Consumer Complaints and Feedback Policy

Authority	Chief Executive Officer
Responsible role	Chief Executive Officer
Operational leads	Chief Operating Officer; Director of Clinical Governance; Executive Support / nominated complaints coordinator
Applies to	Palmerston GP Super Clinic; Palmerston Medicare Urgent Care Clinic; Darwin Medicare Urgent Care Clinic; FCD Health GP Clinic
Status	Draft for approval - September 2026

1. Purpose

FCD Health values feedback, compliments, concerns and complaints as essential information for safe, person-centred care and continuous improvement. This policy establishes a consistent, fair and transparent approach for receiving, assessing, investigating, responding to and learning from consumer feedback and complaints across all FCD Health services.

The policy is designed to ensure that consumers can raise concerns without fear of disadvantage; that complaints involving clinical care or patient safety are escalated appropriately; and that themes and lessons are used to improve systems, workforce capability and patient experience.

2. Scope

This policy applies to all consumers, patients, carers, families, visitors and community members who use or interact with FCD Health services, including:

- Palmerston GP Super Clinic (PGPSC)
- Palmerston Medicare Urgent Care Clinic (PMUCC)
- Darwin Medicare Urgent Care Clinic (DMUCC)
- FCD Health GP Clinic (FCDHGPC).

This policy applies to feedback about clinical care, access, communication, service quality, cultural safety, privacy, facilities, billing, staff conduct, patient experience or any other aspect of care or service delivery.

Workplace complaints and employee grievances are managed under the FCD Health Complaints and Grievance Mechanisms Policy. Protected disclosures relating to misconduct or an improper state of affairs are managed under the FCD Health Whistleblower Policy.

3. Policy principles

FCD Health is committed to the following principles:

- Complaints and feedback are welcomed and will not adversely affect a person's access to care or how they are treated.
- Consumers will be treated respectfully, fairly and without discrimination or reprisal.
- Complaints will be managed as promptly as practicable, with clear communication about expected timeframes.
- Privacy and confidentiality will be protected, with information shared only as required to assess, investigate and resolve the matter or as required by law.
- Consumers may have a support person, advocate or interpreter involved in the process.

- Clinical complaints and patient safety concerns will be linked with clinical governance, incident management and open disclosure processes where appropriate.
- Complaints will be assessed impartially and with procedural fairness for all parties.
- Feedback and complaints will be analysed for themes, trends and improvement opportunities.
- FCD Health will make reasonable adjustments to support people with disability, communication needs, language needs or other barriers to participation.

4. Definitions

Term	Definition
Complaint	An expression of dissatisfaction or concern about a service, care, treatment, decision, interaction or experience that requires a response or resolution.
Feedback	A comment, compliment, suggestion, concern or opinion that may be positive or negative and can be used to improve services.
Consumer	A patient, carer, family member, visitor or community member who uses or interacts with FCD Health services.
Clinical complaint	A complaint involving diagnosis, treatment, medication, clinical decision-making, results, follow-up, referral, escalation, clinical documentation or other aspects of healthcare delivery.
Open disclosure	An open discussion with a patient, and where appropriate their support person, about an incident that resulted in harm while receiving health care, consistent with the Australian Open Disclosure Framework.
Procedural fairness	A fair process in which relevant parties have an opportunity to be heard, decisions are impartial and reasons are appropriately documented.
Resolution	The process of assessing, investigating, responding to and, where appropriate, taking action to address a complaint or concern.

5. How feedback and complaints can be made

Consumers may provide feedback or make a complaint in any of the following ways:

- Online through the feedback form on the FCD Health website.
- Email to feedback@fcdhealth.org.au.
- In person to any member of the FCD Health team, including reception, nursing, medical or management staff.
- By telephone through FCD Health reception or management.
- In writing by letter or a feedback/complaint form provided at a clinic.
- Anonymously, where the consumer chooses not to provide identifying information. Anonymous feedback will still be reviewed, although anonymity may limit FCD Health's ability to investigate or provide a direct response.

Staff receiving verbal feedback or a complaint must ensure the discussion is conducted as privately as practicable, listen respectfully, document the concern accurately, and escalate it in accordance with this policy.

6. Immediate response and acknowledgment

Where possible, simple concerns should be resolved at the point of service by the staff member or manager best placed to assist, provided this can be done safely and appropriately.

Where a matter cannot be resolved immediately, or where it requires formal review:

- FCD Health will acknowledge receipt as soon as practicable and ordinarily within 2 business days.
- The complaint will be entered into the Consumer Feedback and Complaints Register.
- The consumer will be advised who is managing the matter and the anticipated next steps.
- FCD Health will aim to resolve straightforward matters within 10 business days.
- If a matter is complex or requires additional time, the consumer will be advised of the reason for the delay, the expected timeframe and progress updates as appropriate.

7. Triage, risk assessment and escalation

Complaints will be assessed according to the nature of the concern, actual or potential harm, complexity, urgency, regulatory implications and whether immediate action is required to protect a patient, staff member or the organisation.

Immediate escalation is required where a complaint raises or may raise:

- actual or potential serious patient harm;
- a significant clinical error, medication incident, diagnostic concern, treatment delay, failure to follow up a significant result, delayed escalation or unsafe transfer of care;
- alleged abuse, neglect, discrimination, racism, cultural safety concern or serious breach of patient rights;
- serious professional conduct or scope-of-practice concerns;
- a privacy, confidentiality, cyber or information-security breach;
- a threat to patient, visitor or staff safety;
- a repeated or systemic concern that may affect other consumers;
- a material regulatory, contractual, funding, legal or reputational risk; or
- a matter that may require mandatory notification or external reporting.

Such matters must be escalated promptly to the relevant operational lead, Director of Clinical Governance and/or Chief Executive Officer. Where appropriate, the matter must also be entered into the incident management system and considered against the enterprise risk register and escalation thresholds.

8. Clinical complaints and patient safety concerns

Complaints involving clinical care will be reviewed through FCD Health's clinical governance processes. The Director of Clinical Governance, or delegate, will determine the level of clinical review required and may involve the treating clinician, another suitably qualified clinician, nursing leadership, Executive or external advice as appropriate.

Clinical review may include:

- review of the clinical record and relevant correspondence;
- review of results, recalls, referrals, handover or escalation processes;
- review against relevant clinical standards, policies or guidelines;
- discussion with involved clinicians or staff;
- consideration of whether an incident, near miss, open disclosure, mandatory notification or quality improvement activity is required;
- identification of system factors and corrective actions.

9. Investigation and procedural fairness

Investigations will be proportionate to the seriousness and complexity of the complaint. FCD Health will ensure procedural fairness by gathering relevant information, giving people whose conduct or decisions are materially questioned an appropriate opportunity to respond, and avoiding predetermined conclusions.

An investigation may include review of records, policies, rosters, communications, relevant data, interviews with involved parties and consultation with clinical, legal, regulatory or other advisers where required.

Where a complaint concerns an individual clinician, the clinician will generally be informed of the relevant concerns and given an opportunity to respond, unless doing so would create a safety, legal, regulatory or investigative risk.

10. Open disclosure

Where a complaint relates to actual or suspected patient harm, FCD Health will consider whether open disclosure is required. Open disclosure will be undertaken in accordance with the Australian Open Disclosure Framework and FCD Health incident management processes. This may include acknowledgment of what occurred, an explanation of known facts, an apology or expression of regret where appropriate, discussion of immediate care needs, and information about actions being taken to reduce the risk of recurrence.

11. Privacy-related complaints

Privacy complaints will be handled in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles and FCD Health privacy and information-management policies.

A person concerned about the handling of their personal information should be supported to raise the matter directly with FCD Health first. If the matter is not resolved, the person may be able to lodge a privacy complaint with the Office of the Australian Information Commissioner (OAIC).

12. Consumer rights, support and accessibility

- A consumer may have a support person, advocate or representative involved in the complaint process.
- Interpreter and communication assistance will be arranged where reasonably required.
- Information can be provided in an alternative format where practicable.
- Making a complaint will not affect a person's access to care or result in adverse treatment.
- Consumers may withdraw a complaint at any time, noting that FCD Health may still need to act on serious safety, legal or regulatory concerns identified through the complaint.

13. Outcome, response and closure

At the conclusion of the review, FCD Health will provide the consumer with a response appropriate to the nature of the complaint. The response may include:

- a summary of the concern considered;
- an explanation of the review undertaken;
- the outcome or findings that can appropriately be shared;
- an apology or acknowledgment where appropriate;
- actions already taken or planned;
- information about further internal or external review options.

The complaint will be closed in the register when the response has been provided, required actions have been assigned, and any immediate follow-up has been completed. Improvement actions may remain open in the relevant action tracker until verified as complete.

14. External complaint and review options

Consumers are encouraged to raise concerns directly with FCD Health where they feel comfortable doing so, as this may allow the issue to be addressed promptly. A consumer may also seek external assistance or make an external complaint where they prefer to do so or are dissatisfied with FCD Health's response.

External body	When it may be relevant	Contact information
Health and Community Services Complaints Commission (HCSCC)	Complaints about public or private health, disability or aged-care services in the Northern Territory, including GP clinics and individual practitioners.	Free call 1800 004 474 | (08) 8999 1969 | hcscc@nt.gov.au | hcscc.nt.gov.au
Australian Health Practitioner Regulation Agency (Ahpra)	Concerns about the conduct, health or performance of a registered health practitioner where notification to the National Board may be appropriate.	ahpra.gov.au
Office of the Australian Information Commissioner (OAIC)	Privacy complaints remain unresolved after first raising the matter with FCD Health and allowing a reasonable opportunity to respond.	oaic.gov.au

As of 1 June 2026, the Health and Community Services Complaints Commissioner forms part of the Office of the Integrity and Ethics Commissioner while continuing to perform the statutory health complaints function in the Northern Territory.

15. Governance, reporting and continuous improvement

Feedback and complaints are used as a source of organisational learning. FCD Health will review complaint and feedback themes, trends, recurrence, timeliness and action closure through its established governance framework.

The governance pathway includes:

- operational review and action by the relevant service and Executive as required;
- monthly review through the Safety, Quality, Risk and Clinical Governance Committee (SQRCG) of significant complaints, recurring themes, clinical risks, overdue actions and improvement opportunities;
- linkage with incident reporting, audit, quality improvement, workforce education, policy review and risk management where relevant;
- Board reporting by exception where matters are serious, recurring, unresolved, outside risk appetite or materially affect patient safety, compliance, reputation or organisational performance;
- consumer feedback themes included in regular clinical governance and patient experience assurance reporting.

Where feedback identifies a service improvement opportunity, the action should be documented, assigned to an accountable owner and monitored to completion. Where appropriate, FCD Health will communicate service improvements back to consumers through patient information, website updates, waiting-room information or "You said, we did" communication.

16. Roles and responsibilities

Role	Responsibility
Board of Directors	Provides oversight of material or systemic matters and receives assurance reporting where complaint themes or risks warrant Board visibility.

Chief Executive Officer	Holds executive accountability for the complaints framework; oversees serious, systemic, legal, regulatory or reputational complaints; and ensures appropriate escalation and governance assurance.
Chief Operating Officer	Oversees operational complaint handling, service responses, timeliness, implementation of corrective actions and cross-service coordination.
Director of Clinical Governance	Leads or oversees review of clinical complaints and patient safety concerns; determines clinical governance escalation; links complaint findings with incident, open disclosure, audit and quality improvement processes.
Executive Support / nominated complaints coordinator	Maintains the Consumer Feedback and Complaints Register, monitors response timeframes, coordinates documentation and follow-up, and supports reporting and evidence retention.
SQRCG	Reviews significant clinical complaints, themes, trends, risks, action closure and improvement opportunities; escalates material matters as required.
Managers / clinical and nursing leads	Support timely local review, staff communication, corrective actions and escalation within their area of responsibility.
All staff	Receive feedback respectfully, protect privacy, address simple concerns where appropriate, document and escalate complaints promptly, and cooperate with reviews and improvement actions.

17. Record keeping, confidentiality and evidence

- Complaints and feedback requiring follow-up will be recorded in the Consumer Feedback and Complaints Register.
- Records will be stored securely and access limited to personnel with a legitimate role in complaint management, governance or assurance.
- Complaint records will be retained in accordance with FCD Health records-management requirements.
- Where complaint information is used for teaching, audit, governance or quality improvement, information will be de-identified where practicable and only the minimum necessary information used.
- Complaint documentation will support accreditation and governance evidence, including evidence of review, response, action, closure and systemic learning where applicable.

18. Consumer information and website requirements

FCD Health will maintain clear, current and accessible patient-facing information describing how to provide feedback or make a complaint. This information will be available on the FCD Health website and in clinic locations.

Patient-facing information should include:

- how to provide feedback online, by email, in person and by telephone;
- what happens after feedback is submitted and expected response timeframes;
- how privacy and confidentiality are protected;
- the option to provide feedback anonymously;
- interpreter or communication support arrangements;
- HCSCC external complaint information;
- links to the Privacy Policy, Consumer Rights and Responsibilities information and Whistleblower Policy where relevant.

19. Related FCD Health documents

- Consumer Rights and Responsibilities Policy / Your Rights as a Patient
- Complaints and Grievance Mechanisms Policy (staff grievances)
- Whistleblower Policy
- Privacy Policy
- Incident Reporting and Management Policy
- Open Disclosure procedure / framework
- Risk Management Policy and Enterprise Risk Register
- Clinical Governance Framework and Clinical Governance Metrics Framework
- Code of Conduct
- Records Management / retention requirements
- Cultural Safety policies and commitments.

20. Relevant legislation, standards and external frameworks

- Health and Community Services Complaints Act 1998 (NT)
- Privacy Act 1988 (Cth) and Australian Privacy Principles
- Health Practitioner Regulation National Law as applied in the Northern Territory
- RACGP Standards for General Practices - 5th Edition
- ACHS Accreditation for General Practices requirements
- Australian Charter of Healthcare Rights
- Australian Open Disclosure Framework
- National Safety and Quality Health Service Standards, where relevant to FCD Health services.

21. Policy contact

Policy enquiries: Executive Officer / Executive Support
Email: exec@fcdhealth.org.au
Consumer feedback: feedback@fcdhealth.org.au
Website: fcdhealth.org.au

22. Document control

Version	Status	Published / effective	Review	Amendment summary	Approval
1.0	Superseded	24/12/2024	24/12/2026	Initial policy	CEO
1.1	Superseded	21/03/2026	15/03/2027	Darwin UCC/site update	CEO
2.0	Current	08/06/2026	08/06/2027	Four-service scope; updated governance roles.	Approved CEO

Appendix A - Consumer complaint pathway

1. Receive - Listen respectfully; provide privacy; address simple concerns immediately where safe and appropriate.

2. Record - Enter the complaint in the Consumer Feedback and Complaints Register when follow-up is required.

3. Triage - Assess urgency, actual/potential harm, clinical issues, privacy, safety, conduct, legal/regulatory and reputational implications.

4. Escalate - Escalate clinical or significant matters to the Director of Clinical Governance, COO and/or CEO; create an incident report where appropriate.

5. Review - Gather relevant records and information; provide procedural fairness; obtain clinical or other advice as required.

6. Respond - Provide a clear response, outcome, apology/explanation where appropriate, and information about external review options.

7. Improve - Assign actions, link to audit/QI/policy/training/risk systems where relevant, and monitor to completion.

8. Assure - Review themes through SQRCG and report to Executive/Board by exception where material.