

Queensland Health Standard

Purpose

This document identifies mandatory requirements for the implementation of Queensland Health Complaints Management Policy (Non-Consumer Complaints)

Standard #<insert number here>

Requirements for Complaints Systems (Non-Consumer Complaints)

1 Scope

This standard applies to all Queensland Health employees in relation to Non-Consumer Complaints, as defined in Section 9 of the *Queensland Health Policy Complaints Management (Non-Consumer Complaints)*.

This standard is not intended to conflict in any way with Award provisions, legislative, contractual or other Queensland Health policy/directive requirement for the management of particular types of complaints.

2 Definition of Terms

All key terms used in this Standard are detailed in Section 9 of the *Queensland Health Policy Complaints Management (Non-Consumer Complaints)*.

3 Supporting Documents

3.1 Authorising Policy

- Queensland Health Policy Complaints Management (Non-Consumer Complaints)

3.1.1 Associated Standards

- Queensland Health Standard Complaints Reporting (Non-Consumer Complaints)
- Queensland Health Standard Self Audit of Complaints Systems (Non-Consumer Complaints)

3.2 Procedures or Guidelines

- Guide for the resolution of informal complaints at the local level
- Making Decisions: A guide to decision-making processes and tools

3.3 Related Policy or documents

- Office of the Public Service Commissioner Directive 13/06 *Complaints Management Systems*
- Queensland Ombudsman's *Effective Complaints Management Fact Sheets* series
- *Public Service Act 2008*
- *Industrial Relations Act 1999*
- *Queensland Anti-Discrimination Act 1991*
- *Crime and Misconduct Act 2001*
- *Health Service Act 1991*
- *Whistleblowers Protection Act 1994*
- *Workplace Health and Safety Act 1995*
- Directive 11/07 - Grievance Resolution
- IRM3.5 - Grievance Resolution
- IRM3.1-2 - Workplace Harassment
- E1 - Code of Conduct 2006
- E2 - Anti-Discrimination
- E5 - Sexual Harassment
- E9 - Official Misconduct
- I5 - Public Interest Disclosure (Whistleblowers)

4 Review

This Standard is due for review on: 1 July 2010

5 Requirements

Queensland Health non-consumer complaints systems and processes must comply with the Office of the Public Service Commissioner Directive (OPSC) 13/06 *Complaints Management Systems* and Queensland Ombudsman's *Effective Complaints Management Fact Sheet* series.

5.1 Compliance with the OPSC Directive 13/06

The OPSC Directive 13/06 *Complaints Management Systems* specifies minimum standards for complaints systems. All Queensland Health non-consumer complaints systems must comply with the requirements of this Directive.

As per the Directive, the following elements must be included, as a minimum, in all complaints systems and processes:

Visibility and Access

- Complaints about Queensland Health's policies, products or services can be lodged by any member of the public, employee or other stakeholder.
- Information regarding where and how to lodge a complaint and anticipated response times must be readily available through established Queensland Health communication mechanisms such as the Internet, Intranet and Queensland Health facilities that are open to the public.
- Queensland Health will take all reasonable steps to ensure that complaints processes are flexible and no one is excluded from making a complaint. Where necessary, Queensland

Health will ensure an interpreter or a suitable person is available to persons from non-English speaking backgrounds, a learning disability, with a visual or hearing impairment, or those who cannot read or write.

- Business units will ensure adequate resources, including staff and training are available to assist complainants and management of complaints.

Responsiveness

- Queensland Health recognises that complaints may be complex and may contain sensitive issues requiring investigation and analysis. Timeframes for the management of complaints must be reasonable and will not be excessively drawn out. Queensland Health will meet legislative, contractual and other Queensland Government Directive requirements, or where these do not apply, will meet the published timeframes in this standard.
- Queensland Health employees handling complaints will be provided with information, education and training through established Queensland Health mechanisms such as the Intranet, induction training and information sessions. This ensures a consistent approach is followed in the management and resolution of complaints across Queensland Health.
- Queensland Health will ensure that complaints are promptly acknowledged and that complainants are kept informed about the progress of their complaint in accordance with this standard.

Assessment and Action

- All complaints must be managed in accordance with the principles described in section 4 of the *Queensland Health Policy Complaints Management (Non-Consumer Complaints)*.
- Upon receiving complaints, Queensland Health staff must take reasonable steps to ensure that the complaint is properly understood and clarification or additional information is requested from the complainant where required.
- Complaints must be assessed, recorded and reported by the Queensland Health business unit responsible for the policy, system or service the complaint is about. A complaint received about the service or conduct of a particular Queensland Health employee must be assessed and managed in accordance with the relevant Award provisions, legislative, contractual or other Queensland Health policy/directive.
- Complaints must be managed according to this policy unless other provisions apply.
- Queensland Health will ensure that complaints are referred to external agencies where required.

Feedback

- The progress of the complaint must be monitored until the outcome has been communicated to the complainant, which includes providing the complainant with adequate and well articulated reasons for the complaint outcome.
- Complainants must be provided with information on available avenues for external review if not satisfied with local or Departmental decisions.
- Queensland Health will ensure continued improvement in its administration through meaningful feedback within the Department about potential improvements identified as a result of complaints.

Monitoring Effectiveness

- Complaints data must be analysed to identify systemic issues that need to be addressed in order to improve systems, procedures and performance, as outlined by the policy and associated standards.
- Complaints trends for Queensland Health will be reported to Executive Management on a regular basis and will be used to inform the continuous improvements process where appropriate.
- Queensland Health:
 - Will regularly monitor the quality and effectiveness of the Department's Complaints Management Systems and will revise relevant components where appropriate
 - Monitor the time taken to resolve complaints
 - Provide the SCLO with annual statistics regarding complaint management.

5.2 Remedies and Redress

The remedy sought by the complainant should be considered as the first option and informal resolution and compromise are to be attempted wherever possible.

When a complaint is substantiated, remedies will be consistent and fair to both the complainant and Queensland Health. The remedies offered must reflect what is fair and reasonable in the circumstances, and take into consideration Queensland Health's legal obligations and good practices.

A possible range of remedies could include, but are not limited to:

- An apology
- Change of decision
- Change of policy, procedures, practice or product
- Corrective action
- Honouring a prior commitment
- Action taken against the offending employee
- Training provided to the employee to prevent reoccurrence of the problem.

5.3 Timeframes

Unless otherwise provided for by an applicable Award provision, legislative, contractual or other Queensland Health policy or directive, the following timeframes will apply:

- Complaints must be acknowledged in writing within five working days of receipt of the complaint.
- Complaints must be resolved, and the parties advised of the outcome, as soon as possible, ideally within 30 working days of receipt of the complaint*.

The timeframes outlined above are not intended to conflict in any way with Award provisions, legislative, contractual or other Queensland Health policy / directive requirement for the management of particular types of complaints.

*Queensland Health recognises that complaints can be sensitive and complex in nature and may require detailed investigation and analysis. The complexity of, and the resources available for an

investigation into a complaint may result in more time being taken to finalise a complaint. Complainants must be advised of the anticipated time to resolve the complaint and advised of the reason for any delays. Complainants and respondents should be provided with regular progress reports.

5.4 Complaints Register

All Districts, Statewide Services and Corporate Office Divisions that manage non-consumer complaints are required to record all Reportable Complaints on a complaints register. The complaints register must contain sufficient details of each complaint to enable meaningful analysis of complaints and so that reports can be generated.

The complaints register (the “*Queensland Health Non-Consumer Complaints Management Database*”) has been provided to all Districts, Statewide Services and Corporate Office Divisions and will be the primary tool for the collection of complaints data. A current and accurate record of data will be maintained to:

- ensure timely and consistent resolution of complaints
- identify any recurring problems and system-wide problems
- provide quarterly Complaints Management Reports
- provide data for the inclusion with the Queensland Health’s performance reporting requirements, as required.

5.5 Establishment of the Staff Complaints Liaison Office (SCLO)

The Queensland Ombudsman requires Queensland Health to establish and maintain a central point of contact for Queensland Health staff, external agencies and others regarding non-consumer complaints.

This point of contact has been established as the SCLO and is currently located in the Workplace Investigations Unit in Corporate Office. The SCLO’s role is as follows:

- To provide a central point of contact for Queensland Health staff and others who may be unsure on how or where to lodge a complaint.

The SCLO has not been established to replace current complaints processes and will not be managing complaints where there is an existing process. **Complaints will still be managed locally in the first instance or in accordance with the relevant complaints processes.** The SCLO will provide sufficient information to direct staff to the appropriate area to lodge a complaint or report a matter.

- To manage complaints where there is no existing process to address the nature of the complaint made.
- To provide a corporate contact point for central Queensland Government agencies, such as Queensland Public Service Commission or the Queensland Ombudsman to liaise with regarding non-consumer complaint management systems.
- To assist Health Service Districts, Statewide Services and Corporate Office Division to ensure that existing complaint processes comply with OPSC Directive 13/06 and reporting requirements.
- To collect complaints data via quarterly reports to assist with improving complaints management.

To assist staff and others, the SCLO has established and initiated the following:

- A dedicated telephone number (ph: 1800 195 240) which is manned by staff whom are able to provide information in relation to complaint processes. After-hours callers can leave a message which will be responded to by the SCLO within one business day.
- A dedicated email address (staffcomplaints@health.qld.gov.au)
- A website (accessible from the public internet site and the staff intranet site) with complaints information and a facility to lodge a complaint (http://www.health.qld.gov.au/nonconsumer_complaint/default.asp)
- A brochure entitled 'Making a Complaint' (http://www.health.qld.gov.au/nonconsumer_complaint/docs/complain_brochure.pdf)
- A comprehensive Queensland Health Complaints Management Contact List (attachment A)

6 Roles and Responsibilities

Position	Responsibilities	Performance Criteria
Director-General	<ul style="list-style-type: none"> • The Director-General is accountable for the overall implementation of the Queensland Health Complaints Management Policy (Non-Consumer Complaints). • Establishment of a corporate contact point for Queensland Health staff, Queensland Government agencies and others regarding non-consumer complaints management. 	<p>Queensland Health Complaints Management Systems complies with Directive 13/06 Complaints Management Systems.</p> <p>Staff Complaints Liaison Office established and timely advice and assistance is provided to Queensland Health staff, external agencies and others.</p>
EMT members, District Chief Executive Officer or Chief Executive Officer Clinical and Statewide Services, Chief Health Officer, Chief Information Officer	<ul style="list-style-type: none"> • Is responsible for the overall implementation of the Queensland Health Complaints Management Policy (Non-Consumer Complaints) in their area of responsibility by ensuring: <ul style="list-style-type: none"> • An effective Complaints Management Systems is developed and in place for the Health Service District, Statewide Services or Corporate Office Division. • Nominate a staff member within the Health Service District, Statewide Services or Corporate Office Divisions (Complaints Coordinator Non-Consumer Complaints). • Ensuring systems are modified to prevent reoccurrences of similar issues raised in previous complaints. 	<p>Department-wide policy is implemented within the District, Statewide Services or Corporate Office Division and requirements are executed in accordance with the provisions outlined in this standard and associated standards.</p> <p>Staff member is nominated within the Health Service District, Statewide Services and Corporate Office Divisions.</p> <p>Local action taken in a timely manner.</p>

<p>Complaints Coordinator (Non-Consumer Complaints)</p>	<ul style="list-style-type: none"> • Implementing the policy, standard and local procedures that support staff, including staff training for complaints management. • Reporting concerns or issues to management and/or Staff Complaints Liaison Office regarding local Complaints Management Systems. • Reporting trended complaint data quarterly to the Staff Complaints Liaison Office and other relevant groups. • Completing and forwarding the District, Statewide Services and Corporate Office Divisions Self Audit Checklist annually to the Staff Complaints Liaison Office. 	<p>Each District, Statewide Service and Corporate Office Divisions' systems comply with the provisions outlined in this standard and associated standards.</p> <p>Concerns or issues are reported in a timely manner.</p> <p>District, Statewide Services and Corporate Office Divisions work instructions are current.</p> <p>Complaints Management Report is collected and reported in accordance with the provisions outlined in this standard.</p> <p>Self Audit Checklist collected and forwarded annually by due date outlined in this standard.</p>
<p>Director, Workplace Investigations Unit</p>	<ul style="list-style-type: none"> • Policy Custodian for the Queensland Health Policy Complaints Management (Non-Consumer Complaints) and associated policy instruments. 	<p>Policy in accordance with the requirements outlined in the <i>Queensland Health Standard: Policy Cycle Management</i>.</p> <p>Policies are reviewed on schedule.</p>
<p>Staff Complaints Liaison Office (SCLO)</p>	<ul style="list-style-type: none"> • Providing information to Queensland Health staff and others who may be unsure on how or where to lodge a complaint. • Act as a corporate contact point for central Queensland Government agencies, such as Qld Public Service Commission or the Queensland Ombudsman to liaise with regarding non-consumer complaints management. • Assisting Health Service Districts, Statewide Services and Corporate Office Divisions to ensure that existing and new complaints processes comply with OPSC Directive 13/06 and reporting requirements. • Managing complaints where there is no existing process to address the nature of the complaint made. • Collecting and reporting complaints data via quarterly reports. • Collecting and analyse completed Self Audit Checklists annually from Complaints 	<p>Accurate advice is provided in a timely manner.</p> <p>Department-wide policy and standards are implemented within the District, Statewide Services and Corporate Office Divisions.</p> <p>Complaints managed in an efficient and timely manner.</p> <p>Complaints Management Reports are collected and reported in accordance with the provisions outlined in the standard.</p>

	Coordinators for each Health Service District, Statewide Service and Corporate Office Division.	Self Audit Checklists collected and analysed annually.
All Employees	Are to comply with requirements of the policy and standard.	Staff meet compliance requirements in department-wide policy and local work instructions where relevant.

7 History

<i>Date of new / revised policy</i>	<i>Amended to.....</i>
August 2008	New Standard
May 2009	Standard Amended / New Template

Michael Kalimnios
Deputy Director-General
Corporate Services Division

Approved Date:

Policy #<insert number here>

Requirements for Complaints Systems (Non-Consumer Complaints)

Attachment A – Contact List

Queensland Health Complaints Management Contact List

<p>If you're not sure who to go to when lodging a complaint, you can access the QH Incident Reporting System at: http://gheps.health.qld.gov.au/ghis/ or you can talk with the Staff Complaints Liaison Office on: Ph: 1800 195 240.</p> <p>The Staff Complaints Liaison Office will manage any complaints where there is not an existing process to deal with the complaint.</p>	<p>Staff Complaints Liaison Office Ph: 1800 195 240 Fax: (07) 3234 0582 Email: StaffComplaints@health.qld.gov.au</p>
<p>Complaints about <i>Suspected Official Misconduct</i>, anything that might be illegal or could lead to a person being dismissed, should be reported to the Ethical Standards Unit.</p>	<p>Ethical Standards Unit Ph: (07) 3234 0589 Fax: (07) 3234 1528 Email: DESU@health.qld.gov.au</p>
<p>Complaints regarding Occupational Workplace Health and Safety will be sent to your District OH&S manager. If your complaint can't be handled locally, it will be referred to the Occupational Health and Workplace Safety Unit.</p>	<p>Occupational Health & Workplace Safety Unit Ph: (07) 3235 4352 Fax: (07) 3234 0738 Email: OHS@health.qld.gov.au</p>
<p>Matters regarding your employment, including discrimination and other Human Resource issues, including if you are a contractor working within Queensland Health are dealt with by the Human Resources Unit within the District, Corporate or Statewide Service.</p>	<p>Contact your local Human Resource Department, Corporate or Statewide Service.</p>
<p>Matters regarding your employment, including pay and conditions are dealt with by your local pay roll office.</p>	<p>Contact your local pay roll office.</p>
<p>If your complaint is about bullying and harassment it's best to speak to your line manager or local HR office. If it can't be dealt with locally, your complaint will be referred to the Workplace Investigations Unit.</p>	<p>Workplace Investigations Unit Ph: (07) 3235 9455 – 24 hours Fax: (07) 3234 0582 Email: WIU@health.qld.gov.au</p>

<p>If you're not sure who to go to when lodging a complaint, you can access the QH Incident Reporting System at: http://qheps.health.qld.gov.au/qhis/ or you can talk with the Staff Complaints Liaison Office on: Ph: 1800 195 240.</p> <p>The Staff Complaints Liaison Office will manage any complaints where there is not an existing process to deal with the complaint.</p>	<p>Staff Complaints Liaison Office Ph: 1800 195 240 Fax: (07) 3234 0582 Email: StaffComplaints@health.qld.gov.au</p>
<p>Freedom of Information, privacy matters or complaints regarding legislative breaches are dealt with by the Legal Unit in Corporate Office.</p>	<p>Legal Unit Ph: (07) 3234 0302 Fax: (07) 3234 1977 Email: LALU@health.qld.gov.au</p>
<p>Concerns or matters regarding Whistleblowers or Public Interest Disclosures are managed by the Internal Witness Support Unit (IWSU), Assurance & Risk Advisory Services.</p>	<p>Internal Witness Support Unit, Assurance & Risk Advisory Services Ph: (07) 3234 0529 Fax: (07) 3234 0069 Email: PID@health.qld.gov.au</p>
<p>Concerns about patient care relating to the behaviour or clinical practice of individual clinicians should be reported to the relevant Clinical Director in the District. Further information can be sought from the Clinician Performance Support Service about the options available to manage the concern in question.</p>	<p>Clinician Performance Support Service Ph: (07) 3636 6880 Fax: (07) 3636 6897 Email: clipss@health.qld.gov.au</p>
<p style="text-align: center;">External Agencies</p> <p>The agencies listed may be able to assist you regarding complaints or concerns.</p>	<p>The Queensland Ombudsman's Office Ph: 1800 068 908 – toll free outside of Brisbane (07) 3005 7000 Website: www.ombudsman.qld.gov.au</p>
	<p>Crime and Misconduct Commission Ph: (07) 3360 6060 Website: www.cmc.qld.gov.au</p>
	<p>Health Quality and Complaints Commission Ph: (07) 3120 5999 Queensland Toll Free: 1800 077 308 (outside the Brisbane area) TTY: (07) 3120 5997 Fax: (07) 3120 5998 Email: info@hqcc.qld.gov.au Website: www.hqcc.qld.gov.au</p>