

Complaints processes

Guidance and checklist for specialist medical colleges

Background

In 2023, the National Health Practitioner Ombudsman (NHPO) undertook a review of specialist medical college policies, procedures, and practices for accreditation of specialist training settings and published a report: [*Processes for progress – Part one: A roadmap for greater transparency and accountability in specialist medical training site accreditation, October 2023*](#) (the NHPO report). Australian Health Ministers agreed with the 23 recommendations in this report, and also directed the Medical Board of Australia and the Australian Health Practitioner Regulation Agency (Ahpra) to require the AMC to work with colleges and jurisdictions on the implementation of the recommendations: [*Ministerial Policy Direction 2023-01: Medical College Accreditation of Training Sites*](#). Colleges, jurisdictional health departments and the AMC have been working to progress this work.

This checklist relates to Recommendation 21 below.

Recommendation 21: The AMC and colleges should work together to ensure administrative complaint handling processes and associated policies are developed, implemented and made publicly available, and supported by appropriate staff training.

To meet this requirement, this checklist has been developed using information taken from the recommendations included in the main NHPO report and its Appendices (college-specific analysis and recommendations).

Using the Checklist

This checklist is applicable for college policies and processes related to complaints about a college service, policy, process or conduct. Colleges will have various policies that allow for individuals or organisations to express dissatisfaction about, and/or seek a resolution regarding, a college service, policy, process or conduct. Such policies may have different names across colleges but, for the purposes of this checklist, are referred to as ‘complaints policies and procedures’.

*Interaction with [*Merits review process – Guidance and checklist for specialist medical college decisions on accreditation of training settings*](#)*

Colleges may receive requests to review decisions regarding the accreditation of training settings. The relevant checklist for college policies and processes regarding review of accreditation decisions is the [*Merits review processes – Guidance and checklist for specialist medical college decisions on accreditation of training settings*](#).

Complaints processes checklist

#	Checklist Item
Matters subject to complaints processes	
1.	<p>College complaints policies and procedures should clearly outline the types of complaints that may be raised. For example, the policy should state that complaints may be made about:</p> <ul style="list-style-type: none"> • service delivery (such as concerns about staff conduct, the quality of the service or its accessibility) • management of a matter (such as delay, not responding to communications, incorrect or unfair handling of a matter and the reasons for a decision not being clearly provided) • policies and processes, and how they have been applied (such as concerns a policy or process is unfair, incorrect or inadequately explained).
Complaints management	
2.	<p>Information about college complaints policies and procedures should be available on the college website, and should include:</p> <ul style="list-style-type: none"> • information outlining the processes; • a link to the relevant policies and procedures that are easily accessible; • information on how to make a complaint with a link to the relevant documentation that the complainant must complete, and the relevant policies and/or procedures that govern the process; • relevant contact information, such as an email, and ideally a phone number that is regularly monitored for people to use if they wish to discuss a complaint.
3.	<p>College complaints policies and procedures should allow for complaints to be made via hard copy, email and telephone where this is reasonably practicable.</p>
4.	<p>College complaints policies and procedures should allow for complaints to be made on a confidential or anonymous basis. However, clear guidance to complainants about the limitations associated with progressing these types of complaints should also be provided, for example,</p> <ul style="list-style-type: none"> • the inability to keep anonymous complainants updated about the progress of a complaint or advised of the outcome of the complaint; • possible limitations on how a complaint can be investigated if the complaint is anonymous or the identity of a complainant cannot be revealed.
5.	<p>College application processes/forms to lodge a complaint should:</p> <ul style="list-style-type: none"> • contain targeted questions for applicants to complete, including details of the complaint and the outcome they are seeking; • be available online and able to be submitted electronically, where this is reasonably practicable, given the resources of the college and the number of complaints received. <p><i>Note: Colleges that do not currently have the capacity to receive online complaints should work towards this, except where the number of complaints is so low that it is not reasonably practicable for the college.</i></p>
6.	<p>College complaints policies and procedures should include the timeframe for the college to acknowledge receipt of the complaint.</p> <p>Complaints policies and/or procedures should include, as far as practicable, guidance/targets on timeframes for each stage of the complaints process.</p>

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#	Checklist Item <i>continued...</i>
7.	<p>College complaints policies and procedures should clearly outline the stages and steps for complaints management. Ideal administrative complaint handling involves a three-stage process.</p> <p>Stage One should involve the frontline management of the complaint and assessing the complaint to:</p> <ul style="list-style-type: none"> • seek to informally resolve simple or single-issue matters; • refer matters that should be dealt with through other internal or external processes to those processes in a timely manner; • quickly and efficiently escalate more complex or sensitive matters to stage two if they cannot be resolved through stage one. <p>Stage Two should involve specialist management of the complaint. It should involve:</p> <ul style="list-style-type: none"> • some individuals who were not involved in stage one, so as to give a fresh perspective on the matter; • conducting formal inquiries or an investigation; • seeking to resolve and finalise the complaint. <p>Stage Three should involve external review of the complaint if the complainant is not satisfied with the college's management or outcome of the complaint. In the context of administrative complaints made about specialist medical colleges in Australia, this would involve the complainant taking the matter to the National Health Practitioner Ombudsman.</p> <p>Colleges should provide information to complainants in relevant policies and procedures, as well as on their websites, that complaints to the National Health Practitioner Ombudsman may be made about college decisions and actions in certain circumstances. Suggested wording is as follows:</p> <p><i>External review of administrative complaints can be sought from the National Health Practitioner Ombudsman in relation to colleges' delivery of approved programs of study. While it is preferred that complainants first progress through the college's complaints processes, complainants can access external complaint mechanisms without doing so. Information about making a complaint to the National Health Practitioner Ombudsman may be found on its website at: https://www.nhpo.gov.au.</i></p>
8.	<p>College complaints policies and procedures should identify possible outcomes at the conclusion of each stage of the complaints process. These outcomes could include, for example:</p> <ul style="list-style-type: none"> • listening to and acknowledging the person's experience; • taking no action with an explanation of the reasons; • issuing an apology; • providing a better explanation or reasons for a decision or action; • committing to review procedures, policies or processes in response to the complaint; • expediting action; • changing or reconsidering a decision; • any other appropriate action. <p>As noted under item 5, complaints application processes/forms should provide space for the complainant to state the outcome they are seeking.</p> <p>As noted under item 7, external avenues for resolution of complaints should also be clearly outlined when complainants receive the final decision regarding their complaint from the college.</p>
9.	<p>College complaints policies and procedures should specify that the complainant will be provided with written notice of:</p> <ul style="list-style-type: none"> • how the college has responded to each aspect of their complaint; • the reasons for the college's response to each aspect of the complaint; and • the outcome of the complaint at the conclusion of each stage of the college's complaints process.
10.	<p>The college should record all complaints and their outcome, as well as a timeline of actions taken for each complaint to confirm timely processing [see item 6].</p>
11.	<p>College staff dealing with complaints should be competent at assessing them so that they are referred to appropriate pathways within the college (for example, to the review process or to other policies, such as the code of conduct or bullying, harassment, and discrimination policies).</p>