

FEEDBACK AND COMPLAINTS POLICY

Behavioural Edge Psychology

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1. POLICY STATEMENT

Behavioural Edge Psychology is committed to providing high-quality psychological services and maintaining the highest 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 ensures compliance with the AHPRA Code of Conduct (specifically clauses 4.5 and 4.6), the Australian Psychological Society Code of Ethics, 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)
- Parents or guardians of minor clients
- All psychologists and staff employed by or associated with Behavioural Edge Psychology
- Any matter relating to the provision of psychological services, professional conduct, billing, privacy, or administrative processes

3. LEGISLATIVE AND REGULATORY FRAMEWORK

This policy is informed by and compliant with:

AHPRA Code of Conduct Requirements:

Clause 4.5: Registered health practitioners must take reasonable steps to ensure that they do not, because of their conduct, place the public at risk of harm.

Clause 4.6: When a concern, complaint or allegation is made about a registered health practitioner, the practitioner must: (a) acknowledge the concern, complaint or allegation in a timely manner and (b) take steps to deal with it appropriately, which may include an apology or an explanation.

Additional Standards:

- Australian Psychological Society Code of Ethics (2007)
- Health Practitioner Regulation National Law Act
- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Relevant state and territory health complaints legislation

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.

Practitioner: The psychologist or staff member about whom the complaint, concern, or allegation has been made.

5. HOW TO PROVIDE FEEDBACK OR RAISE A CONCERN

5.1 Informal Feedback and Concerns

We encourage clients to share feedback or concerns directly with their treating psychologist. Many issues can be resolved quickly through open communication. You may:

- Raise the matter during a scheduled appointment
- Contact your psychologist by phone or email
- Request a specific appointment to discuss your concerns

If you prefer not to speak directly with your psychologist, or if the concern involves your psychologist's conduct, you may contact our Practice Manager or Principal Psychologist.

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 using any of the following methods:

Written Complaint:

Email: complaints@behaviouraledgepsychology.com.au

Mail: Complaints Officer, Behavioural Edge Psychology, [Insert Address]

In Person:

Request a meeting with the Practice Manager or Principal Psychologist at our practice location

By Telephone:

Phone: [Insert Phone Number] and ask to speak with the Complaints Officer

Complaint Form:

Complete our Formal Complaint Form available at reception or on our website

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
- The name of the psychologist or staff member involved (if applicable)
- Details of what happened, including dates and times where possible
- How the issue has affected you

- What outcome or resolution you are seeking
- Any supporting documentation (if available)

Note: If you require assistance to make a complaint due to language barriers, disability, or other access needs, we will provide appropriate support. Please contact our office to arrange assistance.

6. OUR COMPLAINTS HANDLING PROCESS

6.1 Acknowledgment (Within 2 Business Days)

In accordance with AHPRA Code of Conduct clause 4.6, we will acknowledge your complaint within 2 business days of receipt.

Our acknowledgment will include:

- Confirmation that we have received your complaint
- A unique reference number for your complaint
- The name and contact details of the person handling your complaint
- An outline of the complaints process and expected timeframes
- 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 if external reporting is required (e.g., mandatory reporting, AHPRA notification)
- Consider whether the complaint can be resolved through early resolution processes

6.3 Investigation Process

Standard Investigation (15-30 Business Days):

For most complaints, we will:

1. Gather all relevant information, including client records, staff accounts, and supporting documentation
2. Interview the practitioner and any relevant witnesses
3. Review applicable policies, procedures, and professional standards
4. Analyse the information against the specific allegations
5. Seek external advice or supervision where necessary
6. Determine findings and appropriate actions

Complex Investigation (30-60 Business Days):

For serious or complex complaints (e.g., allegations of harm, boundary violations, or professional misconduct), we may engage an independent external investigator. You will be notified if this is necessary.

Progress Updates:

We will provide you with progress updates at least every 10 business days during the 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
- Our findings regarding each aspect of your complaint
- An explanation of how we reached our conclusions
- Actions taken or proposed to address the issues raised
- An apology where appropriate
- Information about review or appeal options if you are dissatisfied with the outcome

Possible Outcomes:

- Complaint substantiated: Actions will be taken to address the issue and prevent recurrence
- Complaint partially substantiated: Some aspects upheld, with targeted remedial actions
- Complaint not substantiated: Insufficient evidence to support the allegations, with explanation
- Alternative resolution: Matter resolved through mediation, apology, or another agreed outcome

7. PRINCIPLES OF FAIR COMPLAINTS HANDLING

All complaints will be managed in accordance with the following principles:

Accessibility: Multiple channels for making complaints; assistance provided where needed

Responsiveness: Timely acknowledgment and handling within stated timeframes

Objectivity: Fair and impartial assessment based on evidence

Confidentiality: Information shared only on a need-to-know basis and in accordance with privacy laws

Transparency: Clear information about the process, timeframes, and decision-making

Natural Justice: All parties given opportunity to respond; decisions based on evidence

No Retaliation: Complainants will not face adverse consequences for making a complaint in good faith

Continuous Improvement: Complaints inform service improvements and risk management

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
- Be treated with respect and dignity throughout the process
- Receive timely updates about the progress of your complaint
- Have your complaint investigated impartially and objectively
- Receive a written response explaining the outcome

- Have your privacy and confidentiality protected
- Bring a support person to meetings (if desired)
- Withdraw your complaint at any time (though this may not stop an investigation if serious concerns are identified)
- Escalate your complaint to external bodies if dissatisfied with our response

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 immediately to the Principal Psychologist or directly to AHPRA.

9. SUPPORT DURING THE COMPLAINTS PROCESS

We understand that making a complaint can be stressful. The following support is available:

Continuity of Care:

If your complaint involves your treating psychologist, we will discuss options for continuity of care, which may include: (a) continuing with your current psychologist if you are comfortable doing so; (b) transferring to another psychologist within our practice; or (c) facilitating an external referral if preferred.

Independent Support:

You may wish to seek independent support or advocacy through organisations such as the Health Complaints Entity in your state/territory.

Communication Preferences:

Please let us know your preferred method of communication (phone, email, written correspondence) 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.

The following table outlines the relevant external complaint bodies and their areas of jurisdiction:

Organisation	Jurisdiction	Contact Details
Australian Health Practitioner Regulation Agency (AHPRA)	Professional conduct, competence, and health issues of registered psychologists	Phone: 1300 419 495 Web: www.ahpra.gov.au Online: Lodge notification via website
Health Complaints Commissioner (Victoria)	All health service complaints in Victoria	Phone: 1300 582 113 Web: www.hcc.vic.gov.au
Australian Psychological Society (APS)	Ethical complaints about APS members	Phone: (03) 8662 3300 Web: www.psychology.org.au

Organisation	Jurisdiction	Contact Details
		Email: ethics@psychology.org.au
Office of the Australian Information Commissioner (OAIC)	Privacy complaints and data breach issues	Phone: 1300 363 992 Web: www.oaic.gov.au

Note: The table above lists Victoria-specific health complaints bodies. If you are located in another state or territory, please contact your local health complaints entity. Details can be found at www.ahpra.gov.au under 'Raise a Concern'.

11. SERIOUS ALLEGATIONS AND MANDATORY REPORTING

11.1 Immediate Risk Management

Where a complaint alleges serious harm or poses an immediate risk to client safety, we will take immediate action, which may include:

- Suspending the practitioner from practice pending investigation
- Implementing additional supervision or restrictions on practice
- Notifying professional indemnity insurers
- Reporting to AHPRA or other regulatory bodies as required

11.2 Mandatory Reporting Obligations

In accordance with the Health Practitioner Regulation National Law, we have mandatory reporting obligations when there is a reasonable belief that:

- A practitioner has behaved in a way that constitutes a significant departure from professional standards
- A practitioner has placed the public at risk of harm because they have practiced while intoxicated
- A practitioner has placed the public at serious risk because of impairment
- A practitioner has been charged with or convicted of a serious offense

If mandatory reporting is required, we will notify you that a report has been made to AHPRA, except where doing so would place you or others at risk.

11.3 Child Safety and Protection

All psychologists and staff have obligations under state and territory child protection legislation to report suspected child abuse or neglect. These reports will be made to the relevant state child protection authority and may be made without obtaining parental consent where there are reasonable grounds to suspect a child is at risk of harm.

12. RECORD KEEPING AND DOCUMENTATION

We maintain comprehensive records of all complaints, including:

- Date and method of receipt

- Details of the complaint and parties involved
- All communications and correspondence
- Investigation notes and evidence collected
- Findings and outcomes
- Actions taken and follow-up measures

Complaint records are maintained separately from client health records in a secure, confidential complaints register. These records are retained for a minimum of 7 years in accordance with AHPRA guidelines.

13. LEARNING AND CONTINUOUS IMPROVEMENT

We are committed to learning from complaints and using them to improve our services. Our approach includes:

Quarterly Review:

All complaints are reviewed quarterly to identify trends, systemic issues, and opportunities for improvement.

Policy and Procedure Updates:

Policies and procedures are updated in response to lessons learned from complaints.

Staff Training:

Training programs incorporate insights from complaints to enhance professional practice and prevent recurrence.

Quality Assurance:

Complaint data informs our quality assurance and risk management processes.

14. POLICY REVIEW AND UPDATES

This policy is reviewed annually or following any significant complaint, regulatory change, or identified gap in our processes. Reviews consider:

- Changes to legislation and regulatory requirements
- Feedback from clients and staff
- Complaints data and trends
- Best practice guidelines and industry standards
- Recommendations from external reviews or audits

15. CONTACT INFORMATION

For Questions About This Policy:

Practice Manager / Complaints Officer

Behavioural Edge Psychology

Phone: 03 8771 4315

Email: sarah.fischer@behaviouraledgepsychology.com.au

ACKNOWLEDGMENT

This policy has been developed in accordance with:

- AHPRA Code of Conduct (March 2014), particularly clauses 4.5 and 4.6
- Australian Psychological Society Code of Ethics (2007)
- Health Practitioner Regulation National Law Act
- AS/NZS 10002:2014 Guidelines for complaint management in organisations
- Privacy Act 1988 (Cth) and Australian Privacy Principles

Document Control

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