



POLICY

Complaints about the Occupational Therapy Council

August 2023

1. Purpose

- 1.1 This document sets out a policy for handling complaints about the Occupational Therapy Council of Australia Ltd (OTC).
- 1.2 The OTC aims to provide the best customer service for all its stakeholders. The OTC is committed to handling complaints about the OTC in a fair and transparent manner and using what we learn to improve our service.

2. Scope

- 2.1. This policy covers complaints raised by any stakeholder who expresses concern about, or dissatisfaction with how the OTC has carried out its work. Stakeholders may include members of the public, internationally qualified occupational therapists or programs/education providers with, for example, complaints about communication processes, or an OTC policy or process.
- 2.2. The following policies and processes are in place to enable stakeholders to make a complaint or appeal against decisions made by the OTC and provide feedback to help inform the work of the OTC:
 - The 'OQAC Policy and Procedure Appeals Process' outlines how internationally qualified occupational therapists can appeal against the outcome of an initial desktop assessment.
 - The 'OTC Internal Review Policy' outlines how programs/education providers can appeal against accreditation decisions including decisions to refuse or revoke accreditation.
 - The 'Complaints About Accredited Programs and Education Providers Policy' outlines how stakeholders are able to make complaints about an OTC accredited program not meeting the OTC Accreditation Standards for Australian Entry-Level Occupational Therapy Education Programs (Accreditation Standards).
- 2.3. These policies are published on the OTC website.

3. Abbreviations

OTC – Occupational Therapy Council of Australia Ltd
PAC – Program Accreditation Committee (sub-committee of the OTC)
OQAC – Overseas Qualifications Assessment Committee
CEO – Chief Executive Officer

4. Process

In some instances, an issue that might otherwise be a complaint can be satisfactorily resolved informally through discussion with OTC staff without the need for further escalation. Where a formal complaint is made, the OTC will follow the process below.

- The complaint will normally be submitted in writing to the OTC via mail or email.
- The complainant should address the complaint 'in confidence' to the Chief Executive Officer (CEO) of the OTC.
- If the complaint is about the CEO, the complaint should be directed to the Chair of the OTC Board and will be managed by the Chair of the OTC Board.
- All complaints will be centrally recorded. The OTC will acknowledge receipt of the complaint and provide information about the process that will be followed.
- Where a complainant is unable to put their complaint in writing, the OTC will put in place reasonable adjustments to ensure the complaint can be recorded.
- The complaint will be reviewed by the CEO and Chair of the OTC.
 - If the complaint is determined to relate to a disagreement with the internationally qualified occupational therapist assessment process or a program accreditation decision, or a concern about an accredited program, it will be passed on to the Chair or OQAC or PAC as appropriate to be managed under the relevant policy and the complainant will be informed.

4.1 Assessment

- The CEO and the Chair of the OTC will undertake an assessment of the complaint to determine the most suitable person to manage the complaint and the scope of the investigation that may be required. Complaints which are considered vexatious, frivolous or unreasonable may be dismissed. They may also request further information from the complainant if necessary. Advice may also be sought from Directors of the Board of the OTC or members of the OTC Board's committees.
- If the complaint is readily able to be addressed, the OTC will write to the complainant and explain the outcome and, with mutual agreeance, the matter will be closed.
- Every effort will be made to address the concern with the complainant through discussion and if needed, more formal mediation.
- If the complaint is significant and involves other parties, the CEO and Chair of the OTC shall determine the scope of the investigation that may be required and refer the matter for investigation:
 - to the CEO or CEOs delegate, as considered appropriate;
 - to the OTC Board or one of its committees most appropriate to the subject matter of the complaint.

4.2 Investigation

- The complaint will be investigated. This may include seeking further clarification, reviewing documentation including previous correspondence and/or speaking to members of staff and OTC committee members and/or other key stakeholders.

4.3 Conclusion

- A response will be sent to the complainant, explaining the outcome of their complaint. It may not always be possible to resolve complaints to each parties' satisfaction, but the OTC is committed to providing clear information and explaining its decisions.
- Outcomes of complaints might include, for example:
 - an apology for any errors that have or may have occurred and what subsequent action has been taken.
 - improvement of policies or processes.

5. Confidentiality and anonymity of complaints

- 5.1 The OTC will not circulate the complaint more widely than is reasonably necessary to allow the OTC to address the complaint fully.
- 5.2 The collection, storage, use and disclosure of personal information will follow the privacy principles outlined in privacy legislation.
- 5.3 If the OTC considers it is necessary the complainant be identified to the person concerned, (or the nature of the complaint is such that the person concerned is likely to identify or be able to discover the identity of the complainant), then the OTC will first seek the complainant's consent to the disclosure proposed. If the complainant does not give consent or the process for disclosure cannot be agreed, then the OTC's capacity to deal with the issue raised in the complaint may be restricted. The OTC may de-identify relevant material in any disclosure.
- 5.4 Generally, the OTC will inform the staff member or other person or entity involved of the substance of the complaint, but it may not do so or may delay doing so in exceptional circumstances.
- 5.5 The OTC may accept anonymous complaints, acknowledging it can be difficult to undertake a full investigation without knowing the identity of a complainant.

6. Timeliness

The OTC is committed to investigating complaints in a timely manner as follows:

- 6.1 Acknowledge receipt of complaints within five working days of receipt.
- 6.2 Keep complainants regularly updated if it has not been possible to resolve a complaint within expected timeframes.
- 6.3 Assess if the complaint indicates a high potential risk to public safety. If a complaint indicates a high potential risk, the CEO of the OTC and/or the Chair of the OTC will escalate the complaint to the appropriate committee for an out-of-session meeting.
- 6.4 Send a substantive response to a complaint within 3 months of receipt.

7. Escalating the complaint

If the complainant is not satisfied with the way the complaint has been handled by the OTC, the complainant can contact the [National Health Practitioner Ombudsman](#).

8. Related documents

- OQAC Policy and Procedure Appeals Process.
- OTC Internal Review.
- Complaints about accredited programs and education providers.

9. Document information

Policy location:	OTC Website - About Us - Occupational Therapy Council (otcouncil.com.au) Governance handbook		
Date	Reviewed May 2023	Version	V3
Approved	OTC Board August 2023	Review date	August 2026