Complaints and Feedback Policy

DOCUMENT CONTROL

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1. Purpose

The purpose of this policy is to establish a framework for the timely and effective handling of complaints and feedback provided to the Indigenous General Practice Trainee Network (IGPTN). This policy aims to ensure transparency, accountability and fairness in addressing concerns raised by members, employees, contractors, stakeholders or members of the public.

2. Background

This policy forms an important component of sound governance of the IGPTN. Receiving and working to understand complaints can provide useful information and perspectives to allow the organisation to develop and continually improve and is also a critical component of governance and director's duty of care.

Complaints and feedback may also help identify broader organisational risks, policy gaps, process issues, governance concerns or opportunities to improve workplace and program systems.

3. Definitions

Complaint: A concern raised by a member, director, employee, contractor, facilitator, examiner, volunteer, stakeholder or member of the public regarding IGPTN's policies, practices, services or conduct.

Complaint Handler: The individual or team designated to receive, assess, triage, manage and/or resolve complaints.

Reporting Party: The individual or entity raising the complaint, feedback or concern.

Third Party Complaint: A complaint, concern or feedback raised by a person on behalf of or in relation to another person or group who may be affected by the matter.

Grievance: A workplace concern, issue or complaint raised by or about a worker, contractor, volunteer, stakeholder, board member involved in IGPTN work or organisational activities including concerns about work conditions, workplace interactions, role clarity, communication, workload, support, fairness health, safety or wellbeing. See IGPTN's Grievance Policy.

Pathway Triage: The process of assessing a complaint, concern or feedback to determine the most appropriate process for managing it.

Conflict of Interest: A situation where a person's personal, professional, governance or other interests may conflict or be perceived to conflict, with their responsibilities or decision-making role.

4. Scope

This policy applies to all IGPTN operations and to complaints or feedback raised by members, directors, employees, contractors, facilitators, examiners, volunteers and stakeholders.

5. Policy

The IGPTN's response to a complaint is informed by several key principles.

1. Accessibility: The IGPTN will establish accessible channels for members, directors, employees, contractors and stakeholders to raise complaints or provide feedback.
2. Confidentiality: All complaints will be treated confidentially to protect the privacy and safety of all parties involved, in compliance with applicable laws and regulations.
3. Impartiality: Complaints will be investigated impartially and without bias, ensuring fair treatment to all parties involved.
4. Timeliness: Complaints will be addressed promptly and efficiently, with reasonable timelines for resolution.
5. Transparency: The process of handling complaints will be transparent to the extent possible, while respecting confidentiality requirements.
6. Accountability: The IGPTN will take responsibility for addressing complaints ensuring appropriate actions are taken to prevent recurrence and promote accountability.
7. Pathway clarity: IGPTN will assess complaints and concerns to determine the most appropriate pathway for managing the matter. This may include a complaints process, grievance process, WHS/psychosocial hazard process, employment/HR process, governance process, formal investigation or external advice.

8. Procedural Fairness: Where a complaint may result in findings or action affecting a person, IGPTN will provide procedural fairness, including a reasonable opportunity to respond before findings are made.
9. Cultural Safety and Wellbeing: IGPTN will consider cultural safety, wellbeing, support needs and psychosocial risks when assessing and managing complaints or concerns.
10. Conflict Management: IGPTN will identify and manage actual, potential or perceived conflicts of interest, including where complaints involve senior stakeholders, Board members or people holding multiple roles within IGPTN.

Member complaints in regards to decisions made by an Independent Body are not within the scope of this policy. Decisions made by an Independent Body (for example Colleges and will be deemed as the final decision. Any subsequent action the complainant wishes to make is outside IGPTN policies and procedures and will be at their expense.

6. Third-Party Complaints

IGPTN may receive complaints from members regarding the actions, decisions, policies, procedures or conduct of external organisations, including but not limited to training organisations, employers, educational institutions, colleges, government agencies or other service providers.

As IGPTN is not responsible for the governance, management or operations of external organisations, it is generally unable to investigate, determine or resolve complaints about those organisations.

Where appropriate, IGPTN will:

- provide information to members about the appropriate complaints process of the relevant organisation;
- encourage and support the member to raise their concerns directly with the organisation responsible;
- provide advice, guidance or coaching to assist the member in preparing or lodging their complaint;
- where requested by the member and considered appropriate by IGPTN, advocate on the member's behalf by raising the issue with the relevant organisation or facilitating communication, subject to the member's informed consent; and

- where concerns identify broader or systemic issues affecting Aboriginal and Torres Strait Islander GP/Rg trainees, consider advocacy in accordance with IGPTN's Advocacy Policy.

IGPTN will determine the most appropriate form of support based on the nature of the complaint, the wishes of the member, any actual or perceived conflict of interest, confidentiality considerations, available evidence and the potential impact on the wider membership.

IGPTN reserves the right to decline to act on behalf of a member where it considers that:

a. the matter is more appropriately dealt with through the external organisation's own complaints process;
b. the complaint is outside IGPTN's purpose, functions or resources;
c. acting may create a conflict of interest or legal risk; or
d. there is insufficient information to support meaningful advocacy.

Where IGPTN advocates on behalf of a member, its role is limited to supporting fair process, culturally safe practice and positive outcomes. IGPTN does not make findings about the conduct of external organisations or their staff and cannot compel another organisation to take any particular action.

7. Procedure

Receiving the complaint

Any individual may make a complaint, provide feedback or raise a concern with IGPTN.

A complaint, concern or feedback may be raised verbally or in writing.

If the complaint involves the person who would ordinarily receive or manage the matter, the reporting individual may escalate the matter to the next level of management, the CEO, a Director, the Chairperson, the Company Secretary or another appropriate person.

The person receiving the complaint will identify an appropriate person to progress the issue. This person is referred to in this policy as the complaints handler. The complaint handler may be the person receiving the complaint or another person.

A complaint form will be available on the IGPTN website. However, a concern may still be assessed even if it is not submitted on a formal complaint form.

IGPTN will aim to acknowledge receipt of the complaint within 7 days and will provide an update or response within 28 days where practicable. Timeframes may vary depending on the nature, complexity, seriousness, sensitivity or pathway of the matter.

Initial assessment

Upon receiving a complaint, concern or feedback, the complaint handler will conduct an initial assessment to determine the nature, severity, and urgency of the matter.

The complaint handler may gather preliminary information from the complainant, affected person where appropriate and any other relevant sources to inform next steps.

The initial assessment should consider and document:

- What issue has been raised
- Who is affected
- Where there are immediate safety or wellbeing risks
- whether the matter involves employment, governance, grievance or conflict of interest issues
- whether the matter involves senior stakeholders, Board Directors or people holding multiple roles
- whether external advice or independent review may be required
- what pathway should apply

Investigation

If the complaint requires further investigation, the complaint handler will initiate an appropriate investigation process.

A formal investigation may be required where findings about individual conduct, misconduct, serious inappropriate behavior or disciplinary action may be considered.

Senior stakeholders, Board members and conflicts of interest

Where a complaint or concern involves the CEO, Chair, Board Director, Company Secretary or another senior stakeholder, IGPTN will consider whether an alternative pathway, external advice or independent person is required.

This may be required where:

- The person who would usually manage the matter is involved
- There is an actual or perceived conflict of interest
- There is power imbalance

- The matter involves governance/operational role boundaries
- Confidentiality or procedural fairness may be difficult to manage internally
- There is a risk or perceived bias

Any person involved in managing or deciding a complaint must declare any actual, potential or perceived conflict of interest.

Where a conflict exists, IGPTN will determine how the conflict will be managed, including whether another person or external advisor should manage the process.

Resolution

Following assessment, investigation or other appropriate process, IGPTN will determine an appropriate course of action.

Outcomes may include:

- No further action
- Informal resolution
- Clarification or acknowledgement
- Apology where appropriate
- Referral to the grievance policy
- WHS or psychosocial hazard assessment
- Employment/HR action
- Governance action
- Policy or process review
- Training or coaching
- Conflict of interest controls
- Support or wellbeing measures
- Disciplinary action where appropriate
- External advice or review

The level of information provided to the reporting party, affected person or other relevant people will depend on confidentiality, procedural fairness, privacy, WHS obligations and the pathway selected.

Follow-up

Following assessment or resolution of a complaint, IGPTN will monitor the situation where appropriate to ensure that agreed actions, controls or supports are implemented.

Follow up may include:

- Checking whether actions have been completed
- Reviewing whether controls are effective
- Confirming whether further support is required
- Updating WHS, grievance or complaint records
- Reporting de-identified themes or actions to the Board where appropriate
- Identifying any policy gaps or process improvements

Review and continuous improvement

This policy will be periodically reviewed and updated as necessary to ensure its effectiveness and relevance.

Feedback from stakeholders, lessons learned from past experiences, and changes in regulatory requirements or best practices will be considered in the ongoing refinement of this procedure.