COMPLAINTS HANDLING POLICY

Policy Reference	GOV11
Date of Initial Board Adoption	31 August 2016
Minutes Reference	7: 02122020
Date of Audit Committee Endorsement (if applicable)	25 May 2016
Date last reviewed by Eastern Health Authority Board of Management	24 June 2026
Relevant Document Reference	- Code of Conduct for Board Members D12/1640[v5] - Internal Review of a Decision Procedure D20/15895 - EHA Public Interest Disclosure Procedure D20/11480] - EHA Employee Code of Conduct D14/5685[v6] - Customer Service Policy D16/1655[v2]
Applicable Legislation	

1. Introduction

Eastern Health Authority (EHA) is committed to the provision of quality service to customers and regards complaints as an opportunity to improve practices and procedures as well as resolve the matter.

Emphasis will be placed on resolving complaints as quickly as possible. However, where complaints cannot be resolved in the first instance EHA will ensure that they are dealt with through appropriate, formal procedures by staff with the authority to make decisions and resolve complaints.

2. Purpose

The purpose of the Complaints Handling Policy (this Policy) is to provide a fair, consistent and structured process for EHA customers and other members of the public if they are dissatisfied with EHA's actions, decisions or services. Lessons learnt from complaint investigations will be used to directly inform service improvements.

This Policy also aims to provide guidance on:

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

- Distinguishing between requests, complaints and feedback to EHA and giving direction on management of these issues
- How EHA assesses and processes requests and complaints including the collation of information which can be used to directly inform service improvements

3. Scope

This Policy applies to complaints received from members of the public regarding EHA's operations or service delivery.

This Policy does not apply to:

- Complaints regarding EHA's Board of Management. These will be dealt with in accordance with the Code of Conduct for EHA Board Members – Dealing with Complaints Procedure.
- Requests for a review of an EHA decision. These will be dealt with in accordance with the Internal Review of EHA Decisions Procedure.
- Matters covered by the *Public Interest Disclosure Act 2019.* These will be dealt with in accordance with the EHA's Public Interest Disclosure Procedure.
- Allegations of criminal activity. These will be referred to the South Australian Police or other relevant authority.

4. Definitions

Board means the Board of Management of EHA.

Employee means any person performing work on behalf of EHA, either paid or unpaid, including the Chief Executive Officer (CEO).

Complaint means an expression of dissatisfaction with actions of EHA or a service delivered by EHA that have failed to reach the standard stated, implied or expected. This includes complaints about a service that has been, or should have been delivered.

Request for Service is a request for EHA to provide or improve a service.

5. Principles

EHA acknowledges that treating all persons fairly requires impartiality, and as far as practicable confidentiality and transparency at all stages of the process.

- EHA will promote to its customers the methods by which they can request services and make general complaints.
- EHA is committed to providing sufficient resources and well trained staff to manage service and complaint matters, and to review its systems for opportunities for improvement.
- Customer requests and complaints will be dealt with in accordance with this Policy in a timely manner that takes into account a response that is considerate of the matter's

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

complexities, and takes up opportunities for improvement across the organisation where appropriate.

- In processing requests for service emphasis will be placed on:
    - Public safety and emergencies
    - Fulfilling EHA's Business Plan
    - Using EHA resources effectively

Feedback can take the form of comments, both positive and negative, about services provided by EHA without necessarily forming the basis of a request for service or general complaint. EHA welcomes feedback of all types as an important way of continually monitoring its service standards.

6. Policy

6.1 General Complaints Handling

6.1.1 Making a complaint

EHA welcomes complaints as a way of improving its services and programs as well as providing an opportunity to put things right.

This Policy will be made widely accessible to ensure that customers and other members of the public are fully aware of their right to complain. Information about how to lodge a complaint will be placed in a prominent position on EHA's website.

EHA will try to ensure that, whenever possible and appropriate, complaints will be handled independently of the original decision-maker or officer involved in the matter that is the subject of the complaint.

A person can make a complaint in a number of ways:

- Complete the appropriate form on EHA's website www.eha.sa.gov.au
- Telephone – 8132 3600
- Fax – 8132 3623
- Email – eha@eha.sa.gov.au
- Letter – PO Box 275, Stepney SA 5069
- Visit EHA:
  101 Payneham Road
  St Peters SA 5069
  Mon – Fri 9:00am – 5:00pm

6.1.2 Processing a complaint

EHA's response to general complaints received will be managed in accordance with this Policy. This includes ensuring that, whenever possible, complaints are handled

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

independently of the original decision-maker or officer involved in the subject of the complaint.

Employees will be provided with a level of delegated authority appropriate for the nature of complaints they are authorised to resolve.

Employees will record all general complaints received in EHA's records management system in such a way that the information can be utilised to respond to the complaint and for service improvement opportunities.

6.1.3 Steps to resolving a complaint

The following steps will be followed as far as practicable to ensure complaints are dealt with efficiently and effectively:

- Acknowledge complaints promptly
- Assess the complaint
- Plan the investigation where one is warranted
- Investigate the complaint
- Respond to the complainant with a clear decision
- Follow up any customer service concerns
- Consider whether there are systemic issues which need correction.

6.1.4 Timeframes for response

Upon receiving a complaint, EHA will endeavour where practicable to respond within **ten [10] business days**, acknowledging receipt of the complaint and, where possible, resolving it at that time. Where a complaint cannot be resolved immediately the complainant will be advised of the process to be undertaken, the likely timeframe required to investigate and resolve the matter, and will be regularly updated as to progress that is being made to resolve the complaint.

6.1.5 Procedures for resolving general complaints

Complaints may vary greatly in their level of complexity and seriousness. Wherever possible attempts will be made to resolve a complaint when first reported, but if necessary a complaint will be escalated as set out below.

The complaints procedure for dealing with complaints, other than complaints of a breach of the Employee Code of Conduct, consists of a two tiered scheme.

1. Immediate response to resolve the complaint - All employees are empowered to handle complaints in the first instance and it is preferable that they are dealt with promptly at the initial point of contact and at the appropriate officer level where possible.

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

2. Complaint escalated to a more senior officer - A complaint will be directed to the appropriate Team Leader of EHA, where circumstances indicate that the complaint would be more appropriately handled at a higher level and/or where the complaint has not been able to be resolved by way of an immediate response to resolve the complaint. The Team Leader will assess the complaint and determine if it is appropriate to handle the complaint or direct the matter to the CEO.

On occasion, it may be appropriate to consider mediation. This will only occur if both EHA and the complainant agree to undertake mediation.

6.2 Procedures for resolving complaints under Code of Conduct for Employees

A complaint alleging an employee of EHA has breached the Code of Conduct for Employees (the Code of Conduct) will be referred immediately to the CEO to deal with (except where the complaint relates to the CEO).

The CEO will deal with the complaint, including if appropriate, undertake an investigation.

The procedure to be followed in dealing with a complaint under the Code of Conduct will be determined by the CEO (except where the complaint relates to the CEO).

Complaints under the Code of Conduct that relate to the CEO will be referred immediately to the Chair of the Board. The procedure to be followed in dealing with a complaint under the Code of Conduct in relation to the CEO will be determined by the Board.

The CEO (or Chair of the Board where the complaint relates to the CEO) will endeavour to provide information to the complainant about the progress of a complaint and the outcome of the consideration of a complaint where appropriate.

6.3 Complainant rights to external review

While EHA prefers to work with members of the public to resolve complaints quickly and effectively, a complainant will always retain the right to seek other forms of resolution, such as contacting the Ombudsman, or taking legal action at any time.

6.4 Unreasonable complainant conduct

All complaints received by EHA will be treated seriously and complainants will be treated courteously. However, occasionally the conduct of a complainant can be unreasonable. This may take the form of unreasonable persistence, unreasonable demands, lack of cooperation, argumentative or threatening behaviour. What will be 'unreasonable' will vary depending on a number of factors and EHA aims to manage these situations in a fair and equitable manner.

Where a complainant's behaviour is unreasonable, a decision may be made to apply restrictions to that person including in relation to contact by the person with EHA and its staff and board members. Before making any decision to restrict

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

contact, the complainant will be warned that, if the specified behaviour(s) or actions continue, restrictions may be applied.

Where a complainant's behaviour is unreasonable, a decision may be made to suspend action on their complain. Such a decision will be made by the CEO or their delegate and communicated in writing to the complainant.

6.5 Using complaints to improve service

Quality of service is an important measure of EHA's effectiveness. Learning from complaints is a powerful way of helping to develop EHA and increase trust among the people who use our services.

In addition to making changes to procedures and practices where appropriate, EHA will review and evaluate the information gained through its complaints handling procedure on an annual basis to identify systemic issues and improvements to service. Where appropriate, complainants will be provided with an explanation of changes proposed or made as a result of the investigation of their complaint.

6.6 Privacy and confidentiality

Complainants have a right to request that their complaint be investigated in private. EHA will endeavour where possible and lawful to treat complaints including the identity of complainants confidentially.

However EHA is subject to the *Freedom of Information Act 1991* and confidentiality cannot be guaranteed under the provisions of that legislation.

6.7 Remedies

Where complaints are found to be justified EHA will, where practicable, remedy the situation in a manner which is consistent and fair for both EHA and the complainant. The solution chosen will be proportionate and appropriate to the circumstances.

As a general principle the complainant should so far as possible, be put in the position he or she would have been in before the complaint. This may mean providing the desired service or changing a decision. Sometimes, however, it may only be possible to offer an apology.

6.8 Alternative remedies

EHA may seek to use alternative dispute resolution methods such as mediation to resolve a complaint in circumstances where the CEO or the Board deems such a course of action appropriate and the complainant is amenable to that process.

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.

When advising a complainant of the outcome of an investigation of a complaint, EHA will provide information about alternative remedies, including any rights of appeal and the right to make a complaint to an external agency such as the SA Ombudsman.

7. Review and evaluation

EHA may revise or review this Policy at any time (but not so as to affect any process that has already commenced). The CEO will report to the Board on the outcome of the review and make recommendations for amendment, alteration or a substitution of a new Policy if considered necessary.

8. Documentation

To assist in demonstrating that complaint handling processes are fair, transparent and accountable, cost effective and meet community needs, EHA will document all complaints received, the process undertaken to resolve the complaint and the outcome of the complaint.

9. Further Information

This policy will be available for inspection at EHA offices during normal business hours and available from EHA's website www.eha.sa.gov.au.

10. Statement of Adoption

The Policy was initially adopted by the Board on 31 August 2016and subsequently reviewed on 24 June 2026.

This is a version controlled document. The electronic version is the controlled version. Printed copies are considered uncontrolled. Before using a printed copy, verify that it is the current version.