

Title	Complaint Management Process v3				
Code	ANZ-FKC-PL-RM&Q-006				
Scope	All ANZ Fresenius Kidney Care Clinics				
Purpose	This document describes the process and approach of clinical incident and complaint management within Fresenius Clinics				
Creation Date / Review Date	15-07-2019	Effective Date	20-07-2019	Date of next review	July 2022
Related Documents	ANZ-FKC-PL-RM&Q-002 Incident Reporting & Review Process ANZ-NC-PL-RM&Q-005 Open Disclosure Policy ANZ-NC-PL-CP-002 Patients’ Rights and Responsibilities ANZ-FKC-PL-Gov-013 Credentialling and Clinical privileges FMEAU-34 Issue Prevention & Grievance Resolution Policy ANZ-NC-WI-RM&Q-003 Product Complaint Process - FKC Patient Health Care Charter				
Business / System Responsibility	Carolyn Chenoweth, Quality and Infection Prevention and Control Manager				
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Reviewed By	Carolyn Chenoweth, Quality & Infection Prevention & Control Manger  Signature: _____ Date: _____ Louisa Moloney, Project Coordinator Clinical & Quality  Signature: _____ Date: _____	Endorsed By	Samantha Tan, Director of Nursing  Signature _____ Date: _____		
Change History	15-07-2019 v3 updated policy template and content – Leanne Glancy 11-12-2014 v2 updated policy template and content – Carolyn Chenoweth 18-04-2013 Policy Created – Leanne Glancy				

<b>Abbreviations Definitions</b>	RiskMan – electronic risk management program RCA- Root Cause analysis: An RCA is a systematic process of analysis aimed at identifying factors that contributed to the happening of an event and the measures that could be implemented to prevent a recurrence of similar events. It is governed by legislation set out in Hospitals and Health Boards Act 2011 ISR-Incident severity rating
<b>POLICY</b>	Consumers, their families, clinicians and staff can make complaints which are handled with confidentiality, respect and sensitivity. Consumers, clinicians and staff will not be discriminated against or suffer any unjust adverse consequences because of making a complaint about standards of care and service.
<b>Consumer complaints</b>	Consumers and their families are encouraged to provide suggestions, compliments, concerns and complaints regarding the service delivered by Fresenius Clinics. <ul style="list-style-type: none"> <li>• All complaints are handled without prejudice or assumptions</li> <li>• Staff will provide aid to consumers who have special needs, such as those who do not speak English well or have a disability, so that they can provide feedback or follow up a complaint.</li> <li>• Clinical staff involved in clinical incidents or patient complaints need to ensure that the patient(s) and staff involved are safe and their immediate safety needs are addressed</li> <li>• Receipt of complaints will be formally acknowledged within five business days of being lodged.</li> </ul>

	<ul style="list-style-type: none"> <li>If complaints cannot be resolved within two weeks of being lodged they will be escalated to the next level of management.</li> </ul>
Staff responsibility	Staff are expected to attempt resolution of complaints and concerns at the point of service, wherever possible and within the scope of their role and responsibility.
Resolution process	<p>Complaints addressed at clinic level by the clinic staff under the guidance of the Dialysis Clinic Manager.</p> <ul style="list-style-type: none"> <li>An expression of regret to the consumer or carer for any harm suffered.</li> <li>A factual explanation or information about what is known, without speculating or blaming others.</li> <li>An opportunity for the patient, their family and carer to relate their experience</li> <li>Considering the problem and the outcome the consumer is seeking and proposing a solution</li> <li>The steps being taken to manage the event and prevent recurrence</li> <li>Confirming that the consumer is satisfied with the proposed solution.</li> </ul> <p>Issues and resolutions are documented on RiskMan under the feedback section and in the patient's health care records.</p>
Formal & unresolved complaints	<p>Complaints that are not resolved at the point of service, or that are received in writing and require follow up, are regarded as formal complaints. Staff refer to their Manager if:</p> <ul style="list-style-type: none"> <li>After attempting to resolve the complaint, they do not feel confident in dealing with the complainant</li> <li>The outcome the complainant is seeking is beyond the scope of their responsibility</li> <li>They or the complainant believe the matter should be brought to the attention of someone with more authority.</li> </ul> <p>If the complaint is not resolved at the point of service, staff are expected to acknowledge to the complainant that a formal complaint has been received and will be acted on. The complaint will be documented on RiskMan and the Clinic Manager will inform the Fresenius Clinics Director of Nursing about the situation and to arrange further follow up and resolution.</p>
Open disclosure	<ul style="list-style-type: none"> <li>Open disclosure of clinical incidents with patients and their families must occur in a timely manner (as close to the event as possible dependent on circumstances and clinical condition of the patient as per ANZ-NC-PL-RM&amp;Q-005 Open Disclosure Policy)</li> </ul>
Clinic Manager	<p>The Clinic Manager is responsible for:</p> <ul style="list-style-type: none"> <li>Coordinating investigation and resolution of complaints</li> <li>Determining if a complaint needs to be referred to the Director of Nursing</li> <li>Making recommendations for change in policy or procedures to Policy, Clinical Deterioration and Safety and Quality committees.</li> <li>Ensuring the complaint is reported on RiskMan and follow up actions and resolution documented.</li> </ul>
Administration & oversight	<p>The Fresenius Clinics Director of Nursing and Managing Director are responsible for:</p> <ul style="list-style-type: none"> <li>Ensuring appropriate action is taken to resolve individual complaints</li> <li>Acting on recommendations for improvement arising from complaints</li> <li>Ensuring there is meaningful reporting on trends in complaints</li> <li>Ensuring compliance and review of the complaints management policy</li> <li>Notifications to insurers</li> <li>Consultation with professional registration boards and others where necessary.</li> </ul>
Staff training	<p>All staff are informed of the complaint process during orientation. Appropriate staff (i.e. Clinic Managers) will receive additional training in complaint management.</p>
Information for consumers	<p>Consumers are informed about the complaint process through</p> <ul style="list-style-type: none"> <li>The Patient Information Package, which includes <ul style="list-style-type: none"> <li>Patients' Rights &amp; Responsibilities</li> <li>Complaint process</li> <li>Information about relevant State or Territory Health Complaints Entity.</li> </ul> </li> <li>Available brochures on the Australian Charter of Healthcare Rights</li> </ul>
Making a complaint	<p>Complaints, suggestions and compliments can be made by:</p> <ul style="list-style-type: none"> <li>Verbal discussion with staff</li> <li>Written note placed in the suggestion box in each Clinic.</li> <li>Written letter to the Clinic Manager or Director of Nursing</li> <li>Via the Fresenius Medical Care Australia website</li> </ul>

	<ul style="list-style-type: none"> <li>Via the relevant State or Territory Health Complaints Entity</li> </ul>
<b>Staff complaints and grievances</b>	Staff complaints and grievances are managed in accordance with the Fresenius Policy FMEAU-34 Issue Prevention & Grievance Resolution Policy.
<b>Complaints against Nephrologists</b>	Complaints against Nephrologists are made to the relevant Dialysis Clinic Manager and managed in accordance with the Credentiaing policy, ANZ-NC-PL-Gov-013
<b>Product complaints</b>	If staff or consumers have any complaints about products, staff are to follow the instructions in the Product Complaint Process work instructions, ANZ-NC-WI-RM&Q-003.
<b>Risk Management</b>	<p>The Managing Director, Director of Nursing and National Quality Manager review all feedback reported on RiskMan.</p> <p>Feedback is discussed at monthly Safety and Quality Meetings</p> <p>Feedback reports are prepared by the Director of Nursing or National Quality Manager, 6 monthly.</p>
<b>Performance Measurements</b>	<ul style="list-style-type: none"> <li>Number of incident investigations instigated by a complaint as a percentage of total number of incidents reported.</li> <li>Number of complaints lodged at each Clinic &amp; Head office</li> <li>Number of complaints resolved to the patient's satisfaction as a percentage of total number of complaints.</li> </ul>
<b>Evaluation</b>	The policy will be reviewed in accordance with the documentation control process.
<b>References</b>	<ul style="list-style-type: none"> <li>Australian Commission on Safety and Quality in Health Care (ACSQHC). <i>Australian charter of healthcare rights (for consumers)</i>. Sydney NSW; ACSQHC; 2008.</li> <li>Australian Commission on Safety and Quality in Health Care. National Safety and Quality Health Service Standards guide for day procedure services. Sydney: ACSQHC; 2017 Criteria 1.3 ,1.6, 1.11,1.12 &amp; 1.13</li> <li>Australian Competition &amp; Consumer Commission</li> <li><a href="http://www.accc.gov.au/comsumers/complaints">http://www.accc.gov.au/comsumers/complaints</a></li> <li>Australian Council for Safety and Quality in Health Care, July 2005, <i>Complaints management handbook for healthcare services</i>, Commonwealth of Australia, ACT.</li> <li>AZ/NZS ISO 31000:2010 Risk management – Principles and guidelines</li> <li>Standards Australia / Standards New Zealand, 2010.</li> <li>Australian Commission on Safety and Quality in Health Care (2013), <i>Australian Open Disclosure Framework</i>. ACSQHC, Sydney.</li> </ul> <p>The Health Complaints Entity for each State or Territory is listed below.</p> <p><b>ACT</b>  <a href="http://www.hrc.act.gov.au/">ACT Human Rights Commission</a>  <a href="http://www.hrc.act.gov.au/">http://www.hrc.act.gov.au/</a></p> <p><b>New South Wales</b>  <a href="http://www.hccc.nsw.gov.au/">Health Care Complaints Commission</a>  <a href="http://www.hccc.nsw.gov.au/">http://www.hccc.nsw.gov.au/</a></p> <p><b>Northern Territory</b>  <a href="http://www.hcsc.nt.gov.au/">Health and Community Services Complaints Commission (HCSCC)</a>  <a href="http://www.hcsc.nt.gov.au/">http://www.hcsc.nt.gov.au/</a></p> <p><b>Queensland</b>  <a href="http://www.hgcc.qld.gov.au">Health Quality and Complaints Commission (HQCC)</a>  <a href="http://www.hgcc.qld.gov.au">http://www.hgcc.qld.gov.au</a></p> <p><b>South Australia</b>  <a href="http://www.hcsc.sa.gov.au/cgi-bin/wf.pl">Health and Community Services Complaints Commissioner (HCSCC)</a>  <a href="http://www.hcsc.sa.gov.au/cgi-bin/wf.pl">http://www.hcsc.sa.gov.au/cgi-bin/wf.pl</a></p> <p><b>Victoria</b>  <a href="http://www.health.vic.gov.au/hsc/complaint.htm">Office of The Health Services Commissioner</a>  <a href="http://www.health.vic.gov.au/hsc/complaint.htm">http://www.health.vic.gov.au/hsc/complaint.htm</a></p> <p><b>Western Australia</b>  <a href="https://www.hadsc.wa.gov.au/home/">Health and Disability Services Complaints Office (HaDSCO)</a>  <a href="https://www.hadsc.wa.gov.au/home/">https://www.hadsc.wa.gov.au/home/</a></p> <p><b>New Zealand</b>  Health and Disability Commissioner  <a href="http://www.hdc.org.nz/complaints">http://www.hdc.org.nz/complaints</a></p>