

# Complaints & Disagreements Management Policy

Forge Clarity PTY LTD

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## Instructions

Below is a complete, ready-to-use Complaints & Disagreements Management Policy tailored for a remote telehealth counselling and psychotherapy practice, including NDIS participants, general public clients, private 1:1 clients, and free weekly Zoom grief support group attendees. It integrates NDIS Practice Standards and typical psychotherapy practice requirements while centering client needs, safety, transparency and accessibility.

Practice Name: Forge Clarity

Director & Lead Therapist: Tegan Elza Banks

Services Covered:

- Remote telehealth counselling & psychotherapy for private clients
- NDIS-funded behavioural supports
- Free Zoom Grief Support Groups (weekly on Thursdays)
- Volunteer support during group sessions

## **1. Purpose**

The purpose of this policy is to ensure all clients, participants, support persons, and other stakeholders are able to raise complaints, disagreements, concerns, or feedback safely, freely, and without fear of negative consequences.

This policy supports:

- NDIS Practice Standards (Participant Rights & Responsibilities, Incident Management, and Feedback & Complaints)
- Ethical psychotherapy principles
- Safety, respect, accessibility, and trauma-informed communication

## **2. Scope**

This policy applies to:

- NDIS clients
- Private telehealth clients
- General public attendees of the free Zoom Grief Support Group
- Volunteers, subcontractors, and anyone acting under the direction of the practice

Complaints may relate to:

- The behaviour, communication, or service delivery of staff or volunteers
- Session access, cancellations, or scheduling issues
- Quality or safety of remote telehealth services
- Confidentiality or privacy concerns
- Disagreements about therapeutic approaches
- Group support dynamics
- Any aspect of the organisation's operations or decisions
- Other:

### **3. Principles**

Our complaints and disagreements process is based on:

#### 3.1 Accessibility

- Clients can lodge complaints verbally, in writing, anonymously, or via a support person.
- Multiple lodgement paths are offered (email, form, phone, Zoom, NDIS Commission).

Here is the link to the anonymous feedback option:

<https://forgeclarity.com.au/documents>

#### 3.2 Transparency

Clients are informed about their right to complain at intake and reminded periodically.

#### 3.3 Fairness & Procedural Integrity

- All complaints are investigated objectively and respectfully.
- All parties are given an opportunity to explain or respond.
- 3.4 Trauma-Informed Practice
- Clients are not pressured to confront staff directly.
- Emotional safety and support options are provided.

#### 3.5 Non-Retaliation

Clients will not be penalised, disadvantaged, or refused services because they raised a complaint.

#### 3.6 Promptness

- Acknowledgement within 2 business days
- Assessment within 5–10 business days
- Resolution within 21 days, unless complexity requires more time (client is advised if so)

## 4. What Is a Complaint or Disagreement?

A complaint or disagreement can be any expression of dissatisfaction, including but not limited to:

- “I didn’t feel heard during my session.”
- “The Zoom group felt unsafe to me.”
- “A volunteer behaved inappropriately.”
- “I think something was handled unfairly.”
- “I disagree with the recommended therapy plan.”
- “My NDIS supports weren’t delivered as expected.”
- “I didn’t feel comfortable with how confidentiality was explained.”

Clients and participants do not need to use the word “complaint” for the concern to be treated as one.

## 5. How Clients Can Lodge a Complaint

Clients may submit complaints by:

### 5.1 Email & Number

[info@forgeclarity.com.au](mailto:info@forgeclarity.com.au) / 0450 205 370

Reviewed solely by the Director, Tegan Elza Banks

### 5.2 Secure Online Forms

Reviewed solely by the Director, Tegan Elza Banks

### 5.3 Verbal Complaints

- During a session
- During a phone call
- After a Zoom group session
- The therapist or volunteer receiving the complaint must document it within 24 hours.

### 5.4 Anonymous Complaints

Accepted via the online form or email without identifying details.  
Here is the link to the anonymous feedback option:  
<https://forgeclarity.com.au/documents>

### **5.5 Third Party or Advocate**

Complaints may be submitted by:

- A support person
- Carer
- NDIS Support Coordinator
- Other relevant advocate

### **5.6 Direct to NDIS Commission (for NDIS Participants)**

NDIS participants may escalate at any time:

NDIS Quality and Safeguards Commission

Phone: 1800 035 544

Website: [www.ndiscommission.gov.au](http://www.ndiscommission.gov.au)

## **6. Complaints Handling Process**

### **6.1 Stage 1 – Acknowledgement (within 2 business days)**

The complainant will receive:

Confirmation of receipt

Explanation of next steps

Estimated timeframe

Assurance of confidentiality and non-retaliation

### **6.2 Stage 2 – Assessment**

The Director reviews:

- Nature and severity
- Safety or risk implications
- Whether immediate action is required

- Whether the complaint involves a volunteer, group environment, or a private session
- Whether external authorities must be notified (e.g., NDIS Commission, police)

### 6.3 Stage 3 — Investigation (within 10 business days)

Depending on the case, this may involve:

- Speaking with involved staff (including volunteers)
- Reviewing session notes (as clinically appropriate)
- Reviewing Zoom group guidelines and or group protocols
- Requesting further detail from the complainant (optional, not required)
- Seeking advice from a clinical supervisor (without identifying information beyond necessity). This may include talking to the NDIS, ACA, PACFA or other relevant party.

### 6.4 Stage 4 — Resolution and Response (within 21 business days)

The outcome will include:

- Findings and any necessary improvements
- Changes to practice, policy, or group procedures
- Clarifications or apologies where appropriate
- Follow-up support if the client requires emotional containment or referral
- For NDIS participants, outcomes must align with NDIS Practice Standards and be recorded in the NDIS complaints register.
- If more time is required, the client will be informed in writing with reasons and a new timeline.

### 6.5 Stage 5 — Review and Appeal

If the complainant is dissatisfied, they may:

- Request internal review by the Director
- Request support accessing an external advocate
- Escalate to the NDIS Commission (NDIS clients only)
- Escalate to relevant health regulators if applicable.

## **7. Special Considerations for Different Client Groups**

### 7.1 NDIS Participants

- Must be informed of their rights in accessible language
- Complaints must be recorded in an NDIS-compliant register and the Forge Clarity Incident Register

- Advocates/support coordinators may be present
- The participant may escalate to the NDIS Commission at any time
- Reasonable adjustments (easy-English, visual communication, interpreters) must be offered

### 7.2 Private 1:1 Telehealth Clients

Complaints may relate to:

- Clinical process
- Telehealth technology issues
- Feelings of misattunement
- Billing issues
- Therapeutic boundary concerns
- Responses must follow psychotherapy professional guidelines and maintain clinical neutrality.

### 7.3 Free Thursday Zoom Grief Support Group

Because this is an open group:

- Complaints about group dynamics are valid and taken seriously
- Safety concerns may result in temporary or permanent restriction of a participant to protect others
- Volunteers involved will be supervised and informed about complaints affecting their role
- Zoom recordings are not made unless explicitly stated (and consent obtained).

### 7.4 Volunteers

If a complaint involves a volunteer:

- The Director will immediately assess safety
- The volunteer may be asked to pause involvement until the matter is resolved
- Volunteers are not permitted to respond independently to complaints

## **8. Confidentiality & Privacy**

- All complaints are kept confidential and stored securely.
- Only information necessary to resolve the complaint is shared with those involved.
- Client identities are protected whenever possible.

- Anonymous complaints are respected and investigated to the extent that information allows.

## **9. Record Keeping & Reporting**

The Director will maintain:

- A secure digital complaints register
- Case notes related to complaint management
- Evidence of follow-up actions
- Notes on systemic improvements identified

NDIS complaints must be available to auditors upon request.

## **10. Systemic Improvement**

Following resolutions, the practice will:

- Review whether a policy update is required
- Update volunteer procedures if relevant
- Provide training or refreshers to staff/volunteers
- Adjust group rules, access protocols, or telehealth practices as needed
- Review recurring themes every 6 months

Complaints are seen as a valuable source of learning, service improvement, and client empowerment.

## **11. Information Provided to Clients**

Every client or participant receives or has access to:

- This policy (upon request, via website <https://forgeclarity.com.au/documents> or is provided in the Client Liability Waiver & Agreement)
- A short, accessible summary at intake
- Contact details for lodging feedback or complaints ([info@forgeclarity.com.au](mailto:info@forgeclarity.com.au))
- NDIS Commission details (for eligible participants)

## **12. Contact Details for Complaints**

Practice Complaints Contact:

Tegan Elza Banks, Lead Therapist & Director

Contact details: [info@forgeclarity.com.au](mailto:info@forgeclarity.com.au) / 0450 205 370

Only the Director has access to the emails sent through the contact form:  
<https://forgeclarity.com.au/contact>

NDIS Quality and Safeguards Commission:

Phone: 1800 035 544

Email: [contactcentre@ndiscommission.gov.au](mailto:contactcentre@ndiscommission.gov.au)

Online: via NDIS Commission website:

<https://www.ndiscommission.gov.au/complaints/make-complaint-about-provider-or-worker#paragraph-id-7580>

General Public Complaints

Australian Counselling Association:

Online: via ACA website:

<https://theaca.net.au/aca-directories/lodge-a-complaint>

Phone: (07) 3356 4255

Email: [aca@theaca.net.au](mailto:aca@theaca.net.au)

