



# Complaints Management Procedure

## 1. Guiding Principles

The WA Country Health Service (WACHS) welcomes feedback including complaints about WACHS services from consumers, their families and carers and is committed to using the information provided to improve the provision of accessible high quality health care to people in country communities.

## 2. Procedure

The Datix Consumer Feedback Module (CFM) is utilised to record complaints and contacts, file related documentation, document steps taken to investigate and resolve a complaint in accordance with [WA Health Complaints Management Policy](#).

Recommendations and actions undertaken for service improvement are also to be recorded in the Datix system, allocated to a responsible officer for implementation within a specified period and evaluated by a relevant committee periodically until the committee is satisfied that effective action has been taken. Consideration must be given for the inclusion of consumers in the investigation of complaints including development of recommendations for service improvements, and in the evaluation process.

Refer to [WACHS Complaints Business Rules](#) and the [Complaints Process Flowchart](#) for the detailed process including required fields to be completed.

## 3. Definitions

Term	Definition
<b>Complainant</b>	A person that makes a complaint regarding any aspect of a service provided by an organisation.
<b>Complaint</b>	An expression of dissatisfaction by or on behalf of an individual consumer/carer/representative regarding any aspect of a service provided by an organisation where a response or resolution is explicitly or implicitly expected or legally required. <ul style="list-style-type: none"><li>• <b>Anonymous complaint:</b> Where the complainant for whatever reason chooses to withhold identifying details. It is acknowledged that anonymous complaints may not be able to be responded to, but Health Service Providers should nevertheless work to resolve these types of complaints via service improvement.</li></ul>
<b>Complaint category</b>	Ten complaint categories are set out in the Complaint Management Guideline to assist identification of common factors in complaints and to ensure consistent reporting.

Term	Definition
<b>Complaint issue</b>	A complaint category is further subdivided into complaint issues, which aim to accurately identify and reflect the specific matters relating to each complaint.
<b>Consumer</b>	Any person receiving health care from a Health Service Provider either as an inpatient, outpatient or in a community setting. A consumer may also include carers, relatives or friends of a person receiving services from a Health Service Provider, health professionals external to the organisation or other concerned individuals, agencies or groups.
<b>Consumer Feedback Coordinator</b>	The regional position responsible for ensuring data entered into and documents uploaded to the CFM meet minimum requirements and sound governance according to the WACHS Business Rules for CFM. This position reports to the regional safety and quality team and may form part of another role.
<b>Contact/concern</b>	Feedback regarding any aspect of service where: <ul style="list-style-type: none"> <li>• the person states that they do not wish to lodge a formal complaint</li> <li>• the issue can be resolved without going through the formal complaint management process.</li> </ul>
<b>Representative</b>	Someone providing assistance and support to a consumer, including parents, family members, carers and consumer representatives.
<b>Safety &amp; Quality Lead</b>	The regional position responsible for oversight of the complaints process.
<b>Seriousness Assessment Matrix (SAM)</b> <ul style="list-style-type: none"> <li>• <b>Initial SAM score</b></li> <li>• <b>Confirmed SAM score</b></li> </ul>	Framework for assessing the seriousness associated with the events that are the subject of a complaint. Refer to the WA Health <a href="#">Complaints Management Guideline</a> for further information. <ul style="list-style-type: none"> <li>- Based on the first assessment of the complaint entirely on information provided by the complainant.</li> <li>- Based on the complaint and investigation findings.</li> </ul>
<b>Tier 4</b>	The person responsible for leadership and management of the service a complaint received is in relation to.

#### 4. Roles and Responsibilities

The Regional Director ensures

- the region has an effective complaints management process which encourages consumers to provide feedback, meets policy requirements and demonstrates commitment to and ensures evidence of improving services in response to feedback,
- the Chief Executive is advised of any complaint confirmed on the Seriousness Assessment Matrix (SAM) as a SAM 1 and
- approves responses to SAM 1 and SAM 2 complaints.

### Safety & Quality Lead

- oversees the complaints management process including evaluation of improvement actions by relevant committees and overall evaluation of the complaints management process.

### Tier 4

- informs the Regional Director of high risk complaints,
- reviews and approves SAM scores and allocates appropriate complaint investigators,
- oversees communication with consumers and/or their representatives engaging them in decisions about the management of a complaint
- endorses responses to SAM 1 and SAM 2 complaints, progresses to the Regional Director for approval and
- approves responses to SAM 3 and SAM 4 complaints.

### The Complaint Investigator

- follows the guiding principles of complaint investigation detailed in the WA Health [Complaints Management Guideline](#) and [Complaints Management Toolkit](#),
- documents the outcome of the investigation in Datix CFM,
- ensures all elements of a complaint are addressed, drafts a response and ensures any opportunities for service improvement identified are actioned and evaluated by the relevant committee.

### The Consumer Feedback Coordinator

- enters, checks information entered, uploads documents and checks uploaded documents in Datix CFM according to the WACHS Complaints Business Rules,
- monitors compliance with timeframes for managing complaints and
- regularly reviews complaints records for data quality, document security and completeness.

### All Staff

- encourage health consumers, their families and carers to provide feedback, demonstrating the WA Country Health Service is committed to continuous improvement and providing safe high quality health care to people in country communities,
- resolve an issue immediately if it is within your capacity or escalate to senior staff,
- provide advice and information to those who would like to make a complaint externally via the [Health and Disability Services Complaints Office](#) or for aged care residents, carers and representatives the [Aged Care Safety & Quality Commission](#).
- where required, enter feedback and documents received into CFM and
- participate openly in complaint investigations as required.

### 5. Compliance

WACHS complies with the mandatory [WA Health Complaints Management Policy](#), is guided in the management of complaints from children and young people by the National Office for Child Safety [Complaint Handling Guide](#) and proceeds in accordance with the National Safety and Quality Health Service Standards, [Charter of Aged Care Rights](#), and Aged Care Act 1997.

Failure to comply with this procedure may constitute a breach of the WA Health Code of Conduct (Code). The Code is part of the [Integrity Policy Framework](#) issued pursuant to section 26 of the [Health Services Act 2016](#) (WA) and is binding on all WACHS staff which for this purpose includes trainees, students, volunteers, researchers, contractors for service (including all visiting health professionals and agency staff) and persons delivering training or education within WACHS.

WACHS staff are reminded that compliance with all policies is mandatory.

### 6. Records Management

[Records Management Policy](#)

[Health Record Management Policy](#)

Complaints records are maintained in Datix CFM in accordance with [WACHS Complaints Business Rules](#).

### 7. Evaluation

Evaluation of this procedure is to be led by the Safety and Quality Lead and reported to the relevant regional committee including;

- Monitoring the implementation and evaluation of recommendations for service improvements,
- Regular review of Datix CFM data audits via the Datix audit reporting tool,
- Regular review of complainant evaluation survey results,
- Monitoring Key Performance Indicators for Complaints Management outlined in the [WA Health Complaints Management Policy](#),
- Regular review of document management procedures related to complaints,
- External accreditation processes.

### 8. Standards

[National Safety and Quality Health Service Standards](#) – 1.14

[Australian Aged Care Quality Agency Accreditation Standards](#) – Standard 6

[National Standards for Mental Health Services](#) – 1.16

[National Standards for Disability Services](#) – Standard 4

## 9. Legislation

[Health and Disability Services \(Complaints\) Act 1995 \(WA\)](#)  
[Health and Disability Services \(Complaints\) Amendment Regulations 2011](#)  
[Health and Disability Services \(Complaints\) Amendment Regulations 2015](#)  
[Health and Disability Services \(Complaints\) Regulations 2016](#)  
[Mental Health Act 2014 \(WA\)](#)  
[Disability Services Act 1993 \(WA\)](#)  
[Carers Recognition Act 2004 \(WA\)](#)  
[Freedom of Information Act 1992 \(WA\)](#)  
[Corruption, Crime and Misconduct Act 2003 \(WA\)](#)  
[Aged Care Act 1997](#)

## 10. Related Forms

Consumer feedback forms available at sites  
Complaints Management Record form available from intranet

## 11. Related Policy Documents

[WACHS Patient Opinion Response Procedure](#)  
[Open Disclosure Procedure](#)

## 12. Related WA Health System Policies

[Complaints Management Policy](#)  
[Complaints Management Guideline](#)  
[Complaints Management Toolkit](#)  
[Clinical Incident Management Policy](#)

## 13. Policy Framework

[Clinical Governance, Safety and Quality](#)

## 14. Appendix

[Complaints Process Flowchart](#)

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<b>Contact:</b>	Program Manager Clinical Risk		
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