy applies only to matters relating to services provided directly by Rosella Care Therapy.

The Practice is not responsible for matters relating to:

- Services delivered by other providers or organisations
- Decisions made by the *National Disability Insurance Agency (NDIA)*
- Matters outside the professional scope of the Practice

Where appropriate, complainants may be referred to the relevant organisation or authority.

2. Legislative and Regulatory Framework

This Policy is informed by, and implemented in accordance with, relevant legislation and regulatory frameworks including but not limited to:

- *NDIS Act 2013 (Cth)*
- *NDIS (Complaints Management and Resolution) Rules 2018*
- *Privacy Act 1988 (Cth)*
- *Health Records and Information Privacy Act 2002 (NSW)*
- *Australian Consumer Law (Competition and Consumer Act 2010)*
- *NDIS Practice Standards and Quality Indicators*

Where inconsistencies arise between this Policy and applicable legislation, legislation prevails.

2.1 Jurisdiction

This Policy operates in accordance with the laws of the **Commonwealth of Australia and the State of New South Wales**, and should be interpreted consistently with applicable regulatory frameworks.

3. Guiding Principles

The Practice manages complaints in accordance with the following principles:

- Fairness and impartiality
- Procedural fairness
- Accessibility and inclusion
- Respect, dignity, and cultural safety
- Timeliness and transparency
- Privacy and confidentiality
- Continuous quality improvement

Individuals raising concerns will be treated respectfully and **will not experience retaliation, discrimination, or disadvantage** as a result of lodging a complaint.

Clients retain the right to pursue complaints through **external regulatory or legal channels at any time.**

4. Methods for Providing Feedback or Making a Complaint

4.1 Direct Contact Methods

Complaints may be submitted verbally or in writing to:

Ella Tobin
Rosella Care Therapy
Email: admin@rosellacaretherapy.com
Phone: 0494 156 839

4.2 Accessibility and Adjustments

Where required, reasonable adjustments will be made to support accessibility, including:

- Involvement of a support person, advocate, or interpreter
- Alternative communication methods
- Accessible formats where reasonably practicable

4.3 Anonymity

Complaints may be made anonymously where lawful. However, anonymity may limit the Practice's ability to investigate or resolve the matter.

5. Complaints Handling Process

5.1 Acknowledgement

Complaints will be acknowledged within **five (5) business days**, where reasonably practicable.

The acknowledgement will generally include:

- Confirmation that the complaint has been received
- Clarification of the issues raised
- The preferred communication method of the complainant
- An outline of the complaints process and expected timeframes

Immediate action may be taken where urgent client safety or risk issues are identified.

5.2 Preliminary Assessment

An initial assessment will determine:

- The nature and seriousness of the complaint
- Whether informal resolution may be appropriate
- Whether a formal investigation is required
- Whether there are immediate risks to client safety

- Whether mandatory external reporting obligations apply

Complaints outside the scope or authority of the Practice may be referred to an appropriate external organisation.

5.3 Investigation

Where a formal investigation is required, the process may include:

- Review of relevant documentation, including clinical notes where appropriate
- Clarification with the complainant
- An opportunity for the person subject to the complaint to respond
- Consideration of professional, ethical, contractual, and legal standards

Investigations will be conducted:

- Impartially and free from bias
- Proportionately to the seriousness of the complaint
- Confidentially to the extent reasonably possible

Procedural fairness will be maintained. All relevant parties will be provided an opportunity to respond to allegations or information prior to final findings being made.

5.4 Resolution and Outcome

Outcomes may include, but are not limited to:

- Explanation or clarification
- Apology where appropriate
- Service improvements or corrective actions
- Referral to a regulatory authority where required

Where appropriate, the complainant will receive a written response outlining:

- The issues considered
- Findings of the investigation
- Actions taken or proposed
- Options for further review

The Practice aims to provide a final response within thirty **(30) days of receiving the complaint**, however complex matters may require additional time. Where delays occur, the complainant will be notified.

5.5 Review and Escalation

If a complainant is dissatisfied with the outcome, they may request an internal review where appropriate.

Complaints may also be escalated to external bodies including:

- *NDIS Quality and Safeguards Commission*
- *Office of the Australian Information Commissioner (OAIC)*

- *NSW Information and Privacy Commission*
- *NSW Ombudsman*

Complainants may seek **independent legal advice at any stage**.

6. NDIS Participants

NDIS participants may lodge complaints directly with the Practice or with the *NDIS Quality and Safeguards Commission* at any time.

Lodging a complaint will **not affect access to services or supports**.

Where required, the Practice will comply with **NDIS reportable incident and regulatory reporting obligations**.

7. Privacy Complaints

Complaints relating to personal or health information are managed in accordance with:

- *Privacy Act 1988 (Cth)*
- *Health Records and Information Privacy Act 2002 (NSW)*

Where concerns cannot be resolved internally, individuals may contact the *Office of the Australian Information Commissioner* or the *NSW Information and Privacy Commission*.

8. Confidentiality and Procedural Fairness

All complaints will be treated confidentially to the extent permitted by law.

Information may be disclosed where reasonably necessary to:

- Investigate a complaint
- Comply with legal or regulatory obligations
- Prevent serious risk to health or safety

All individuals involved will be afforded procedural fairness, including the right to respond to relevant information prior to final decisions.

9. Unreasonable Conduct

The Practice is committed to respectful communication.

Behaviour that is abusive, threatening, discriminatory, or harassing may result in the Practice:

- Limiting methods of communication
- Requiring written communication only
- Terminating interactions that involve threatening behaviour
- Terminating services in accordance with applicable Service Agreements

These measures may be implemented to ensure the safety and wellbeing of staff and clients.

9.1 Vexatious or Frivolous Complaints

The Practice may determine that a complaint is vexatious, frivolous, or not made in good faith where the complaint lacks substance, is intended to harass or intimidate, or repeatedly raises issues that have already been investigated and resolved.

Where a complaint is assessed as vexatious or frivolous, the Practice may:

- Decline to undertake further investigation
- Limit or cease further correspondence regarding the matter
- Refer the matter to an appropriate external authority if required.

This determination will be made with regard to principles of procedural fairness.

10. Record Keeping

The Practice maintains a confidential complaints register documenting:

- Date the complaint was received
- Nature of the complaint
- Actions taken
- Outcomes and resolution

Records are stored securely in accordance with:

- *Privacy Act 1988 (Cth)*
- *Health Records and Information Privacy Act 2002 (NSW)*

11. Mandatory Reporting and Serious Matters

Nothing in this Policy limits legal obligations relating to:

- Mandatory reporting requirements
- Reportable incidents under NDIS legislation
- Child protection reporting obligations
- Cooperation with law enforcement or regulatory bodies

Where required, the Practice will notify the appropriate authorities in accordance with relevant legislation.

12. Continuous Improvement

Feedback and complaints are periodically reviewed to:

- Identify opportunities for service improvement
- Inform risk management practices
- Update policies and procedures where necessary

This Policy will be reviewed annually or as required by regulatory or operational changes.

13. Contact Details

Ella Tobin

Email: admin@rosellacaretherapy.com

Phone: 0494 156 839