# Recommendation 21: Learning lessons and improving service delivery at the earliest opportunity

Recommendation 21 requires Ambulance Victoria to develop a service-delivery improvement strategy that includes processes for collecting feedback from all those involved in a complaint and a clear way of identifying how this feedback can improve the service, with the aim of implementing these improvements as soon as possible.

This process should also outline how to identify and intervene against victimisation, and provide guidance and training to complaint managers and handlers on analysing the root causes of organisational and systemic issues.

## Recommendation intent and why it matters

Recommendation 21 is intended to better align Ambulance Victoria’s complaint monitoring with leading practice approaches and ensure compliance with the positive duty, including by improving the identification of victimisation and systemic issues. Additionally, Recommendation 21 aims to ensure that complaint managers and handlers have the necessary capabilities and resources to perform their roles effectively.

## Findings

### What we found in Phase 1 of the Review

During Phase 1 of the Review, the Commission was unable to identify any processes or procedures used by Ambulance Victoria to share information about trends, patterns or lessons arising from report and complaint data with its staff. For example, details about reports and complaints were not included in Ambulance Victoria’s annual reports. Ambulance Victoria indicated that this issue had been identified as an action in its organisational culture risk-treatment plan and further work on an approach was intended to be undertaken following the finalisation of the Commission’s Review.

The Commission found that the data collection and reporting in use Ambulance Victoria’s complaint system did not provide detailed analysis of identified root causes or trends to inform measures and steps that could have been taken to address either specific identified risks or those that were emerging.[[1]](#footnote-2) The assessment of report and complaint data (alongside other datasets) was a key function of the newly established Specialist Support Unit[[2]](#footnote-3) and was a positive recognition of the importance of this capability. See sections 9.5.1 and 9.5.2 of the Phase 1 Report.

### What we found in Phase 3 of the Review

**Ambulance Victoria has developed the Professional Standards Continuous Improvement Framework but no strategies to monitor or identify victimisation**

The Professional Standards Continuous Improvement Framework (Framework) outlines a process to obtain and utilise feedback from PSBD service users. Types of feedback collected includes a post-complaint survey, performance measures, general feedback from participants, assessment committee reflections and stakeholder briefings, among others. Under the Framework, feedback is reviewed considered with a view to making improvements in consultation with the Performance Standards team. The Framework also includes a process to escalate systemic risks, but does not contain strategies to monitor or identify victimisation.

During the Progress Evaluation Audit, 75% of the 2024 workforce survey respondents said that they were unsatisfied with the opportunity to provide feedback on how their complaint had been handled.

The Commission also frequently heard workforce concerns about a lack of oversight of the PSBD, which indicates that oversight mechanisms have not been sufficiently communicated to the broader workforce.

I am concerned that there is no oversight over the PSBD and they just get to walk around and say what they will or they will not investigate.

Participant

**Ambulance Victoria has not yet provided complaint handlers or managers with guidance on analysing organisational and systemic issues**

The Commission has not found evidence of Ambulance Victoria offering specific guidance to the individuals responsible for managing and handling complaints on the factors that should inform analysis of organisational and systemic issues. Without this guidance, complaint officers may be less effective in identifying and addressing systemic issues.

**Ambulance Victoria has not yet delivered training to complaint handlers to ensure they have the relevant skills, training and expertise to analyse organisational and systemic issues**

While Ambulance Victoria has shown its intention to deliver this element of the recommendation, the Commission has not found evidence of it being acquitted.

The Commission notes that Ambulance Victoria has developed the PSBD Learning and Development Strategy 2024–2026 (Strategy), which includes analysis of the training needs of both the PSBD and the whole of Ambulance Victoria. The Commission found that most of the training requirements identified are specified in the Strategy as requiring further development. Given the Strategy is dated 2024–2026, it is likely that some necessary programs will be developed in the future.

**Ambulance Victoria has made some progress towards aligning its complaint monitoring with leading practice approaches, but needs to build on this**

At the time of the Progress Evaluation Audit, the PSBD had been operational for over one year, in which time multiple measures for monitoring complaint outcomes had been established. Ambulance Victoria has delivered some steps recommended by the Victorian Ombudsman’s complaint-handling guide,[[3]](#footnote-4) such as identifying systemic issues through annual reporting, identifying training opportunities and using feedback from complaints to improve processes.

With the PSBD now established, Ambulance Victoria should focus on refining complaint service delivery through continuous evaluation and improvement to ensure that complaint and oversight processes remain effective, responsive and best practice.

**Ambulance Victoria is maturing in its approach to monitoring and addressing victimisation in line with the positive duty**

Ambulance Victoria’s work to identify and respond to victimisation in line with the positive duty requires further development. In response to the Progress Evaluation Audit workforce survey, 42% of respondents stated that they had received unfavourable treatment at work as a result of their complaint to the PSBD.

While Ambulance Victoria has demonstrated some ability to monitor and address systemic issues, the organisation’s lack of comprehensive analysis of victimisation rates is hindering its ability to fully comply with the positive duty under the *Equal Opportunity Act 2010* (Vic), which mandates proactive steps to prevent discrimination, harassment and victimisation.

### Progress in achieving change



The Commission has assessed the extent of Ambulance Victoria’s progress towards implementation of Recommendation 21 as implemented to a moderate extent, given that Ambulance Victoria has established a continuous improvement process, but noting that the process has some gaps. The Commission also notes that it did not find evidence of team learning and development.

The Commission has flagged the approach taken to implementing this recommendation for reconsideration by Ambulance Victoria, based on reduced resourcing for training and development, and work needed to improve victimisation positive duty compliance.

## What measures are still needed?

Learning lessons and understanding people’s experiences of a report and complaint system are vital quality indicators and will provide Ambulance Victoria with essential information to create a safer workplace and improve confidence and trust from the workforce in the complaint system. If implemented, robust feedback mechanisms should assist Ambulance Victoria in stopping harm before it occurs, as part of the Reform Enabler: Culture of Prevention.

During the Progress Evaluation Audit, the workforce consistently informed the Commission that by training frontline leaders to handle minor incivility more effectively, the number of complaints directed to the PSBD would decrease. Decreasing the number of complaints made to the PSBD would reduce the resource demands, allowing the PSBD to focus on its core responsibilities.

If the organisation invests in the uplift and capacity of our frontline leaders, then in the long term, you won't need the extra resources, the Professional Standards, because staff won't be going there because it's getting dealt with by the leaders at the frontline.

Participant

The Commission encourages Ambulance Victoria to combine uplift of complaint handlers’ skills and training to analyse systemic issues with work to promote the Reform Enabler: Distributed Leadership, which will assist in complaints regarding low-level incivility being adequately addressed at a local level without unnecessary escalation or centralisation. See also Recommendation 14: Enhancing perceptions of independence and supporting capability for the new organisational response to reports and complaints of unlawful conduct and Recommendation 20: Understanding how the report and complaint system is working.

As the leadership capabilities develop, it would be prudent to review the PSBD's scope of complaints.

1. Victorian Equal Opportunity and Human Rights Commission, Independent Review into Workplace Equality in Ambulance Victoria: Phase 1 (Volume I, 2021) 494. [↑](#footnote-ref-2)
2. Victorian Equal Opportunity and Human Rights Commission, Independent Review into Workplace Equality in Ambulance Victoria: Phase 1 (Volume I, 2021) 496. [↑](#footnote-ref-3)
3. ‘A good practice guide to handling complaints | Victorian Ombudsman’, *Victorian Ombudsman* (1 September 2016) <https://www.ombudsman.vic.gov.au/learn-from-us/practice-guides/a-good-practice-guide-to-handling-complaints/>. [↑](#footnote-ref-4)