



POLICY

Natural Justice Policy

Purpose

This policy provides clarification around the principles QCPP uses to support natural justice.

Application

QCPP is committed to fair assessment outcomes, quality improvement, closing the loop on feedback, transparent resolution of complaints and appeals, being impartial and correcting mistakes.

Compliments and Complaints

QCPP welcomes feedback in any format including but not limited to the QCPP Customer Satisfaction Survey, email, telephone, or formal correspondence. Each component of feedback, whether it be a compliment, or a complaint will be acknowledged and actioned according to the appropriate procedures listed in this policy.

Complaints will be handled within the confines of confidentiality as agreed with the complainant. The nature of the complaint and who needs to be involved in the investigation, to reach a satisfactory outcome, will determine the degree and level of confidentiality and impartiality.

In exceptional circumstances where a complaint cannot be resolved within the documented timeframes, progress reports will be provided every 5 business days to the complainant until the complaint is resolved.

Please see the Complaints matrix (below) for detail of escalation process and response times.

| Level | Examples of Complaints | Time frame |
|---------|---|---|
| Level 1 | Minor Complaints: that can be solved almost immediately, such as: Internal processes, not receiving an invoice on time | Within five (5) business days |
| Level 2 | Complaints of a Serious Nature: Public complaints against a pharmacy Breach of QCPP rules Complaints against an Assessor or staff member *Sanction may also be applied – refer to Sanctions Policy | Within thirty (30) business days or, if unable to be resolved within 30 business days, provide a response every five (5) business days until a resolution has been achieved |
| Level 3 | Complaints of a Highly Serious Nature: | Within thirty (30) business days or, if unable to be resolved within 30 business |





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| | E.g.: Community safety, Privacy Act, fraud, media escalation, professional practice, QCPP reputation at risk *Sanction may also be applied – refer to Sanctions Policy | days, provide a response every five (5) business days until a resolution has been achieved |
| Level 4 | Appeals Decision made by QCPP that is appealed by a pharmacy | Three (3) months |
| Level 5 | Appeal Disputes External arbitration of appeal referred to JASANZ to manage accordingly. | Three (3) months |

Corrective Action Review Request

The Corrective Action Review (CAR) Request process provides QCPP pharmacies an avenue to recognise practices or processes that may alter from QCPP requirements however meet the intent of QCPP requirements. Pharmacy owners or authorised delegates should complete a CAR as soon as reasonable after the “remedial action required” or “non-conformance” has been issued, and before the action due date. A CAR is to be initiated via the QCPP Customer Portal against the relevant corrective action on the pharmacy’s current assessment record. All evidence supporting the request should be provided at the time of submission.

If the application of the CAR is to be broader than an individual pharmacy (e.g. a banner group practice) then the application should be made in writing via email to interpretations@qcpp.com. Alternative evidence acceptance may be applied based on satisfactorily meeting the intent of an individual requirement at a group level.

All CARs are considered on their merits by the QCPP Technical Advisor and may be referred to the Interpretations and Rulings Panel if further consultation is required, for example where precedent has not previously been set. The Interpretations and Rulings Panel will consider:

1. Whether the corrective action has been correctly raised; and
2. If so, whether the intent of the requirement has been met

Possible outcomes to CARs include:

| Corrective Action incorrectly raised | Corrective Action withdrawn |
|--|---|
| Corrective Action correctly raised; intent of requirement not met due to circumstances outside of pharmacy control (e.g. fire, significant staff illness) | Corrective Action stands. Time Limited Concession applied to allow provisional accreditation to proceed within Program time frames, with individual action to be closed by modified due date. |
| Corrective Action correctly raised; intent of requirement met | Corrective Action stands Full Cycle Concession applied to close Corrective Action |





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| Corrective Action correctly raised; intent of requirement not met | Corrective Action stands Concession not granted |
| Corrective Action correctly raised; evidence provided sufficient | Corrective Action remediated. Corrective Action Request withdrawn, or closed |

Interpretations and Rulings Panel

The Interpretations and Rulings Panel meets on an as needs basis to consider Corrective Action Review Requests as well as any other queries that may be submitted to the interpretations@qcphp.com email address relating to the QCPP Requirements. Outcomes are sent via email to the primary email address the query or CAR is associated with – e.g. store email or head office email. [Where relevant, responses to general queries will also be posted to the Knowledge Hub to assist all pharmacies in their interpretation of the requirements].

Appeals

A pharmacy owner or authorised delegate may lodge an appeal against appealable decisions as per Rules 46, 47 and 48 of the QC2020 Program rules.

Appeals are considered within the QCPP's Appeals Matrix:

| Appeal level | Scenario | Authority | Time frame |
|----------------|--|---|-----------------------|
| Level 1 | Remedial review request (Corrective Action from QCPP Assessment) | Technical Advisor / Interpretations and Ruling Panel (if applicable) | 5-15 business days |
| Level 1 | An appeal not relevant to Corrective Action from QCPP Assessment | Customer Experience Manager | 5-15 business days |
| Level 2 | Appeals escalated from Level 1 | Customer Experience Manager | 5-15 business days |
| Level 3 | Appeals escalated from Level 2 | Director QCPP | 2 to 30 business days |
| Level 4 | Appeals escalated from Level 3 | General Manager Practice & Health Service / Clinical Governance Committee | 2 to 30 business days |
| Level 5 | Appeals escalated from Level 4 | Impartiality Committee | Up to 3 months |





Level 6

External arbitration

JAS-ANZ

Up to 6 months

All appeals will initially be considered as a Level 1. In the event an appeal outcome is disputed, the matter will be escalated to the next level of the Appeals Matrix.

The outcome of appeals will not be determined by the person who made the original decision. In some cases, this may result in escalation of the appeal to the next level.

Conflict of Interest

Any decision resolving a complaint or appeal shall be made by, or reviewed and approved by, person(s) not involved in the certification activities related to the complaint or appeal.

If a staff member feels that they may have unfair bias in the decision-making process in relation to a complaint or appeal, they are required to declare their Conflict of Interest (COI) to their immediate supervisor or manager and include a brief note of this in the relevant complaint or appeal file.

If a complaint concerns a staff member within the QCPP/EY Team, that person cannot be involved in decisions relating to the resolution of the complaint or appeal. Furthermore, if a QCPP staff member has been employed by, provided consultancy to the client making the complaint or appeal, or about which the complaint is being made they also cannot be involved in decisions relating to the resolution of the complaint or appeal.

Related rules, terms and policies

Rule 24. d

Rule 25

Rule 39

Rule 40-48

Sanctions Policy

Exceptional Circumstances Policy

Privacy Policy

Service Agreement: Terms and Conditions

