Complaints Policy

Purpose

The Orientation and Mobility Association of Australasia (OMAA) is the peak professional body that establishes and maintains standards of professional practice for Orientation and Mobility (O&M) Specialists in Australasia. The OMAA welcomes all feedback.

This Complaints Policy defines the procedures for handling formal complaints about an alleged breach of professional standards. These procedures are designed to protect service users, the public, O&M professional standards, and the reputation of the OMAA.

Scope

Complaints, concerns, compliments, suggestions, and formal proposals for improvement can be submitted through improve@omaaustralasia.com and will be distributed to the OMAA executive, committee, or officer best suited to respond.

The OMAA can investigate a formal complaint against an ordinary or registered member where there is an alleged breach of ethics or professional standards as defined in the OMAA Quality Framework.

When a concern or complaint regarding a non-member is received, the OMAA has limited authority to act, but might assist by providing salient information and advice or identifying other appropriate avenues and supports to submit a complaint. These options include the non-member's employer, the NDIA, a government complaints commissioner, or an industry ombudsman.

The appendix in this policy includes two forms to assist feedback:

- OMAA Complaints Form
- OMAA Proposal Form

The OMAA Quality Framework includes but is not limited to:

- OMAA Constitution
- OMAA Code of Ethics
- OMAA Scope of Practice
- OMAA Standards of Exemplary Practice
- ACVREP COMS Handbook

Definitions

- **Advocate**: one who supports or promotes the interests of a cause or group (https://www.merriam-webster.com/, retrieved 9/5/2026)
- **Complainant**: a person who raises a formal complaint about the professional conduct of a qualified O&M Specialist
- **Complaint**: an alleged breach of the OMAA Code of Ethics and/or professional standards by a fully qualified O&M specialist
- **COMS**: Certified Orientation and Mobility Specialist

- **Concern**: a general issue or suspected breach of ethics or professional conduct that might negatively affect the O&M profession or its stakeholders
- **Ordinary OMAA member**: a fully qualified O&M Specialist who is a current financial member of the OMAA, whether or not certified (COMS) but is not a registered (ROMSA)
- **Respondent**: an O&M Specialist about whom a complaint has been received
- **ROMSA**: an OMAA member who maintains international certification (COMS), has agreed to the OMAA code of ethics and is subsequently listed on the OMAA website as a Registered Orientation and Mobility Specialist in Australasia
- **Vexatious complaint**: an unwarranted claim that seems unreasonable or repetitive, without foundation or merit, pursued to harass, annoy or subdue another

Policy Statements

The OMAA is committed to the principles of transparency, access, equality, freedom of speech, privacy, and cooperation in responding to complaints.

The OMAA Complaints Policy and feedback procedures shall be made accessible and publicly available at https://www.omaaustralasia.com/.

Every effort will be made to communicate with stakeholders in their preferred format, including audio or braille formats, use of qualified interpreters or assistive technology.

The OMAA Constitution has rules (28-32) for managing complaints, which focus on mediation. There are separate rules (22-27) for taking disciplinary action against a member.

The OMAA encourages stakeholders who have concerns to discuss these with their support networks and approach the respondent directly to try to resolve the matter, before approaching the OMAA for mediation or submitting a formal complaint.

A complaint must be made by an individual (or an authorised advocate who has written consent) who has first-hand knowledge of the matter and its implications for ethical and professional practice. The OMAA will not accept an anonymous complaint because access to relevant details and stakeholders is needed to mediate or investigate a complaint towards resolution.

A complainant who engages an advocate needs to confirm permission in writing, for the OMAA to engage directly with the advocate.

The OMAA encourages both the complainant and respondent to enlist a safe person to offer personal support during the investigation of a complaint.

The OMAA shall adhere to the requirements of confidentiality, natural justice and privacy when processing concerns and complaints. Confidential information may be disclosed if required by law, to prevent harm or injury to a person; or if deemed necessary, for further investigation through a government or regulatory body, including where criminal behaviour is suspected.

The OMAA shall document concerns, formal complaints, proposals and resulting actions, and aim to resolve concerns and complaints in a timely manner.

The complaints register shall only be accessible to the complaints/feedback registrar, the OMAA President and the Chair of the Professional Standards Committee. Details will be shared at their discretion, to resolve complaints, assess risks, and improve policies and procedures of the OMAA.

A complainant can withdraw a formal complaint at any time by notifying the OMAA in writing.

The OMAA shall not be responsible for any costs or expenses incurred by the complainant, the respondent, or a witness in connection with processing a complaint.

Roles and Responsibilities

OMAA Professional Standards Committee

- Establishes, oversees, and reviews all aspects of the Complaints Policy on behalf of the OMAA Executive
- Calls for nominations and elects a complaints/feedback registrar
- Ensures the registrar maintains the register and reports to the OMAA Executive monthly, or as necessary
- Oversees the progress of enquiries to ensure timely resolution of complaints
- Recruits and trains members to serve voluntarily as mediators/investigators

OMAA complaints/feedback registrar

- Serves as the nexus of feedback to the OMAA on behalf of the OMAA Executive
- Explains the basis on which a formal complaint can be made, determines whether the complaint can be resolved informally and when necessary, assists with completion of the OMAA Complaints Form
- Logs complaints and maintains the complaints/feedback register
- Reports monthly to the Chair of the Professional Standards Committee
- Convenes a disciplinary subcommittee (Hearing Panel or Appeals Panel) to manage disciplinary action according to OMAA Constitution Rules 22-27
- Works with the Chair of the Professional Standards Committee to select a 3-member Hearing Panel or a separate 3-member Appeals Panel when taking disciplinary action
- Communicates with all stakeholders in the complaints process in accordance with documented timeframes, and securely stores all documentation relating to an enquiry and its outcomes
- Distributes compliments, concerns, suggestions and proposals for improvement to the appropriate OMAA officer or committee
- Reports in a timely way to the person who lodged the feedback

Complaints officers

- Are appointed by the Professional Standards Committee, including but not limited to OMAA members and O&M clients from Australia and New Zealand
- May also include subject matter experts in relevant areas such as in law; supervision of students and new graduates; human resources; access and advocacy; mediation; medicine and allied health.

OMAA complaints officer

- undertakes training in conducting impartial investigations and crucial conversations using plain language, before mediating or investigating a complaint on behalf of OMAA
- Refers the matter to another complaints officer and return any relevant materials to the feedback registrar if unavailable to participate (e.g., insufficient time), or if there is a conflict of interest (e.g., contractual arrangement or personal relationship with a key stakeholder)

- Keeps the feedback registrar appraised of changes
- Demonstrates independence, initiative, maturity, sensitivity, impartiality, discretion, and knowledge about OMAA standards
- Encourages informal resolution before conducting a formal enquiry
- Uses available communication technologies or work face-to-face as needed to ensure timely resolution of a complaint
- Seeks advice from an external advisor or forwards the matter, as appropriate, to an industry ombudsman, government complaints commissioner, funding body, the NDIA, union representative, or other subject matter expert

Hearing Panel

- Comprises at least three complaints officers
- Interviews the complainant, the respondent and other relevant stakeholders to understand the situation and discern how best to manage the disciplinary matter
- Manages the investigation in a sensitive, respectful, discrete, fair and timely manner
- Remains neutral and professional when listening to stakeholders' perspectives
- Asks questions and reserves opinions until both sides are investigated
- Makes clear recommendations
- Determines when further support or advice is needed, and identifies referral pathways, including professional mediation, as required
- Keeps the complaints/feedback registrar and OMAA Executive appraised of the progress of an enquiry.

Appeals Panel

- Comprises at least three complaints officers, different from members of the Hearing Panel
- Manages an appeal about disciplinary action in a sensitive, respectful, discrete, fair and timely manner
- Remains neutral and professional when listening to stakeholders' perspectives
- Asks questions and reserves opinions until both sides are investigated
- Reviews documentation and liaises with the complainant, the respondent and other relevant stakeholders to resolve the issue, with clear recommendations
- Consults with the OMAA President or delegate to confirm the recommended outcome of an appeal

Complaints Procedure

Overview of Complaints Procedure

Stages	Procedural Steps	Responsibility
1. Making a complaint	Encourage informal resolution Recognise and refuse a vexatious complaint Document a formal complaint using the OMAA Complaints Form	Complainant, with assistance from complaints/feedback registrar if necessary

2. Triage	Discuss with complaints officer/s and/or seek external advice to: ● Mediate and resolve the complaint, OR ● Undertake disciplinary action by an OMAA Hearing Panel OR ● Refer for external advice or action. Communicate decision to complainant and respondent	Complaints/feedback registrar in consultation with complaints officer/s
3. Investigation and Hearing	Plan the process for disciplinary action and communicate the plan to stakeholders Share completed Complaint Form with respondent, request a written reply, and share reply with the complainant and Hearing Panel Investigate the matter and recommend appropriate outcomes	Hearing Panel in consultation with complaints/feedback registrar
4. Possible outcomes	Resolve the complaint with no further action Develop an action plan for reconciliation and/or education Refer the matter on to another agency for investigation (e.g., My Aged Care, NDIS, O&M service provider, Equal Opportunity Commission, Ombudsman, Police) Review OMAA Policies and Procedures An appeal can be made within six months from the initial determination	Hearing Panel in consultation with complaints/feedback registrar, reporting to Executive
5. Appeal	The Appeals Panel reviews all information and makes a final determination which is confirmed by the OMAA President or delegate.	Appeals Panel, confirmed by Executive

1. Making a complaint

The OMAA Complaints Form (Appendix 1) is accessible via the OMAA website https://www.omaaustralasia.com/complaints-policy-2/. The feedback registrar will first encourage the complainant to approach the respondent directly to resolve the issue, then can advise and assist in completing the Complaints Form.

2. Triage

When a formal complaint is received, the feedback registrar shall, within 5 business days:

- confirm that the respondent is an ordinary or Registered OMAA member
- ensure enough information has been received to process the complaint, requesting further information where necessary
- ensure the complainant has given written permission to disclose all relevant details to the respondent and other relevant stakeholders
- check whether an advocate has been given consent to act by the complainant
- check whether the complainant has previously lodged the same complaint with another agency and request the outcome of all previous investigations in writing
- log the complaint in the complaints/feedback register

The complaints/feedback registrar shall then liaise with complaints officer/s to consider whether the complaint:

- appears to be frivolous or vexatious
- is of a criminal nature and should be referred for legal action, or would be better handled by another investigator/agency (e.g., My Aged Care, the NDIA, blindness service agency, government complaints commissioner, ombudsman)
- can be investigated by the OMAA through mediation or a formal hearing. The feedback registrar will communicate the outcome of triage to the complainant indicating intention to investigate, referral to another agency, or inability to progress the complaint, with the reasons for this decision, within 10 business days.

Mediation might lead to:

- an acknowledgement and apology
- a recommendation for further education and/or a period of supervised practice to support remediation
- a request for more information and documentation relevant to an investigation

3. Investigation and hearing about disciplinary action

If the OMAA decides disciplinary action is warranted, the respondent will be notified in writing 14-28 days before a forthcoming hearing (Constitution Rule 24):

- stating that the Association proposes to take disciplinary action against the member, and the grounds for the proposed disciplinary action
- Specifying the date, place and time of the hearing
- Inviting the member to attend and address the hearing and/or give a written statement to the panel at any time before the hearing
- setting out the member's appeal rights (OMAA Constitution Rule 26)

A Hearing Panel will be conducted according to the OMAA Constitution Rule 25, giving the respondent an opportunity to be heard, whether in person or through any written statement/s.

A Hearing Panel will consider:

- the length and nature of the respondent’s professional experience
- the respondent’s employment context and workplace health
- adequate supervision in the workplace
- cultural differences
- whether the respondent’s actions might be deemed intentional, wilful, or harmful
- the consequences of the respondent’s actions
- whether OMAA has received previous complaints about the respondent

- To progress an investigation, the Hearing Panel may convene as a succinct group, in person, via phone, video conferencing or email, or liaise individually as required
- The Hearing Panel may make decisions unanimously or by simple majority

4. Outcomes

Resolution of a complaint might involve a formal apology, or mediation to heal relationships.

An agreed action plan might be negotiated for the respondent to maintain OMAA membership, outlining the recommendations of the mediator or Hearing Panel. The action plan will require accountability from the respondent with set times for reporting and review to a designated person, and any costs paid by the respondent. This action plan might involve:

- a formal warning, with subsequent review of professional practice
- a recommended program of study or professional development
- a minimum three-month period of COMS-supervised practice
- regular mentoring sessions for a minimum of one year

In the event of professional misconduct, the Hearing Panel might suspend membership rights or expel the member from the Association. The respondent can appeal suspension or expulsion according to the OMAA Constitution, Rule 26.

Where a breach of criminal or civil law is suspected, the complaint will be referred to another jurisdiction (e.g., Police, Equal Opportunity Commission) and the OMAA might suspend membership pending the outcome of the investigation. Evidence of serious misconduct could lead to:

- suspension of certification/registration or OMAA membership for a fixed period
- termination of certification/registration or OMAA membership
- termination of eligibility for OMAA membership
- changes to OMAA policies and procedures

After suspension for professional misconduct, a respondent must make a written request for reinstatement to the OMAA, with evidence of a change in professional behaviour. Approval for reinstatement needs to be confirmed by the OMAA Executive.

Timelines for handling complaints

Guidelines for response times are outlined here. Stakeholders may request an extension to response periods, outlining the reasons for the request, in writing.

Action	Time frame
Complaints/feedback registrar shall contact the complainant, log the complaint and notify the OMAA President and the Chair of the Professional Standards Committee of a formal complaint being received	within five business days
The OMAA shall aim to triage a formal complaint, inform stakeholders of refusal of a vexatious complaint, or the outcome of mediation	within 10 business days

Before disciplinary action is taken against a member, the Secretary must give written notice to the member with details of the hearing, according to the OMAA Constitution (Rule 24)	no earlier than 28 days, and no later than 14 days, before the Hearing Panel meets
The OMAA shall aim to complete a formal hearing about disciplinary action	within three months
Stakeholders are required to respond to any request for information in writing	within 10 business days
The complaints/feedback registrar or delegate will notify all relevant stakeholders of the outcome or resolution of a formal hearing or appeal	within five business days
A respondent who fails to comply with an agreed action plan resulting from a hearing will be asked to contact the OMAA Persistent disengagement will generate an internal complaint to the feedback registrar with a subsequent Hearing.	within 10 business days
When an Ordinary or Registered OMAA member is non-compliant with Code of Ethics, the member will be asked to rectify the situation Persistent non-compliance will lead to submission of an internal complaint to the feedback registrar with a subsequent Hearing.	within 10 business days

Records and Audit

Hard copy documents relating to feedback will be electronically scanned, securely stored, and retained for a minimum period of seven (7) years in a password-protected location, including:

1. Complaints Forms with supporting documentation, information and correspondence
2. The OMAA Feedback Register
3. Written feedback received by the OMAA including concerns, compliments, and suggestions for improvement
4. Formal proposals, with resulting OMAA decisions, and actions.

The Professional Standards Committee with assistance from the complaints/feedback registrar will organise an audit of the Complaints Policy and resulting procedures every two years.

Appendices

Appendix 1

Sample OMAA Complaints form. This form is available and downloadable via: https://www.omaaustralasia.com/wp-content/uploads/210629-Complaints-Form-v1.1-1.docx

Appendix 2

Sample OMAA Proposal form. This form is available and downloadable via: https://www.omaaustralasia.com/wp-content/uploads/210629-Proposal-to-OMAA-v1.1-1.docx

Appendix 3

Document Development

Work on this document was begun by Ewa Borkowski and Brenda Harris, then continued by Lil Deverell and Sandra Holmes in collaboration with the Professional Standards Committee. The OMAA acknowledges the generous assistance of ESSA in providing model documents and advice in line with NASRHP guidelines.