



COSMETIC PHYSICIANS  
COLLEGE  
OF AUSTRALASIA

## Policy - Appeals and Complaints

Policy Domain:	
Policy Area:	
Policy Author:	
Contact:	
Version:	
Approval Details:	
Effective Date:	
Review Date:	
Related Documents:	

### 1. Purpose

To ensure that the CPD Home provides a fair and consistent approach and application of process for all CPD Home members or potential members which allows review and appeal of the CPD home's determination that:

- a practitioner's CPD activity does not meet the requirements of the CPD program,
- a practitioner has not complied with the Registration standard: CPD,
- a practitioner is not approved to become a member of the CPD Home, and
- any other decision made by the CPD Home and its representatives.

To ensure principles of procedural fairness and natural justice and maintained through fair handling of all complaints as raised, identification of any conflicts of interest with aim to resolve within 60 days.

### 2. Policy statement

The CPCA is committed to implementing a fair and consistent approach review of any complaint or appeal made by any party regarding the actions of the CPD Home members.

### 3. Responsibility

Implementation of this policy is the responsibility of the CPD Home Committee Chair. Activities as outlined in the procedure will be conducted by the nominated and appropriately delegated Complaints Administrator. All outcomes and actions will be de-identified by the Complaints Administrator and reported through to the CPD Home Committee and CPCA Board (if required).

### 4. Scope

This policy applies to any individual or party who makes a complaint or appeal regarding a decision or action undertaken by the CPD Home or its representative.

This Policy and accompanying forms will be publicly available at all times to allow appropriate advice and use by any relative party.

## 5. Procedure

### Appeal

1. Appeals will be considered when they are made no more than 14 days after the decision has been provided to the party.
  - a. Appeals after 14 days will not be considered.
2. Appeals must be made in writing either directly via email or through completion of the Appeals and Complaints form.
3. The party will be notified within 48 hours that the request for appeal has been received.
4. An initial review will be made by the CPD Home Administrator to ensure that any additional information is sought in preparation for providing the application to the CPD Home Committee.
5. Once all information is received the appeal and supporting documentation will be sent to the Complaints Administrator for review.
  - a. The Complaints Administrator will immediately advise if any conflict of interest has arisen as per the Conflict-of-Interest Policy.
  - b. The CPD Home Administrator will advise the party that the appeal request has been sent to the Complaints Administrator within 24 hours and will advise the date by which the party should receive a response.
    - i. Response to appeals will be provided within 14 working days once received by the Complaints Administrator unless otherwise advised or due to extenuating circumstances
      1. If the response cannot be provided within 14 days the appellant party will be notified in writing.
  - c. The Complaints Administrator will review all evidence provided, identify if further investigation is required and advise the outcome of the investigation.
6. Once the investigation is concluded and an outcome is determined, the appellant party will be notified in writing.
7. If a decision is unable to be reached the matter will be referred to the CPCA Board for review.

### Complaint

1. Complaints must be made in writing either directly via email or through completion of the Appeals and Complaints form.
2. The party will be notified within 48 hours that the complaint has been received.
3. An initial review will be made by the CPD Home Administrator to ensure that any additional information is sought in preparation for providing the complaint to the Complaints Administrator.
4. Once all information is received the complaint and supporting documentation will be sent to the Complaints Administrator for review.
  - a. The Complaints Administrator will immediately advise if any conflict of interest has arisen as per the Conflict-of-Interest Policy.

- b. The CPD Home Administrator will advise the party that the complaint has been sent to the Complaints Administrator within 24 hours and will advise the date by which the party should receive a response.
    - i. Response to appeals will be provided within 14 working days once received by the Complaints Administrator unless otherwise advised or due to extenuating circumstances
      - 1. If the response cannot be provided within 14 days the complainant will be notified in writing.
  - c. The Complaints Administrator will review all evidence provided, identify if further investigation is required and advise the outcome of the investigation.
- 5. Once the investigation is concluded and an outcome is determined, the complainant will be notified in writing.
    - a. This will include any rectifications or adjustments that will be offered to resolve the issue.
  - 6. If a decision is unable to be reached the matter will be referred to the CPCA Board for review.
  - 7. If the complaint pertains to the Complaints Administrator it will be referred to the CPCA Board for review.

#### **Continuous Improvement**

- 1. All appeals and complaints received will be de-identified, through the removal or redacting of the individual's name, contact details, and any supplied business details including if they are present in the details of the complaint, and added to the Complaints and Appeals register to facilitate overarching review and monitoring of systems and practices.
  - a. Where multiple members appeal or complain about the same decision or action further investigation will be made to see if there is a system improvement needed.
- 2. The Complaints and Appeals Register will be monitored as part of systematic continuous improvement processes.

#### **Bias and Discrimination**

- 1. To ensure that all appeals and complaints are given due process, they will be considered initially by the nominated Complaints Administrator.
  - a. The Complaints Administrator will be nominated by the CPD Home Committee Chair.
  - b. The Complaints Administrator is required to identify any conflict of interest.
    - i. Should conflict of interest exist, the CPD Home Committee Chair will be advised and a new Complaints Administrator will be nominated.
      - 1. If this is not possible, an external reviewer will be nominated at the expense of the CPD Home.
  - c. In the event that the appeal or complaint relates to a decision or outcome already determined by the Complaints Administrator either a different Complaints Administrator will be appointed or an external reviewer will be nominated at the expense of the CPD Home.
- 2. External Reviewers assist where complaints and appeals are not able to be fully resolved by the Complaints Administrator or CPD Home Committee. External Mediators appointed will:
  - a. Be independent of the CPD Home Committee and CPCA Board
  - b. Have the skills and qualifications to reasonably conduct the review

- c. When engaged to conduct a secondary review, will consider the process undertaken to ensure fairness and due process have been afforded and will determine if the outcomes / actions of the investigation are reasonable.
  - d. Will provide guidance to all parties through a formal report.
3. If an appeal or complaint is unsuccessful, the applicant will be provided with details on how to make an external appeal where possible.
- a. This may incur a fee that is to be borne by the applicant.

**6. Supporting Documents / Systems**

- CPCA Website
- CPCA Membership Information Pack
- CPD Appeal and Complaint Form
- Complaints and Appeals Register
- Continuous Improvement Policy
- Continuous Improvement Register
- CPD Home Committee Terms of Reference

**7. Review**

This policy will be reviewed no less than annually at the time of use to ensure it remains fit for purpose.

**8. Version Control**

Version	Date	Changes Made	Approved By
DRAFT	11/09/2022	New document created	Dr Michael Molton
V2	15/05/2023	HT - Updates to de-identification practices, mediator selection process and publicly availability statement made as per AMC Feedback	