

# QPA Complaints and Appeals Handling System

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## 1. Introduction

### 1.1 Purpose

This policy is intended to ensure that QPA handles complaints fairly, efficiently and effectively.

The QPA complaint management system is intended to:

- Ensure responses to issues raised by people making complaints are timely and cost-effective way
- Boost public confidence in our administrative process, and
- Provide information that can be used by QPA to deliver quality improvements in our services, staff and complaint handling.

This policy provides guidance to our staff, and to people who wish to make a complaint, on the key principles and concepts of our complaint management system.

### 1.2 Scope

This policy applies to all staff receiving or managing complaints from the public made to, or about, QPA regarding our service, staff and complaint handling. This policy also covers the handlings of appeals resulting from a complaint outcome or decision.

Staff grievances and code of conduct complaints are dealt with through separate mechanisms.

This policy does not refer to:

- Complaints about other organisations brought to the attention of QPA
- Complaints regarding the actions of practitioners or practices, including those accredited by QPA. Should you have a complaint of this nature, please direct your correspondence to the appropriate health care complaint organisation in your state:

<p>Health Care Complaints Commission</p> <p>Locked Mail Bag 18</p> <p>Strawberry Hills NSW 2012</p> <p>1800 043 159</p> <p><a href="mailto:hccc@hccc.nsw.gov.au">hccc@hccc.nsw.gov.au</a></p> <p><a href="http://www.hccc.nsw.gov.au">www.hccc.nsw.gov.au</a></p>	<p>The Office of the Health Services Commissioner</p> <p>Level 26, 570 Bourke Street</p> <p>Melbourne VIC 3000</p> <p>1300 582 113</p> <p><a href="mailto:hcc@hcc.vic.gov.au">hcc@hcc.vic.gov.au</a></p> <p><a href="http://www.hcc.vic.gov.au/contact">www.hcc.vic.gov.au/contact</a></p>
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<p>Office of the Health Ombudsman</p> <p>PO Box 13281 George Street</p> <p>Brisbane QLD 4003</p> <p>133 646</p> <p>complaints@oho.qld.gov.au</p> <p><a href="http://www.oho.qld.gov.au">www.oho.qld.gov.au</a></p>	<p>Health Complaints Commissioner</p> <p>GPO Box 960</p> <p>Hobart TAS 7001</p> <p>1800 001 170</p> <p>health.complaints@ombudsman.tas.gov.au</p> <p><a href="http://www.healthcomplaints.tas.gov.au">www.healthcomplaints.tas.gov.au</a></p>
<p>Health and Disability Services Complaints Office</p> <p>GPO Box B61</p> <p>Perth WA 6838</p> <p>08 6551 7600</p> <p>mail@hadsco.wa.gov.au</p> <p><a href="http://www.hadsco.wa.gov.au">www.hadsco.wa.gov.au</a></p>	<p>ACT Human Rights Commission</p> <p>GPO Box 158</p> <p>Canberra City ACT 2601</p> <p>02 6205 2222</p> <p>human.rights@act.gov.au</p> <p><a href="http://www.hrc.act.gov.au">www.hrc.act.gov.au</a></p>
<p>Health and Community Services Complaints Commissioner</p> <p>PO Box 199</p> <p>Rundle Mall SA 5000</p> <p>08 8226 8666</p> <p>info@hcsc.sa.gov.au</p> <p><a href="http://www.hcsc.sa.gov.au">www.hcsc.sa.gov.au</a></p>	<p>Health and Community Services Complaints Commission</p> <p>GPO Box 4409</p> <p>Darwin NT 0801</p> <p>08 8999 1969</p> <p>hcsc@nt.gov.au</p> <p><a href="http://www.hcsc.nt.gov.au">www.hcsc.nt.gov.au</a></p>

### 1.3 Organisational commitment

This organisation expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
Managing Director	Promote a culture that values complaints and their effective resolution	<p>Report publicly on QPA's complaint handling.</p> <p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Support recommendations for our service, staff and complaint handling improvements arising from the analysis of complaint data.</p>
Business Operations Committee	Establish and manage our complaint management system.	<p>Provide regular reports to the Managing Director on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with the Managing Director and implemented where appropriate.</p> <p>Empower staff to resolve complaints promptly and in accordance with QPA's policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p>

<p>All staff</p>	<p>Understand and comply with QPA's complaint handling practices.</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of QPA's complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints to access our complaints process.</p> <p>Be alert to complaints and to assist staff handling complaints to resolve matters promptly.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</p>
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## 2. Terms and Definitions

### 2.1 Complaint

Expression of dissatisfaction made to or about QPA, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- Staff grievances - see our Grievance Policy and Procedure QS.2015.0080.1
- Code of conduct complaints - see our Code of Conduct QS.2015.0003.02
- Responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback']
- Service requests [see definition of 'service request' below], and
- Requests for information – see our Privacy Policy QS.2015.0093.02

### 2.2 Complaint management system

All policies, procedures, practices, staff and software used by QPA in the management of complaints.

### 2.3 Dispute

An unresolved complaint escalated either within or outside of our organisation.

### 2.4 Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about QPA, about our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### 2.5 Service request

The definition of a service request includes:

- Requests for accreditation services
- Requests for action
- Routine inquiries about the organisation's business
- Requests for the provision of services and assistance
- Reports of failure to comply with Terms and Conditions of Accreditation
- Requests for explanation of policies, procedures and decisions.

### 2.6 Grievance

A clear, formal written statement by an individual staff member about another staff member or a work related problem.



## 2.7 Policy

A statement of instruction that sets out how QPA should fulfil our vision, mission and goals.

## 2.8 Procedure

A statement or instruction that sets out how QPA's policies will be implemented and by whom.

## 3. Guiding principles



### 3.1 Facilitate complaints

#### 3.1.1 People focus

QPA is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

#### **People making complaints will be:**

- Provided with information about our complaint handling process
- Provided with multiple and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- Provided with reasons for our decision/s and any options for redress or review.

#### 3.1.2 No detriment to people making complaints

QPA will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

### 3.1.3 Accessibility

QPA will ensure that information about how and where complaints may be made to or about QPA is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with his or her consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

## 3.2 Respond to complaints

### 3.2.1 Early resolution

Where possible, complaints will be resolved at first contact with QPA.

### 3.2.2 Responsiveness

QPA will promptly acknowledge receipt of complaints.

QPA will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

QPA is committed to managing people's expectations, and will inform them as soon as possible, of the following:

- The complaints process
- The expected time frames for our actions
- The progress of the complaint and reasons for any delay
- Their likely involvement in the process, and
- The possible or likely outcome of their complaint.

QPA will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

QPA will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### 3.2.3 Objectivity and fairness

QPA will address each complaint with integrity and in an equitable, objective and unbiased manner.

QPA will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person or by the Impartiality Committee, and not the original decision maker.

#### 3.2.4 Responding flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

QPA will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

#### 3.2.5 Confidentiality

QPA will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by QPA as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

### 3.3 Manage the parties to a complaint

#### 3.3.1 Complaints involving multiple agencies

Where a complaint involves multiple organisations, QPA will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

#### 3.3.2 Complaints involving multiple parties

When related parties make similar complaints we will try to arrange to communicate with a single representative of the group.

#### 3.3.3 Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

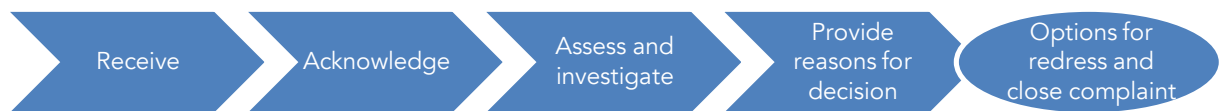
#### 3.3.4 Managing unreasonable conduct by people making complaints

QPA is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with QPA, their conduct can significantly affect the progress and efficiency of our work. As a result, QPA will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

## 4. Complaint management system



### 4.1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

### 4.2 Receipt of complaints

QPA will record the complaint and its supporting information. Complaints are requested to be made in writing, or by fax, email or phone to

Quality Practice Accreditation Pty Ltd  
PO Box 83  
Gundagai NSW 2722  
Ph: (02) 6944 4042  
Fx: (03) 8888 9988  
E: info@gpa.net.au

The record of the complaint will document:

- The contact information of the person making a complaint
- Issues raised by the person making a complaint and the outcome/s they want
- Any other relevant details and
- Any additional support the person making a complaint requires.

All complaints will be recorded directly on the QPA Complaints Register and referred to the Business and Operations Manager, or appropriate Manager if necessary. Should the Business and Operations Manager be unavailable, the complaint shall be referred to the Business Operations Committee.

On receipt of the Complaint Handling Form, the Business and Operations Manager will make an assessment of the nature of the complaint and determine appropriate action. This may include seeking further advice from the QPA Managing Director or legal advice.

### 4.3 Acknowledgement of complaints

QPA will acknowledge receipt of each complaint within two business days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

### 4.4 Initial assessment and addressing of complaints

#### 4.4.1 Initial assessment

After acknowledging receipt of the complaint, QPA will confirm whether the issue/s raised in the complaint is/are within our control. QPA will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

#### 4.4.2 Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:

- Give the person making a complaint information or an explanation
- Gather information from the service, person or area that the complaint is about
- Investigate the claims made in the complaint, or
- Ensure appropriate correction and corrective action is taken

QPA will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

### 4.5 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, QPA will contact the person making the complaint within ten business days and advise them:

- The outcome of the complaint and any action QPA took
- The reason/s for our decision
- The remedy or resolution/s that QPA have proposed or put in place, and
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

In the event that the complaint cannot be resolved internally, the complainant shall be referred to:

- JAS-ANZ and/or the Australian Commission on Quality and Safety in Health Care where the complaint relates to general practice, or
- the RACGP where the complaint relates to Medical Deputising Service or After-Hours Services

#### 4.6 Appeals

An appeal against the decision of a complaint must be made in writing to:

The Manager Director  
Quality Practice Accreditation Pty Ltd  
PO Box 83  
Gundagai NSW 2722

The appeal must state the basis for the appeal, and provide evidence as to why the appellant believes the decision of the committee concerned was unjust.

Initially the appeal will, within five business days, be referred to a specially convened sub committee of the QPA Advisory Board. The Advisory Board sub committee will comprise two permanent members of the Advisory Board that are independent to any previous determinations leading to the appeal under consideration.

Where the appeal relates to a certification decision, the Advisory Board may recommend:

- That the appeal warrants further advice from the RACGP with regards to the interpretation of standards
- That a judgement is required from the RACGP as to whether the appellant's practice meets the requirements of the standards
- That QPA be directed to meet the requirements of the JAS-ANZ GP Scheme or ISO/IEC 17021-1
- The QPA be directed to meet the requirements of their accreditation to JAS-ANZ and ISQua
- That the appeal be rejected

In all cases, the appellant will be fully informed in writing within 20 business days of the outcome of deliberations and further avenues of appeal that may be available, including notification to JAS-ANZ, the RACGP and/or the Australian Commission on Quality and Safety in Health Care.

The Manager Director shall be responsible for ensuring that all appeals are handled with due diligence.

Appeals and their outcomes shall be reviewed at each Advisory Board meeting.

#### 4.7 Closing the complaint, record keeping, redress and review

QPA will keep comprehensive records about:

- How QPA manages the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and

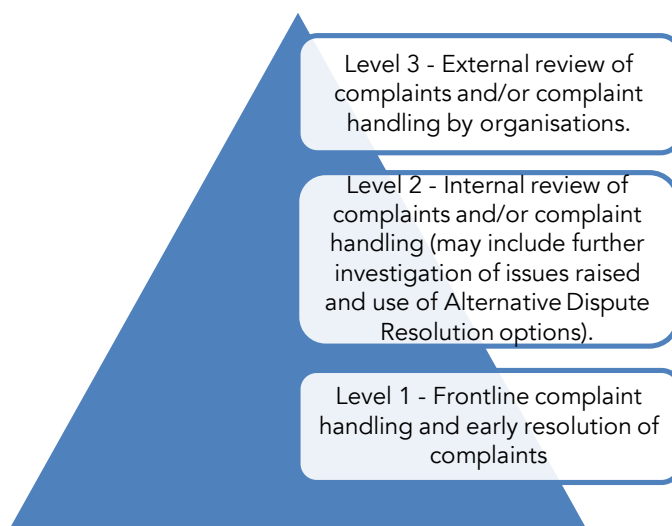
- Any outstanding actions that need to be followed up.

QPA will ensure that outcomes are properly implemented, monitored and reported to the complaints handling manager and/or senior management.

#### 4.8 Alternative avenues for dealing with complaints

QPA will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant accreditation bodies).

#### 4.9 The three levels of complaint handling



QPA aims to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, QPA may decide to escalate the complaint to the Managing Director within QPA.

This second level of complaint handling will provide for the following internal mechanisms:

- Assessment and possible investigation of the complaint and decision/s already made, and/or
- Facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of QPA's review of their complaint, they may seek to appeal the decision or seek an external review of QPA's decision from the RACGP, JAS-ANZ or the Australian Commission on Safety and Quality in Health Care. Alternatively, a complaint may be made directly to one or all of these organisation without lodging a formal complaint with QPA.



## 5. Accountability and learning

### 5.1 Analysis and evaluation of complaints

QPA will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be completed on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified, and
- The number of requests QPA receives for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to QPA's Board of Director and Business Operations Committee for review.

### 5.2 Monitoring of the complaint management system

QPA will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints, and
- Identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits and complaint satisfaction surveys

### 5.3 Continuous improvement

QPA is committed to improving the effectiveness and efficiency of our complaint management system.

To this end, QPA will:

- Support the making of appropriate resolution of complaints
- Implement best practices in complaint handling
- Regularly review the complaints management system and complaint data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

All complaints or appeals shall be documented and report, including action taken by QPA in relation to the complaint or appeal, and made available to the RACGP, JAS-ANZ, ISQua and the Australian Commission for Safety and Quality in Health Care where required.

### Document Review

This document is effective from 5th August 2019 and remains valid until superceded by an updated version in line with the QPA Document Management System Policy