

MOTIVATE KIDS



## CLIENT POLICY

### **Client Complaints, Feedback and Grievances**

*Version 1.6 | Reviewed October 2024*

## Overview

This policy outlines the expectations and responsibilities for employees, contractors, and volunteers of Motivate Kids regarding the use of smoking, alcohol, and other drugs. It emphasises creating a safe and healthy workplace for all staff, clients, and visitors. The policy is aimed at minimising harm related to the consumption of these substances in and outside the workplace, ensuring compliance with health and safety standards.

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| <b>Scope</b>            | HR Policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Key Information</b>  | <p><b>Smoking:</b></p> <ul style="list-style-type: none"> <li>Prohibited indoors and in vehicles; only allowed in designated outdoor areas.</li> <li>Staff are only to smoke during allocated breaks and properly dispose of cigarette butts.</li> </ul> <p><b>Alcohol and Drugs:</b></p> <ul style="list-style-type: none"> <li>Zero tolerance for being under the influence of alcohol or drugs while working.</li> <li>Zero tolerance for possession, sale, distribution, manufacture or consumption of Illicit Drugs in the workplace.</li> <li>Staff must disclose any medication that could impair their performance.</li> <li>Testing may occur in cases of suspicion, major incidents, or refusal to cooperate with testing.</li> </ul> <p><b>Support and Training:</b></p> <ul style="list-style-type: none"> <li>Employees may receive support, including referral to treatment programs if their performance is impacted by alcohol or drugs.</li> <li>Regular training on the policy will be provided, including cultural awareness training if needed.</li> </ul> |
| <b>Responsibilities</b> | <p><b>Management:</b></p> <ul style="list-style-type: none"> <li>Ensure fair and consistent implementation of the policy.</li> <li>Maintain confidentiality when dealing with staff issues.</li> <li>Lead by example by complying with the policy.</li> <li>Address and manage concerns about unsafe behaviour related to alcohol or drug use.</li> <li>Make adjustments for staff on prescribed medications when necessary.</li> </ul> <p><b>Staff:</b></p> <ul style="list-style-type: none"> <li>Present themselves for work free from the influence of alcohol or drugs.</li> <li>Adhere to zero alcohol limits when interacting with clients or parents.</li> <li>Notify the CEO of any concerns about colleagues under the influence.</li> <li>Behave responsibly at work events, and comply with the policy at all time.</li> <li>Report any health and safety risks due to substance use in the workplace.</li> </ul>                                                                                                                                                  |
| <b>Key Documents</b>    | Nil                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |



## 1. Purpose

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Motivate Kids believes that all complaints, feedback, and grievances provided by our Clients are an important opportunity to improve the quality of our services. Through this Policy Motivate Kids ensures that our Clients, their families, carers, advocates and members of the public are aware of their right to complain and the procedure to follow to lodge their complaint, feedback or grievance. All complaints, feedback, and grievances shall be treated confidentially, where possible, and Motivate Kids shall take all reasonable measures to ensure complainants are protected from reprisals and/or victimisation.

## 2. Policy Statement

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1. Motivate Kids understands and supports person-centred and family-centred approaches to delivery of therapy services and recognises the central role of families in children's lives. This approach may include inputs and evaluations from families, friends and carers. Feedback received assists continuous improvement and contributes towards enhancing service delivery.
2. Motivate Kids is committed to working collaboratively together with Clients to continue to deliver a high standard of therapeutic services that meet the needs of Clients and their families and ensures that the Client participates fully in their family and community life.
3. When managing complaints Motivate Kids shall take a focus on identification of risk and the prevention of errors in order to reduce the potential dissatisfaction and harm to Clients.
4. Motivate Kids shall give all Clients access to lodging complaints, feedback, and grievances without fear of retribution or victimisation and shall ensure that all received complaints, feedback, and grievances are considered, appropriately referred and actioned upon.
5. Motivate Kids shall engage employees and contractors that have the right skills and training to meet the standards prescribed by this Policy.

## 3. Scope

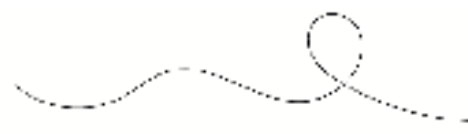
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This Policy applies to all employees, volunteers and contractors of Motivate Kids and shall be implemented with all Clients of Motivate Kids.

## 4. Definitions

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1. Any reference to a **Person-centred Approach** also includes family-centred approach when considered in relation to providing services to children.
2. Any reference to **Feedback** also means a reference to a complaint, a grievance or a dispute.



## 5. Communication

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1. This Policy shall be communicated to existing Clients on its commencement and to new Clients on the commencement of their service.
2. This Policy shall be communicated to all staff of Motivate Kids on its commencement and to new staff members on the commencement of their employment in compliance with Recruitment and Induction Policy and Training and Registrations Policy.
3. This Policy shall be read in conjunction with:
  - a. Appendix Issued Pursuant to the Information Sharing Guidelines;
  - b. Communication, Confidentiality and Privacy Policy;
  - c. Data Breach and Cyber Security Policy;
  - d. Drugs and Alcohol Policy;
  - e. Duty of Care and Incident Management Policy;
  - f. Individual Programs Policy;
  - g. Performance Management and Disciplinary Policy;
  - h. Quality Management Policy;
  - i. Recruitment and Induction Policy;
  - j. Training and Registrations Policy;
  - k. Vulnerable Persons Policy.
4. This Policy is available in pictorial format.

## Policy and Procedure

## 6. Quality Assurance

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1. Motivate Kids shall deliver services in accordance with its lawful obligations, rules and regulations that set standards such as:
  - a. Support for Clients to meet their aspirations and to participate in the community;
  - b. Respect for Clients' right to choose;
  - c. Non-Discrimination;
  - d. Culture of Respect.
2. All staff of Motivate Kids shall be subject to regular performance reviews as indicated in Performance Management and Disciplinary Policy which shall support the practice of providing feedback and goal setting for continuous improvement.
3. Individual Client programs developed for each Client in accordance to the Individual Programs Policy shall be reviewed at least annually, allowing for feedback and amendments to match the Client's wishes.
4. This Policy shall be read in consultation with Code of Conduct and Ethical Guidelines for each discipline in which staff is employed at Motivate Kids. Health Practitioners have a responsibility to be familiar with their discipline specific Code of Conduct and Ethical Guidelines and to comply with the Health Practitioner Regulation National Law, as applicable. The Code of Conduct and Ethical Guidelines outline professional standards and guidelines to support practitioners in providing high quality healthcare to Clients.



5. All unregistered health practitioners employed or otherwise working for Motivate Kids are required to comply with the Code of Conduct for Certain Health Workers which promotes safety and quality in health services for those not covered by the Australian Health Practitioner Regulatory Agency (AHPRA).
6. Where a health practitioner has a serious concern about the treatment provided by another health practitioner the matter shall be referred to the Health and Community Services Complaint Commissioner and AHPRA in accordance with the Code of Conduct in addition to the internal reporting requirements of Motivate Kids as outlined in the Duty of Care and Incident Management Policy.
7. Information received through Client Feedback and surveys shall be compiled and analysed for themes and trends on the Client Feedback and Complaint Log.
8. Motivate Kids schedules and implements Planning Days every year where discuss and action how to better the service based on client and staff feedback. The practice is accountable to regular self-assessment and development. Each Planning Day has a Planning Day Agenda with actions required by each staff member to complete by the next Planning Day. This way, Motivate Kids completes a regular self-assessment every year, including information about service improvements and new additions made during the past 12 months as well as providing information for the next 3-12 months.

## 7. Procedure

1. Motivate Kids shall provide an Easy Read and Pictorial copy of this Policy to all Clients on intake.
2. Any Client of Motivate Kids as well as their family member, carer, advocate, guardian or other nominee has a right to lodge their feedback, complaint, grievance or dispute about the services or the way they are delivered at any time during or after receiving said services using any available means for lodging this Feedback.
3. Motivate Kids shall accept and consider Feedback lodged by Clients by the means of:
  - a. Face-to-face verbal communication to the person delivering services or to the managers;
  - b. Telephone call on (08) 7200 2431;
  - c. Email at [rochelle@motivatekids.com.au](mailto:rochelle@motivatekids.com.au);
  - d. Motivate Kids Website Feedback form; <https://www.motivatekids.com.au/submit-a-feedback-form/>
  - e. Any Client surveys;
  - f. Filling in a Client Feedback form (provided within Welcome Pack);
  - g. Written communications to Australian Health Practitioners and Regulation Board for Registered Health Professionals and the Health and Community Services Complaints Commissioner for Unregistered Health Professionals;
  - h. Call NDIS Quality and Safeguard Commission on 1800 035 544 or through their online form at <https://www.ndiscommission.gov.au/participants/complaints>.
4. NDIS Complaints about abuse or neglect can also be made to the National Abuse and Neglect Hotline on 1800 880 052. Harm-related complaints for children and young people should be made to the Child Abuse Report Line on 13 14 78. For further information refer to the Vulnerable Persons and Child Safe policy.



5. Complaints can also be made anonymously to the NDIS Commissioner by email or phone 1800 035 544 and the NDIA 1800 800 110.
6. For the purpose of achieving the best outcome possible Clients are encouraged to include the following information in their Feedback:
  - a. Detailed description of the matter of the Feedback: persons involved, location, date, time, sequence of events and their results;
  - b. Actions that the Client would like Motivate Kids to take to resolve the complaint;
  - c. Preferred means of communication between the Client and Motivate Kids in regard to the Feedback, investigations and actions taken.
7. The staff member receiving the Feedback shall document in writing any complaint that is received verbally.
8. Received Feedback shall be acknowledged to the Client by phone or in writing as appropriate and information shall be provided on the staff member responsible for handling it.
9. Motivate Kids shall respond promptly and fairly to any Feedback requiring follow-up action or investigation, aiming to provide an outcome within two weeks.
10. Motivate Kids shall take reasonable action to attempt to resolve any complaints, grievances or disputes by consulting with Clients, staff and management.
11. Where such action is not sufficient the matter shall be referred to the relevant legislative authority: AHPRA (Registered Practitioners) or Health and Community Services and Complaints Commissioner (Unregistered Practitioners).
12. Management of complaints shall be conducted in a confidential and courteous manner according to the Communication, Confidentiality and Privacy Policy without any form of retribution against the Client.
13. Staff issues or positive feedback shall be addressed with the staff members in question promptly to encourage everyday practice reflection and self-development.
14. Where resolution provides for an increase in service offerings, those shall be considered against budget and staff expertise. Partnerships with other organisations may provide for an increased service offering where budget and expertise do not allow Motivate Kids to further expand on the services offered.

## 8. Advocacy

1. Clients have the right to have an advocate or representative to assist them in making a complaint or providing feedback.
2. Where a client expresses a wish for an advocate or representative to assist them, Motivate Kids shall assist the client in accessing and contacting an advocate. Further information is available here: <https://www.ndiscommission.gov.au/participants/disability-advocacy>. Clients may also use the Disability Advocacy Finder available here: <https://disabilityadvocacyfinder.dss.gov.au/disability/ndap/>
3. There may be occasions where Clients are not comfortable requesting assistance from Motivate Kids to provide information on advocates or representatives. Further information on making complaints, rights and processes can be found on the NDIS website: <https://www.ndiscommission.gov.au/about/complaints>



4. Advocates and representatives can and should be involved in the management of a complaint at the request of the client.

## 9. Dispute Resolution

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1. Where a Client is not satisfied with the outcome of the Complaints management process, they may seek external representation to assist with the resolution of complaints.
2. The Health and Community Services Complaints Office is an independent Statutory Authority providing an impartial resolution service for complaints relating to health and disability services provided in South Australia.
3. Staff may assist Clients in accessing and contacting the Health and Community Services Complaints Office by accessing their website on [www.hcscs.sa.gov.au](http://www.hcscs.sa.gov.au).

## 10. Investigations

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1. Not all feedback, complaints, disputes or grievances will require an investigation.
2. Where an investigation is necessary, it shall be undertaken in accordance with the provisions of the internal Performance Management and Disciplinary Policy (where applicable), the Principles of Natural Justice and Procedural Fairness and shall follow the process:
  - a. Collect evidence (this may involve direct observation, collation of documentation relating to the complaint, interviews with parties to the complaint, etc.);
  - b. Assemble and consider the evidence;
  - c. Compare the findings with relevant standards, protocols or guidelines, whether national or local, to establish the facts, draw conclusions about causation and make recommendations for actions to minimise risk;
  - d. Develop an improvement strategy with prioritised actions, responsibilities, timescales and strategies for measuring the effectiveness of actions;
  - e. Implement the improvement strategy and track progress, including the effectiveness of actions.
3. The investigation process shall be tailored to the Client's needs and/or disability.
4. Where possible and appropriate the Client shall be kept informed of the progress of the investigation and its outcome and offered support during this process.
5. Incidents that require reporting shall be reported promptly to the relevant authorities such as Department of Child Protection, SA Police, etc. as outlined in the Duty of Care and Incident Management Policy and Data Breach and Cyber Security Policy.

## 11. Documentation

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1. Details of the Feedback, investigations, reports and outcomes shall be recorded and managed in a confidential manner and stored securely in accordance with Communication, Confidentiality and Privacy Policy and a Client Feedback and Complaint Log maintained.
2. Records shall contain:
  - a. Details of the initial Feedback received from the Client;



- b. Communications with the Client regarding the matter;
- c. Staff members responsible for addressing the matter;
- d. Investigations;
- e. Actions taken;
- f. Outcome and whether and how the outcome was reported to the relevant authorities and parties.

## 12. Training

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1. Motivate Kids shall provide information and training to all staff and management about this Policy and its application.



## 13. Commencement and Review

| Approval and Review         |                     |
|-----------------------------|---------------------|
| <b>Date of commencement</b> | 1st October 2018    |
| <b>Current Version</b>      | 1.6                 |
| <b>Approved</b>             | Rochelle Mutton     |
| <b>Review frequency</b>     | Every 3 years       |
| <b>Current Version Date</b> | 1st October 2024    |
| <b>Date of next review</b>  | 1st October 2027    |
| <b>Document owner</b>       | Director of Therapy |

### Review History

| Date       | Version | Details                                                                           |
|------------|---------|-----------------------------------------------------------------------------------|
| 1/10/2018  | 1.0     | New Policy                                                                        |
| 6/5/2019   | 1.1     | Added reference to Client Feedback and Complaint Log as per NDIS Audit Outcome    |
| 15/5/2019  | 1.2     | Added NDIS Quality and Safeguard phone number and online link to provide feedback |
| 30/12/2020 | 1.3     | Updated advocacy and dispute information                                          |
| 25/5/2022  | 1.4     | Updated to reflect responding to harm and abuse for children                      |
| 14/10/2023 | 1.5     | Minor updates for change of government department name from DCSI.                 |
| 1/10/2024  | 1.6     | Minor update to adjust to changing operational requirements                       |

## 14. Lodgement and Review

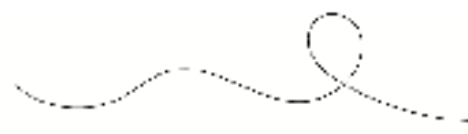
1. This document shall be lodged as part of a new child safe environments compliance statement with the Department of Human Services when reviewed.
2. This Policy must be reviewed every 5 years or when legislatively required (whichever is sooner).

## 15. Documents

1. Client Feedback Form;
2. Client Feedback and Complaint Log.

## 16. References

1. External:
  - a. Australian Occupational Therapy Competency Standards (AOTCS) 2018;
  - b. Code of Conduct for Certain Health Care Workers;
  - c. Health and Community Services Complaint Commissioner;
  - d. Health Practitioner Regulation National Law;



- e. Information Sharing Guidelines for Promoting Safety and Wellbeing;
  - f. National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018;
  - g. National Guidelines for Early Childhood Intervention.
2. Internal:
- a. Appendix Issued Pursuant to the Information Sharing Guidelines;
  - b. Communication, Confidentiality and Privacy Policy;
  - c. Data Breach and Cyber Security Policy;
  - d. Drugs and Alcohol Policy;
  - e. Duty of Care and Incident Management Policy;
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