AUSTRALIAN COMMISSION ON SAFETY AND QUALITY IN HEALTH CARE

Ahpra & National Boards

Checklist for practitioners handling feedback and complaints

A positive feedback and complaints culture can help improve the safety and quality of healthcare and services. This checklist aims to help practitioners effectively handle feedback and complaints when they are first made directly to the health provider and may also be relevant to those who have a role in establishing and maintaining complaints systems and processes.

We know that negative feedback or complaints can be stressful for practitioners. The Ahpra website has a list of general support services and specific support services available for dental and medical practitioners midwives, nurses and pharmacists you can access.

Your organisation should have it own processes and resources. If you work for a health service, you should be familiar with the complaints policies and procedures for your organisation and any specific complaints standards that apply.[1] Other resources may be available from your professional association and state and territory health complaints bodies. More resources are available at https://www.ahpra.gov.au/Resources/Checklist-for-practitioners-handling-feedback-and-complaints.aspx.

It's important to remember that:

- the public has the right to reasonably express their opinion about the care received from registered health practitioners
- the right to make a complaint and provide feedback is included in the Australian Charter of Healthcare Rights[2]
- relevant feedback and complaints are an opportunity to improve health care services, systems and processes
- well-managed feedback or complaints can increase patient, client and the community's confidence in you as a practitioner or health service.

Checklist

1. Promote a positive feedback and complaints culture

- Make sure your 'how to provide feedback or a complaint' information is available in a range of ways, simple to access and easy to use. Ensure this is a culturally safe process, free from racism.[3]
- Put in place and publish effective feedback and complaints management policies and procedures.
- Make sure relevant staff have skills and training in cultural safety, customer service, managing feedback and complaints, having difficult conversations, managing unreasonable conduct, conflict resolution and are aware of carers' rights.
- Look after yourself and staff's wellbeing. If you are stressed, seek support or advice and ensure that any staff involved in the complaint are supported.

2. Use a simple, clear, fair feedback and complaints process

- Make sure your feedback and complaints process is simple, clear and includes joint problem solving.
- Make sure the process is objective, fair and conflicts of interest are disclosed. Consider the power differences between the patient/client and you/or the health care service.
- Document the feedback or complaint. Keep accurate records and gather all relevant facts and documents.
- To help achieve a fair process, speak to the person who made the complaint before it is resolved to discuss the process used, the proposed outcome and key reasons for the proposed outcome.
- Clearly explain to the person who provided feedback or made a complaint the outcome, and reasons for the decision, any internal or external review processes and how to make a further complaint if they are unhappy with the outcome. For example, they can make a complaint to a health complaints entity in their state or territory, or to a National Board.

3. Acknowledge and respond promptly and sensitively

- Acknowledge feedback and complaints and the impact of the patient or client's experience as soon as possible.
- Check if consent is needed before responding to feedback or complaints from a person other than the patient or client.
- Resolve feedback and complaints as soon as possible.
- Consider solutions that are clear, fair, proportionate, appropriate and timely and address the patient's or client's health needs whenever possible.

---

1 All health services accredited under the National Safety and Quality Standards in Health Care are required to have a complaint handling system and processes in place to respond to patient complaints www.safetyandquality.gov.au/standards/nsqhs-standards. Health services may also have specific complaint handling standards that apply in their state or territory for example, the Victorian Complaint Handling Standards under the Victorian *Health Complaints Act 2016.*

2 www.safetyandquality.gov.au/our-work/partnering-consumers/australian-charter-healthcare-rights.

3 For Aboriginal and Torres Strait Islander Peoples, the National Registration and Accreditation Scheme's definition of cultural safety is set out in the Ahpra and National Boards' Aboriginal and Torres Strait Islander Health and Cultural Safety Strategy for the National Scheme.

4. Assess and manage the feedback or complaint

- For individual practitioner complaints, seek advice from your professional indemnity insurer or professional association depending on the issue raised.
- If you are responding to a complaint on behalf of the health service, seek internal advice on the policies and processes which you should follow.
- Provide an opportunity for the person to explain why they provided feedback or complained, their concerns, and their desired outcome(s).
- Manage expectations by providing information about process and possible outcomes.
- Assess any concerns or risks raised. Act promptly and effectively on safety, legal or regulatory issues, including issues that may need a notification. Consider other legislative requirements such as reporting under state child safety legislation.
- If feedback or a complaint can't be resolved immediately, reach an agreement with the patient or client on how to update them. Keep them informed if there are delays, including providing a clear internal escalation process when required.

5. Promote respectful and open communication

- Ensure culturally safe and respectful practice that is free from racism, bias or other forms of discrimination when resolving the feedback or complaint.
- Try to meet any patient or client needs to help resolve the complaint such as a support person e.g. Indigenous Health Liaison Officer, interpreter, or by following communication preferences about how to engage. For example, a face-to-face discussion may be more effective than written or virtual communication.
- Listen, and be empathetic. It is important not to be defensive or appear to be minimising or dismissing a person's concerns.
- Make sure patient or client care is not adversely affected because of feedback or a complaint made. Consider options for a second opinion, review by a colleague, or if ongoing treatment should be transferred to another practitioner where appropriate.
- Be open and honest, including apologising when appropriate.[4]
- Work with the person who provided feedback or complained to resolve their concerns. Wherever possible, share with them any changes you make to prevent a similar event occurring.

6. Protect confidentiality and privacy

- Store feedback and complaint records separately from health records and in accordance with privacy principles.
- Make sure the investigation and resolution of a complaint is confidential.

7. Use feedback and complaints to reflect and make improvements

- Record feedback and complaints to identify trends and risks and report on changes made to improve services.
- Reflect on areas of patient and client care that are raised in feedback and complaints, including what could have been better and consider how lessons could be applied to practice and processes.
- Seek comment from people who provided feedback or complained on their level of satisfaction with the outcome and process, in a culturally safe way that is free from racism, bias or other forms of discrimination.
- Use the information as part of clinical governance, quality improvement, planning, and training to improve the quality of care; share insights and ideas for improvement with your colleagues.
- Regularly review policies on feedback and complaints management, informed consent and open disclosure.

8. Provide information if a complaint is made to a complaints body or regulator

- Be aware that people may raise a complaint directly with a health complaints body or regulator such as Ahpra. Each health complaints body has processes for responding directly to these complaints and engaging with the health service or directly with the practitioner, depending on the nature of the concern.
- When responding to a request from a health complaints body or regulator, it can be helpful to share your feedback and complaints policy to show what processes you have in place.
- Explain how you applied your feedback and complaints policy to attempt to resolve the concerns.
- Share how you have used the feedback or complaint to reflect and make changes to improve your practice and processes.

This checklist was developed jointly by Ahpra, the National Boards and the Australian Commission on Safety and Quality in Health Care, in consultation with stakeholders and consumers.

[4] All Australian jurisdictions have enacted apology laws to protect statements of apology or regret made after 'incidents' from subsequent use in certain legal settings. Australian Commission on Safety and Quality in Health Care, Australian Open Disclosure Framework: Saying sorry – A guide to apologising and expressing regret during open disclosure. Some states and territories may have Duty of candour legislation in place that may also apply.