

The Practice of Dr Natasha J Ayles

Complaints Policy

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Opportunities are available for patients and other visitors to tell us, “how we are doing” and we collect systematic patient experience feedback at least every three (3) years.

The practice information sheet provides patients with information on how to provide feedback, including how to make a complaint.

We have a complaints resolution process which all members of the practice team can describe, and we also make the contact details for the Victorian health complaints agency readily available to patients if we are unable to resolve their concerns.

Patients have a ‘right to complain’ and where possible, patients and others are encouraged to raise any concerns directly with the practice team who are all trained to make sure patients of the practice feel confident that any feedback or complaints made will be handled appropriately. We believe most complaints can be responded to and resolved at the time the patients or other people such as carers, relatives, friends, or other consumers make them known to our team.

Patients may also follow the complaints procedure at the RACF.

Under national and Victorian privacy laws, our practice provides and adheres to a complaints process for privacy issues and those related to the *Australian Privacy Principles (APPs)*.

All members of our practice team are educated to be prepared to address complaints as they arise. Depending on the nature of the complaint and any advice received from our medical indemnity insurers where required, complaints are recorded and actioned with a copy placed in the patient’s health record if related to patient care.

All clinical and medical staff, as well as administration staff, are aware of the professional and legal obligations regarding the mandatory reporting of unprofessional conduct.

Procedure

Patients and others have opportunities to register their complaints either verbally, in writing (letter) or via the RACF. Patients or others can complain anonymously if desired.

All members of our practice team are educated to be prepared to address complaints as they arise.

When receiving complaints, our practice keeps in mind the following to minimise further patient anxiety and hostility:

- Handle all complaints seriously, no matter how trivial they may seem.
- Verbal complaints made in person should be addressed in a private area where possible.
- Use tactful language when responding to complaints.
- Do not blame others; the complainant may not have all the facts, or they may distort them.
- Address the complainant’s expectations regarding how they want the matter resolved.
- Assure the complainant that their complaint will be investigated and the matter not disregarded.
- Offer the person an opportunity to complete a formal complaint form (they may accept or decline).

- Document all complaints and other relevant information and place this in the complaint folder so the person designated to manage complaints is informed of the complaint (even if the matter appears to have been resolved).
- Alert the general practitioner about disgruntled or hostile patients/NOK so they can diffuse the situation immediately - often people are reluctant to make a complaint directly to a general practitioner.
- Always inform the person designated to manage complaints if you become aware of any significant statements made by the patient/NOK or significant change in patient/NOK attitude.

The practice has appointed The Practice Manager with designated responsibility for seeking, collecting, analysing, investigating, resolving and managing all feedback and complaints. Any investigation and resolution of complaints is undertaken using an open disclosure process, incorporating the following:

- Acknowledge the patient's right to complain.
- Acknowledge receipt of the complaint as soon as possible, but within two (2) working days using the *Acknowledgment of Complaint* letter template.
- Respond to all complaints as soon as reasonably practicable, but within thirty (30) days in an open and constructive manner including an explanation and, if appropriate, an apology.
- If a resolution of the matter is to take longer than thirty (30) days, an update of the resolution activities will be provided to the patient, with an anticipated revised timeframe for resolution.
- Work with the patient to resolve the complaint and communicate the outcome with the patient, including any changes made as a result of the complaint.
- If appropriate, contact the practice's insurer when there is a complaint about a member of the medical or clinical team to seek advice on resolving the complaint before any action is taken
- Where a complaint is made against a practice team member, provide the team member with an opportunity to discuss the details in a private setting.
- Ensure the complaint does not adversely affect the patient's care.
- Record the complaint, investigation and actions in the dedicated complaints file and, if related to patient care, include a copy in the patient's health record.
- Ensure, where appropriate, complaints are reviewed at practice team meetings; analyse trends and discuss the methods of resolution.
- Review other types of patient feedback (i.e. feedback surveys, suggestion box) during practice team meetings.
- Keep a record of improvement(s) made in response to feedback or complaints.
- Where appropriate, inform the complainant about practice improvements made as a result of their input.

If the matter cannot be resolved, the patient is advised about how to contact the external health complaints agency for our Victorian State/Aged Care Complaints Commissioner

Victoria

Office of the Health Services Commissioner

Telephone: 1300 582 113

Web: www.hcc.vic.gov.au

Complaints that relate to privacy issues or concerns that cannot be resolved internally are to be directed to the Office of the Australian Information Commissioner (OAIC).

Office of the Australian Information Commissioner

Telephone: 1300 363 992

Postal Address: GPO Box 5218, Sydney NSW 2001

Web: www.oaic.gov.au _

Members of the public may make a notification to the Australian Health Practitioner Regulation Agency (AHPRA) - www.ahpra.gov.au - about the conduct, health or performance of a practitioner or the health of a student. Practitioners, employers and education providers are all mandated by law to report notifiable conduct relating to a registered practitioner or student to AHPRA.

Patients and their NOK are also able to make complaints via the Aged Care Complaints Commissioner:

phone: 1800 951 822 (free call)

email: info@agedcarequality.gov.au

online: www.agedcarequality.gov.au/

Postal address: Aged Care Quality and Safety Commission, GPO Box 9819, Melbourne VIC.

10.0 INTRODUCTION

The objective of this document is to provide you, our patient and your medical treatment decision maker (MTDM)/power of attorney (POA) or next of kin (NOK), with clear information on how your personal information is collected and used within our practice and to the residential aged care facility (RACF) you live at. Occasionally we also need to share your personal information to involve others in your healthcare and this policy outlines when, how, and why we share your information. If you have any questions regarding this policy, you can contact our office.

10.1 When and why is your consent necessary?

When you register as a patient of this practice, you provide consent for the GPs and practice staff to access and use your personal information to facilitate the delivery of healthcare. Access to your personal information is restricted to practice team members who require it for your care, and the RACF as appropriate. If we ever use your personal information for purposes other than outlined in this document, we will obtain additional consent from you.

It is important to us that as our patient, you understand why we collect and use your personal information.

By acknowledging this Privacy Policy you consent to us collecting, holding, using, retaining and disclosing your personal information in the manners described below.

10.2 Why do we collect, use, store, and share your personal information?

The practice collects, uses, stores, and shares your personal information primarily to manage your health safely and effectively. This includes providing healthcare services, managing medical records, and ensuring accurate billing and payments. Additionally, we may utilise your information for internal quality and safety improvement processes such as practice audits, accreditation purposes, and staff training to maintain high-quality service standards.

10.2 What personal information is collected?

The information we will collect about you includes your:

- names, date of birth, addresses, contact details
- medical information including medical history, medicines, allergies, and adverse reactions immunisations, social history, family history and risk factors
- Medicare number (where available) for identification and claiming purposes
- Concession card number (where applicable) for claiming purposes
- DVA number (where applicable) for claiming purposes
- healthcare identifier numbers
- health fund details.
- NOK name and contact details

10.4 Can you deal with us anonymously?

It is not practical for us to provide health care to unidentifiable patients.

Anonymous communication is only appropriate if you choose to provide feedback about our service when no response is required.

10.5 How is personal information collected?

We will always comply with privacy obligations when collecting personal information from third-party sources. This includes ensuring transparency with patients, obtaining necessary consents, maintaining data accuracy, securing the information, and using it only for specified purposes.

The practice may collect your personal information in several different ways:

- When you make your first appointment, the practice team will collect your personal and demographic information via your registration.
- With your signed consent, we request your previous medical history from your previous GP. Considering your past medical history allows us to provide comprehensive care to you.
- We may also collect your personal information when you visit our website, send us an email, SMS or telephone us.

In some circumstances, personal information may also be collected from other sources, including:

- Your guardian or responsible person.
- The residential aged care facility you are residing at.
- Other involved healthcare providers, such as specialists, allied health professionals, hospitals, community health services, and pathology and diagnostic imaging services.
- Your health fund, Medicare, or the Department of Veterans' Affairs (if relevant).
- While providing medical services, further personal information may be collected via:
 - electronic prescribing
 - My Health Record
- Photos and medical images: These can be taken using personal devices for medical purposes, following the guidelines outlined in our guide on using personal devices for medical images.

10.6 When, why and with whom do we share your personal information?

We share appropriate information with the nursing staff at the aged care facility you reside at to enable appropriate care planning and interventions to be put into place for you.

We sometimes share your personal information:

- with third parties for business purposes, such as accreditation agencies or information technology providers – these third parties are required to comply with APPs and this policy
- with other healthcare providers (e.g. In referral letters)
- when it is required or authorised by law (e.g. court subpoenas)
- when it is necessary to lessen or prevent a serious threat to a patient's life, health or safety or public health or safety, or it is impractical to obtain the patient's consent
- to assist in locating a missing person
- to establish, exercise or defend an equitable claim
- for the purpose of confidential dispute resolution process
- When it is a statutory requirement to share certain personal information (e.g. some diseases require mandatory notification)
- When it is provision of medical services, through electronic prescribing, My Health Record (e.g. via Shared Health Summary, Event Summary).

Only people who need to access your personal information will be able to do so. Other than providing medical services or as otherwise described in this policy, the practice will not share personal information with any third party without your consent.

We do not share your personal information with anyone outside Australia (unless under exceptional circumstances that are permitted by law) without your consent.

10.7 Will your information be used for marketing purposes?

The practice will not use your personal information for marketing any goods or services directly to you without your express consent. If you do consent, you may opt out of direct marketing at any time by notifying the practice in writing.

10.8 How is your information used to improve services?

The practice may use your personal information to improve the quality of the services offered to

patients through research, analysis of patient data for quality improvement, and for training activities with the practice team.

We may provide de-identified data to other organisations to improve population health outcomes. If we provide this information to other organisations patients cannot be identified from the information we share, the information is secure and is stored within Australia. You can let reception staff know if you do not want your de-identified information included.

At times, general practices are approached by research teams to recruit eligible patients into specific studies which require access to identifiable information. You may be approached by a member of our practice team to participate in research. Researchers will not approach you directly without your express consent having been provided to the practice. If you provide consent, you will then receive specific information on the research project and how your personal health information will be used, at which point you can decide to participate or not participate in the research project.

10.9 How are document automation technologies used?

Document automation is where systems use existing data to generate electronic documents relating to medical conditions and healthcare.

The practice uses document automation technologies to create documents such as referrals, which are sent to other healthcare providers. These documents contain only your relevant medical information. These document automation technologies are used through secure Medical Director's medical software 'Helix'.

All users of the medical software have their own unique user credentials and password and can only access information that is relevant to their role in the practice team.

The practice complies with the Australian privacy legislation and APPs to protect your information. All data, both electronic and paper are stored and managed in accordance with the Royal Australian College of General Practitioners [Privacy and managing health information guidance](#).

10.10 How is your personal information stored and protected?

Your personal information may be stored securely in various forms:

- Electronically in your patient file in Helix,
- Hard copy in your personal file in our locked filing cabinet.
- At the residential aged care facility you reside at (see their privacy policy for further information about storage of records held there)

Our computer system, including Helix is password protected and each team member only has access to information relevant to their role.

Our filing cabinet is in our secure office, is locked when not in use and only accessible to those staff with relevant roles.

All staff members sign a confidentiality agreement on commencement of their employment.

10.11 How can you access and correct your personal information at the practice?

You have the right to request access to, and correction of, your personal information.

The practice acknowledges patients may request access to their medical records.

Should you wish to access this information, please contact one of our staff for a request for health information form

The practice will respond to any requests to access or correct your personal information as soon as

possible, within 7 days.

The practice will take reasonable steps to correct your personal information where the information is not accurate or up to date. Sometimes, we will ask you to verify your personal information held by the practice is correct and current. You may request we correct or update your information. To do this please advise a team member directly or via the contact options listed below.

10.12 How can you lodge a privacy-related complaint, and how will the complaint be handled at the practice?

We take complaints and concerns regarding privacy seriously. You should express any privacy concerns you may have via the contact options listed below. We will then attempt to resolve it in accordance with the resolution procedure.

If you do not feel we have resolved your issue You may also contact the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner will require you to give them time to respond before they investigate. For further information visit www.oaic.gov.au or call the OAIC (Office of the Australian Information Commissioner) on 1300 363 992.

10.13 How is privacy on the website maintained?

At The Practice of Dr Natasha Ayles, any personal information you share with us through website, email, and social media, is handled securely and confidentially. This practice uses analytics and cookies.

10.14 Policy review statement

Our privacy policy is regularly reviewed to ensure compliance with current obligations.

If any changes are made:

- They will be reflected on the website.
- Significant changes may be communicated directly to patients via email or other means.

Please check the policy periodically for updates. If you have any questions, feel free to contact us.

10.15 Contact Methods

We can be contacted in person when doing rounds or via the senior staff at the residential aged care facility you reside at, or, via the methods below:

Email | office@fernbank.net.au

Fax | 03 8080 1614