

**Approved by:** CEO  
**Approval date:** 01 April 2022  
**Date for review:** 01 April 2024  
**Review frequency:** Biennially  
**Version:** 2.0



# Complaints Management Policy

## Policy Number 7.13

### STAKEHOLDER RELATIONSHIPS AND COMMUNICATIONS

#### 1. Purpose

Wentworth Healthcare Ltd is committed to managing complaints in a manner consistent with our values.

The purpose of this policy is to:

- 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; and
- Facilitate continuous improvement informed by robust analysis of complaints.

#### 2. Scope/Application

- All Wentworth Healthcare Employees and members of the Wentworth Healthcare Board.
- Anyone wanting to submit a complaint against Wentworth Healthcare Ltd or the services of their commissioned providers.

#### 3. Policy Statement and Principles

Wentworth Healthcare is committed to taking all complaints seriously and recognises and respects everybody's right to provide feedback or lodge a complaint about our services.

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 its 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 commission, we will address the complaint and we also expect our subcontracted service providers 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 WHL's values and code of conduct.

**Accessibility:**

Wentworth Healthcare will ensure the complaint management process and policy is publicly accessible to complainants and published 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:**

WHL will ensure personal information that identifies individuals is only disclosed as permitted under the relevant privacy laws, secrecy provisions and confidentiality obligations.

**What is a Complaint?**

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

**How to Lodge a Complaint:**

All complaints regarding Wentworth Healthcare Ltd, or a service commissioned by Wentworth Healthcare Ltd can be submitted either directly to a staff member, over the phone, in writing, or via the 'Have your say' portal on the Nepean Blue Mountains PHN Website, or directly with the Commissioned Service.

The vast majority of issues causing concern can be handled quickly and in an informal manner. In most cases these issues can be resolved through informal discussions with appropriate staff members.

Even if an issue is able to be resolved informally, all staff are required to log issues through our Complaints Management System so we are able to identify any systemic issues arising and take appropriate rectification action.

If you have been unable to resolve a matter informally, or simply wish to make a formal complaint, this can be done by any of the following means:

Lodge your complaint via the 'Have your Say' portal on the Nepean Blue Mountains PHN Website.

Writing a letter to Wentworth Healthcare Ltd addressed to "Complaints", using the following address:

Wentworth Healthcare Ltd  
Blg BR, Suite 1, Level 1,  
Locked Bag 1797  
Penrith NSW 2751

If the issue has not been resolved to your satisfaction, the issue can be escalated to the Wentworth Healthcare CEO or an external body.

Complaints regarding the PHN program can be escalated to the Department of Health as per their complaints policy available at the following link:

<https://www1.health.gov.au/internet/main/publishing.nsf/Content/PHN-Program-Complaints-Policy>

## **Confidentiality**

Confidentiality applies with respect to both information relating to the person making the complaint, and, if relevant to a person against whom a complaint is made. Wentworth Healthcare will use its reasonable endeavours to maintain the confidentiality of information throughout the complaints process.

Personally identifiable information about a complainant will only be made available for the purpose of addressing the complaint and (unless the complainant consents) will be actively protected from disclosure.

Complainants who wish to remain anonymous or not have the details of the complaint discussed with the person whom the complaint is about, should be made aware that this may limit the ability of Wentworth Healthcare to undertake a full investigation and to resolve the complaint.

## **4. Roles and Responsibilities**

Effective complaint management requires a whole-of-organisation approach with clear points of accountability for reporting and feedback, as follows:

**Wentworth Healthcare Ltd Board** has ultimate responsibility for:

- Ensuring a system is in place for responding to complaints.
- Reviewing reports on complaint trends and issues.

**Chief Executive** is responsible for:

- Receiving reports outlining complaints received and outcomes.
- Reporting to the WHL 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 WHL.
- Ensuring appropriate resources are available and utilised for effective complaint management.
- Ensuring appropriate actions are implemented to eliminate or minimise similar problems from occurring.
- Ensure the Complaints Management System is incorporated into the organisation's Quality Management System.

**Executive Manager, Corporate Services** is responsible for:

- The development, management and ongoing improvement of the Wentworth Healthcare Complaints Management System.

**Executive Managers/Managers** are responsible to:

- Train and empower staff to resolve 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 under the direction of management staff.

**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 the complaint.
- Addressing the issues and concerns raised by the 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 will be expected to work with Wentworth Healthcare to address the complaint.

## 5. References and Other Documents

*Complaint Management Procedure*

*Critical Incident Management Policy and Procedures Critical Incident Investigation Form*

***Related policies and procedures:***

*Critical Incident Management Policy and Procedure*

***Forms, checklists:***

*Complaint Management Investigation Form Complaint management flowchart*

***Other resources:***

*Primary Health Networks Program Complaints Policy – Department of Health Clinical Risk Management for Commissioners – Deeble Institute/AHHA*

## 6. Further Assistance

For further information or guidance about this Policy, please contact the Executive Manager Corporate Services.

## 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			Elisa Manley
October 2020	Editorial	Transferred to current template	Project Support Officer Business Improvement
April 2022	Editorial	Manager titles	Executive Manager Strategy and Integration

<sup>i</sup> Wentworth Healthcare Ltd Complaints Management System is comprised of its Complaints Policy, Complaints Procedure and Complaints Register.