

HEALTH COMPLAINTS COMMISSIONER

# STRATEGIC PLAN

1 July 2021 – 30 June 2024

## OUR PURPOSE

To facilitate complaint resolution and protect the public from harm by enhancing the quality and safety of health services.

## OUR MISSION

We work with all Victorians towards safe and ethical healthcare through our commitment to independent, impartial and effective complaint handling and regulatory action.

## EVERYTHING WE DO IS UNDERPINNED BY OUR VALUES

- **IMPARTIALITY** – We are fair and transparent in everything we do
- **INTEGRITY** – We provide services with honesty and in a respectful and ethical manner
- **COLLABORATION** – We are inclusive and engaged in our approach
- **COURAGE** – We act with strength and are committed to our purpose

# OUR STRATEGIC PRIORITIES

BUILD CULTURE AND  
CAPACITY

BEST PRACTICE  
REGULATORY FUNCTIONS

EXCELLENCE IN  
COMPLAINT RESOLUTION

EFFECTIVE  
GOVERNANCE

ENHANCED  
STAKEHOLDER  
ENGAGEMENT AND  
EDUCATION

# Deliver excellence in complaint resolution

## Objectives

- The process for receiving, assessing, resolving and/or referring complaints is accessible, timely and effective
- Consumers are assisted to formulate complaints and encouraged and empowered to directly resolve their concerns
- Consumers and health service providers are supported in navigating the complaint resolution process and understand their relative responsibilities
- Accurate data entry and processes support prompt identification of potentially systemic matters and those which may require regulatory action
- Feedback from consumers and health service providers is used to improve practices and systems
- Complaint resolution process compares favourably against benchmark
- Policies, guidelines and procedures support best practice decision making and are applied consistently
- Website is accessible and relevant
- ICT infrastructure supports operational performance, efficiency and effectiveness
- Performance and productivity meet or exceed benchmarks
- Data analysis and reporting support accurate insights into complaint and performance trends
- Health service providers supported in implementing best practice in complaint handling
- Effective information exchange with Ahpra and relevant bodies ensures potential risks to health and safety are addressed

# Deliver excellence in complaint resolution

<b>Actions Year 1: 2021 – 2022</b>	<b>Actions Year 2: 2022 – 2023</b>	<b>Actions Year 3: 2023 – 2024</b>
<ul style="list-style-type: none"> <li>▪ Review of ICT Infrastructure</li> <li>▪ Website upgrade</li> <li>▪ Conduct a complaint data review</li> <li>▪ Undertake a data quality audit</li> <li>▪ Conduct a review of service delivery complaints</li> <li>▪ Review taxonomies for selected case types</li> <li>▪ Review the process for sharing and recording of notifications and complaints between Ahpra and the HCC</li> </ul>	<ul style="list-style-type: none"> <li>▪ Develop staff training module to improve collection and use of data</li> <li>▪ Benchmark best practice ADR</li> <li>▪ Review complaint and enquiry forms, information tools and processes to ensure they are accessible, clear and easy to navigate for members of the public</li> <li>▪ Audit of existing policies and procedures and development of new policies and procedures as required</li> <li>▪ Conduct consumer satisfaction survey</li> <li>▪ Build and implement a database of privacy breach reporting within the Resolve CMS</li> </ul>	<ul style="list-style-type: none"> <li>▪ Review complaint resolution processes through commitment to best practice</li> <li>▪ Conduct two further complaint data reviews</li> <li>▪ Conduct health service provider satisfaction survey</li> <li>▪ Review performance benchmarks and KPIs</li> </ul>

# Best practice regulatory functions

## Objectives

- Investigations are commenced and interim and permanent prohibition orders and warning statements are issued promptly
- Providers are monitored for compliance and breaches prosecuted
- Investigation team structure is best practice with the right roles for our regulatory functions
- Understanding of higher risk investigations
- Understanding of areas of highest risk among health services and/or health service providers
- Recognised by Government and Minister as a key regulator within the health sector
- Investigations and inquiries into high-risk health services conducted
- Possible areas for legislative reform are identified and recommendations made to Government

# Best practice regulatory functions

<b>Actions Year 1: 2021 – 2022</b>	<b>Actions Year 2: 2022 – 2023</b>	<b>Actions Year 3: 2023 – 2024</b>
<ul style="list-style-type: none"> <li>▪ Implement a compliance monitoring framework</li> <li>▪ End to End review of investigations processes and workflows to benchmark against best practice</li> <li>▪ Develop key performance indicators</li> <li>▪ Audit of policies and procedures to identify gaps</li> <li>▪ Review of the Investigation team structure and work allocation to ensure effective case management</li> <li>▪ Establish baseline training requirements for team members</li> <li>▪ Develop a risk matrix and assessment tool for investigations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implement End to End review findings</li> <li>▪ Action policies and procedures audit findings</li> <li>▪ Undertake a Complainant and Provider experience of investigations satisfaction survey</li> <li>▪ Develop data reporting and intelligence led investigations capacity Complete Memoranda of Understanding and other data sharing arrangements</li> <li>▪ Conduct a data review of high-risk areas of health services and/or health service providers identified through investigations</li> <li>▪ Measure progress of Investigations processes and workflows against best practice benchmarks</li> </ul>	<ul style="list-style-type: none"> <li>▪ Conduct inquiries under s.103</li> <li>▪ Identify high-risk areas of health service provision for investigation and/or legislative reform</li> <li>▪ Audit of Investigations processes and workflows against best practice benchmarks and KPIs</li> <li>▪ Implement Audit findings to meet best practice benchmarks</li> </ul>

# Build culture and capacity

## Objectives

- COVID-Safe return to office at 570 Bourke Street
- Performance Development Planning process reflects HCC values and strategic goals
- Increased employee engagement
- Increased productivity
- Understanding of learning and development needs for staff
- Appropriate learning and development programs in place
- Improved leadership capability
- Develop retention, mobility, and attrition strategies
- Develop an onboarding and offboarding process



# Build culture and capacity

<b>Actions Year 1: 2021 – 2022</b>	<b>Actions Year 2: 2022 – 2023</b>	<b>Actions Year 3: 2023 – 2024</b>
<ul style="list-style-type: none"> <li>▪ Develop COVID-19 Safe Work practices</li> <li>▪ Develop policies and guidance materials to support and promote all forms of flexible working and staff wellbeing</li> <li>▪ Participate in People Matter Survey</li> <li>▪ Conduct Pulse Surveys and develop learnings</li> </ul>	<ul style="list-style-type: none"> <li>▪ Develop a workforce plan for each of: Customer Service Team, Resolutions Teams and Investigations Team, including review of team structures and VPS levels</li> <li>▪ Participate in People Matter Survey</li> <li>▪ Training needs analysis (TNA) conducted by managers identifying learning and development and skills coaching needs within their teams</li> <li>▪ Review and revise learning and development programs with a focus on whole-of-HCC approach taking into account specific writing skills, customer service practices, administrative decision-making, understanding legislation, for all staff, as well as other targeted and technical training</li> <li>▪ Develop leadership learning programs focused on setting expectations, difficult conversations, and being a people leader</li> <li>▪ Conduct Pulse Surveys and develop learnings based on earlier surveys including People Matter Surve</li> </ul>	<ul style="list-style-type: none"> <li>▪ Develop key performance indicators for all leadership roles to incorporate into Performance Development Planning process</li> <li>▪ Develop retention, mobility, and attrition strategies</li> <li>▪ Design and implement onboarding and offboarding process</li> <li>▪ Participate in People Matter Survey</li> <li>▪ Conduct Pulse Surveys and develop learnings based on earlier surveys including People Matter Survey</li> </ul>

# Stakeholder engagement and education

## Objectives

- Positive brand awareness and to be recognised for role we play in the Victorian community, including proactive media engagement
- Increased contacts, complaints and enquiries leading to continued organisational growth
- Targeted and proactive education and training opportunities identified
- Baseline measure of stakeholder satisfaction of our service
- Increased participation rates at education and training sessions, including online modules
- Increased stakeholder engagement
- Brand awareness continues to grow
- Development of further on-line training modules
- Communications and engagement strategy up to date
- Increased stakeholder satisfaction
- Publication of detailed information for consumers and health service providers

# Stakeholder engagement and education

<b>Actions Year 1: 2021 – 2022</b>	<b>Actions Year 2: 2022 – 2023</b>	<b>Actions Year 3: 2023 – 2024</b>
<ul style="list-style-type: none"> <li>▪ Develop Communication and Engagement Strategy</li> <li>▪ Develop Engagement plan, including education/training calendar</li> <li>▪ Develop partnerships with key stakeholders, including media, through structured and proactive engagement to build sustainable relationships</li> <li>▪ Conduct stakeholder satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>▪ Identify education and training opportunities through targeted surveys</li> <li>▪ Targeted stakeholder engagement program developed</li> <li>▪ Develop a framework for publication of data relating to complaints and regulatory functions</li> </ul>	<ul style="list-style-type: none"> <li>▪ Continue to develop relationships with key stakeholders and intensify engagement</li> <li>▪ Development of further on-line training opportunities</li> <li>▪ Review Communications and Engagement Strategy</li> <li>▪ Conduct further stakeholder satisfaction surveys</li> </ul>

# Governance

## Objectives

- Health Complaints Regulations introduced
- Sound financial management
- *Health Complaints Act 2016* review completed
- ICT infrastructure is fit for purpose
- Additional funding sources identified for:
  - specific projects required to lead change across health services
  - high risk areas of health service provision for investigation and/or legislative reform
- Ensure legislative framework keeps pace with changing health service provision

# Governance

<b>Actions Year 1: 2021 – 2022</b>	<b>Actions Year 2: 2022 – 2023</b>	<b>Actions Year 3: 2023 – 2024</b>
<ul style="list-style-type: none"> <li>▪ Advocate for introduction of Health Complaints Regulations</li> <li>▪ Plan and implement ‘MS Teams’ telephony</li> <li>▪ Develop forecasting and budget allocation systems</li> </ul>	<ul style="list-style-type: none"> <li>▪ Promulgate amendments to HCA to staff and stakeholders</li> <li>▪ Develop a plan to identify high-risk areas of health service provision for investigation and/or legislative reform</li> <li>▪ Develop a process to use data and knowledge of the sector to build business case for additional funding for specific projects, including high-risk areas of health service provision</li> </ul>	<ul style="list-style-type: none"> <li>▪ Follow up internal review of the HCA and the regulatory environment</li> <li>▪ Undertake a review of existing ICT infrastructure</li> </ul>