

ACT Ambulance Service	
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Purpose

This policy and associated procedure provide ACT Ambulance Service (ACTAS) with a uniform approach to managing external feedback in a regulated environment post the introduction of national registration.

Scope

This policy applies to all employees of ACTAS. The policy applies to all feedback (including complaints) from the community e.g. patients and their advocates and external health care providers. It also applies to any feedback from ACTAS staff relating to the provision of patient care. Any feedback received under this policy may be referred to clinical review and/or People and Culture or to the Health Complaints Commissioner for further action. This policy also excludes mandatory employer notifications to the Paramedicine Board of Australia under the National Registration and Accreditation Scheme.

Background

As a public sector agency providing emergency pre-hospital health services to the Canberra community and surrounding area, ACTAS strives to provide the best possible care. Feedback from our patients and other stakeholders provides valuable information to assist us to deliver a quality service, and to identify improvements in our practice.

It is widely recognised that well managed consumer feedback can lead to:

- a. Enhanced quality and safety of the healthcare system
- b. Improved understanding of the patient and carer's perspective of the health care experience
- c. Improved relationships with patients and other stakeholders
- d. Identification of opportunities for improvement of services
- e. A culture of reporting and accountability

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- f. Enhancement of the reputation of the service
- g. Improved morale.

This policy is informed by restorative justice, and emphasises the importance of addressing and responding to feedback promptly, and within the principles of natural justice.

References

Health Records (Privacy and Access) Act 1997

Public Sector Management Act 1994

Territory Records Act 2002

Australian Standard ISO 10002:2004, MOD Customer Satisfaction-Guidelines for complaints handling in organisations

Commonwealth Ombudsman Better Practice Guide to Complaint Handling (April 2009)

ACT Public Sector ACT Ambulance Service Enterprise Agreement 2013 – 2017

AS111 Performance Measures

AS 131 Authority for and Scope of Clinical Practice

AS 132 Clinical Review Policy

ACTAS Wellbeing Policy and related Procedures

QSRM01 Clinical Review Procedure

QSRM04 External Feedback Procedure

Definitions and Acronyms

ACTAS means the ACT Ambulance Service.

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Carer means any other person or organisation other than the patient, with the written consent of the patient makes complaint to the ACTAS for services provided to the patient.

Agreement means the ACT Public Sector ACT Ambulance Service Enterprise Agreement 2013 – 2017

Delegate means for the purpose of this policy, the Chief Officer of the ACTAS.

Director-General means the Chief Executive of the Justice and Community Safety Directorate.

Complainant means any person external to the ACTAS who lodges a complaint related to ACTAS products or services and may include patients, carers and external health providers.

Complaint means any expression of dissatisfaction made to the ACTAS, related to its services, or the complaint management process itself, where a response or resolution is explicitly or implicitly expected. A 'Complaint' would also include a 'public interest disclosure' made in accordance with the *Public Interest Disclosure Act 1994*.

Member means an employee of the ACTAS.

PSMA means the *Public Sector Management Act 1994*.

The National Law means the *Health Practitioner Regulation National Law (ACT) Act 2010*.

Policy Details

Policy Statement

1. Under this policy, ACTAS is committed to an environment that:
 - a. Acknowledges staff by ensuring all feedback is received by those to whom it is relevant.
 - b. Supports the monitoring of feedback to improve service quality.
 - c. Provides an efficient, fair and accessible framework for addressing feedback.

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- d. Recognises, promotes and protects the rights of patients and their carers to comment about the services provided to them.
 - e. Recognises and promotes feedback from health care providers and other external stakeholders who form part of the broader healthcare team.
2. ACTAS is committed to a process of managing external feedback that is just, timely, and incorporates natural and restorative justice principles. All feedback will be actioned in line with Key Performance Indicators (KPIs). The process must:
 - a. Ensure issues raised can be effectively addressed
 - b. Take account of all relevant information
 - c. Ensure all parties have the opportunity to be heard
 - d. Be fair to all parties and provide advice on outcomes.
 3. ACTAS will comply with its reporting responsibilities under the National Law.

Roles and Responsibilities

Chief Officer

The Chief Officer is responsible for making effective feedback management a priority for the ACTAS. This will be achieved through:

1. Ensuring Quality Safety and Risk Management (QSRM) has adequate resources to support effective feedback management.
2. Authorisation of publically available information to be communicated to patients, carers, consumers and ACTAS members.
3. Exercising the delegated functions of the Director-General as they relate to management of feedback linked to member's actions in accordance with Section H of the Enterprise Agreement.

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General Manager QSRM

The General Manager QSRM is responsible for:

1. Managing external feedback in accordance with this policy, associated procedures and listed KPIs.
2. The establishment, maintenance and review of this policy and associated procedures.
3. Reporting on feedback received and developing strategies for identified trends or service wide identified issues.
4. Referring any feedback to the appropriate team for further action if necessary.
5. Ensuring the Chief Officer and Commissioner are briefed on feedback with the potential to result in significant liability and/or significant media attention.
6. Reporting 'notifiable conduct' to the Australian Health Practitioner Regulation Agency by making a mandatory notification in accordance with employer responsibilities under National Law.

All ACTAS Managers

Under the guidance of QSRM, all ACTAS Managers (General Managers, Ambulance Managers and Duty Officers) are responsible for:

1. Participating in the feedback process.
2. Ensuring staff receiving critical feedback or comment are appropriately supported through the process.
3. The staff member's manager must not discuss the details of the feedback with anyone other than their manager and those directly involved.
4. All managers who deal with a complaint directly will comply with the process outlined in this Policy and subordinate Procedure, and must advise QSRM to ensure accurate record keeping and facilitate the identification of trends.

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- Where a manager has a conflict of interest or a perceived conflict of interest they will declare the conflict and the matter will be reallocated by QSRM to another appropriate manager.

All staff

- All members of ACTAS are required to participate in any feedback process under this policy and procedure.
- Staff identified in feedback will have the opportunity to review the feedback in full (with the exception of identifying information such as name and addresses), and be informed of any further action, including the reasons for decisions.
- All staff mentioned in feedback will be provided with support and assistance where required.
- Where a staff member is concerned a manager following through a complaint has a conflict of interest, they will advise QSRM who will assess and action accordingly.
- All paramedic staff are required to meet their responsibilities as registered health practitioners and to comply with mandatory reporting responsibilities under the National Law.

Records Management

- External feedback will be recorded and managed centrally by QSRM.
- Where feedback leads to an independent investigation, QSRM records will be forwarded to the appropriate area.

Patient Confidentiality

There are situations where feedback is received from someone other than the patient concerned. For example, another family member may provide feedback, with or without the patient's knowledge. In accordance with the *Health Records (Privacy and Access) Act 1997*, no

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personal information about the care of a patient will be provided to another person without the patient's permission, even if they are listed as next of kin. In these situations, QSRM will advise the person to seek the patient's permission prior to actioning the feedback. If the patient involved in the case does not agree to the release of information, QSRM staff will inform the person as to why the case cannot be pursued.

In the event of external feedback in the situation where the patient is unable to give consent, for example, where there is a guardianship arrangement, or where the patient is deceased, personal information will be provided to the legal guardian or next of kin in accordance with the provisions of the *Health Records (Privacy and Access) Act 1997*.

Compliance

All staff are expected to participate in this process.

Non-compliance

Where an ACTAS employee declines to participate in the feedback process, QSRM will advise the Chief Officer and the Directorate's People and Workplace Strategy (PWS) unit and refer the matter accordingly for further action.

KPIs

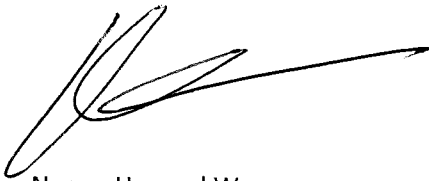
In accordance with External Feedback Procedure.

Review

This Policy and associated procedure will be reviewed in 12 months.

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Authorised



Name: Howard Wren

Title: Chief Officer

Date: 6 May 2019

REVISION HISTORY

Rev Number	Description of Change	Author	Effective
Initial Issue	Replaces ACTAS Complaints Policy	GM QSRM	24 April 2018
revision	Update for national registration	GMQSRM	6 May 2019