

Approved by: CEO
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Complaints Management Policy

Policy Number 9.18

CLINICAL GOVERNANCE

1. Purpose

Wentworth Healthcare Ltd is committed to managing complaints in a manner consistent with our values of respect, ethical practice, continuous improvement, collaboration, and quality.

The purpose of this policy is to:

- Provide guidance to our staff in managing complaints.
- Providing complainants with details of our complaints management policy.
- Provide access to an open, and responsive clear complaints-handling process.
- Ensure complaints are handled objectively, fairly, and confidentially.
- Ensure complaints are received and responded to in a timely manner.
- Facilitate continuous improvement informed by robust analysis of complaints.

2. Scope/Application

Wentworth Healthcare has a legal obligation under the Corporations Act 2001 Act and the Australian Charities and Not-for-Profits Commission (ACNC), in handling complaints. In delivering the Primary Health Network Program for the Nepean Blue Mountains Region, Wentworth Healthcare also has an obligation from the Department of Health and Aged Care to address complaints about its programs and services.

As such, robust complaints handling policies and procedures are required to be in place with access and visibility of these processes made available to staff and the public. Wentworth Healthcare encompasses these processes under its Complaints Management System, comprising complaints management policy, complaints management procedure and complaints register. To ensure the complaints management processes are accessible and clear to the public, a Complaints Management public facing statement is available on the Wentworth Healthcare website.

This policy applies to all Wentworth Healthcare members of the Board, employees, contractors, and volunteers receiving or managing complaints from the public and clients made to, or about us, regarding our programs, services and staff, or our complaints handling process.

Within scope of this policy are complaints, about the programs and services delivered through all of Wentworth Healthcare's contracts and commissioning and engagement activities in delivering health care within the Nepean Blue Mountains region.

Out of scope are grievances and or industrial relations complaints raised by Wentworth Healthcare staff. These are managed through the Wentworth Healthcare Grievance Policy and Grievance Procedure.

Feedback about a program or services, which can be positive or negative (but not a formal complaint), inclusive of stakeholder surveys, good news stories and similar, will be managed separately to this policy.

What is a Complaint?

A complaint is an expression of dissatisfaction made to Wentworth Healthcare, related to our services, programs or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

The difference between a complaint and a critical incident relates to the level of harm encountered. A critical incident is any event or circumstance which has or could lead to unintended and or unnecessary mental or physical harm to a consumer. A complaint may escalate or relate to a critical incident. Critical incident management is addressed separately through the Wentworth Healthcare Clinical Governance Framework, Critical Incident Management Policy, and associated procedures.

Complaints may also escalate to a dispute which is an unresolved complaint either within or outside of our organisation and will follow the complaints management process. Grievances, comprising of a formal written statement by an individual staff member about another staff member or a work-related problem are outside the scope of this policy and are treated separately under Wentworth Healthcare Grievance Policy and Procedure.

Complaints may also be directly about Wentworth Healthcare's delivery of the Commonwealth Department of Health and Aged Care's Primary Health Network (PHN) program. These can be addressed by Wentworth Healthcare for resolution in the first instance. Subject to the nature of the complaint, if a complaint is made to the Commonwealth Department of Health and Aged Care, the department will be managed in accordance with the [PHN Complaints Policy](https://www.health.gov.au/resources/publications/primary-health-network-phn-program-complaints-policy). <https://www.health.gov.au/resources/publications/primary-health-network-phn-program-complaints-policy>.

In some cases a complaint may raise issues that require mandatory external notification or referral because the complaint should be managed by another government agency, particularly if the complaint relates to direct clinical care by a service outside of Wentworth Healthcare's accountability (Department of Housing, Department of Community Services, Commonwealth Aged Care Complaints Resolution Scheme, Health Care Complaints Commission etc) or; the complaint requires mandatory notification to another agency, such as the Police, the Coroner or the NSW Department of Health, Australian Health Practitioners Registration Authority (AHPRA).

3. Policy Statement and Principles

Wentworth Healthcare is committed to a positive complaints management environment. We recognise the importance of timely and thorough investigation and management of all complaints so we can address and improve our delivered and commissioned programs and services.

Wentworth Healthcare expects staff at all levels to be committed to fair, effective, and efficient complaint handling. Where a complaint is received regarding a service or program Wentworth

Healthcare delivers or commissions, we will ensure the Wentworth Healthcare complaints management system is followed. In doing so:

- We will treat all complaints fairly, with impartiality and transparency, while maintaining confidentiality.
- We will ensure mechanisms are in place to receive, consider and resolve complaints related to the business in a timely and effective manner.
- All assessment of complaints will be undertaken in a manner consistent with our values and code of conduct.
- Where a complaint is received regarding a service we contract or commission, we will address the complaint with the service provider who we also expect to have an accessible and comprehensive complaint management system in place.

Guiding Principles

Objectivity and Fairness:	Wentworth Healthcare will recognise and respect everybody's right to provide feedback or lodge a complaint and will treat all complaints fairly with impartiality and transparency. Any assessments will be undertaken in a manner consistent with Wentworth Healthcare's values and code of conduct.
Accessibility:	Wentworth Healthcare will ensure the complaint management process and policy is publicly accessible to receive complaints and is published through a policy statement on the Wentworth Healthcare website. This includes information on how and where to lodge a complaint, and how complaints are managed.
Responsiveness and Efficiency:	Wentworth Healthcare will record, track, acknowledge and process complaints in a timely manner and will ensure the level of assessment is proportional to the complexity of the complaint.
Confidentiality:	Wentworth Healthcare will ensure personal information that identifies individuals is only disclosed as permitted under the relevant privacy laws, secrecy provisions and confidentiality obligations as governed by the Australian Charities and Not-for-profits Commission Act 2012.
Open Disclosure:	Open disclosure involves a discussion between the service provider, the client or patient using the service and if relevant their support people, about an incident that resulted in an unexpected outcome or harm to themselves. Open disclosure is a reasonable expectation and reflects best practice for high quality services.

4. Roles and Responsibilities

Wentworth Healthcare will take a whole-of-organisation approach with clear points of accountability for effective reporting and feedback, as follows:

- **Wentworth Healthcare Board** has ultimate responsibility for:
 - Ensuring a system is in place for responding to complaints.
 - Ensuring Wentworth Healthcare Board Directors are aware of their roles and responsibilities in relation to the complaints management system.
 - Reviewing reports on complaint trends and issues.

- **Chief Executive Officer** is responsible for:
 - Receiving reports outlining complaints received and outcomes.
 - Reporting to the Wentworth Healthcare Board and other Board Committees as required and in accordance with the Risk Assessment for Complaints Management.
 - Encouraging an environment where complaints are handled seriously and thoroughly.
 - Ensuring an effective Complaint Management System is developed and in place for Wentworth Healthcare.
 - Ensuring training of staff in the Complaints Management System is prioritised.
 - Ensuring the Complaints Management public facing Policy Statement is available on the Wentworth Healthcare website to support access for consumers, carers, community members including key stakeholders.
 - Ensuring appropriate resources are available and utilised for effective complaint management.
 - Ensuring appropriate actions are implemented to eliminate or minimise similar problems from occurring.

- **Executive Manager Mental Health and Integration** is responsible for:
 - The development, management, and ongoing improvement of the Wentworth Healthcare Complaints Management System.

- **Executive Managers/Managers** are responsible for:
 - Educate staff in the Complaints management system. This includes regular training to upskill staff to address complaints promptly in accordance with Wentworth Healthcare's Complaints Management System.
 - Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.
 - Regularly discuss the management of complaints across Program areas.
 - Provide regular reports to the CEO on the management of complaints, including opportunities for improvement.

- **All Staff** are responsible for:
 - Understanding and complying with the Wentworth Healthcare Complaints Management System including ensuring any complaint they receive is reported and addressed.
 - Participation in complaints management processes, including training requirements, under the direction of management and executive.

- **Commissioned Services** are responsible for:

- Meeting Wentworth Healthcare compliance in having an effective complaints management policy and procedure in place as part of their commissioned services contract.
- Working with Wentworth Healthcare to resolve complaints related to their service.
- Addressing the issues and concerns raised in a complaint to ensure the continuum of a safe and quality commissioned service.

➤ Consumers and Community Members

Consumers, carers, and community members making a complaint about a Wentworth Healthcare commissioned or delivered service or program will be required to provide necessary relevant information to Wentworth Healthcare to allow us to investigate and address a complaint.

5. References and Other Documents

- Department of Health and Aged Care. Primary Health Networks (PHN) Complaints Policy. April 2024
- WHL Complaints Management Statement
- WHL Complaints Management Procedure
- *Critical Incident Management Policy and Procedures*

Forms, checklists:

- Complaint Notification Form
- Complaint Management Investigation Report

Other resources:

- NSW Government. Policy Directive. Complaints Management. 24 April 2020.

6. Further Assistance

For further information or guidance about this Policy, please contact the Executive Manager Mental Health and Integration.

7. Revisions Made to This Policy

Date	Major, Minor or Editorial Revision	Description of Revision	Author
<i>Date of revision/new policy</i>	<i>Refer to Definitions in the Policy Development and Review Policy for definitions of major, minor and editorial amendments.</i>	<i>Outline the main changes made to the policy. For New Policies, please state 'New Policy'</i>	
April 2020	Editorial	Minor updates	Elisa Manley
October 2020	Editorial	Transferred to current template	Project Support Officer Business Improvement
April 2022	Editorial	Manager titles	Executive Manager Strategy Integration
April 2024	Editorial, updates	Major Updates	Executive Manager Strategy Integration
April 2025	Minor	Updated policy to sit under Clinical Governance in QMS. Updated numbering from 7.13 to 9.18 to reflect change. Removed procedural section (no longer required due to	Executive Manager Strategy and Integration and People and Culture Officer

		creation of separate procedure). Updated reference and other documents section. Updated position titles.	
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