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# Complaint Management Policy

<b>Author:</b>	Manager, Member Services
<b>Department:</b>	Member Engagement & Support
<b>Owner:</b>	Chief Executive Officer
<b>Approved by:</b>	Senior Leadership Team (SLT)
<b>Effective Date:</b>	23 May 2022
<b>Next Review Date:</b>	December 2023
<b>Legislation and Standards:</b>	<i>AS/NZS 10002-2014 Guidelines for complaint management in organisations.</i>
<b>Related Policies and Procedures:</b>	<ul style="list-style-type: none"> <li>• Complaint Management Procedure;</li> <li>• Code of Conduct;</li> <li>• Fraud and Corruption Policy</li> <li>• Reconsideration Review and Appeals Process By-law;</li> <li>• Privacy Policy;</li> <li>• Risk Management Policy;</li> <li>• Risk Management Framework;</li> <li>• Whistleblower Policy</li> </ul>
<b>Applicability:</b>	All employees in Australia and Aotearoa New Zealand

## HISTORY

<b>Version</b>	<b>Amendment</b>	<b>Date</b>
1.0	Initial Approval	4 December 2017
2.0	Policy reviewed and updated following internal audit and discussion with stakeholders	7 April 2022
3.0	Policy reviewed by SLT	12 April 2022
4.0	Policy approved by CEO	11 May 2022

The Royal Australasian College of Physicians (RACP) implemented a policy in 2017 to promote management of feedback and complaints in a fair, transparent, and timely manner. The resulting complaint management system is intended to:

- make it easy for people to provide feedback and make complaints;
- enable the RACP to assess and respond to complaints in a fair and timely manner; and
- enable the RACP to analyse feedback and complaints to identify and implement improvements to business processes and systems.

A review in 2021 updated the policy and supporting procedures to expand upon escalation, risk assessment, and reporting to the Board.

### WHAT MATTERS ARE COVERED BY THIS POLICY?

This Policy applies where a person provides feedback or makes a complaint about:

- a decision the RACP has or has not made;
- a service the RACP has or has not provided; or
- the behaviour of the RACP's employees and its members.

This policy does not apply to the matters listed below; however, feedback and complaints related to these matters can be submitted in the same way as other feedback and complaint types. Where feedback and complaints regarding the matters below are received, these will be forwarded to the relevant team in the RACP for action according to existing RACP policies and procedures, and will be recorded in, but not be managed under, this complaint management system:

- staff grievances;
- reports under the Code of Conduct (for members);
- matters dealt with under the Reconsideration Review and Appeals Process By-law;
- matters relating to any act or practice of the RACP in relation to the individual's personal information held by the RACP (refer to the RACP's Privacy Policy);
- areas outside of the RACP's control or authority (e.g., entitlement to Medicare benefits, workforce issues, workplace matters, or issues that should be taken to the relevant regulator);
- reports concerning misconduct, improper circumstances, or a breach of any law under the Whistleblower Policy; or
- any other matters as determined by the Chief Executive Officer from time to time.

### POLICY STATEMENT AND PRINCIPLES

The RACP is committed to delivering high quality services and welcomes feedback and complaints about its services and performance as a means of monitoring and improving service delivery to members, as well as enhancing organisational effectiveness and efficiency.

The RACP manages feedback and complaints received in a transparent, timely, culturally safe, and fair manner.

The RACP will inform persons on how to provide feedback and/or make a complaint so that lodging feedback and/or a complaint is easy and accessible.

Where possible, the RACP aims to resolve complaints at first contact. Our employees are trained and empowered to resolve complaints promptly and professionally.

When resolution of a complaint at first contact is not possible, where practical, the RACP will request that the complaint be made in writing.

The RACP will acknowledge receipt of a complaint and notify the complainant of the timeframe for providing a full response, noting that in some cases no further action will be taken by the College beyond the acknowledgement of receipt. The complainant will be notified where no further action will be taken by the College.

The RACP will regularly advise the complainant of progress in responding to the complaint (at least monthly) and advise the complainant, in writing, of the outcome of its consideration of the complaint.

Personal information that identifies an individual will be managed in accordance with the RACP Privacy Policy for Personal Information.

The RACP will accept anonymous complaints either verbally via the College Contact Centre or in writing. The RACP will record these complaints and will, at its discretion, consider what action it may take based on the information that has been provided.

Those wishing to make anonymous reports may also consider making use of the RACP's Whistleblower process.

The RACP will take all reasonable steps to ensure that people making complaints are not adversely affected where a complaint has been lodged by them or on their behalf.

## **ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES**

<b>Who</b>	<b>Responsible for</b>	<b>How</b>
Board	Fostering a culture that values feedback and effective complaint resolution	<ul style="list-style-type: none"> <li>• Support the Complaint Management Policy</li> <li>• Review reports arising from complaint management and act appropriately.</li> </ul>
Finance & Risk Management Committee	Fostering a culture that values feedback and effective complaint resolution	<ul style="list-style-type: none"> <li>• Support the Complaint Management Policy</li> <li>• Review reports arising from complaint management and act appropriately.</li> </ul>
Fellowship Committee	Fostering a culture that values feedback and effective complaint resolution	<ul style="list-style-type: none"> <li>• Support the Complaint Management Policy</li> <li>• Review reports arising from complaint management and act appropriately.</li> <li>• Review reports on feedback and complaints received and resolved, and advocate for improvements to RACP products, services, and delivery</li> </ul>
Chief Executive Officer	Fostering a culture that values feedback and effective complaint resolution	<ul style="list-style-type: none"> <li>• Support all employees to be receptive and open to feedback</li> <li>• Actively assist employees to resolve complaints in a timely manner</li> <li>• Review reports on the RACP's complaint management and act appropriately.</li> </ul>

Who	Responsible for	How
Senior Leadership Team (SLT)	Actively promote a culture within their Teams that values feedback and effective complaint resolution	<ul style="list-style-type: none"> <li>• Approve the Complaint Management Policy</li> <li>• Ensure all employees are aware of the Complaint Management Process and their respective role</li> <li>• Ensure all employees are trained appropriately for their role</li> <li>• Actively assist employees to resolve complaints in a timely manner</li> <li>• Review reports on feedback and complaints received and resolved, and where appropriate, implement improvements to RACP products, services, and delivery</li> <li>• Review reports on the effectiveness of the complaint management system and implement appropriate changes to the system.</li> </ul>
Executive General Manager, Member Engagement & Support	Effective execution of the complaint management system	<ul style="list-style-type: none"> <li>• Oversee requests for review of responses to complaints, where appropriate</li> <li>• Provide regular performance reports to the SLT, CEO, Fellowship Committee, FRMC and Board including insights into RACP products and services and any suggested changes to the complaint management system.</li> </ul>
Member Services Manager	Effective administration of the complaint management system	<ul style="list-style-type: none"> <li>• Oversee the effective day-to-day application of the Complaints Management Policy</li> <li>• Provide specialist complaints management advice and support to all areas of the RACP</li> <li>• Centrally coordinate the resolution of all complaints that cannot be resolved at first contact, including working with Governance where complaints need to be referred to external parties.</li> </ul>
All Employees	Understand and adhere to the complaints management system	<ul style="list-style-type: none"> <li>• Treat all people with respect, particularly people who provide feedback or make complaints</li> <li>• Assist people who wish to provide feedback and/or make complaints</li> <li>• Where possible resolve complaints at first contact</li> <li>• Document feedback and/or complaints in the College's customer relationship management (CRM) system</li> <li>• Support other teams to resolve Level 1 complaints by providing information and advice promptly</li> <li>• Provide feedback to Member Services on issues and trends arising from the complaint management system</li> <li>• Assist implementation of improvements to the complaint management system and/or the products and services delivered by the RACP.</li> </ul>

## BREACH OF THE POLICY

Any breach of this policy by RACP employees will be managed under the RACP Performance Management Policy.

## REPORTING

Monthly reports will be provided to the CEO and SLT, prepared by the Manager Member Services and submitted by the Executive General Manager, Member Engagement & Support that:

- assess the performance of the Complaints Management system, including against stated key performance indicators (KPIs); and
- identify
  - compliance;
  - trends;
  - systemic issues;
  - if required, items for early escalation to the Board; and
  - potential improvements.

Unless otherwise required, a summary report will be provided each quarter to the Fellowship Committee, Finance & Risk Management Committee of the Board and the RACP Board.

## POLICY REVIEW AND UPDATE

This policy will be reviewed every three years or as required by changes to legislations, standards, or other requirements. The policy may also be changed because of amendments to other Policies.

Employees and members of the College may provide feedback about this document by emailing [RACPPolicy@racp.edu.au](mailto:RACPPolicy@racp.edu.au)

## DEFINITIONS

Term	Means
“Board”	the Board of Directors of the College.
“College”	The Royal Australasian College of Physicians, ACN 000 039 047, an incorporated body limited by guarantee.
“Fellow”, “Trainee”, and “Member”	have the same meaning as in the College Constitution
“FRMC”	the Finance & Risk Management Committee of the Board
“Person”	any person who may be a member of the College or the general public
“Complaint”	an expression of dissatisfaction made to or about the College’s products, services, or employees that requires a response or resolution and <b>is</b> explicitly or implicitly expected or legally required.
“Feedback”	Opinions, comments and expressions of interest or concern, made directly or indirectly, to or about the College, about its products, services,

<b>Term</b>	<b>Means</b>
	or complaint handling where a response <b>is not</b> explicitly or implicitly expected or legally required.
“Level 1 Complaint”	<p>Complaints from a person about:</p> <ul style="list-style-type: none"> <li>a. a decision or position of the College (that is not covered by the Reconsideration Review and Appeals process <u>By-law</u>); or</li> <li>b. a service the College has provided or not provided; or</li> <li>c. the behaviour of the College’s employees and/or its members; or</li> <li>d. any other matter that does not fall into the definition of a level 2 complaint.</li> </ul>
“Level 2 Complaint”	<p>Complaints under any of the following:</p> <ul style="list-style-type: none"> <li>a. RACP Constitution</li> <li>b. Code of Conduct</li> <li>c. Reconsideration Review and Appeals Process By-law</li> <li>d. Statement on Respectful Behaviour in College Training Programs</li> <li>e. Supporting Physicians’ Professionalism and Performance Guide</li> <li>f. Grievance Procedure</li> <li>g. Working Together Policy</li> <li>h. areas outside of the College control or authority (e.g., entitlement to Medicare benefits, workforce issues, workplace matters, issues that should be taken to the relevant regulator, etc.)</li> <li>i. any other matters as determined by the Chief Executive Officer from time to time</li> </ul>
“Employees”	Employees employed by the College on a permanent basis (full-time or part-time), on a fixed term contract, or on a temporary or casual basis.