

ACT Ambulance Service	
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1 Introduction

As a public sector agency with a major public focus, the ACT Ambulance Service strives to provide effective service delivery to its patients and members. An effective complaint management policy, incorporating a clear departmental statement which is adopted and adhered to at all levels of the service is an essential quality assurance component of our services to the community.

Feedback from our patients and our members helps us to reinforce what we are doing right as well as how we can continue to improve our services. An effective complaints management framework reassures our patients and members of our commitment to resolving problems, improving relations, building loyalty and improving our accountability and transparency in service delivery.

This policy should be seen as complementing existing Enterprise Agreement provisions as they relate to Workplace Behaviours, Underperformance and Misconduct and Discipline, as opposed to replacing these provisions. This becomes particularly relevant where complaints relate to alleged conduct of a serving member of the ACT Ambulance Service. It should also be noted that issues of clinical practice will be assessed within the services clinical governance framework.

2 Purpose

The purpose of this policy is to give context, direction and to provide consistency to the manner in which ACT Ambulance Service will manage complaints. Under this policy, the ACT Ambulance Service:

- recognises, promotes and protects the rights of our patients and members to comment and complain about the services provided by the ACT Ambulance Service;
- provides an efficient, fair and accessible framework for resolving patient and member complaints; and
- supports the monitoring of patient and member complaints in an endeavour to improve the quality of services the ACT Ambulance Service provides.

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3 Scope

This policy applies to all ACT Ambulance Service members.

4 References

Health Records (Privacy and Access) Act 1997.

Public Interest Disclosure Act 1994.

Public Sector Management Act 1994.

Territory Records Act 2002.

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

ACTAS Policy Statement AS111: Performance Measures.

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

ACT Public Service Justice and Community Safety Directorate ACT Ambulance Service Enterprise Agreement 2011 – 2013.

5 Definitions and Acronyms

ACTAS means the ACT Ambulance Service.

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 Service Justice and Community Safety Directorate ACT Ambulance Service Enterprise Agreement 2011 – 2013.

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

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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*.

Public Interest Disclosure means the disclosure of information to the ACTAS that the person making the disclosure believes on reasonable grounds suggests that a member may have engaged in conduct that may represent a breach of Section 9, General Obligations of Public Employees, PSMA.

6 Responsibilities and Accountabilities

6.1 Chief Officer

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

- oversight of development and authorisation of policy to support and guide effective complaint management in the ACTAS;
- allocation of adequate resources to support effective complaint management;
- authorisation of publically available information to be communicated to patients, carers, consumers and ACTAS members; and
- exercising the delegated functions of the Director-General as they relate to management of complaints linked to member's actions in accordance with Section H of the Agreement.

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6.2 Deputy Chief Officer

The Deputy Chief Officer is responsible for:

- ensuring that the complaints management policy is implemented and communicated to all parties;
- reviewing internal reports on the quality and timeliness of complaint management;
- using complaint information in program review and service delivery; and
- periodic review of the complaints management policy to ensure that it is effectively maintained and continually improved.

6.3 General Manager Quality, Safety and Risk Management (QSRM)

The General Manager QSRM is responsible for:

- ensuring the investigation process follows the principles of natural justice. This means that all those involved in the complaint know about it and that decision making is fair, unbiased and just;
- establishing a process of performance monitoring, evaluation and reporting to complaints management;
- reporting to the Deputy Chief Officer on the complaints management process with recommendations for improvement and meeting target time limits;
- liaison with complainants as the ACTAS management representative or the appropriate delegation of this function;
- allocation of complaints to the appropriate ACTAS General Manager or QSRM members for review and identification of resolution and continuous improvement requirements;
- following initial assessment; refer all code of conduct matters to the appropriate General Manager for follow up in accordance with Section 9 of the PSMA; and

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- monitoring and ensuring that the complaints data base is maintained, updated to reflect progress of complaint resolution and taking corrective action where deficiencies are identified.

6.4 All General Managers

All General Managers are responsible for:

- Code of Conduct and performance matters concerning members in their respective chain of command emerging from and/or related to complaints in accordance with Enterprise Agreement provisions.

6.5 All Members

Members are responsible for:

- being aware of their roles and responsibilities in respect of complaints management and complying with this policy; and
- displaying conduct at all times consistent with that of Public Employees under Section 9 (General Obligations of Public Employees) of the PSMA.

7. Policy

7.1 Complaint Management

All complaints received will be managed in accordance with this policy. Management of any complaint notified to the ACTAS as a 'public interest disclosure' will be managed in accordance with the requirements of the *Public Interest Disclosure Act 1994*.

7.2 Commitment

All customer or member complaints will be managed fairly, effectively and courteously with the confidence of all involved parties maintained at all times. In doing so, the ACTAS will ensure that the rights of the patient are protected, as are those of the member who receive complaints, or who may be the subject of a complaint.

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7.3 Promoting our Complaint Management Procedure

ACTAS will ensure that patients, carers and members are aware of their right to complain by promoting the complaint management policy via education of our members, encouraging public access via our website, annual client satisfaction survey and reporting on complaints received.

ACTAS will also publish, and update as required, documentation on our website to inform our patients and carers:

- 'Frequently asked Questions' relating to ambulance Fees and Charges;
- management of requests for Full or Partial Waiver of ambulance accounts;
- management of requests for credit or cancellations of ambulance accounts; and
- our Management of Complaints policy.

This advice will include key positions in the ACTAS that patients or carers may contact to obtain assistance to provide written or verbal feedback to services provided.

7.4 Recording of Complaints

Complaints will be recorded in order to:

- monitor progress of complaints;
- ensure accountability;
- identify and address root causes; and
- enable data analysis and management reporting.

All complaints will be registered and managed in accordance with this policy. Complaint forms will be updated as required and made available to our patients and members to ensure consistency in information collected. Complaint information will be electronically recorded at one central point to allow for the monitoring of progress, analysis of complaints and management reporting for service improvement.

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7.5 Privacy of Records

All documents received and created under this policy shall be managed by the ACTAS in accordance with the *Territory Records Act 2002* and the *Health Records (Privacy and Access) Act 1997*. In doing so, the ACTAS will ensure that the privacy of the patient, the carer or the member is respected at all times.

7.6 Response Benchmarks

The time taken to review and finalise a complaint is identified as one of the key attributes that influence perception of a customer response system.

Services provided by the ACTAS may require in-depth review and analysis by other parties as part of complaint management. Timely access to members due to rotating shift work may also delay complaint management hence the following closure timeframes will be used as a benchmark:

- Initial Acknowledgement - Written acknowledgement of initial contact from client and provision of ACTAS Complaint Form **within 7 working days.**
- Preliminary Assessment - Preliminary assessment of complaint received from client to determine if Full Assessment required **within 28 working days.**
- Full Assessment - Comprehensive assessment completed including report to Chief Officer with any recommendations **within 56 working days.**

Response benchmarks provide the maximum time allowed to assess and finalise a complaint. Where at all possible, a complaint should be finalised prior to these benchmark timeframes. Performance measures for management of complaints are also defined in ACTAS Policy Statement AS111: Performance Measures.

7.7 Extension to Response Benchmarks

Some complaints may take longer to finalise due to extenuating factors beyond the control of the member tasked to manage the complaint. In this situation, an extension to the benchmark timeframe is to be sought from the Deputy Chief Officer. This provides the opportunity to identify strategies to overcome similar delays in future management of complaints and to provide feedback to the complainant on revised timeframes.

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7.8 Appeal of the Delegates Decision

In the event that the patient, carer or member does not agree with the decision of the Delegate, the patient, carer or member may seek review of the decision by:

i) Patient or Carer

Writing to the ESA Commissioner. The Commissioner will review the original decision and relevant material prior to responding to the patient or carer. If the patient or carer is still unsatisfied, the patient or carer may, where the complaint relates to the provision of a health service request a review of the decision by writing to the Health Services Commissioner at the ACT Human Rights Commission.

ii) Member

A member, or the member's representative, has the right to apply to the Chief Executive for a review of any action or decision in relation to the members' employment, unless the action or decision is specifically excluded under Section I '*Internal Review Procedure*' of the Agreement.

A review initiated by the member to the Chief Executive must:

- (a) be submitted to the Chief Executive in writing;
- (b) describe the reason why the application is being made; and
- (c) describe the outcome sought.

7.9 Empowering our Members

ACTAS members are the single most important resource in the complaint management process. Members tasked to undertake management of patient, carer or members complaints will be provided with the necessary skills, knowledge and confidence to do so via:

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- ensuring ready access for all members to the ACTAS Complaint Management policy;
- education of our members on complaints management through programmed in-service periods;
and
- identification and provision of necessary training of members tasked to undertake complaint management.

Authorised

DAVID FOOT ASM
Chief Officer
ACT Ambulance Service

Name: David Foot ASM
Title: Chief Officer
Date: 5 June 2013

REVISION HISTORY

Rev. No.	Description of Change	Author	Effective
Initial issue		Chief Officer	30 March 2011
v2	Changes to reflect establishment of QSRM and Enterprise Agreement	GM QSRM	5 June 2013

