B-09.02 Complaints

Policy

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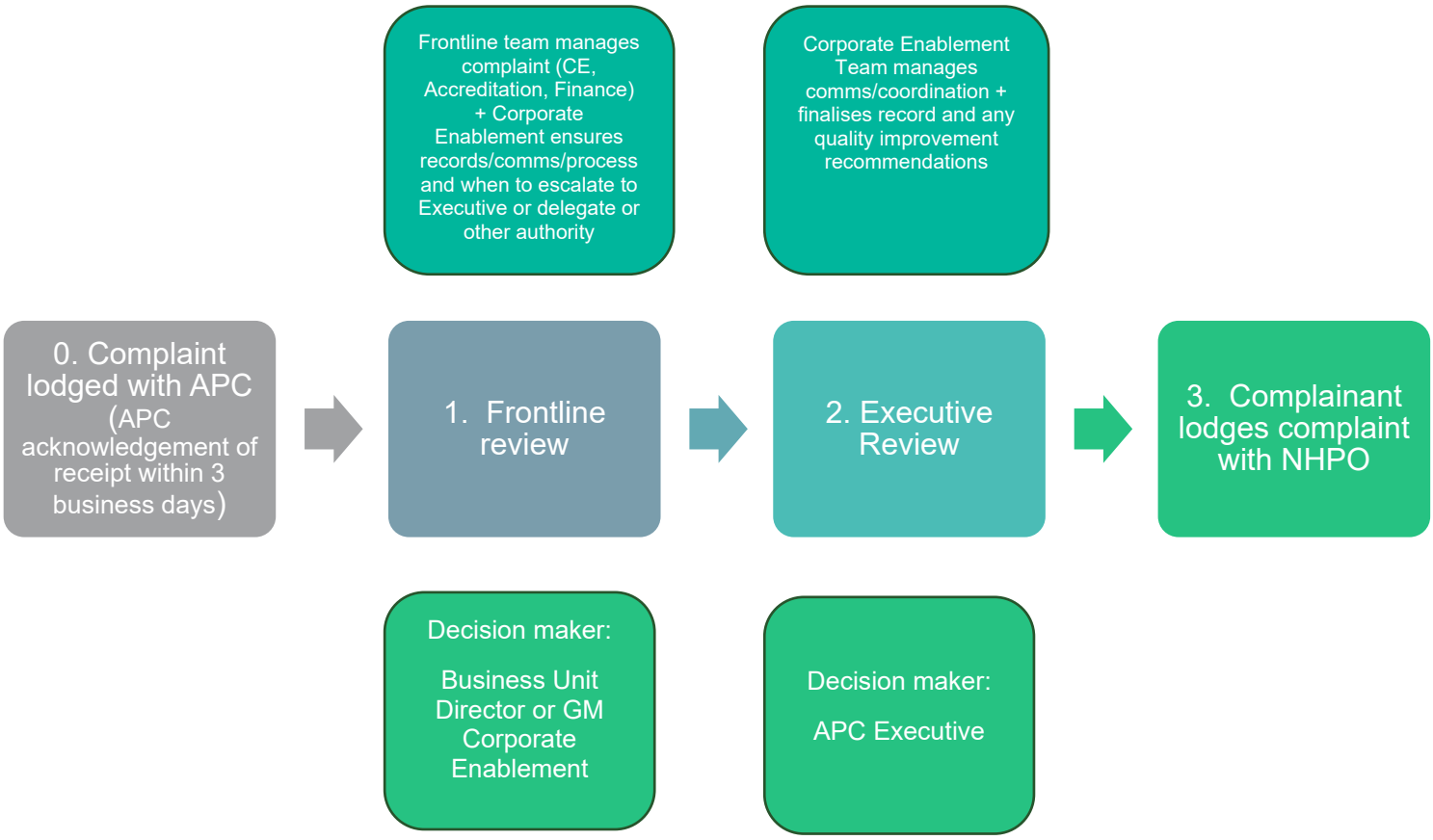
About this Policy

Underlined words are terms that are explained in the Definitions section of this policy.

Complaints processes:

This policy covers the following processes involved in the management of complaints as summarised below.



Complaints Policy

1. Purpose

The purpose of this policy is to provide information about how the Australian Pharmacy Council (APC) manages complaints about its business, services or staff.

2. Overview

The APC is a not-for-profit company limited by guarantee. It works in the National Registration and Accreditation Scheme (NRAS) through delegation from the Pharmacy Board of Australia (PharmBA) and in accordance with the Health Practitioner Regulation National Law (the National Law). It also conducts business outside of NRAS.

The APC:

a) Assesses pharmacists and overseas authorities,

b) Develops standards,

c) Delivers exams,

d) Accredits Australian programs of study that lead to registration with the PharmBA,

e) Accredits education programs for registered pharmacists completing additional, specialised training (expanded scope of practice), and

f) Accredits international pharmacy degree programs.

From time to time, individuals or organisations who engage with the APC may wish to raise a complaint about the APC. Complaints can be made about APC services, decisions, staff, the management of a matter, policy or execution of a process.

Complaint reviews at the APC involve a decision maker evaluating how the issue raised in the complaint was handled to see if there were any errors. The complaint decision maker's role is not to establish if the matter (or decision) was correct or incorrect, but to establish if the process was handled appropriately.

The APC encourages third parties to raise complaints where appropriate as doing so helps it improve its business processes, policies and systems.

This policy is aligned to *AS 10002:2022 Guidelines for complaint management in organisations*.

3. Scope

This policy relates to any Complainant who:

a) Uses or engages with the APC or its services, and

b) Has a genuine complaint they seek resolution to.

This policy also applies to any APC staff member or contractor who is involved in managing a complaints process.

This policy does **not** apply to third party concerns regarding APC accredited programs.

While they may lead to an individual lodging one, complaints are different to appeals. This policy does **not** apply to APC Exam, Skills Assessment or Accreditation Appeals.

The APC does **not** manage complaints about pharmacists or pharmacy premises or licensing.

The policy does **not** apply to complaints made about APC on external third-party social media platforms.

4. Principles

This policy is based on the following five principles:

Right to complain

Complainants who have genuine complaints have a right to complain. Complainants will not be disadvantaged or penalised in any way by lodging a complaint with the APC. Vexatious or unsubstantiated complaints will not be processed.

Confidential

All information provided by the Complainant and used under this policy will be treated sensitively, confidentially and in accordance with the Privacy Act 1988 and the APC's Privacy Policy.

Transparent

Complainants will be provided with clear, concise information about how to complain, the progress of their complaint and the outcome of their complaint. The APC will take all reasonable steps to ensure the accessibility of this policy and its processes to Complainants. The APC will always seek to involve the Complainant in the management of their complaints process as far as reasonably and practically possible.

Timely

Complaints will be processed in a timely and efficient manner. The APC will seek to provide the Complainant with the earliest outcome possible.

Fair

Complaints will be processed consistently, impartially and after the collection of all relevant information. Complaints will be managed in the interests of natural justice and in accordance with the APC's values, policies and obligations under the National Law.

5. Types of complaints

Complainants can make one or more types of complaints, including:

a) Anonymous complaints, (via online form only)

b) Confidential complaints, or

c) Fully disclosed complaints

Where a Complainant lodges an anonymous or confidential complaint, the APC's ability to process and resolve the complaint may be limited or unfeasible. Anonymous or confidential complaints can restrict the APC's ability to gather additional relevant information required to determine how best to resolve the issue.

6. Administrative actions eligible for complaint

Complainants can raise complaints about a range of APC actions and services whether delivered under its delegation through the National Law or otherwise.

Grounds (reasons) for complaints include, but are not limited to, dissatisfaction with:

a) Actions taken by the APC staff, contractors, Board or committees,

b) Services provided by APC (e.g. quality, conduct of staff),

c) How matters have been managed (e.g. delays, lack of fairness),

d) Incorrectly applied or executed APC processes or procedures not covered by other policies (e.g. Appeals),

e) A breach of policy or natural justice, and

f) Unfair or discriminatory practices.

7. Process

There are up to three steps involved in the APC's complaint handling process. These steps are not sequential nor mandatory. Complainants can decide which steps they want to pursue in their absolute discretion.

7.1. Step 1: Frontline review

Complainants can request a frontline review of their complaint undertaken by frontline staff. Frontline reviews afford the Complainant and the APC the fastest, most direct and effective route to complaint resolution.

Frontline reviews are informal assessments of complaints aimed at establishing:

a) Any key elements to the complaint (e.g. sensitivities or time pressures),

b) If the complaint is about a decision taken by APC that is better managed through an appeals process, and

c) What resolution the Complainant is seeking.

Frontline staff may ask the Complainant for further information to help their review of the complaint. The relevant APC business unit Director is the Responsible Officer for frontline reviews (e.g. Director Accreditation, or Director Assessments). The relevant business unit will manage the complaint coordination, recording and communication with the Complainant for Frontline Review.

As soon as all relevant information is collected and reviewed, and the complaint resolution is determined by the Responsible Officer, the APC will communicate the outcome of the Frontline Review to the Complainant in writing. This communication will include how the APC considered the dimensions of the complaint and reasons for the chosen resolution.

7.1.1. Frontline Review outcomes

Outcomes of frontline reviews include (but are not limited to):

a) Those outcomes listed in Section 8 of this policy,

b) Review of an APC decision via an appeals policy,

c) Referral to another authority for management, or

d) Escalation to Executive Review.

7.1.2. Escalation or referral from Frontline Review

Where the Responsible Officer establishes that the complaint might require escalation to Executive Review or referral to another authority, they will pass the complaint to the General Manager Corporate Enablement (GMCE) for management.

The GMCE will then review the complaint and confirm whether escalation to Executive Review or referral to another authority is required and appropriate. If neither escalation nor referral is required, the GMCE will hand the complaint back to the Responsible Officer for resolution.

7.2. Step 2: Executive Review

Complainants may decide that they do not wish to have a Frontline Review of their complaint for whatever reason. Alternatively, the GMCE may determine that the complexity of the complaint requires escalation to an APC Executive. In such cases, Complainants can request, or the GMCE can recommend, an Executive Review.

Reasons for Executive Review may include (but are not limited to):

a) Complainant dissatisfaction with the outcome of the Frontline Review,

b) The complexity or seriousness of the complaint,

c) The legal issues involved in the complaint,

d) The risk profile of the complaint, or

e) If the complaint concerns a senior member of the APC.

In addition to any considerations that may have been undertaken as part of a Frontline Review, the Executive Review will consider (list not exhaustive):

a) The severity and complexity of the complaint,

b) Any health or safety issues relevant to the complaint,

c) The potential impacts of the complaint on the Complainant and the APC,

d) If immediate action is required, and

e) The outcomes sought by the Complainant.

This process will involve an APC Executive(s) reviewing the detail of the complaint. They may request further information from the Complainant. The APC's Corporate Enablement team (CET) will be involved in the complaint coordination, recording and communication with the Complainant.

As soon as any additional relevant information is collected and reviewed, and the Executive Review is completed, the APC will communicate the complaint outcome to the Complainant in writing.

This communication will include how the APC Executive(s) considered the dimensions of the complaint and reasons for the chosen resolution.

7.3. Step 3: Complaint to the National Health Practitioner Ombudsman (NHPO)

The National Health Practitioner Ombudsman (NHPO) is the independent body that is responsible for handling complaints about entities within the National Registration and Accreditation Scheme, including the APC.

The NHPO can handle complaints about the APC's:

- accreditation of programs of study, and
- assessment of overseas qualified pharmacists.

Individuals can make a complaint about the APC to the NHPO at any time via email (complaints@nhpo.gov.au), phone (1300 795 265) or post:

National Health Practitioner Ombudsman
GPO Box 2630
Melbourne VIC 3001

For more information about the National Health Practitioner Ombudsman's role in handling complaints about accrediting authorities like the APC, see the NHPO website.

authorities like the APC, please visit NHPO Accreditation Authorities.

8. Complaint outcomes

The outcome of a complaint will depend on the specific details and circumstances of the complaint itself.

Some examples of ***possible*** complaint outcomes are as follows (list not exhaustive):

a) Explanation of decisions or actions taken,
b) Review of a decision or recommendation that the decision is appealed,
c) Provision of further information to the Complainant,
d) An apology or admission of fault,
e) Expediting, stopping, changing or cancelling an action, process or policy,
f) Ensuring compliance,
g) Correcting records,

h) Taking action to prevent potential detriments,

i) Repairing or replacing damage or lost property,

j) Removing a penalty,

k) Disciplinary action,

l) Refunding of fees, or

m) No action.

9. Lodging a complaint

Complainants can make a complaint at any time. Complainants can lodge a complaint in several different ways as below. The APC will acknowledge receipt of complaints within 3 business days.

APC will accept complaints lodged:

a) In person at the APC office: T1 Level 2, 6 Brindabella Circuit South, Brindabella Business Park Canberra Airport ACT 2609,

b) Over the phone (+61 2 6188 4288),

c) Via APC social media platforms (LinkedIn, etc.),

d) By email (complaints@pharmacycouncil.org.au)

e) Anonymously or confidentially through an online complaints form, or

f) Prepaid post: GM, Corporate Enablement (Complaints)
Australian Pharmacy Council
PO Box 1227
Fyshwick ACT 2609

Depending on the way in which the Complainant raises their complaint, relevant information will be recorded by an APC staff member or by the Complainant themselves.

10. Timeframes

The APC will provide the Complainant with acknowledgement of receipt of their complaint within 3 business days.

Depending on the nature and complexity of the complaint, review and resolution times can vary. The APC aims to resolve most complaints within 30 calendar days from receipt of the complaint.

The APC will provide regular updates to the Complainant about the progress of their complaint and upon reasonable Complainant request.

The APC is committed to resolving complaints as soon as reasonably possible.

11. Complaints oversight

APC management will provide the APC Board with quarterly reports on all complaints received within the previous quarter.

12. Management of complaints

Frontline Reviews are managed by the relevant APC business unit.

The APC Corporate Enablement team (CET) has overall responsibility for complaint coordination, management and record keeping across the APC.

The APC CEO is responsible for ensuring the APC has sufficient complaints systems in place to manage and address complaints.

13. Complaints involving multiple parties

Where the APC receives complaints about the same issue from multiple parties, the APC CET will coordinate communication and resolution between the parties.

The CET will ensure all privacy and confidentiality obligations are met for all parties.

14. Information provided

See Appendix 1 for a list of information the APC will ask Complainants to provide.

The APC will only be able to address complaints where it has sufficient and substantiated information to do so.

15. Unreasonable conduct by the Complainant

Where the Complainant demonstrates or engages in unreasonable conduct, the APC can determine, in its absolute discretion, to pause or close the complaint process without an outcome.

16. Reporting

Information collected from the Complainant and through the complaints handling process will be recorded on APC systems. The number and type of complaints will be reported to the APC Board. Complaints information will be used to inform quality improvements to APC business processes where relevant.

17. Complaint fees

There is no fee to lodge a complaint.

Glossary of Terms

Term	Meaning
Anonymous complaint	A complaint lodged by a Complainant where they do not provide any personally identifiable information (name, contact phone number) to the APC. Anonymous complaints should be made online using the online complaints form. The APC's capacity to address or resolve anonymous complaints may be limited or negligible.
APC Executive	The APC Chief Executive Officer, the Deputy Chief Executive Officer, the Chief Standards Officer, General Manager Corporate Enablement or General Manager Strategy and Innovation. The APC Executive(s) who undertakes an Executive Review of a complaint cannot be the executive(s) responsible for the business unit relevant to the complaint. The APC Executive who is the subject of a complaint, cannot be involved in handling the complaint. Any APC Executive who has been involved in any decisions made as part of the Frontline Review cannot be involved in the Executive Review process. If a complaint is lodged about the APC CEO, the Chair and Deputy Chair of the APC Board will conduct the Executive Review.
Appeal	A process that allows an individual to ask for a review of a decision or outcome.
Complaint	As adapted from the Australian Standards AS 10002:2022: A complaint is an expression of dissatisfaction made to or about an organisation, related to its products, services, process, policy staff or the handling of a complaint or other matter, where a response or resolution is explicitly or implicitly expected or legally required.
Confidential complaint	A complaint lodged by a Complainant where they provide personally identifiable/sensitive information but do not authorise the APC to share the information externally with any relevant third parties for the resolution of the complaint. Complainants who lodge confidential complaints initially can decide to authorise the full disclosure of their information at a later time if they want to. The APC's capacity to address confidential complaints may be limited or negligible.
Frontline staff	The APC staff member or team that is responsible for the product or service that is the subject of the complaint.

Term	Meaning
	For example: Director Assessment, Head of IT and Digital Transformation, Accreditation Team, Candidate Engagement Team, Finance Team, etc.
Fully disclosed complaint	A complaint lodged by a Complainant where they provide personally identifiable/sensitive information and authorise the APC to use such information in the resolution of the complaint.
Responsible officer	The APC business unit Director who is accountable for the timely resolution of a frontline complaint.
Unreasonable conduct by complainant	*As defined in Australian Standards AS 10002:2022:* Any behaviour by a person which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the people involved in the complaint process.

List of Abbreviations

Abbreviation	Term
APC	Australian Pharmacy Council
AS 10002:2022	Australian Standard 10002:2022 – Guidelines for Complaint management in organisations
CEO	Chief Executive Officer
CET	Corporate Enablement Team
GMCE	General Manager Corporate Enablement
National Law	Health Practitioner Regulation National Law
NHPO	National Health Practitioner Ombudsman
PharmBA	Pharmacy Board of Australia

Appendix 1: Information collected from complainant

Complainants will be asked to provide the APC with specific information when lodging a complaint.

The APC will accept anonymous complaints (complaints that do not include the information described below as 'optional').

The following is a list of the information the APC will collect to manage the complaint process:

a) Date of complaint,

b) Whether or not the Complainant wishes the complaint to be anonymous, confidential or fully disclosed,

c) Complainant name or pseudonym (optional),

d) Complainant APC CRN number or application number (if applicable),

e) Complainant email and phone details (optional),

f) Preferred contact method (optional),

g) The name, email and phone number of anyone the Complainant wish to authorise to correspond with the APC on their behalf (optional),

h) Any support requirements the Complainant or their authorised representative may need to proceed with the appeal or correspond with the APC (optional),

i) The product, service, team or area of the APC's business the complaint refers to,

j) The issue(s) that the complainant wishes to raise,

k) The outcome the complainant wishes to achieve through resolution of the complaint, and

l) Any other information or supporting evidence they deem relevant to their complaint.

The APC will correspond with either the Complainant or their authorised representative (if appointed) only.

All information provided to the APC by the Complainant will be managed confidentially and in accordance with its Privacy Policy.

A record of the complaint, all correspondence and any supporting information provided by the candidate will be stored on APC systems for record and quality assurance purposes.

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