



1. TITLE: GP REGISTRAR CONCERNS AND COMPLAINTS POLICY

- 1.1 Policy reference: CO-A-002-05
- 1.2 Category: Academic – Education
- 1.3 Approval date: July 2020
- 1.4 Approved by: Chief executive
- 1.5 Effective date: September 2020
- 1.6 Review/revision date: July 2021
- 1.7 Unit responsible: Learning team

2. Policy declaration

2.1 Purpose

The Royal New Zealand College of General Practitioners (the College) supports general practice registrars throughout the General Practice Education Programme (GPEP or the programme), including the provision of a process for raising and resolving concerns and complaints between general practice registrars and their medical educators, general practice teachers, College programme advisors and other College staff.

3. Background

GPEP year 1: The College places registrars in College-accredited teaching practices in order to enable them to gain general practice skills and experience under the guidance of medical educators and approved general practice teachers.

GPEP years 2 and 3: The College provides GPEP training in order to allow general practice registrars to gain general practice skills and experience under the guidance of medical educators.

3.1 Objectives

The College has a strong commitment to ensuring that all general practice registrars' concerns and complaints related to GPEP and their training are responded to and resolved in a timely, consistent, transparent, fair and equitable manner.

This policy sets out the principles for general practice registrars in training to raise and have resolved concerns or complaints regarding their experience with other registrars, medical educators, general practice teachers, College programme advisors and other College staff.

3.2 In scope

College-employed, practice-employed and self-funded registrars enrolled in GPEP and registrars entering the programme via a Prior Specialist Training Pathway to Fellowship.

Concerns and complaints general practice registrars may have with:

- › other College-employed, self-funded, and practice-employed general practice registrars
- › medical educators
- › general practice teachers
- › College programme advisors
- › other College staff.

3.3 Out of scope

- › Registrars enrolled in the College's Annual Maintenance Programme.
- › Registrars enrolled in the Division of Rural Hospital Medicine's Rural Hospital Medicine (RHM) Training Programme.
- › This policy does not apply to employment-specific issues and excludes matters or issues that are specifically addressed by other policies as follows:
 - Workload or sickness, which is covered by the employment agreement with the College for GPEP year 1 College-employed registrars and the employment agreement between practice-employed, self-employed and GPEP year 2 and 3 registrars and their practice.
 - Health and safety (including stress), which is covered by the College's Health and Safety Policy for GPEP year 1 College-employed registrars and the employment agreement between practice-employed, self-employed and GPEP year 2 and 3 registrars and their practice.
 - Harassment, bullying or discrimination, which is covered by the College's Harassment, Bullying or Discrimination Policy for GPEP year 1 College-employed registrars and the employment agreement between practice-employed, self-employed and GPEP year 2 and 3 registrars and their practice.
 - Any issues that meet the threshold for mandatory referral to the Medical Council of New Zealand (MCNZ), e.g. concerns about a registered health practitioner's health that might be impacting on their ability to practise safely.

4. Definitions

All definitions are available in the College's Academic Regulatory Framework for Quality Assurance (CO-A-001-00).

5. Policy statements

5.1 Policy principles

The following principles govern how concerns and complaints are dealt with by the College, regardless of the specific nature of the concern or complaint:

- a. Registrars receive accurate, timely, clear, and consistent information on concerns and complaints policy and procedures.
- b. Registrar concerns and complaints are considered and addressed in a fair, transparent, valid and timely manner.
- c. The rights of both the complainant and respondent are protected, and both parties are treated fairly and without prejudice.
- d. All parties named in a complaint have the right to natural justice.
- e. Support is available to all parties involved, which may include a nominated support person for all parties.
- f. Processes will be culturally appropriate and may include tikanga Māori.
- g. The provisions of the Privacy Act apply.
- h. Personal information related to complaints is strictly confidential to the College.
- i. No registrar is disadvantaged academically or subject to penalties or other discrimination as a consequence of raising a concern or complaint.
- j. A complaint may be withdrawn by a registrar at any stage.
- k. Wherever possible, improvement is brought about as a result of a registrar's concern or complaint.

5.2 **General policy**

- 5.2.1 All teaching practices are required to have systems and processes in place to identify and manage staff performance. They are also required to have systems and processes in place to effectively manage concerns and complaints raised by general practice registrars. All general practice registrars should be familiar with the system and process in place at their practice.
- 5.2.2 Where a general practice registrar wishes to raise a concern or a complaint about employment matters, these must be raised with the employer in the first instance. For a College-employed registrar this will be the College. For a practice-employed registrar this will be the practice manager.
- 5.2.3 Where a registrar wishes to raise a concern or complaint about the teacher, medical educator or other aspect of their training programme, they should in the first instance (where possible), raise this directly with the parties concerned, and notify the College.
- 5.2.4 Registrars' concerns and complaints should be raised as soon as practicable, but within thirty (30) working days of the alleged incident or situation occurring.

5.3 **Concerns**

- 5.3.1 A concern is generally a situation in which a registrar considers appropriate academic or professional standards directly related to their training programme have not been met or wishes to raise a query with the College about an issue or concern. The impact on the registrar has not been significant and it is likely a resolution can be met by direct, informal discussion with all the parties involved.

5.3.2 In the first instance, the registrar should raise their concern/s directly with the person/s concerned either in person, by phone or by email if appropriate, as soon as possible after the alleged incident or situation occurred.

5.3.3 Where the concern/s directly relate to a College programme advisor or other College staff, the matter should be communicated to relevant College senior management.

5.4 **Complaints**

5.4.1 A complaint is generally a situation in which a registrar seeks some form of redress or a change to a current situation directly related to their training programme. The impact and effect on the registrar has been significant and requires a formal process of resolution.

5.4.2 A formal complaint must be made in writing on the GP Registrar Complaints form by the registrar and submitted to the head of learning (or delegate). The complaint must provide sufficient detail to enable the College to investigate.

5.4.5 The procedures for GP Registrar Complaints apply. The procedures detail the processes, identify the roles and responsibilities and clearly defines the various steps and timeframes.

5.5 **Exclusions to the policy**

5.5.1 The College cannot provide direct legal assistance to a registrar in any matter.

5.5.2 This policy does not apply to academic misconduct, such as dishonesty during examinations or plagiarism, or a review or appeal of final examination results.

5.5.3 The College will not investigate or progress:

- anonymous concerns or complaints based on hearsay
- complaints or concerns raised by another party on a registrar's behalf
- complaints that are made more than thirty (30) working days after the alleged incident or situation occurred
- a complaint related to findings or decisions made about one or more registrar by regulators or in other legal proceedings
- a complaint that has previously been dealt with under this policy.

5.6 **Review and appeals**

5.6.1 Rights of appeal and procedures on appeal are to be found in the Appeals Policy (CO-A-002-06).

5.6.2 If a registrar does not accept the outcome of the head of learning (or delegate), or equivalent's investigation they may appeal the decision and request a review of the complaint by the chief executive.

5.6.3 The chief executive will rule on the appeal and inform the registrar of the outcome.

6. Related policies, documents and legislation

- > Academic Regulatory Framework for Quality Assurance (CO-A-001-00)
- > Appeals Policy (CO-A-002-06)
- > GP Registrar Concerns and Complaints Procedure (CO-A-002-05A)
- > GP Registrar Complaints Form
- > Supporting Registrars Policy (CO-A-002-04)
- > Privacy Act 1993

7. Administrative procedures

7.1 Promulgation of published policy

This policy will be available via the College intranet and website.