

Administrative complaint handling policy and procedure

Purpose

Ahpra is committed to excellent customer service and continuous improvement. Feedback is always welcome to help us improve our services. This policy sets out our process for addressing complaints made about Ahpra and the National Boards.

The purpose of Ahpra's *Administrative complaints handling policy and procedure* is to listen to the concerns raised by people, respond to complaints promptly, empathetically and fairly, and ensure that we learn from issues identified in the complaints process to improve our processes, systems and services.

Scope

The National Registration and Accreditation Scheme (the National Scheme) exists to ensure Australians have access to safe high quality health practitioners. The Australian Health Practitioner Regulation Agency (Ahpra) administers the National Scheme in partnership with the National Boards. Ahpra and the National Boards are committed to delivering high standards of accountability in business and customer service functions.

This policy forms part of those standards.

This complaints policy applies to concerns that relate to the service delivery, policies, procedures and decisions of Ahpra, National Boards and associated Committees, and the Agency Management Committee. Further information about the role of each of these can be found [here](#).

While this policy relates to the management of complaints specifically, feedback of any type is welcome at Ahpra. Ahpra reviews and notes all feedback, complaints and compliments and uses this information to improve our services.

This policy **does not** cover concerns about the health, performance or conduct of health practitioners. There is a different process for making a notification about a health practitioner. A notification about a health practitioner can be made by following the <https://www.ahpra.gov.au/Notifications/Raise-a-concern.aspx> link on the Ahpra website (www.ahpra.gov.au).

Responsibility

The Executive Director of Regulatory Operations has overall responsibility for ensuring that complaints are managed appropriately. Making a complaint under this policy does not take away from any other rights a complainant may have in relation to Ahpra or a National Board.

Reporting

AHPRA will report on de-identified complaints in its annual report and on its website.

Review and consultation

This policy commenced in March 2019.

This policy is reviewed at least every two years to ensure that it continues meet the needs of our organisation as well as the relevant standards and best practice guidelines.

When reviewing this policy we consider feedback received from practitioners, members of the public and staff. We also undertake consultation with the National Health Practitioner Ombudsman and Privacy Commissioner and our staff to obtain suggestions to improve this policy.

Complaint Management Principles

Our complaints management policy is based on the following principles.

Principle	This means
Accessibility	<ul style="list-style-type: none"> • We publish information about our complaints policy and how to make a complaint and it is easy to find. • We provide people with a range of contact options to make a complaint. • We assist people to make a complaint when assistance is needed. • We recognise that some people have particular needs or vulnerabilities and provide a complaint service that accommodates the requirements of all people. • We communicate with people in a way that suits the person. • We encourage people to give us their feedback about our decisions, policies, procedures and service.
Understanding	<ul style="list-style-type: none"> • We understand and acknowledge that the issue raised is important to the person making a complaint. • We talk to the person raising the concern • We demonstrate that we have understood the concerns raised. • We ask how people would like their concern to be resolved. • In our response we acknowledge and consider a person's feelings as valid and important.
Responsiveness	<ul style="list-style-type: none"> • We have systems in place that identify how complaints are assessed, allocated and escalated when appropriate. • We adhere to all required complaints management time frames and when this isn't possible we contact to people to let them know a revised time frame and provide an explanation for the delay. • We empower our staff resolve complaints as quickly and efficiently as possible. • We acknowledge that methods for dealing with complaints will differ depending on the circumstances and allow flexibility to resolve a complaint in a way that is appropriate in the circumstances.
Transparency	<ul style="list-style-type: none"> • We talk to people about what is and isn't possible during the complaints management process and explain why. • In our acknowledgement of a complaint we provide information about what to expect and when, while AHPRA investigates their complaint. • We provide a full explanation to people of the reasons for our decision regarding their complaint. • During the complaints process we review what information we have previously provided to determine if there is any further information we

	<p>could provide to a person to better help them understand our decision, processes or policies.</p> <ul style="list-style-type: none"> • We are open about our processes and our management of a matter and seek to demonstrate how we act in the public interest when we respond to a complaint. • We have an open, constructive and responsive relationship with the National Health Practitioner Ombudsman and Privacy Commissioner.
Fairness	<ul style="list-style-type: none"> • We deal with concerns raised to us in a spirit of resolution rather than defensiveness. • We offer an explanation and an apology when a mistake is made. • We offer to people that their complaint can be dealt with by an independent officer. • We are impartial in our management of all concerns raised about AHPRA and National Boards. • We advise people of their options to escalate their complaint if they remain concerned and offer assistance to do so if this is needed. • We offer our staff an opportunity to respond to any allegation made about them personally.
Improvement	<ul style="list-style-type: none"> • We have well established procedures to identify and report issues about our service delivery, policies and procedures during the management of a complaint. • We regularly review data captured from the complaints process to identify thematic issues. • We ensure that any identified problems with our systems or service delivery are followed up and required changes are implemented. • We encourage learning from complaints to improve our services.
Accountability	<ul style="list-style-type: none"> • We appropriately resource our complaints management framework and staff are given training and support to effectively manage complaints. • We identify, measure and report on Key Performance Indicators (KPI's) to ensure that we are providing a quality service. • We report publicly on our complaints handling performance in our annual report and other documents as appropriate. • We undertake a review of our complaints management data at least every 12 months so that we can evaluate our performance. • We review our complete Complaints Management Framework every two (2) years to ensure that it is still fit for purpose.

Definitions

Agency Management Committee

The Agency Management Committee is the corporate board of Ahpra.

Board

Board is a National Board of Australia, or the State Board of the National Board of Australia as a delegate of a National Board.

Committee

Committee is the delegate of a National Board of Australia.

Complaint

Any expression of concern, dissatisfaction or frustration with the quality or delivery of service, a policy or procedure, or the conduct of another person.

This policy identifies two (2) stages of complaints which are categorised by the complexity of the issues raised in the complaint and the time AHPRA considers will be required to resolve the complaint.

Stage 1 Complaint A complaint that can be resolved quickly by frontline staff.

Stage 2 Complaint A complaint that raises complex issues and/or requires time to review and resolve.

Compliment

Any expression of satisfaction.

Feedback

Any suggestion for improvement or identification of a deficiency where it is clear that a specific response or resolution may not be required nor expected.

Notification

A notification is the process of providing information about the professional conduct, professional performance or health of a registered health practitioner or student to the relevant National Board. Any person or organisation can make a notification if they believe that an individual health practitioner may be putting the public at risk.

Query

A question or request for further information about the delivery of service, a policy or a procedure. Ahpra records data about queries as part of our frontline service delivery.

How to make a complaint

If you have a concern about our services, administrative actions or the application of a policy please make contact with the staff member who had responsibility for managing your matter. If the allocated staff member is unable to resolve your concern to your satisfaction the next step is to contact our National Complaints Management Team.

A complaint (or any feedback including compliments) can be made by:

- Completing the form on the Ahpra website www.ahpra.gov.au/About-AHPRA/Complaints.aspx
- Mailing a complaint to:
National Complaints Manager
Ahpra
G.P.O. Box 9958
In your capital city
- By telephone: 1300 419 495

How we manage administrative complaints

Ahpra has implemented the following model for administrative complaints management:

Ahpra Administrative Complaints Model			
	Stage 1 - Complaint	Stage 2 - Complaint	Stage 3 - External Review
Who?	Managed by a Regulatory Operations frontline officer or line manager	Managed by a Complaints Officer or the National Complaints Manager	NHPOPC
What?	<ul style="list-style-type: none"> •Straightforward service delivery complaints. •Straight forward complaints about regulatory outcomes or policies <p><u>Example:</u></p> <ul style="list-style-type: none"> •Complaints about delays. •Complaints about poor communication. •Complaints about using incorrect contact details. •Dissatisfaction about a regulatory outcome. 	<ul style="list-style-type: none"> •Complex complaints about service delivery, regulatory outcomes, and policies. •Stage 1 complaints that have been unable to be resolved. <p><u>Example:</u></p> <ul style="list-style-type: none"> •Complaints about an outcome of a registration application or notification requiring a significant review. •Complaints about the application of a policy or guideline of a National Board. 	External investigation and/or review managed by the NHPOPC
How long?	3-5 Business days	10-20 Business days	As determined by the NHPOPC

Timeframes

It is our aim to acknowledge and respond to complaints as quickly as possible. We expect to acknowledge and respond to complaints within the following timeframes:

Acknowledgement	Stage 1 Within 2 business days	Stage 2 Within 2 business days
Response	Within 3-5 business days	Within 20 business days

If we are unable to meet the above timeframes for response, we will contact the person who made the complaint to provide an explanation as well as an expected date that we will be able to respond to the complaint.

During the complaints process

Every complaint will be allocated to an officer for response. People who make a complaint will be provided with the contact details of the officer who has been allocated responsibility for responding to their complaint.

Unhappy with the response to a complaint

Complaints made to AHPRA can be escalated in accordance with the Ahpra Administrative Complaints Model above. We will provide people who make a complaint with details about their options to escalate their complaint if they remain unhappy when we respond to a complaint.

The National Health Practitioner Ombudsman

If a person is dissatisfied with Ahpra's response to or management of their administrative complaint under this policy, then they can raise their concerns with the National Health Practitioner Ombudsman (the Ombudsman).

The Ombudsman receives complaints and helps people who think they may have been treated unfairly in administrative processes by the agencies in the National Scheme.

The Ombudsman will usually only deal with complaints that have already been lodged with Ahpra, and after AHPRA has been given a reasonable opportunity to resolve the complaint in line with our complaints handling policy and procedure. You can read more about making a complaint to the Ombudsman at www.nhpo.gov.au

Contact details for the Office of the National Health Practitioners Ombudsman:

Address: GPO Box 2630, Melbourne, Victoria 3001
Telephone: 1300 795 265
Email: Complaints@nhpo.gov.au

Serious misconduct or corruption

Ahpra has a *Public interest disclosure (Whistleblower) policy* for dealing with allegations of serious misconduct or impropriety in the administration of the National Law. Details of the policy are available on the [Public interest disclosure \(Whistleblower\) policy](#) page.

Resources

Legislation

- The Health Practitioner Regulation National Law Act (the National Law). www.ahpra.gov.au/Legislation-and-Publications/Legislation.aspx
- The *Ombudsman Act 1976* (Cth) as adopted by the National Law and amended by the National Law Regulations. www.austlii.edu.au/au/legis/cth/consol_act/oa1976114
- The *Privacy Act 1988* (Cth) as adopted by the National Law and amended by the National Law Regulations. www.austlii.edu.au/au/legis/cth/consol_act/pa1988108

Guidelines and Standards

- 'Better Practice Guide to Complaint Handling', Commonwealth Ombudsman, 1 April 2009. Available at: www.ombudsman.gov.au/docs/better-practice-guides/onlineBetterPracticeGuide.pdf
- 'Guidelines for complaints handling in organizations', Standards Australia, 29 October 2014. (ISO 10002:2014).

Related documents

- Ahpra Public Interest Disclosure ('Whistleblower') Policy. Available at: <http://www.ahpra.gov.au/About-AHPRA/Complaints/Whistleblower-policy.aspx>
- Ahpra Privacy Policy. Available at: <http://www.ahpra.gov.au/About-AHPRA/Privacy.aspx>
- Ahpra Service Charter. Available at: <http://www.ahpra.gov.au/Publications/Corporate-publications.aspx#service>
- *Memorandum of Understanding* with the Office of the National Health Practitioner Ombudsman and Privacy Commissioner (2015). Available at: <http://www.ahpra.gov.au/About-AHPRA/Complaints.aspx>