

APA Complaints and Feedback Policy

1. Purpose

The Australian Physiotherapy Association (APA) values and encourages feedback, including complaints, from both its members and the general public regarding the quality, effectiveness, and accessibility of the goods and services it provides. The APA is committed to maintaining high standards of service and professionalism and views feedback as an essential tool for continuous improvement. Whether it relates to educational programs, membership benefits, professional resources, or any other APA service, all complaints and feedback are taken seriously and addressed in a fair, transparent, and timely manner.

The purpose of this policy is to set out the process by which the APA manages complaints and receives feedback, in a timely, fair and impartial manner.

2. Application

This policy applies to members of the APA and the public.

This policy also imposes duties on APA Staff (employees and contractors).

This policy does not apply to:

- Any proceeding or complaint that pertains to the internal management of staff, including but not limited to hiring, promotions, disciplinary actions, workplace policies, and staff conduct, shall be handled in accordance with established internal procedures. Additionally, any complaint regarding employment decisions that impact individuals who are not officially recognised as staff members—such as applicants for roles—shall be subject to separate review processes as determined by the relevant policies.
- complaints by the APA Board. These are to be raised with the Chair who will determine accordingly;
- any dispute, reconsideration or appeal related to the Australian College of Physiotherapists. These are managed under the [ACP Appeals, complaints and grievances Policy](#) and [ACP Appeals, complaints and grievances procedure](#);
- any complaint about elections to the APA Board which are dealt with under the Elections Policy;
- any complaint relating to the election of APA members to APA Committees. These are managed under the [APA Committee Regulations](#);
- any complaint that is currently under review, investigation, or adjudication by another official body, tribunal, or regulatory authority, or any complaint whose subject matter is directly related to an ongoing legal proceeding, including litigation, arbitration, or mediation, shall not be considered under this process. This ensures that parallel proceedings do not interfere with or contradict established legal frameworks and that all matters are addressed in the appropriate forum in accordance with due process and jurisdictional authority.
- any disclosure under the *Whistleblower Policy*.

This policy does not apply to complaints against individual Physiotherapists. Complaints against individual Physiotherapists who are members of the APA can be brought to the attention of the APA by contacting

us through our website, or via email on complaintsandfeedback@australian.physio. On receipt of your information we may determine whether the matter should be considered by the APA National Professional Standards Panel or referred directly to the Australian Health Practitioner Regulation Agency (Ahpra).

Anyone can refer a complaint about a physiotherapist to Ahpra. Ahpra can be contacted on 1300 419 495 or at www.ahpra.gov.au.

This policy is to be read in conjunction with the policies listed in section 9.

This policy may cease to apply to a complaint at any stage of the complaints handling process where a complaint is redirected in accordance with clause 5.4.

3. Proving Feedback to the APA

The APA welcomes feedback of all kinds from APA members and the general public. You can provide feedback to us through email at complaintsandfeedback@australian.physio. If you are a member of the APA you are also welcome to call our Members Services team on 1300 306 622 or 03 9092 0888. If we deem your feedback to be a complaint, we will use our complaints handling processes to address any issues that you have raised.

We will acknowledge receipt of your feedback.

4. Principles for Complaint Handling

This policy complies with the relevant parts of ISO 10002:2018 *Quality management – Customer satisfaction – Guidelines for complaints handling in organizations*. The following principles underpin the complaints handling process under this policy:

4.1 Visibility

Information on how to make a complaint is available on the APA website.

4.2 Accessibility

The Complaints Policy and associated procedures are easily accessible, simple to understand and well published to ensure ease of implementation.

4.3 Responsiveness

Each complaint received is tracked in a system and a follow up email or phone call is provided to each complainant that contains expectations of complaint resolution timelines.

4.4 Objectivity and No Detriment

Each complaint will be handled in an objective and impartial manner.

All parties will be afforded natural justice and procedural fairness in the handling of complaints by the APA including:

- ensuring all parties to the complaint know what to expect during the complaints handling process;
- carrying out the complaint handling process in a transparent but confidential manner;

- providing all parties with equal opportunity to participate in the process;
- treating all parties in a respectful manner; and
- providing reasons for decisions made.

Complainants will be treated respectfully and will not be disadvantaged or suffer detriment through lodging a complaint in good faith, regardless of the outcome. The APA will not tolerate reprisals against complainants.

Staff members involved in the handling of a complaint, investigation or adjudicating on a complaint, must not act in any complaint in which they have a conflict of interest.

4.5 Confidentiality and Anonymity

The privacy and confidentiality of all parties will be respected to the extent practicable and appropriate. A complainant has the option of making a complaint anonymously. Where an anonymous complaint is received, the complainant's anonymity will be persevered insofar as is possible. The APA may, however, be unable to act or report on a complaint where the complainant is anonymous.

4.6 Accountability

Accountability for receiving complaints resides with the Executive Leadership Team Member allocated the complaint and Responsible Officer or Appeal Officer allocated the complaint by the Executive Leadership Team Member.

4.7 Capacity

Complaints will be handled in a timely manner, considering the complexity and seriousness of issues raised, to ensure all parties have access to an appropriate resolution and opportunities for further concerns to arise are minimised.

4.8 Authority

The Executive Leadership Team Member to whom a complaint is allocated will ensure Staff involved in handling complaints have the necessary authority and management support to carry out the process effectively, make decisions and have access to appropriate resources to fulfil their role.

4.9 Outcomes

All members and staff of the APA will be supported in trying to resolve complaints where appropriate to promote and support timely and efficient complaints handling.

The operation of the complaints handling process and findings will be reported to the Executive Leadership Team and to the Board. Preventative and corrective actions will be taken to address the causes of complaints and to improve the quality of the APA's policies and services.

5. Complaint Handling Process

5.1 What is a complaint?

A complaint is an expression of concern, dissatisfaction, or frustration that considers the quality or delivery of service, the need to reconsider a decision, a policy or procedure, or where the conduct of another person is unsatisfactory or unacceptable. A complaint might include a:

- case where incorrect advice has been provided;
- situation where an incorrect policy has been applied; or
- concern about the time taken to provide goods or a service.

A complaint is not:

- a request for information;
- an explanation of a decision or policy; or
- a request for a refund related to goods and services that we provide.

5.2 Receipt of a Complaint

Generally, all complaints must be made via the complaints form on the APA website or via email at complaintsandfeedback@australian.physio. Members may also contact Member Services via 1300 306 622 or 03 9092 0888 to lodge complaints.

Anonymous complaints will be treated in the same way as identified complaints and follow the same process subject to the necessary modifications resulting from the anonymous nature of the complaint. For example, it may not be possible to notify the complainant of progress if no contact details have been provided. In some cases, it may not be practical to investigate the complaint if additional information cannot be obtained because the complainant cannot be contacted.

Staff of the APA should always be treated with respect and courtesy when handling complaints.

Where a person involved in a complaint behaves in a threatening, rude or harassing manner towards Staff, the APA may decline to further consider the complaint.

Where the Complaints Manager is the subject of the complaint, the complaint will be allocated to another Executive Leadership Team Member.

Complaints:

- in writing are to be forwarded by the recipient to the Complaints Manager. This includes any complaints directed to the CEO or Executive Leadership Team Members or any complaints received at a Staff APA email address;
- made to member services via telephone or email are to be forwarded by the recipient to the Complaints Manager; and
- made directly to any Board member by email or other means are to be forwarded to the Company Secretary who will forward them to the Complaints Manager.

All complaints, upon receipt, are to be logged by the Complaints Manager into the complaints management system.

5.3 Refusal of Complaints

The Complaints Manager may reasonably refuse a complaint where, in their opinion:

- a person involved in a complaint behaves in a threatening, rude or harassing manner towards Staff;
- the complaint is false, frivolous, vexatious or lacking in substance;
- is outside the jurisdiction of this policy under clause 2;
- the complaint is malicious or not made in good faith;
- a significant period of time has elapsed since the conduct in question has taken place such that any complaint would be futile;
- the complaint is substantially the same as a previous complaint between the parties which has already been the subject of a decision made by the Complaints Manager;
- in the case of an anonymous complaint, it is not possible to obtain information from the complainant to properly determine whether the complaint is likely to be substantiated or not;
- the complaint is the subject of existing legal proceedings or other forms of review or appeal; or
- the complainant does not have a sufficient interest in the matter.

The Complaints Manager may refuse an appeal which:

- is lodged later than 14 calendar date after the complainant being notified of the decision in the original complaint;
- does not fall within the grounds for an appeal as described in clause 5.8; or
- has no or little new information upon which to base an appeal.

Where the Complaints Manager proposes to split or limit a complaint, the Complaints Manager may discuss the proposal with the complainant to reach an alternative arrangement. If the complainant refuses to accept the Complaint Manager's proposal or an alternative arrangement cannot be reached, then the Complaints Manager may still refuse the complaint.

5.4 Redirection of a Complaint

The Complaints Manager may at any time decide a complaint is better dealt with under an alternative policy.

In some instances, following discussion with the CEO, the APA may refer the complaint directly to an external investigatory body such as the Police, WorkSafe or another agency.

5.5 Withdrawal of a Complaint

A complainant may withdraw a complaint at any time by notifying the APA in writing. The withdrawal of a complaint does not prevent the APA from continuing to investigate or otherwise act on the complaint.

5.6 Complaint Process

The Complaints Manager may allocate any complaint to the most appropriate Executive Leadership Team Member unless the complaint is about an Executive Leadership Team Member. The Executive Leadership Team Member may choose to be the responsible officer or delegate to someone else appropriate to be the responsible officer (the Responsible Officer).

The Executive Leadership Team Member to whom a complaint has been allocated must not delegate the complaint to any officer who is the subject of the complaint.

If an Executive Leadership Team Member is the subject of a complaint, the Complaints Manager must allocate the complaint to the CEO who becomes the Responsible Officer.

Within 10 business days from the acknowledgement of the receipt of the complaint, the Responsible Officer must:

- review the complaint documentation;
- seek any additional information from the complainant within a specified time;
- provide both parties with the opportunity to make submissions regarding the complaint within a specified time;
- discuss the complaint with both parties if necessary;
- seek to mediate to determine the complaint as necessary; and
- otherwise investigate the complaint as they see fit.

If a complainant fails to respond to a request for information within the time specified by the Responsible Officer, the Responsible Officer may continue to determine the complaint on the available evidence.

Having considered all the evidence, the Responsible Officer must decide whether the complaint is substantiated, partially substantiated or not substantiated.

The Responsible Officer must make a recommendation to the allocated Executive Leadership Team Member as to the outcome of the complaint, detailing the results of the investigation, their rationale for the decision along with any proposed actions.

The Responsible Officer must notify the parties of their decision once the Executive Leadership Team Member has been advised of the outcome of the investigation. The Responsible Officer must provide the parties with basic reasons for the decision reached.

The Responsible Officer is responsible for ensuring implementation of the outcome of the investigation within a reasonable time.

Board members must not become involved in the complaints process at any point as this presents a legal risk to the APA and is inconsistent with good independent decision making and the international standard on complaints handling upon which this policy is based (ISO 10002:2018).

5.7 Possible Outcomes

Outcomes from complaints may include:

- written or verbal partial or full apologies;
- monetary compensation or refund;
- provision of documents;
- reprovion of a service or good at no or discounted charge;
- commitment to change procedures or processes in response to the complaint;
- commitment to refer a matter to an external agency; or
- any other appropriate action.

5.8 Appeals Process

A complainant may appeal the results of a decision or an investigation by submitting a fresh complaint using the means described in clause 5.2 referring to the same identifier as the original complaint and outlining the grounds for appeal. The appeal is to follow the process in clause 5.2.

An appeal must be made within 14 calendar days of the complainant being notified of the decision in the original complaint.

Appeals cannot be made on the merits of the decision. An appeal can only be made on the basis that the original complaints handling process was flawed in some way.

There is no charge for appeals.

Once an appeal is received by the Complaints Manager, the Complaints Manager may refuse, redirect or split the appeal in accordance with clauses 5.3 and 5.4.

The Complaints Manager must:

- allocate the appeal to an Executive Leadership Team Member other than the Executive Leadership Team member whose business unit was allocated the original complaint; and
- notify the Responsible Officer for the original complaint that an appeal has been received.

Upon receipt of an appeal, a Responsible Officer who is implementing an outcome from the decision of the original complaint must suspend any action to implement that outcome.

The Executive Leadership Team Member must:

- not allocate the appeal to the Responsible Officer who dealt with the initial complaint;
- allocate the appeal to an appropriate officer (the Appeal Officer) who is more senior than the Responsible Officer who dealt with the original complaint; and

- if the only officer more senior than the Responsible Officer is the Executive Leadership team Member themselves, then the Executive Leadership Team Member must act as the Appeal Officer.

Within 10 business days upon the receipt of the appeal, the Appeal Officer must:

- consider all the information from the original complaint investigation;
- consider the new or additional information provided with the appeal; and
- otherwise investigate the appeal as they see fit.

Having considered all the evidence, the Appeal officer must decide whether the appeal is substantiated, partially substantiated or not substantiated.

The Appeal Officer must make a recommendation to the Executive Leadership Team Member detailing the results of the investigation along with any proposed outcome.

The Appeal Officer must notify the parties of their decision once the Executive Leadership Team Member has been advised of the investigation.

The Responsible Officer remains responsible for ensuring implementation of the outcome of the investigation within a reasonable time.

5.9 Appeals Principles

The appeal process must adhere to the following principles:

- Decision makers must:
 - ensure an appellant has an adequate opportunity to put their case forward;
 - ensure the appeal is not being decided by the person who made the original decision;
 - have no conflict of interest in the subject of the appeal;
 - hear the appeal in an expedient manner;
 - ensure all relevant information is considered in making a decision; and
 - make decisions in writing, which are appropriately recorded and communicated to appellants within a reasonable time of determination.
- Appellants must:
 - only bring appeals when avenues for dispute resolution have been exhausted;
 - not bring appeals which are false, frivolous, vexatious or lacking in substance;
 - provide information requested by the Appeals Officer; and

- not seek to obstruct or otherwise abuse the appeals process.

5.10 Appeals Process

There are no further appeals. Any decision on an appeal is final.

5.11 Record Keeping

The Responsible Officer and Appeal Officer must log all relevant details of the complaint and appeal in the case management system including as a minimum:

- How and when the complaint or appeal was received;
- A description of the complaint or appeal and supporting information;
- The APA service being complained about or the decision being appealed;
- Any immediate action taken;
- Details of decisions including notification to relevant Executive Leadership Team Members and parties to the complaint or appeal, and the date of completion of investigation activities;
- Records of outcomes;
- Names and contact details of complainants and where possible, persons the subject of the complaint;
- The outcome (if any) sought by the complainant; and
- Any other relevant information.

6. Reports and Monitoring

6.1 The Complaints Manager must compile a quarterly report which contains:

- The total number of feedback, cases and appeals logged year to date and the number logged on a monthly basis;
- The time taken to resolve complaints and appeals which have been finalised in the last 12 months on a rolling basis, including the average time;
- The number of open cases and appeals at the current time;
- The number of complaints and appeals refused;
- Sufficient details of any individual complaints (excluding whistleblower disclosures) which in the opinion of the Complaints Manager expose the APA to a significant risk; and
- Any other data which the Complaints Manager believes would inform the Executive Team.

The Report is to be provided quarterly to the Executive Leadership Team and may be escalated as appropriate to the Board.

6.2 Monitoring

The Complaints Manager must monitor the progress of investigations and maintain the data relating to complaints. Responsibility for progress and finalisation for complaints lies with the Executive Leadership Team Member to whom the complaint has been allocated. The Complaints Manager will monitor progress on complaints and may raise specific issues regarding individual complaints with relevant Executive Leadership Team Members. As a general guide, the Complaints Manager will:

- For complaints older than 10 business days, perform follow up actions; such as status/progress checking with the Responsible Officer the complaint was referred to;
- For complaints older than 15 business days, report and escalate the status/progress check to the Responsible Officer's Executive Leadership Team Member;
- For complaints older than 25 days, report and escalate the status/progress check to the CEO.

The target for resolution of all complaints is 30 business days.

7. Amendment of this Policy

The CEO may make amendments to this policy at any time.

8. Responsibilities

Appeal Officer	Receives allocated appeal from the Complaints Manager. Cannot be Responsible Officer for the complaint which is being appealed.
CEO	Responsible for policy and amendments.
Complaints Manager	<ol style="list-style-type: none"> i. Receives all complaints and appeals and allocates them to appropriate Executive Leadership Team Member or diverts them to another process. ii. Accesses complaints data to compile periodic reports for the Executive Leadership Team and the Board.
Executive Leadership Team Member	Responsible for allocating complaints and appeals to the most appropriate office
Responsible Officer	<ol style="list-style-type: none"> i. Receives allocated complaint from Executive Leadership Team Member ii. Responsible for investigation, recommendation of decision to Executive Leadership Team Member, record keeping, notifying parties to the complaint and implementing outcomes.

9. Related Documents and Policies

ISO 10002:2018 Guidelines for Complaints Handling in Organisations

APA Membership Code of Conduct

Staff Code of Conduct

Whistleblower Policy

Board Elections Policy

ACP Appeals, complaints and grievances Policy

ACP Appeals, complaints and grievances procedure

APA Committee Regulations

National Professional Standards Panel Regulations

10. Policy Review and Currency

This policy will be reviewed every three calendar years from the last approval date. This policy remains valid and applicable notwithstanding if it is overdue for review.

Version History

Version	Date of effect	Amendment details	Amended by
1.0		Initial release	CEO
Policy Owner	Company Secretary		
Approved by:	CEO	Approved April 2025	
Next Review Due	April 2028		