

5 February 2013

The Inquiry Manager  
Committee on the Health Care Complaints Commission  
Parliament House  
Macquarie St, Sydney 2000



Attention: Jason Arditi

Dear Mr Arditi

### **Inquiry into Health Care Complaints and Complaints Handling in NSW**

Thank you for your letter of 21 January 2013, asking further questions on behalf of the Committee.

The Public Interest Advocacy Centre (PIAC) in its submission to the Committee, at page 3, recommends that there be a consistent model of complaints management across all of NSW Health.

The Committee asks: *What sort of information should be made available to health consumers for their benefits and to potentially reduce the number of complaints?*

The information that should be made available to health consumers in this situation is the location, contact details and availability for face-to-face contact by designated Complaints Officers /Patient Liaison Officers.

Information should also be available about how to make a complaint to the HCCC. However, information should also be provided about the potential advantages of local resolution (timeliness, less formality, ability to deal with non written complaints) over a formal written complaint to the HCCC.

This information should be available on the Department of Health and the HCCC website and in social media. However, local information should also be available in posters and pamphlets that can be prominently displayed in hospitals and clinics, as well as being made available at local sources of information such as public libraries. The Department of Health, Area Health Districts and the HCCC should also regularly use local and state-based electronic and print media to inform health consumers about the different ways to resolve consumer concerns about health care.

The Committee asks: *What would be the key features (of a standardised local complaints handling system in NSW) which should be adopted?*

The Committee also asks: *Are there any examples of best practice complaints handling system which the Committee should look at?*

The Committee should note that the Australian Commission on Safety and Quality in Health Care publishes the *Better Practice Guidelines on Complaints Management for Health Care Services*, which can be found at:

Level 7, 173-175 Phillip St  
Sydney NSW 2000  
DX 643 Sydney  
Phone: 61 2 8898 6500  
Fax: 61 2 8898 6555  
[www.piac.asn.au](http://www.piac.asn.au)  
ABN: 77 002 773 524

<http://www.safetyandquality.gov.au/former-publications/better-practice-guidelines-on-complaints-management-for-health-care-services-pdf-106-kb/>

The *Australian Charter of Healthcare Rights*, which NSW has endorsed, gives consumers the right to comment on their care and to have their concerns addressed. The Charter states that this means that consumers can comment on or complain about their care and have their concerns dealt with properly and promptly. The Charter can be found at:

<http://www.safetyandquality.gov.au/our-work/national-perspectives/charter-of-healthcare-rights/>

PIAC suggests that the Committee look to Victoria for a model of a more standardised system of local health complaints resolution.

The main features of the Victorian system are:

1. The principle of having a 'patient representative' in major hospitals (with the CEO being the designated contact point if there is not a patient representative).
2. The document *The Australian Charter of Healthcare Rights in Victoria* (at <http://health.vic.gov.au/patientcharter/victoria/comment.htm>) gives health consumers a right to speak to the hospital's patient representative 'if you are unsatisfied with how your doctor or treatment team is responding to your concerns'.
3. All complaints through this system are logged into the Victorian Health Information Management System. These complaints are forwarded on a monthly basis to the Victorian Health Services Commissioner. This allows an audit and analysis of complaints and concerns received by health services.
4. The following is a funding requirement for health services:

*Funded organisations are required to have effective and responsive complaint management systems in place to deal with complaints in a timely and appropriate way.*

Patient representatives appear to have similar duties to their equivalents in NSW hospitals. Please note, however, that PIAC was unable to locate any centralised online list of patient representatives in Victoria. Online information about Patient Representatives seems to be limited to local area health web sites. For example, see the 'Western Health' website at [http://www.wh.org.au/Patients\\_and\\_Visitors/Complaints\\_and\\_Compliments/index.aspx](http://www.wh.org.au/Patients_and_Visitors/Complaints_and_Compliments/index.aspx)

PIAC thanks the Committee for being able to make a further contribution.

Yours sincerely



**Peter Dodd**

Solicitor Health Policy and Advocacy  
Public Interest Advocacy Centre

Direct phone: +61 2 8898 6523

E-mail: [pdodd@piac.asn.au](mailto:pdodd@piac.asn.au)

