



## POLICY

# Complaints about the Occupational Therapy Council

April 2025

## 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 in a fair and transparent manner and using what we learn to improve our service.

## 2. Abbreviations

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

## 3. Definition

Complaint - an expression of concern, dissatisfaction or frustration with the quality or delivery of service, a policy or procedure, or the conduct of another person.

## 4. Scope

This policy covers complaints raised by any stakeholder who has concern about, or dissatisfaction with:

- The OTC's processes
- The conduct of an OTC Board director, a committee member, an OTC representative, a staff member or an external contractor/sub-contractor representing the OTC.

## 5. Out of scope

If the complaint is regarding registration or accreditation decisions made by either the OQAC or PAC, please refer to the relevant complaint process:

- The 'OQAC Stage 1 and Stage 2 Appeals - Policy and procedures' outline how internationally qualified occupational therapists can appeal against the outcome of an initial desktop assessment or a decision relating to the supervised practice assessment process, including a decision to not issue a Certificate of Practical Completion.

- The 'OTC Internal review of program accreditation decisions policy' outlines how program/education providers can appeal against accreditation decisions including decisions to refuse or revoke accreditation.
- The 'Complaints about accredited programs and providers policy' outlines how stakeholders can make complaints about an OTC accredited program not meeting the OTC Accreditation standards for Australian entry-level occupational therapy education programs (accreditation standards).

These policies are published on the OTC website.

## 6. Process

In most 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 CEO of the OTC via email [ceo@otcouncil.com.au](mailto:ceo@otcouncil.com.au) within thirty (30) days of the perceived issue arising.
- The complaint should include the date of the occurrence, the person, document or action the complaint is concerning, a full description of the complaint, any relevant supporting information and/or documents, and the effect or issue this matter has caused.
- If the complaint is about the CEO, the complaint should be directed to the Chair of the OTC Board via [admin@otcouncil.com.au](mailto:admin@otcouncil.com.au) and will be managed by the Chair of the OTC Board.
- All complaints will be recorded. The OTC will acknowledge receipt of the complaint and provide information about the process to be followed within five (5) business days of receipt of the written complaint.
- 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.

### 6.1 Assessment

- The complaint will be assessed by the CEO and Chair of the OTC Board within thirty (30) days of receipt of the written complaint (unless the complaint is about the CEO; then it will be reviewed by the Chair and Deputy Chair of the OTC Board. If the complaint is about the Chair of the OTC Board, it will be reviewed by the CEO and Deputy Chair of the OTC Board), to determine the most suitable person to manage the complaint and the scope of the investigation that may be required. Further information may be requested from the complainant if necessary. Advice may also be sought from the OTC Board or members of the OTC's committees.  
For noting:
  - Complaints which are considered vexatious, frivolous or unreasonable will be dismissed.
  - If the complaint is determined to relate to a disagreement about the assessment process for an internationally qualified occupational therapist or a decision by OQAC, or a program accreditation process or decision, or a concern about an accredited program, it will be passed on to the Chair of OQAC or PAC as appropriate (within five (5) business days from the CEO and Chair of the OTC Board's assessment) to be managed under the relevant policy, and the complainant will be informed accordingly.
- If the complaint is readily able to be addressed, the OTC will write to the complainant within sixty (60) days of receipt of the initial complaint and explain the outcome and, with mutual agreement, 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 Board shall refer the matter to the full OTC Board and/or the committee most appropriate to the subject matter of the complaint, with assistance of background information from the Executive Officer (OOAC) or the Accreditation Manager (PAC). This should be completed within sixty (60) days of receipt of the written initial complaint.

## 6.2 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. This should be completed within ninety (90) days of receipt of the initial written complaint.

## 6.3 Conclusion

- A response will be sent to the complainant within five (5) business days of the completion of the investigation, explaining the outcome of the 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 any subsequent action taken in response
  - improvement of policies or processes
  - staff training.

## 7. Confidentiality and anonymity of complaints

- 7.1 The OTC will not circulate the complaint more widely than is reasonably necessary to allow the OTC to address the complaint fully.
- 7.2 The collection, storage, use and disclosure of personal information will follow the privacy principles outlined in privacy legislation.
- 7.3 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.
- 7.4 Generally, the OTC will inform the staff member or other person or entity involved of the substance of the complaint but in exceptional cases, the decision may be made not to do so or to delay.
- 7.5 The OTC may accept anonymous complaints, acknowledging it can be difficult to undertake a full investigation without knowing the identity of a complainant.

## 8. Timeliness

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

- 8.1 Acknowledge receipt of complaints within five (5) business days of receipt
- 8.2 Keep complainants updated if it has not been possible to resolve a complaint within the expected timeframes.
- 8.3 Respond to further queries regarding the complaint within five (5) business days of receiving the request.

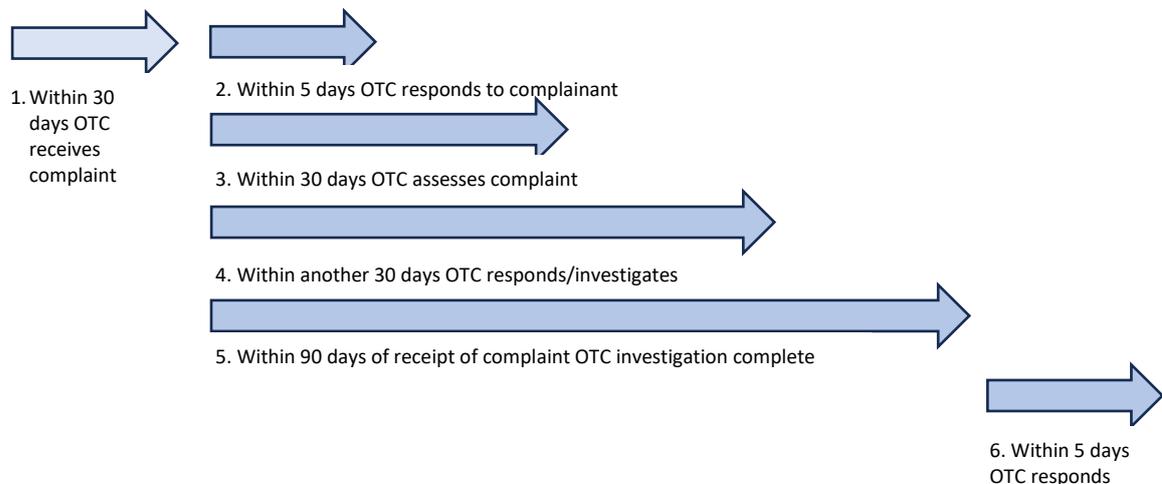
8.4 Send a substantive response to a complaint within ninety (90) days of receipt of the initial complaint.

The manager of the complaint can extend the timeframe if unexpected circumstances arise. All relevant parties will be advised in writing, specifying the new timeframe.

The complainant must also respond to any queries from the OTC regarding the complaint within five (5) business days of receiving the request.

If the OTC does not receive any further communication from the complainant within thirty (30) days of the request, the OTC will assume the complainant has decided to rescind the complaint and will record the outcome of the complaint as ‘unresolved due to non-communication’.

The following summarises the tasks and timelines required:



1.	2.	3.	4.	5.	6.
Complainant writes to OTC within 30 days of incident occurring.	OTC responds within 5 business days of receipt of the written response and forwards complaint to CEO and Chair of OTC Board for assessment.	Complaint assessed by CEO and Chair of the OTC Board to determine most suitable person to respond, within 30 days of OTC's receipt of written complaint.	If complaint can be readily addressed, OTC will write to complainant within 60 days of receipt of initial complaint explaining outcome.	Complaint will be investigated and investigation completed within 90 days of initial complaint.	
			If complaint is significant, the matter may be referred to the full OTC Board and/or appropriate committee within 60 days of receipt of initial complaint.		

## 9. Escalating the complaint

The OTC will assess if the complaint indicates a high potential risk to public safety. If a complaint indicates a high potential risk, the CEO and/or the Chair of the OTC Board will escalate the complaint to the appropriate committee for an out-of-session meeting.

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](#).

## 10. Related documents

- OQAC Stage 1 and Stage 2 - Policy and procedure - Appeals process
- PAC Policy: Internal review of program accreditation decisions
- PAC Policy: Complaints about accredited programs and education providers

## 11. Document information

Policy location:	OTC Website - <a href="#">About Us - Occupational Therapy Council (otcouncil.com.au)</a> Governance handbook		
Date	Reviewed 11 April 2025 GSAC	Version	V3
Approved	OTC Board endorsement	Review date	6 September 2025

w [otcouncil.com.au](http://otcouncil.com.au)

e [Admin@otcouncil.com.au](mailto:Admin@otcouncil.com.au)  
[ceo@otcouncil.com.au](mailto:ceo@otcouncil.com.au)

p +61 (0) 484 091 870

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Occupational Therapy Council of Australia Ltd  
PO Box 615  
Kalamunda WA 6926  
ABN 50 377 833 627

The Occupational Therapy Council of Australia Ltd acknowledges the traditional custodians of the lands where we work and live. We celebrate the diversity of Aboriginal and Torres Strait Islander Peoples and their ongoing cultures and connections to the lands and waters of Australia. We pay our respects to Elders past, present and emerging.