

CORPORATE SERVICES

Complaints Management Procedure

05 July 2023



Coast & Country
PRIMARYCARE
Better Health - Better Life

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1. Purpose

Coast and Country Primary Care (CCPC) welcomes feedback from everyone and commits to responding to and treating feedback in a confidential manner. This procedure confirms the right of anyone – including participants, carers, advocates, providers, workers and members of the public – to provide feedback to CCPC and have it dealt with fairly.

The purpose of this procedure is to:

- Inform each person of their right to complain and work with the person, their families and carer to try and resolve the issue.
- Provide a safe environment for each person to make a complaint.
- Ensure that there are no negative consequences or retribution for any person who makes a complaint.
- Support participation in the complaint handling process of any person wanting to make a complaint and work with the person to identify the desired outcome.
- Treat each person making a complaint in a manner that protects their privacy and respects confidentiality.
- Provide fair and timely resolution of complaints.
- Keep each person informed at all stages of the decision-making process concerning their complaint and the reasons for those decisions.
- Inform each person of their right to complain to an external body.
- Ensure concerns and complaints are handled impartially, justly, confidentially and with the appropriate sensitivity.
- Define the responsibilities and rights of all parties.
- Enable CCPC to respond to its changing environment and adapt any systems, processes and approaches that may be identified as an issue as part of any complaint or complaint process.

2. Scope

Feedback, including complaints, may relate to any area or service of CCPC or the performance of our workers. Feedback includes comments, compliments, complaints and suggestions.

A compliment is any expression of positive feedback about the work of CCPC and its workers. Such expressions will always be welcome and will be celebrated by work teams and managers, with gratitude shown to the person or people providing that feedback.

A complaint includes any expression of dissatisfaction for which a response is expected or warranted. A complaint about us includes:

- Any dissatisfaction about us, our work, the delivery of our services or the behaviour of our workers.
- Any allegation of impropriety or misconduct by a CCPC worker.

This procedure does not cover employee grievances or disputes which are dealt with in accordance with the CCPC *Grievance and Disciplinary Procedure*.

3. Procedure

3.1. Making People Aware That Feedback is Welcome

CCPC clients, participants, patients and other stakeholders are provided with information on how and where to provide feedback / make a complaint through provision of information such as:

- In CCPC service pamphlets and brochures.
- In Service Agreements (e.g. NDIS).
- Our *Complaints Management Procedure* on the CCPC website at <https://ccpc.com.au>.
- Feedback/complaints at the time of reviews and surveys.
- Social media.
- Other mechanisms relevant to programs/contracts and as required by relevant service standards.

3.2. Open Disclosure

At times during the delivery of services, adverse events and patient harm may occur. In the event of such an occurrence, CCPC is committed to open disclosure and will clearly communicate information relating to the event with the patient, their family and carers in accordance with the *CCPC Open Disclosure Statement*.

3.3. Providing Feedback

A person can provide feedback or make a complaint verbally in the first instance with the CCPC employee they are most comfortable with. We encourage positive feedback direct to workers and the informal resolutions of complaints where possible.

CCPC will support anyone making a complaint or providing feedback with individual, cultural and linguistic needs throughout the process. For example, CCPC clients have a right to communicate in the language of their choice. If requested we will source an interpreter on the individual's behalf from the National Interpreter Service (www.multicultural.nsw.gov.au) to assist with the process.

CCPC will provide advocacy to assist individuals with a disability to have their legal and human rights upheld and to be treated with dignity and respect. CCPC have staff who are experienced in providing advocacy services. Alternatively, we will provide contact details of other providers in the area.

We encourage complaints to be submitted in writing via the Online Contact Form on our website at <https://ccpc.com.au/contact-us/>. Complaints can be anonymous. Feedback and complaints can also be made by telephone or email, or people are also welcome to visit our offices. Contact details for our offices are provided on the CCPC website at <https://ccpc.com.au/contact-us/>, or contact us via:

- Phone: (02) 4365 2294
- Email: ccpc@ccpc.com.au
- Mail and Location Address: 167b The Entrance Rd, Erina NSW 2250

3.4. Receiving & Recording Feedback

3.4.1. Positive Feedback

Where it is deemed necessary we will respond to positive feedback, and will always strive to ensure feedback is shared with relevant workers and teams. It is also useful to keep a record of positive feedback/compliments received to review with colleagues / mentors and facilitate discussions on how we can continuously improve.

3.4.2. Receiving & Responding to Complaints

When a complaint is made, it is critical that the complainant (e.g. client, participant or their family member, worker or other provider) feels the complaint has been adequately acknowledged and they are given time to express how it has affected them and what actions they would like to see taken.

Verbal Complaints

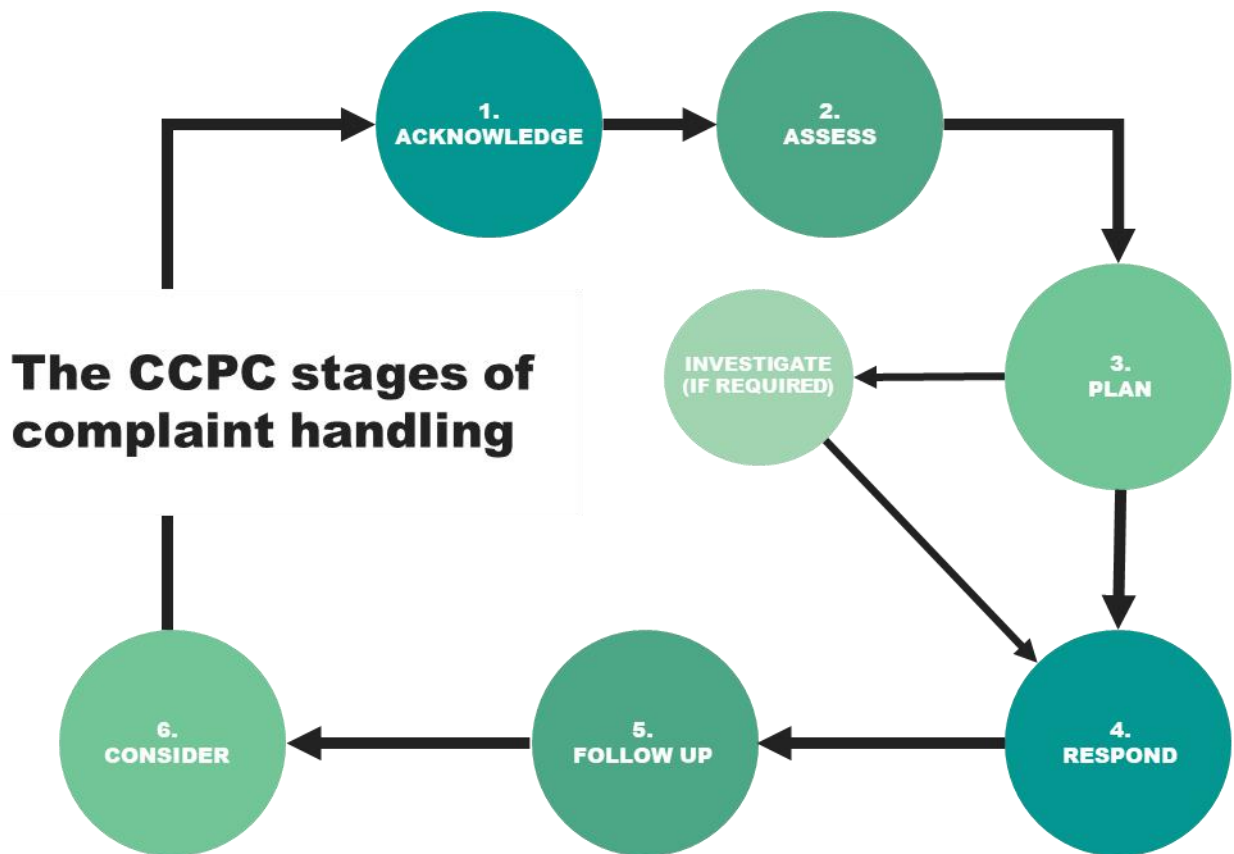
1. The worker taking the complaint will talk fairly, sensitively and confidentially to the person making the complaint in a way which reflects their individual, cultural and linguistic needs.
2. The worker receiving the complaint should obtain as much detail as possible about what happened and why the complaint has been made.
3. The worker who receives the complaint will discuss complaint with their supervisor/manager who will then contact the complainant as soon as practically possible, but at least within 24 hours.
4. The worker who receives the complaint shall record the complaint using the CCPC *Event Report Form* in accordance with the CCPC *Event Reporting and Management Procedure*. The report must include all necessary factual details, immediate actions that have been taken and any identified / planned follow-up actions.

Written Complaints

1. Complaints received via the CCPC website or social media, in writing or via a completed *Event Report Form* will be routed to the relevant service manager, or others as needed to ensure appropriate and timely response.
2. The responsible person may contact the complainant via phone where appropriate (e.g. to seek further information), and will then acknowledge the complaint in writing within in 5 business days.
3. Written responses and all future correspondence and documentation relating to the complaint (including file notes on phone calls with complainants) will be filed securely and confidentially with the incident records in accordance with the CCPC records management procedures.

Complaints reports and all related documents are to be kept for 7 years.

3.5. Actioning Feedback



As demonstrated in this diagram, many cases can be resolved by the following six steps:

- 1. Acknowledge** all complaints quickly.
- 2. Assess** the complaint, give it priority, and start to think about which resolution approach you may take. This should include considering any other people who should be consulted about the concerns such as the consumer’s legal representative.
- 3. Plan** the type of information you may need to collect to assess the

complaint and how you will collect it. Where required:

- a. Investigate** the complaint to help inform your resolution approach.
- 4. Respond** to the complainant with a clear decision.
- 5. Follow up** any concerns.
- 6. Consider** the learnings from this complaint and what can be improved systematically or more broadly, to help prevent the same issue from occurring again.

Adapted from: Aged Care Quality and Safety Commission 'Better practice guide to complaints handling in aged care services' (2021)

3.5.1. Acknowledge

The supervisor/manager will, in collaboration with the complainant where appropriate, decide on the most suitable course of action. A complaint must be acknowledged quickly. This demonstrates that the complainant will be treated with respect and can be an important tool in managing the complainant's expectations. In the context of open disclosure (see s.3.2 above) this might include the acknowledgement of where something goes wrong that has harmed or had the potential to cause harm to a client, which comes to the attention of CCPC. The consumer may or may not be aware of the issue.

The acknowledgement of a complaint should:

- Outline the complaints process,
- Outline the issues to be examined.
- Invite the client and their representative/s to participate in the resolution process.
- Provide contact details and where possible, the name of a contact person.
- Reassure that confidentiality will be respected during the process.
- Give an estimate of how long it is likely to take to resolve the complaint and when the complainant will next be contacted.

Written acknowledgement can be beneficial, but is not always necessary. If the complaint is made by telephone and cannot be resolved straight away, it might be more efficient to talk to the complainant about how the complaint will be handled and when they will next be contacted. Ensure this phone call is documented.

Similarly, a complaint that is made by letter and can be resolved quickly can sometimes be acknowledged and resolved at the same time.

3.5.2. Assessment & Priority

Early assessment of a complaint which is essential for effective complaints handling. The early assessment should include:

- Clarifying the concerns and issues raised by the complainant.
- Determining the level of risk to the wellbeing, safety and health of clients, participants, workers or others identified in the complaint (this is done via the Event Reporting process).
- Deciding whether priority should be given to dealing with one or more aspects of a complaint.
- Determining if there are any other CCPC management legal representatives that should be consulted.
- Asking the complainant how they would like to see their complaint resolved.

3.5.3. Planning

To assist in working out how to manage a complaint, it can be useful to plan on how to resolve the complaint. This could include acknowledgement, an apology, answers and / or action. Where appropriate, seek feedback from others such as other clients, patients, participants and workers. Planning should include when, how and through whom (e.g. advocate) complainant will be kept informed of progress.

3.5.4. Investigation

The purpose of an investigation is to gather relevant information that can be used to identify an appropriate solution which will resolve the complaint. Not all complaints require a formal investigation to be resolved. The risk level assigned to the complaint in the *Event Report* will determine investigation requirements, however supervisors/managers may initiate an investigation for lower risk events if desired. Investigation of the circumstances surrounding

the complaint and identification of improvement actions will occur in accordance with the *CCPC Event Reporting and Management Procedure*. Improvement actions may include:

- Further training of staff / others involved.
- Reviewing and enhancing policies and / or procedures.
- Change of personnel.
- Changes to the environment / delivery mode for services.

It's reasonable and good practice to ask complainants to assist by providing any documentation they may have in relation to the complaint. It is critical that complainants and clients (where possible), have an opportunity to present their point of view. This includes being given an opportunity to comment on information or claims from other sources.

CCPC will consider engaging an external investigator when dealing with serious complaints or events that could benefit from the experience and expertise of a professional investigator (see s.3.6 below).

3.5.5. Respond & Act

Once CCPC has reached a decision, this will be communicated clearly to the complainant and any other relevant parties by the supervisor/manager. Often a response can be a conversation with the complainant.

A written explanation may be more suitable for serious, complex or disputed matters. It might be appropriate to talk with the complainant to let them know that a more detailed written explanation will be provided.

Thought should be given to providing the complainant and consumer with an apology. An apology can be an important step in achieving a successful outcome to a complaint and demonstrates empathy to the complainant. Apologising or expressing regret when things go wrong is also a key component of open disclosure. An apology or open disclosure is not an admission of guilt or fault by CCPC. When providing an apology, it is helpful to consider:

- Timeliness.
- Sincerity.
- Being specific and to the point.
- Accepting responsibility for what occurred and the impacts caused.
- Explaining the circumstances and causes (without making excuses).
- Summarising key actions agreed to as a result of the complaint.

Start implementing agreed actions, keeping the complainant informed and recording actions, communications and responses. Actions will be monitored by the supervisor/manager and updates on progress will be added to the event record until the complaint is satisfactorily concluded.

3.5.6. Consider and Follow-up

It's good practice to ask complainants for feedback on how their complaint was handled and resolved. Supervisors/managers and others responding to complainants should encourage complainants to consider providing feedback when responding to their complaint.

See also s.3.10 (Monitoring, Evaluation & Oversight) below.

3.6. Serious Complaints

If the complaint is of a serious nature (e.g. mandatory reporting required, could lead to litigation, police involved):

- The supervisor/manager shall notify the Executive Manager and CEO as soon as practicable.

- An event record should be commenced by the Executive Manager in consultation with the team member.
- The CEO will immediately notify the Board Chair and the organisation's insurers. No action is to be taken without the advice and direction of the insurers.
- A formal incident investigation will be conducted in accordance with the CCPC *Event Reporting and Management Procedure* to explore what led to the complaint and if any steps are required to prevent it occurring again.

Note: If police are involved in the incident, no internal investigation is to commence until the police investigations are complete unless authorised by the CEO.

3.7. What if the Complaint is not Resolved?

All clients, participants and stakeholders of CCPC have a right to complain to an external body if they are not satisfied with the service they are being provided. It is their right to make a complaint (where relevant) to the Ombudsman about the provision of a service by a service provider under the NSW *Community Services (Complaints, Review and Monitoring) Act 1993*.

If the complainant is still not satisfied with the way the complaint has been handled by CCPC or the outcomes achieved, the complainant shall be referred to the NDIS Quality and Safeguards Commission, Health Care Complaints Commission, Aged Care Quality and Safety Commission or Ombudsman NSW as appropriate. Contact details will be provided to the participant.

NDIS Commission:

If the complaint is about NDIS supports or services, you can contact the NDIS Commission on their website via <https://www.ndiscommission.gov.au/participants/participants-make-complaint> or by:

- Calling 1800 035 544 (free call from landlines) or TTY 133 677 (interpreters can be arranged).
- If you have a hearing and/or speech impairment and are unable to make and receive phone calls, you can visit The National Relay Service and ask for 1800 035 544.

Health Care Complaints Commission:

For serious issues or complaints that have not been dealt with to your satisfaction, you can contact the NSW Health Care Complaints Commission to make complaint or contact them via <https://www.hccc.nsw.gov.au/> or by calling 1800 043 159.

Aged Care Quality and Safety Commission:

The Commission is the primary point of contact for the quality and safety of aged care services. To submit feedback, a concern or a complaint by calling 1800 951 822, email info@agedcarequality.gov.au, post GPO Box 9819, in your capital city.

Lodging a Complaint With the Ombudsman:

The Ombudsman NSW handles complaints regarding non-government community service providers and NSW government agencies. Persons can make a complaint online via www.ombo.nsw.gov.au or call 02 9286 1000.

3.8. Discrimination, Abuse, Neglect or Exploitation

CCPC will support any client/consumer and their family or carer who wishes to raise allegations of discrimination, abuse, neglect or exploitation according to the mandatory reporting requirements of the CCPC *Event Reporting and Management Procedure*.

3.9. Service-Specific Procedures

Each clinical service may also develop service-specific processes, work instructions or guidelines to support their workers in meeting the requirements of this procedure when receiving, recording and responding to complaints or feedback from their clients, participants, patients or other stakeholders (e.g. funders).

3.10. Monitoring, Evaluation & Oversight

Data on feedback and complaints and the effectiveness of responses needs to be monitored, reviewed and reported to be effective, and facilitate continual improvement. The following groups provide oversight by regularly reviewing feedback/complaints and responses to identify improvements to our services and complaints management processes:

- CCPC Board
- Leadership Team
- Quality, Safety and Risk Committee
- Clinical Governance Committee
- Work Health and Safety (WHS) Committee

4. Review

This procedure shall be reviewed every three (3) years, or more frequently if required.

5. Associated Documents and References

Internal

- Privacy Policy
- Open Disclosure Statement
- Event Reporting and Management Procedure
- Event Report Form

Related Legislation / Standards

- Aged Care Act 1997 (Cth)
- Aged Care Quality and Safety Commission 'Better practice guide to complaints handling in aged care services' (2021)
- AS/NZS ISO 9001:2015 Quality management systems — Requirements.
- Australian Council for Safety and Quality in Health Care 'Complaints Management Handbook for Health Care Services' (2005)
- Australian Government Commonwealth Ombudsman 'Better Practice Complaint Handling Guide' (Feb 2023)
- Aged Care Quality and Safety Commission 'Better practice guide to complaints handling in aged care services' (2021)
- Community Services (Complaints, Review and Monitoring) Act 1993 (NSW)

- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018
- National Safety and Quality Primary and Community Healthcare Standards (2021)
- National Safety and Quality Mental Health (NSQMH) Standards for Community Managed Organisations (2022)
- NDIS Quality and Safeguards Commission ‘Effective Complaint Handling Guidelines for NDIS Providers’ (2017)
- NDIS Quality and Safeguards Commission ‘Complaints Management and Resolution Guidance’ (2019)
- NDIS ‘Procedural Fairness Guidelines’ (2018)

6. Definitions and Abbreviations

Term	Definition
CCPC	Coast and Country Primary Care
NDIS	National Disability Insurance Scheme
NSQMH	National Safety and Quality Mental Health
P&C	People and Culture
WHS	Work Health and Safety

7. Revision History

Version	Release Date	Approver	Next Review
2	July 2023	Executive Manager, Corporate Services	July 2026