
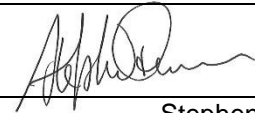

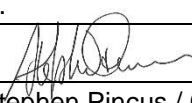
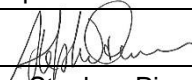




## Education and Training Complaints and Appeals Policy

Description			
Domain:	Educational		
Policy Number:	EDU003		
TRIM Folder Number:	10/719		
Owner: Responsible Area/Dept	DoT/DoE		
Author:	Christine Heatherington-Tait, EMES		
<b>Distribute to:</b>	GP registrars ✓	Staff ✓	Board X
Via	Information Bulletin ✓	Email ✓	Website ✓
<b>This Policy includes:</b>	Procedure	Yes	
	Instrument(s) or Delegation(s)	No	
	Attachment(s)	No	
Approval Process:			
DoT / DoE Approved to Progress	Yes	Signature:  Date approved: 12 / 03 / 2018	
Board Committee approved to progress:	N/A		
Final Authorisation	CEO		
Date Originally Adopted:	14/04/2009		
Review Cycle:	Annually and as required		
<b>Signature:</b>			15 / 03 / 2018
Title	Stephen Pincus / CEO		Date

Year Reviewed		
2014	<b>Comment:</b> updated title in clause 4 in procedure.	
	Signature: 	09 / 01 / 2014
	Name & Title: Dr Brett Dale / CEO	Date
2016	<b>Comment:</b> updated definitions and links to external sites, and process for complaints related to program staff.	
	Signature 	28 / 09 / 2016
	Name & Title: Stephen Pincus / CEO	Date
2018	<b>Comment</b> a re-draft of policy and procedure to clarify complaint and appeal process, update with regards to DoH and college policies, removed flowchart and included a form for reporting complaints and a form for submitting an appeal.	
	Signature 	15 / 03 / 2018
	Name & Title: Stephen Pincus / CEO	Date

# Policy

## 1.0 Purpose

This policy articulates the NTGPE complaints and appeals process related to education and training provided by NTGPE with the aim to ensure complaints and appeals arising from NTGPE programs are dealt with efficiently, effectively and in a procedurally fair manner.

## 2.0 Scope

### 2.1 Application

This policy applies to complaints and appeals submitted by program participants, GP supervisors and training posts that relate to any process, decision or outcome of education and training provided by or through NTGPE.

### 2.2 Limitations

- 2.2.1 This policy does not apply to applicants seeking selection onto the AGPT program.
- 2.2.2 This policy does not apply to registrars who have accepted an offer to train on the AGPT program but are yet to commence training.
- 2.2.3 This policy does not apply to registrars who withdraw from the AGPT program under Category 1 – Voluntary. A voluntary withdrawal from the AGPT program cannot be appealed.
- 2.2.4 This policy does not include appeals related to external assessment by the college(s).

## 3.0 Definitions

- 3.1 **ACRRM** – Australian College of Rural and Remote Medicine.
- 3.2 **AGPT** - Australian General Practice Training Program.
- 3.3 **CEO** – Chief Executive Officer of NTGPE.
- 3.4 **Complainant or Appellant** - A person who initiates a complaint or appeal regarding activities related to the process or outcomes of education and training provided by NTGPE. Complainants or appellants can include program participants, GP supervisors and training posts.
- 3.5 **Director of education (DoE)** – The DoE has overall responsibility for NTGPE’s medical education program, including design, implementation and evaluation.
- 3.6 **DoH** – Department of Health.
- 3.7 **DoE** – Director of Education is responsible for overseeing all NTGPE medical and cultural education programs.
- 3.8 **DoT** – Director of Training is responsible for overseeing all NTGPE medical and cultural training programs.
- 3.9 **EASA** – Employee Assistance Service NT. NTGPE provides employees, program participants and supervisors with confidential access to counselling, professional advice and support on workplace and personal issues. Employees, program participants and GP supervisors are able to access the service for up to five sessions.
- 3.10 **EMES** – Executive Manager Education and Support is responsible for the operational management of NTGPE’s GP registrar, supervisor and practice accreditation, John Flynn placement and pastoral care programs.
- 3.11 **General Practice Registrar (GP registrar)** – a GP registrar training through NTGPE under the Australian General Practice Training Program (AGPT).
- 3.12 **GPRA** – General Practice Registrars Australia.

- 3.13 **JFPP** – John Flynn Placement program
- 3.14 **Lead medical educator - supervisor and practice accreditation (Lead ME-SPA)** – A senior medical educator taking responsibility for the day to day educational delivery of NTGPE’s AGPT program.
- 3.15 **Pastoral care officer** - an NTGPE staff member who provides on-going support, referral and advice relating to personal, workplace and training issues to all GP registrars in the training program.
- 3.16 **Program managers** - The NTGPE staff member responsible for managing and supporting NTGPE teaching staff and program participants in the delivery of all aspects of the training program.
- 3.17 **Program participant** - A program participant can include a GP registrar or JFPP undertaking training or clinical placement with NTGPE.
- 3.18 **RACGP** – Royal Australian College of General Practitioners.
- 3.19 **Review panel** – a panel of up to 3 persons convened by the CEO to review a complaint or appeal who were not directly involved in the initial decision under review. May consist of a medical educator (external or internal to NTGPE), a GP supervisor, NTGPE board member, NTGPE program staff member or another external person deemed suitable.
- 3.20 **RLO** – Registrar liaison officer - This is a GP registrar who provides liaison between the GP registrar group and NTGPE.
- 3.21 **RTO** – Regional training organisation.
- 3.22 **SLO** – Supervisor liaison officer - This is a GP supervisor who provides liaison between the current GP Supervisor group and NTGPE.
- 3.23 **Training team** – a team of NTGPE staff who oversee the training journey of each GP registrar. The team consists of a named medical educator, program manager and pastoral care officer who hold different responsibilities but work as a team supporting an individual GP registrar.
- 3.24 **TRIM** – NTGPE’s Total Records and Information Management System.

## 4.0 Responsibilities

### 4.1 NTGPE

- 4.1.1 Ensure program participants, training posts and supervisors are provided with relevant information relating to this policy and procedure at orientation and through online access.
- 4.1.2 Acknowledge, process and resolve complaints and appeals in a timely, effective and procedurally fair manner.
- 4.1.3 Provide a facilitation and mediation role, if appropriate, when complaints involve issues that are outside NTGPE’s direct jurisdiction.
- 4.1.4 Maintain data and monitor all complaints and appeals received and record their outcomes.
- 4.1.5 Aim to resolve issues before being escalated to a formal complaint process.

### 4.2 Program participants, training posts and supervisors

- 4.2.1 Be aware of, and comply with this policy and procedure for lodging and resolving education and training complaints and appeals.
- 4.2.2 Actively participate in feedback sessions and surveys regarding education and training programs.

## 5.0 Inclusions to this policy

### 5.1 NTGPE Education and Training Complaints and Appeals procedure

# Procedure

## 1.0 Complaint process

- 1.1 Where possible issues should be resolved directly with the other party involved.
- 1.2 If the complainant is unable to resolve the issue by direct communication with the other party, the following is recommended:
  - GP registrars should contact a member of their training team.
  - Supervisors or training post should contact the Supervisor and Practice Accreditation coordinator in the first instance or the Lead ME - Supervisor and Practice Accreditation (Lead ME-SPA).
  - JFPP students to contact the program manager.
- 1.3 The NTGPE contact person will then attempt to resolve the issue in consultation with the complainant and other relevant parties. This may include discussion or mediation with program participants, supervisors, program staff, registrar liaison officer (RLO) or supervisor liaison officer (SLO).
- 1.4 Although NTGPE has no direct jurisdiction in employer related issues for GP registrars and GP supervisors, NTGPE will facilitate the discussion of issues impacting on a program participant's wellbeing or training outcomes. This may involve implementing agreed strategies to improve the learning environment and involve the RLO or SLO. Training posts and GP registrars will always be referred to the [National Terms and Conditions for the Employment of Registrars](#) in the first instance.
- 1.5 Where the complainant feels their complaint remains unresolved after this initial process they should complete the [NTGPE Complaint Reporting form](#) and submit to the [Education Leadership Assistant](#).
- 1.6 Complaints relating to NTGPE medical or cultural education staff will be directed to the DoE/DoT, while complaints relating to NTGPE program staff will be directed to the EMES. Complaints regarding the DoE, DoT and EMES will be directed the CEO.
- 1.7 This formal written complaint should be submitted within 30 business days of the issue arising. Submission of the complaint form initiates the process for a formal complaint.
- 1.8 Complainants should at this stage be reminded of the support services available to them:
  - GP registrars have access to their NTGPE pastoral care officer, EASA, [Doctors Health NT](#), RLO and GPRA
  - GP supervisors and training posts can access EASA, [Doctors Health NT](#), SLO or GPRA
- 1.9 Decisions can only be determined based upon the evidence provided.
- 1.10 The DoE/DoT or EMES acknowledges receipt of the formal complaint in writing (email sufficient) within seven business days and investigates the matter with all concerned parties as follows:
  - for non-assessment complaints, the investigation is conducted according to the nature and seriousness of the matter and may include internal mediation with the concerned parties or, if required a review panel may be convened; and
  - for complaints regarding assessment, remarking or reassessment may be considered.
- 1.11 The DoE/DoT or EMES responds to the complainant in writing within 30 business days of receiving the complaint with the results of the investigation and reasons for the decision.
  - Outcomes of the investigation may include:
    - that no further action will be taken; or
    - information about corrective action; and if required
    - strategies and ongoing monitoring to prevent a similar occurrence.

## **2.0 Complaints recourse**

- 2.1** All parties are advised that if they are not satisfied with NTGPE's resolution of the complaint they can either refer the complaint to Department of Health in accordance with the [AGPT Complaints policy 2017](#) or submit an appeal as per NTGPE's appeals process described below.

## **3.0 Appeals process**

This process details how program participants, supervisors and training posts can appeal decisions of NTGPE that include but not limited to:

- outcome of formal complaint;
  - denial of a transfer to another RTO;
  - denial of extension of training time;
  - denial of exception or exemption to a training requirement; and
  - accreditation decisions
- 3.1** Appellants are required to complete an NTGPE Appeal Application and submit to NTGPE's CEO within 20 business days of receiving the decision they wish to appeal.
- 3.2** The CEO will acknowledge receipt of the appeal in writing (email sufficient) within 7 business days. All parties will be informed of the appeal process.
- 3.3** Appellants should at this stage be reminded of the support services available to them:
- GP registrars have access to their NTGPE pastoral care officer, EASA, Doctors Health NT, RLO or GPRA.
  - GP supervisors and training posts can access EASA, Doctors Health NT, SLO or GPSA.
- 3.4** For appeals involving assessment, a review panel will be convened within 30 business days to review the previous investigation.
- 3.5** For appeals not directly related to assessment:
- the CEO will review the appellant's submitted evidence; and
  - if required a review panel may be convened.
- 3.6** In all cases, the appeal will be conducted in a transparent, procedurally fair and impartial manner.
- 3.7** The results of the appeal and corrective action to be taken will be reported in writing to all parties concerned within 30 business days of the appeal being lodged.
- 3.8** Notwithstanding the times set out above, particular circumstances in a particular matter may prescribe variations to the above guidelines. Failure to adhere to the timelines specified does not represent a breach of the policy.

## **4.0 Appeals recourse**

A GP registrar may appeal NTGPE's decision to the Department of Health in accordance with the AGPT Appeals policy 2017 after exhausting all processes under this policy.

## 5.0 Documentation

### 5.1 For formal complaints and appeals:

- documentation of the complaint or appeal and investigation result will be stored in the secure Complaints and Appeals TRIM container (10/745);
- documentation will be stored in the relevant program participant, training post/placement location and/or supervisor/placement supervisor file to indicate there is supplemental information in the Complaints and Appeals file; and
- relevant data is entered on the *NTGPE Complaints, Appeals and Critical Incidents Register*

### 5.2 The EMES reviews the register on a regular basis and reports quarterly to the CEO.

## 6.0 Related documents

### 6.1 [NTGPE Complaint Reporting form](#)

### 6.2 [NTGPE Appeal Application](#)

## 7.0 Related policies and legislation

### 7.1 [RACGP Registrars Clinical Appeals Policy](#)

### 7.2 [RACGP Registrar Clinical Appeals Policy - Guidance Document](#)

### 7.3 [ACRRM Appeals Policy for AGPT registrars](#)

### 7.4 [AGPT Complaints Policy 2017](#)

### 7.5 [AGPT Appeals Policy 2017](#)