

# Feedback and Complaints Policy

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Version 2.1 | Effective 12 August 2026

## 1. Policy Statement

Behavioural Edge Psychology Pty Ltd is committed to providing high-quality psychological services and maintaining high standards of professional conduct. We value feedback from our clients and recognise that concerns and complaints provide valuable opportunities for learning, improvement and maintaining trust in the therapeutic relationship.

This policy establishes a clear, transparent and accessible process for clients to provide feedback, raise concerns or make formal complaints. It reflects the Psychology Board of Australia Code of conduct for psychologists (effective 1 December 2025), the NDIS Code of Conduct, the NDIS Practice Standards and relevant legislation.

Our commitment: all feedback and complaints will be treated seriously, managed fairly, dealt with promptly, and handled confidentially while respecting the rights of all parties involved.

## 2. Scope and Application

This policy applies to:

- All current and former clients of Behavioural Edge Psychology
- Authorised representatives of clients, with appropriate consent or legal authority
- Referrers, funding bodies and other stakeholders
- The Principal Psychologist and any contractor, locum or staff member engaged by the practice in future
- Any matter relating to the provision of psychological services, professional conduct, billing, privacy or administrative processes

Behavioural Edge Psychology is the sole-director practice of Dr Sarah Fischer, Principal Psychologist. References in this policy to the practitioner and to the person managing a complaint therefore usually refer to the same person; section 6.5 explains how impartiality is protected in that situation. The practice provides services in person at its Caulfield South and St Kilda consulting rooms and by telehealth delivered from Victoria to clients across Australia. This policy applies to all service streams, including Medicare, privately funded, NDIS, TAC, WorkSafe Victoria and medicolegal services.

## 3. Legislative and Regulatory Framework

This policy is informed by and consistent with the following.

### **Psychology Board of Australia Code of conduct for psychologists (effective 1 December 2025)**

The Code replaced the shared Code of conduct (2014) and the regulatory role previously played by the APS Code of Ethics. Two standards are directly relevant. Standard 4.5 (*your response when your service has harmed clients*) requires the psychologist to act immediately to rectify a problem where

possible, report the incident to relevant authorities where required, and communicate respectfully with the client and associated parties. Standard 4.6 (*concerns about psychologists' conduct, health or performance*) requires the psychologist to acknowledge the client's right to raise concerns, provide information about available complaints systems, work with the client to resolve issues locally where possible, and provide a prompt, open and constructive response to the Board and AHPRA. The wording above is a paraphrase; the published Code is the authoritative text.

### NDIS requirements

As a registered NDIS provider, Behavioural Edge Psychology must comply with:

- National Disability Insurance Scheme Act 2013 (Cth)
- National Disability Insurance Scheme (Code of Conduct) Rules 2018 (Cth), including section 6(1)(e), which requires providers to promptly take steps to raise and act on concerns about matters that may impact the quality and safety of supports, and section 6(1)(f), which requires all reasonable steps to prevent and respond to all forms of violence against, and exploitation, neglect and abuse of, people with disability
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (Cth), which require an accessible complaints management and resolution system appropriate to the scale and scope of supports delivered
- National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018 (Cth) and the NDIS Practice Standards and Quality Indicators, including the complaints management and incident management standards
- National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018 (Cth), which require an incident management system and notification of reportable incidents to the NDIS Quality and Safeguards Commission

### Additional standards and legislation

- Health Practitioner Regulation National Law, as in force in Victoria
- Privacy Act 1988 (Cth), the Australian Privacy Principles and the Health Records Act 2001 (Vic)
- Health Complaints Act 2016 (Vic) and equivalent health complaints legislation in other jurisdictions
- AS 10002:2022 Guidelines for complaint management in organizations
- APS Code of Ethics, which continues to apply to Dr Fischer in her capacity as an APS member

## 4. Definitions

**Feedback.** Information, observations or suggestions provided by clients about their experience with our services. Feedback may be positive or constructive and does not necessarily require a formal response or investigation.

**Concern.** An informal expression of dissatisfaction or worry about an aspect of service delivery that can typically be resolved through discussion and immediate action.

**Complaint.** A formal expression of dissatisfaction about the conduct, treatment or services provided that requires investigation and a formal response.

**Allegation of harm.** A serious claim that a client has suffered, or may suffer, physical, psychological, emotional or financial harm because of the services provided or professional conduct.

**Complainant.** The person making the complaint, concern or allegation.

## 5. How to Provide Feedback or Raise a Concern

### 5.1 Informal Feedback and Concerns

We encourage clients to share feedback or concerns directly. Many issues can be resolved quickly through open communication. You may raise the matter during a scheduled appointment, contact the practice by phone or email, or request a specific appointment to discuss your concerns. If you prefer not to raise a concern directly with Dr Fischer, you may contact any of the external bodies listed in section 10 at any time.

### 5.2 Making a Formal Complaint

If your concern cannot be resolved informally, or if you wish to make a formal complaint, you may do so by any of the following methods:

- **In writing:** email [sarah.fischer@behaviouraledgepsychology.com](mailto:sarah.fischer@behaviouraledgepsychology.com)
- **In person:** request a meeting with the Principal Psychologist
- **By telephone:** 03 8771 4315

### 5.3 Information to Include in Your Complaint

To help us investigate and resolve your complaint effectively, please provide your full name and contact details, details of what happened including dates and times where possible, how the issue has affected you, the outcome or resolution you are seeking, and any supporting documentation. If you require assistance to make a complaint due to language barriers, disability or other access needs, we will provide appropriate support, including interpreters, advocates or accessible formats.

## 6. Our Complaints Handling Process

### 6.1 Acknowledgment (Within 2 Business Days)

We will acknowledge your complaint within 2 business days of receipt. Our acknowledgment will include confirmation that we have received your complaint, a reference number, an outline of the complaints process and expected timeframes, and information about your rights and external complaint pathways.

### 6.2 Initial Assessment (Within 5 Business Days)

We will conduct an initial assessment to determine the nature and severity of the complaint, identify whether immediate action is required to prevent harm, establish the appropriate investigation pathway, determine whether external reporting is required (for example mandatory notification or NDIS reportable incident notification), and consider whether the complaint can be resolved through early resolution.

### 6.3 Investigation Process

**Standard investigation (15 to 30 business days).** For most complaints we will gather all relevant information, including records and supporting documentation, review applicable policies, procedures and professional standards, analyse the information against the specific issues raised, seek external advice, supervision or insurer guidance where necessary, and determine findings and appropriate actions.

**Complex investigation (30 to 60 business days).** For serious or complex complaints, such as allegations of harm, boundary violations or professional misconduct, an independent external investigator will be engaged. You will be notified if this occurs.

**Progress updates.** We will provide you with progress updates at least every 10 business days during an investigation. If unexpected delays occur, we will notify you promptly and explain the reasons.

### 6.4 Outcomes and Resolution

Following our investigation, we will provide you with a written outcome that includes a summary of the investigation process, findings on each aspect of your complaint, an explanation of how conclusions were reached, actions taken or proposed, an apology where appropriate, and information about review or escalation options if you are dissatisfied.

Possible outcomes are that the complaint is substantiated, partially substantiated or not substantiated, or that the matter is resolved through an alternative agreed pathway such as facilitated discussion or apology.

### 6.5 Impartiality in a Sole-Practitioner Practice

Because Dr Fischer is both the practitioner and the complaint handler, some complaints cannot be investigated impartially in-house. Where a complaint concerns her own conduct, health or performance, the following safeguards apply:

- You will always be given clear information about the external complaint pathways in section 10, at the time you complain and again with the written outcome
- An independent external investigator, professional supervisor or professional indemnity insurer adviser will be engaged for serious allegations
- Where the complaint raises matters requiring notification, Dr Fischer will comply with her self-notification obligations under the National Law and cooperate fully with the Board, AHPRA and any other regulator
- Making a complaint will never affect the quality of care you receive, and options for continuity of care, including referral to another psychologist, will be discussed with you

## 7. Principles of Fair Complaints Handling

All complaints are managed in accordance with the principles of accessibility, responsiveness, objectivity, confidentiality, transparency, natural justice, protection from retaliation, and continuous improvement, consistent with AS 10002:2022.

## 8. Your Rights and Protections

### 8.1 Your Rights as a Complainant

You have the right to have your complaint taken seriously and handled professionally, to be treated with respect and dignity, to receive timely updates, to an impartial and objective investigation, to a written response explaining the outcome, to have your privacy protected, to bring a support person to meetings, to withdraw your complaint at any time (noting that an investigation may continue if serious concerns have been identified), and to escalate your complaint to external bodies at any time.

### 8.2 Protection from Retaliation

Behavioural Edge Psychology strictly prohibits any form of retaliation, victimisation or adverse treatment of clients who make complaints in good faith. Making a complaint will not affect the quality of care you receive. If you believe you have experienced retaliation, please report this directly to AHPRA or the Health Complaints Commissioner.

## 9. Support During the Complaints Process

**Continuity of care.** If your complaint concerns your treatment, we will discuss options for continuity of care, which may include continuing with your current arrangements if you are comfortable doing so, or a facilitated referral to another psychologist if preferred.

**Independent support.** You may seek independent support or advocacy, including through the Health Complaints Commissioner, the NDIS Quality and Safeguards Commission, or a disability advocacy organisation.

**Communication preferences.** Please let us know your preferred method of communication and we will accommodate your preferences wherever possible.

## 10. External Complaint Pathways

You have the right to make a complaint to external bodies at any time, either instead of or in addition to lodging a complaint with us.

| Organisation                                             | Jurisdiction                                                                                                    | Contact                                                                                                                                                             |
|----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Australian Health Practitioner Regulation Agency (AHPRA) | Professional conduct, performance and health of registered psychologists                                        | Phone 1300 419 495;<br><a href="http://www.ahpra.gov.au">www.ahpra.gov.au</a> (lodge a notification online)                                                         |
| Health Complaints Commissioner (Victoria)                | Complaints about health services and the handling of health information in Victoria                             | Phone 1300 582 113; <a href="http://hcc.vic.gov.au">hcc.vic.gov.au</a>                                                                                              |
| NDIS Quality and Safeguards Commission                   | Complaints about NDIS supports and services, including quality, safety and breaches of the NDIS Code of Conduct | Phone 1800 035 544;<br><a href="http://www.ndiscommission.gov.au">www.ndiscommission.gov.au</a> (lodge a complaint online)                                          |
| Office of the Australian Information Commissioner (OAIC) | Privacy complaints and data breaches                                                                            | Phone 1300 363 992;<br><a href="http://www.oaic.gov.au">www.oaic.gov.au</a>                                                                                         |
| Australian Psychological Society (APS)                   | Ethical complaints about APS members                                                                            | Phone 03 8662 3300;<br><a href="http://www.psychology.org.au">www.psychology.org.au</a> ;<br><a href="mailto:ethics@psychology.org.au">ethics@psychology.org.au</a> |

| Organisation                           | Jurisdiction                                                             | Contact                                              |
|----------------------------------------|--------------------------------------------------------------------------|------------------------------------------------------|
| National Health Practitioner Ombudsman | Complaints about how AHPRA and the National Boards have handled a matter | <a href="http://www.nhpo.gov.au">www.nhpo.gov.au</a> |

If you are located outside Victoria, contact details for your local health complaints entity are available at [www.ahpra.gov.au](http://www.ahpra.gov.au) under 'Raise a concern'.

## 11. Serious Allegations and Mandatory Notifications

### 11.1 Immediate Risk Management

Where a complaint alleges serious harm or poses an immediate risk to client safety, immediate action will be taken, which may include modifying or ceasing the relevant service, notifying the professional indemnity insurer, engaging an independent investigator, and reporting to AHPRA or other regulators as required.

### 11.2 Mandatory Notification Obligations

Under the Health Practitioner Regulation National Law, mandatory notification to AHPRA is required where there is a reasonable belief that a practitioner has practised while intoxicated by alcohol or drugs, engaged in sexual misconduct in connection with practice, placed the public at risk of substantial harm because of an impairment, or placed the public at risk of harm through a significant departure from accepted professional standards. These obligations include self-notification. If a mandatory notification is made, you will be informed where it is appropriate and lawful to do so.

### 11.3 Child Safety and Protection

Although Behavioural Edge Psychology provides services to adults only, obligations under Victorian child protection legislation still arise where information indicates a child is at risk. Reports will be made to Child Protection or Victoria Police where there are reasonable grounds to believe a child is in need of protection and may be made without consent.

### 11.4 NDIS Reportable Incidents

Reportable incidents connected with NDIS supports will be notified to the NDIS Quality and Safeguards Commission within the timeframes set by the National Disability Insurance Scheme (Incident Management and Reportable Incidents) Rules 2018 (Cth).

## 12. Record Keeping and Documentation

We maintain comprehensive records of all complaints, including the date and method of receipt, details of the complaint and parties involved, all communications, investigation notes and evidence, findings and outcomes, and actions taken. Complaint records are maintained separately from client health records in a secure, confidential complaints register and are retained for a minimum of 7 years after resolution.

## 13. Learning and Continuous Improvement

Complaints are reviewed at least quarterly to identify trends, systemic issues and opportunities for improvement. Policies and procedures are updated in response to lessons learned, insights are

incorporated into professional development and supervision, and complaint data informs the practice's quality and risk management processes.

## 14. Policy Review and Updates

This policy is reviewed annually, and following any significant complaint, regulatory change or identified gap. Reviews consider changes to legislation and regulatory requirements, feedback from clients, complaints data and trends, current standards including AS 10002:2022, and recommendations from external reviews or audits.

## 15. Contact Information

### **Behavioural Edge Psychology Pty Ltd**

Dr Sarah Fischer, Principal Psychologist

Phone: 03 8771 4315

Email: [sarah.fischer@behaviouraledgepsychology.com](mailto:sarah.fischer@behaviouraledgepsychology.com)

Consulting rooms: 223 North Road, Caulfield South VIC 3162; Stable Health Clinic, 22 Alma Road, St Kilda VIC 3182. Telehealth is available to clients across Australia.

## Document Control

| Item           | Detail                                                                                                                                                                                                                                           |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Version        | 2.1 (supersedes version 2.0, 12 August 2026, and version 1.0, December 2025)                                                                                                                                                                     |
| Approved by    | Dr Sarah Fischer, Principal Psychologist and sole director                                                                                                                                                                                       |
| Effective date | 12 August 2026                                                                                                                                                                                                                                   |
| Next review    | August 2027                                                                                                                                                                                                                                      |
| Key references | Psychology Board of Australia Code of conduct for psychologists (2025), standards 4.5 and 4.6; AS 10002:2022; NDIS Act 2013 (Cth) and subordinate rules; Privacy Act 1988 (Cth); Health Records Act 2001 (Vic); Health Complaints Act 2016 (Vic) |