ER–CRP–GRP–PRC–007
Complaints Management Procedure

OFFICIAL

Owner and Approver

Document Owner(s)	Reviewers	Approver
EGM	Governance Council	CEO

Version Control

Version	Date	Approver	Change description
3.0	16.11.2021	EGM	Reviewed and updated format, document number, responsibilities, storage of documents, fixed broken links
4.0	09.12.2022	EGM	Complete revision of process for internal use only.
4.1	23.01.2023	EGM	Corrected error under point 1.4 e.

eReports at its discretion, may change, delete, suspend or discontinue parts or the policy in its entirety, at any time without prior notice. In the event of a policy change, employees will be notified. Any such action shall apply to existing as well as to future employees.

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1. Introduction

1.1 Purpose

Complaints are a valuable source of feedback and an important tool for business and staff development. Diligent and prompt attention to complaints can help us identify the needs of our clients and stakeholders, understand our business shortcomings, increase client satisfaction and improve overall performance.

These procedures are designed to assist eReports business areas in dealing with complaints from any source about the services, products, actions or decisions provided by the company through its employees and contracted consultants.

1.2 What is a complaint?

eReports defines a complaint as *"a generic term referring to the expression of dissatisfaction, orally or in writing, about the service or actions of an eReports associated service, process or staff."*

Types of complaints eReports may receive are as follows:

- Examinee complaints relating to a medicolegal report or staff/practitioner conduct
- Client complaints relating to report delivery, report quality or service provision

1.3 Scope

These procedures apply to all business units and employees (including individuals on a contract) with eReports.

The procedures do not cover the following:

- staff grievances – refer to the *Complaint and Grievance Resolution Policy and Procedure*
- public interest disclosures or official misconduct complaints – refer to the *Public Interest Disclosure Policy*
- privacy complaints – complaints concerning breaches of privacy are to be referred without delay to the nominated Privacy Officer, who will manage the complaint in accordance with the *Privacy Act 1988 (Cth)* and *any relevant State/Territory Privacy Acts and Regulations.*
- Right to Information requests – enquiries concerning right to information requests are to be referred to the Privacy Officer, who will manage them in accordance with the provisions of the *Privacy Act 1988 (Cth)* and any relevant State/Territory Acts and Regulations.

1.4 Associated Documentation

- Complaints SharePoint Folder – A central repository for all complaints-related information and investigative documentation.
  Note: Every year has its own folder and is the repository for ALL information relating to complaints received in that year.

- Complaints Register – For the recording and tracking of all complaints received by eReports. This document will be reviewed as a part of the reporting and continual improvement processes on a six-monthly basis by the Governance Council.

Note: A new complaints register is started at the beginning of every year and can be found in the relevant year's folder.

To use the Complaints Register:

a. Go to the Complaints folder on SharePoint

b. Open the folder corresponding to the year of the complaint and then open the Complaints Register.

c. Assign a reference number in the *"Ref. No."* column.
Reference numbers are created using the below formula:

YYYY-[Complaint number]

The complaint number noted above should be a three-digit number only. For example, the fourth complaint of the year 2022 would be 004. As such, the Reference number to be applied to that particular complaint would be *"2022-004"* or the 34^{th} complaint of the year 2022 would be *"2022-034"*.

d. Add the relevant demographic details (i.e. claim/reference number, complainant name, complaint receipt date) to each column of the complaint as you work through the complaint.

e. Add a *"Type of Complaint"*.
The type of complaint is determined by using the "Type of Complaint Key" (see below), which uses a numbering system to categorise the source of the complaint and the subject of the complaint.

Type of complaint KEY:			
SOURCE	1. Client [1]	SUBJECT	1. Booking
	2. Examinee/claimant		2. Documentation
	3. Consultant		3. Examination (including conduct & behaviour)
	4. Staff		4. eReports staff (including conduct & behaviour)
	5. Public		5. Accounts matters
	6. Other		6. Report unsatisfactory [2]
			7. Travel matter [3]
			8. Other subject
			9. Privacy
1. Client is any customer of eReports including lawyer, Regulator, insurer (& their Agents)			
2. Any report issue including report turnaround time, content quality, etc			
3. Travel includes air transport, accommodation etc			

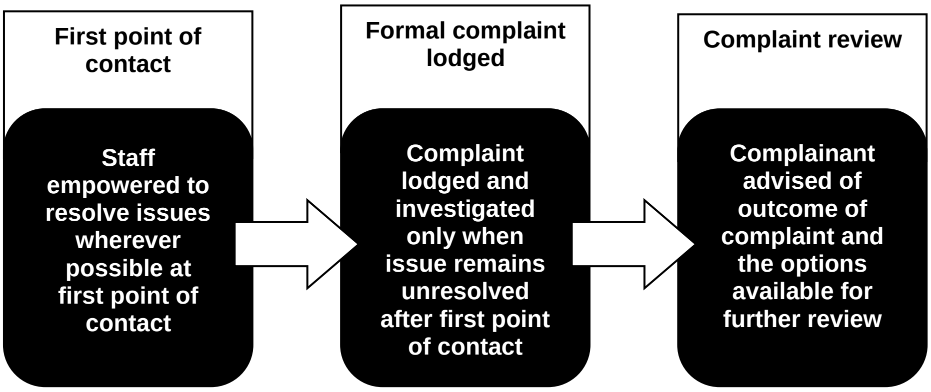
Using the above key, a complaint from a client about an unsatisfactory report would be represented using the code *"1-6"* or a consultant complaining about a documentation issue would be represented using the code *"3-2"*.

f. Update the rest of the information in each of the columns of the Complaints Register as you progress through the investigation until resolution and/or closure of the complaint.

2. Complaint management process

The eReports complaints management process that must be followed varies depending on the type of complaint received. Each process variation recognises that, before a complaint is lodged or raised with the complaints officer, every effort will be made to resolve the complaint at the original point of contact.

The flow chart below outlines the basic three steps involved in the complaint process.



2.1 Examinee Complaints

If an examinee has submitted a complaint:

- via their relevant legislative body (e.g., WorkSafe)
- the complaint only requires the written response of the assessing consultant

These complaints should be actioned using the Complaint Reports – File Prep procedure.

If an examinee has submitted a complaint in writing to eReports or called eReports directly they should be referred back to the referring client to facilitate the complaints process. The below tips will assist you with how you might be able to effectively handle an examinee wanting to lodge a complaint.

- Remain neutral and professional while the examinee is voicing their concerns. Interrupting them may lead to an escalation of the issue.
- Do not offer opinion on the subject matter of the complaint.
- Encourage the examinee to get in touch with their contact at the referring organisation.
- Direct them to the Complaints Policy on our public website.
- If the examinee is not willing to raise the complaint with the referring organisation, refer them to any of the following alternate avenues for complaints lodgement and resolution.
    - The relevant legislative body
    - The relevant Ombudsman
    - The Australian Health Practitioners Regulation Agency (AHPRA)
    - The Australian Competition and Consumer Commission (ACCC)

2.2 Client Complaints

Where a client has submitted a complaint verbally or in writing the Client Experience team should take ownership of that complaint and attempt to resolve the issue in the first instance before referring on to the Complaints Officer.

If a client submits a complaint via email and the email is not addressed to bookings@ereports.com.au or the appropriate Client Experience team member is not copied in on the email, the email should be forwarded to the bookings@ereports.com.au inbox to be assigned to the appropriate Client Experience team member.

If a client complains via phone call, they should be transferred to the Client Experience team immediately for them to attempt to resolve the issue.

The process to be followed is as follows:

1. Review the complaint and then discuss it with the client. This is the most efficient and most service-focused way to resolve a problem.

   Staff members are empowered to resolve these issues wherever possible and have the authority to:
   - obtain necessary information to assess the validity of the complaint
   - resolve issues or concerns, wherever possible
   - reject issues or concerns (while informing the complainant of the entitlement to lodge a formal complaint).

2. a) If the matter is dealt with to the satisfaction of the client at this stage, the issues or concerns do not need to be recorded as a complaint under these procedures.

b) If unable to resolve the matter at this point, escalate to the Client Experience Director..

3. The Client Experience representative should then repeat the above process and attempt to resolve the issue before it is raised as a formal complaint.

4. If all attempts to resolve the issue or concern to the satisfaction of the client have failed at this point, a formal complaint should be lodged for an internal investigation.

   To do this, send the details of the complaint and actions taken to date to Complaints@ereports.com.au via email.

5. The Complaints Officer will decide whether the complaint falls within the scope of the eReports Complaints Management Procedures, or whether it should be dealt with in another way.

6. If the complaint falls within the scope of eReports Complaints Management Procedures, the Complaints Officer will:
   a. Add it to the Complaints Register.

b. Create a unique folder on the Management SharePoint site for the secure and confidential storage of all supporting documentation relating to the complaint; and

c. Refer the complaint to the Senior Manager of the relevant business unit.

7. The assigned Senior Manager should then take the following actions:

a. Acknowledge the complaint with the client.

b. Investigate the complaint.

Below are examples of actions you may take in order to investigate the complaint.

- clarifying the details provided in a complaint
- identifying actions taken to resolve the issue before the complaint was lodged
- gathering and analysing information from relevant file notes, correspondence and/or other sources
- reviewing applications submitted by the complainant
- reviewing documentation submitted by the complainant
- reviewing previous administrative decisions or actions
- interviewing complainants, employees and/or other individuals involved in the complaint
- reviewing relevant policies, procedures and/or legislation
- reviewing previous complaints about the same issue.

c. Maintain updates to the Complaints Register during the course of the investigation.

8. The Senior Manager will record the investigation findings and include any supporting documentation with the investigation outcome.

The investigation outcome should detail of the findings and recommendations regarding appropriate actions and opportunities for improvement, as appropriate.

Examples of outcomes that may result from an investigation are as follows:

- amending a decision
- a written/verbal apology
- an explanation
- changes to a service provided by the department
- identification of an opportunity for improvement of an existing policies or procedure
- staff training
- disciplinary action.

In some circumstances, no further action on a complaint may be recommended. The rationale for this course of action may include:

- the matter has been investigated by the company and it is considered that all action to address the original complaint has been satisfactorily completed
- the matter is currently being managed by an external agency, court or tribunal

- the matter has already been adequately managed by an external agency, such as the Police Service, an external administrative authority, court or tribunal
- after assessment, the complaint is determined to be frivolous or vexatious.

Investigation outcomes must be noted by the investigating individual on the Complaints Register.

9. At the conclusion of the investigation, a written response must be provided to the complainant (examinee or client) outlining the key findings and/or recommendations made concerning the complaint. Where the complaint has been submitted by an examinee, the respondent must include the client in the response.

   Complaints@eReports.com.au must also be included on the written response provided to a complainant to ensure effective complaint management and continual improvement initiatives.

   The written response should directly address the issues raised in the complaint, identify any actions taken to resolve the complaint and how and why these actions have been taken.

10. At the point of resolution of the complaint, the Senior Manager should ensure:
    - All documentation relating to the complaint and its investigation is available in the unique folder established for that specific complaint.
    - Update the Complaints Register and close the complaint.

3. Performance reporting

The **Complaints Officer** will provide a report to the Governance Council for review and oversight at six monthly intervals. This report will highlight the performance of the complaints management system over the previous six months and will include (but is not limited to):

- number and nature of complaints received during the reporting period
- number of complaints resolved during the reporting period
- time taken to investigate complaints
- action to address systemic issues (if any)
- complainant satisfaction with the company's procedures for investigating complaints.

4. Review

This Procedure is due for review three (3) years from its date of release or after business, legislative or regulatory changes.

5. Related Policies and Procedures

- Complaints Policy - PUBLIC