



Australian Government  
National Health and Medical Research Council

N|H|M|R|C

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# NHMRC Complaints Policy

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| WORKING TO BUILD A HEALTHY AUSTRALIA |

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## Revision History

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June 2016	NHMRC Complaints Policy	Extensive revision of 2008 policy

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P: 13 000 NHMRC (13 000 64672)

or call (02) 6217 9000

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## 1. Our role – who we are and what we do

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NHMRC is a statutory agency within the Australian Government Health portfolio, and operates in accordance with the *National Health and Medical Research Council Act 1992* (NHMRC Act).

NHMRC's functions are to foster 'improved health and medical knowledge, including through funding research, translating research findings into evidence-based clinical practice, administering legislation governing research, issuing guidelines and advice for ethics in health and the promotion of public health'.<sup>1</sup>

The scope and reach of NHMRC's activities are broad, with the agency spanning a wide range of health topics in the various aspects of its work – from funding research to guideline development and advice. The overall purposes of NHMRC, supporting the agency's mission of 'working to build a healthy Australia', can be summarised as follows:

- fund high quality health and medical research and build research capability
- support the translation of health and medical research into better health outcomes
- promote the highest ethical standards in health and medical research.

The NHMRC also administers the *Prohibition of Human Cloning for Reproduction Act 2002* and the *Research Involving Human Embryos Act 2002*.

<sup>1</sup> Department of Health Portfolio Budget Statements 2016–17, p.390.

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## 2. Purpose of this policy<sup>2</sup>

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The purpose of this policy is to provide clear information to NHMRC stakeholders about the procedures used for dealing with complaints. The policy sets four overall objectives for the agency's handling of complaints:

- consistent and fair management of complaints
- sensitive and respectful handling of complaints
- prompt and effective complaint resolution
- information from complaints will be used to improve policies and services.

This policy outlines a process for complaints related to the following two areas:

- general complaints about NHMRC, including those relating to our policies, services, guidelines and advice
- complaints about NHMRC administrative processes related to research funding.

This policy does **not** cover NHMRC's response to:

- Allegations of research misconduct or complaints related to investigations of research misconduct. Information about how such allegations can be reported and investigated is available on the NHMRC website.
- Complaints related to the operation of the *Freedom of Information Act 1982* and the *Privacy Act 1988*. Information about NHMRC's privacy policy and about freedom of information, including making complaints regarding these matters, can be found on the NHMRC website.

<sup>2</sup> This policy has been developed with reference to the Commonwealth Ombudsman's Better Practice Guide to Complaint Handling and AS ISO 10002–2006 (Customer satisfaction – Guidelines for complaints handling in organizations). The management of complaints at NHMRC has been modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration.

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### 3. Feedback and enquiries

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If you have an enquiry about administrative processes related to NHMRC funding schemes, please direct your enquiry to the Research Help Desk through your institution's Research Administration Office (RAO). RAOs can find Research Help Desk contact details in the [Contact Us](#) section of this document or on the NHMRC website at [www.nhmrc.gov.au/grants-funding/research-help-centre](http://www.nhmrc.gov.au/grants-funding/research-help-centre).

For general enquiries, use the contact details provided in the [Contact Us](#) section in this document or at [www.nhmrc.gov.au/about/contact-us](http://www.nhmrc.gov.au/about/contact-us). The [NHMRC Service Charter](#) also has information on the services NHMRC provides.

NHMRC values your feedback and welcomes comments and suggestions about any aspect of our service at any time. The easiest way to provide us with feedback is to fill in our online [feedback form](#). You can also use the details provided in the [Contact Us](#) section of this document or on our website at [www.nhmrc.gov.au/about/contact-us](http://www.nhmrc.gov.au/about/contact-us).

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## 4. How we handle complaints

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The NHMRC Complaints Team manages the complaints process, working across the organisation with other NHMRC staff and liaising with the NHMRC Executive as required.

NHMRC staff are bound to conduct their duties in accordance with the *Australian Public Service Values* and *Code of Conduct* as set out in the *Public Service Act 1999*. Please refer to the [NHMRC Service Charter](#) for more information.

The following guiding principles apply to the NHMRC complaints process:

- **Visibility and accessibility:** Information about how to make a complaint will be readily available and the complaints process will be straightforward.
- **Responsiveness:** Receipt of each complaint will be acknowledged in a timely manner and complaints will be addressed promptly.
- **Objectivity:** Each complaint will be addressed in a fair, equitable and unbiased manner throughout the complaints process.
- **Confidentiality:** Personal information concerning a complaint will be available to NHMRC officers only where needed for the purposes of addressing the complaint and will be actively protected from disclosure outside the NHMRC, unless such disclosure is consented to or is required by law.

Our procedures for handling [general complaints](#) and [research funding complaints](#) are outlined in the following sections.

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## 5. Complaint procedures: general complaints

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General complaints about NHMRC may relate to our policies, services, guidelines or advice.

### 5.1 How to make a general complaint

- If you have a concern about any aspect of NHMRC's work, you may contact the staff member involved by phone or email to discuss the matter prior to making a formal complaint.
- If you are an applicant for or recipient of NHMRC funding with concerns or queries relating to this research funding, contact should be made through your Research Administration Office (RAO) via the Research Help Desk ([www.nhmrc.gov.au/grants-funding/research-help-centre](http://www.nhmrc.gov.au/grants-funding/research-help-centre) or see the [Contact Us](#) section of this document).
- If either of the above are not appropriate for your particular concern, or if you are dissatisfied, you can make a formal complaint to the NHMRC Complaints Team by:
  - Completing and submitting the NHMRC complaints form online via the NHMRC website <https://www.nhmrc.gov.au/about-contact-us/making-complaint>.
  - Downloading the form, completing it, then emailing to the NHMRC Complaints Team.
  - Use a hard copy of the form that is provided at [Attachment A](#) and post to NHMRC.

Email: [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au)

Mail: Complaints Team  
National Health and Medical Research Council  
GPO Box 1421  
CANBERRA ACT 2601

The complaints form asks you to provide your name and contact details, what your complaint is about and what result you are seeking. Anonymous complaints can be made, but NHMRC will not be able to provide feedback about how the complaint was resolved.

As noted above, if you are an applicant for or a recipient of NHMRC funding, and your complaint relates to this funding, your complaint should be made through your institution's RAO. Procedures for making complaints related to research funding processes are provided in [section 6](#) of this policy.

**All formal complaints must be in writing.**

## 5.2 How general complaints are handled

- The NHMRC Complaints Team is the primary contact point for lodgement of and enquiries regarding general complaints about NHMRC.
- Receipt of your general complaint will be acknowledged.
- Complaints may not be investigated where a complainant raises the same issue as their previous complaint.
- You will be informed in writing of the outcome of the investigation as soon as possible.
- NHMRC will consider whether there are any improvements that could be made to NHMRC policies or services as a result of information gathered through investigating the complaint.

## 5.3 What to do if you are still not satisfied

- You can write to the Complaints Team explaining why you are not satisfied with the response.
- Your complaint may then be referred for further review internally. We will aim to provide a response as soon as possible.

## 5.4 External review of general complaints

You may choose to make your complaint to a body outside the NHMRC, including if you are dissatisfied with the response you have received from NHMRC. Depending on the type of complaint you are making, bodies that may be able to consider your concerns include:

- Commonwealth Ombudsman
- Privacy Commissioner
- Australian Information Commissioner
- Scheme for Compensation for Detriment caused by Defective Administration (the CDDA Scheme).

Contact details are provided in the [Other Contacts](#) section of this document.

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## 6. Complaint procedures: research funding

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This section relates to complaints about any aspect of NHMRC's research funding processes. This includes complaints that relate to the application and peer review processes and to grants administration.

Complaints should be made in accordance with the arrangements set out below. NHMRC will only consider complaints if:

- the complaint relates to research funding processes; and
- reasons are provided in support of the complaint.

Complainants should also specify how they would like the complaint to be resolved.

NHMRC will not engage in merits review of grant applications. This complaints investigation will relate only to process.

As noted in section 6.1, complaints about research funding should be made through your Administering Institution's Research Administration Office (RAO). From 1 January 2017, complaints about research funding will only be considered if they are made through the RAO.

Note that, during the rebuttal period, objections made to assessor comments should be raised with the relevant line area of NHMRC, rather than with the Complaints Team. This process is detailed in section 6.3 below.

### 6.1 Who can make a complaint about research funding?

Any participant in the grant application or peer review process may make a complaint about NHMRC's processes related to research funding, this includes:

- Administering Institutions, including complaints made on behalf of Chief Investigators or Fellows
- NHMRC peer reviewers
- Independent observers of NHMRC peer review
- NHMRC staff.

Applicants for or recipients of NHMRC funding should make their complaints via their Administering Institution's RAO. This step is to enable the RAO to advise the complainant whether the complaint is valid and so that the RAO can provide the complainant with any information NHMRC has previously provided the institution in relation to the issue/s intended to be raised.

If a research supervisor wishes to raise a complaint on behalf of another person, they must provide NHMRC with written permission from that person, noting that the complaint should be made through the Administering Institution's RAO.

## 6.2 How to make a complaint about research funding

Formal complaints:

- must be made in writing to the NHMRC **through the Administering Institution's RAO**
- should be made within **28 calendar days** of any relevant NHMRC decisions or actions, noting that the longer the lapse of time before the complaint is made, the more difficult it may be to resolve the concerns.

Each complaint should be directed through the Administering Institution's RAO to the Complaints Team

via email to: [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au).

or at:

Complaints Team  
National Health and Medical Research Council  
GPO Box 1421  
CANBERRA ACT 2601

The following information should be included in the complaint:

- NHMRC funding scheme
- Application year
- Application or Grant Identification Number
- Complainant's name
- Complainant's role (on the application or grant or in the peer review process)
- Details of the complaint
- Reasons for the complaint
- How the complainant would like the complaint resolved
- Details of any time-sensitive circumstances pertaining to the complaint
- Contact details.

NOTE: NHMRC procedures for objecting, during the rebuttal process, to comments made by assessors in the course of peer review are different from those in place for complaints related to all other aspects of the research funding process. Please see 'Objecting to assessor comments during the rebuttal process' below.

## 6.3 Objecting to assessor comments during the rebuttal process

There are occasions when a Chief Investigator (CI) on a grant application wishes to object to assessor comments that the CI considers inappropriate. Where a CI wishes to raise such concerns during the rebuttal process, the objection should be made in writing, through the CI's RAO, directly to the relevant funding scheme director via the Research Help Centre at [help@nhmrc.gov.au](mailto:help@nhmrc.gov.au).

This approach recognises the tight timeframes in which rebuttal needs to be provided and facilitates prompt attention to any concerns.

Further information about this process is available in the [NHMRC Funding Rules](#).

Applicants who are dissatisfied with the response they receive to their initial objection may seek a further review by the NHMRC Complaints Team. This should be directed via the Administering Institution's RAO to [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au).

## 6.4 How your complaint about research funding will be handled

NHMRC will investigate and respond to all complaints made in accordance with this policy about NHMRC processes related to research funding. Complaints may not be investigated where a complainant raises the same issue as their previous complaint.

NHMRC will not provide application scores except where explicitly permitted by the Funding Rules.

Additionally NHMRC will not reveal the identities of peer reviewers via the complaints process.

The Complaints Team will:

- acknowledge all complaints
- conduct a review of matters relevant to the complaint
- aim to respond to the complainant as soon as possible, noting that the length of time taken to resolve a complaint will depend on the nature and complexity of the issues raised and the stage in the NHMRC peer review process in which the complaint is received.

The decision-maker for a complaint is usually the Director of the NHMRC Ethics and Governance Section. Matters may be escalated to the Executive Director, Evidence, Advice and Governance, NHMRC General Manager or NHMRC CEO, as required.

Depending on the nature and content of the complaint, and the timeframe for resolution, matters may sometimes be referred by the Complaints Team to the relevant area of NHMRC for an initial response, if this would result in the most effective and efficient handling of your concerns. If you are dissatisfied with this response, you may seek a further review from the Complaints Team.

Note that where relevant and feasible, applications will continue to progress through the peer review process while complaints are being handled.

## 6.5 What if my research funding complaint is not upheld?

If a complaint is not upheld, you will receive a letter from the NHMRC, sent through your Administering Institution's RAO, advising of the reasons for the decision to not uphold the complaint. You will be advised of any options for further review in the letter. You may also consider approaching a body outside the NHMRC (see sections 6.9 and 6.10 below).

## 6.6 What if my complaint is upheld during the peer review process?

If a complaint is upheld while the peer review process is ongoing, NHMRC will endeavour to resolve the matter in a way that minimises any detriment to the applicant and/or peer reviewers.

The remedy for a complaint will depend on the nature of the complaint and the stage of the peer review process.

## 6.7 What if my complaint is upheld after the peer review process has concluded?

If a complaint is upheld after the peer review process has concluded, NHMRC cannot guarantee it will be able to remedy any process errors identified in relation to the application.

Instead NHMRC will determine the likely impact of the error on the application's progression through the peer review process and will consider appropriate action.

## 6.8 Will my complaint lead to improved processes in the future?

NHMRC records the types of complaints it receives and uses this information to inform any future improvements to NHMRC policies or procedures.

## 6.9 What to do if you are still not satisfied

If you are dissatisfied with the response from the NHMRC Complaints Team, you may consider raising your concerns with the NHMRC Commissioner of Complaints.

### **Can I complain directly to the Commissioner, without first approaching NHMRC?**

The NHMRC Commissioner may choose not to investigate complaints if the complainant has not approached the NHMRC with the complaint in the first instance, and the Commissioner is satisfied that it would be reasonable for the complainant to do so.

### **How can I lodge a complaint with the NHMRC Commissioner of Complaints?**

Details on how to lodge a complaint with the Commissioner are available on the [NHMRC website](#). Complainants are strongly encouraged to make any complaint to the Commissioner through their Administering Institution's RAO. If this is not done, the complainant should notify their RAO that a complaint has been made to the Commissioner.

## 6.10 External review of complaints about research funding

You may also choose to make your complaint to a body outside the NHMRC, including if you are dissatisfied with the response you have received from NHMRC or from the Commissioner of Complaints. Depending on the type of complaint you are making, bodies which may be able to consider your concerns include:

- Commonwealth Ombudsman
- Privacy Commissioner
- Australian Information Commissioner
- Scheme for Compensation for Detriment caused by Defective Administration (the CDDA Scheme)

Contact details are provided in the [Other Contacts](#) section of this document.

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## 7. Review and improvement of this policy

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NHMRC will ensure this policy remains up to date and that it is meeting the needs of our stakeholders. In reviewing the policy, we will take into account how efficiently and effectively both general complaints and research funding complaints have been handled, and identify areas for improvement.

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## 8. Contacting NHMRC

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### General enquiries and feedback

**Feedback form**

[www.nhmrc.gov.au/about/contact-us](http://www.nhmrc.gov.au/about/contact-us)

***Telephone***

13 000 NHMRC (13 000 64672)  
or +61 2 6217 9000 for international callers

***Fax***

+61 2 6217 9100

***Email***

[nhmrc@nhmrc.gov.au](mailto:nhmrc@nhmrc.gov.au)

***Location***

Level 1, 16 Marcus Clarke Street  
Canberra ACT 2601

***Postal***

National Health and Medical Research Council  
GPO Box 1421  
Canberra ACT 2601

### Research funding enquiries (Research Help Desk)

***Email***

[help@nhmrc.gov.au](mailto:help@nhmrc.gov.au)

***Telephone***

1800 500 983 or  
+61 2 6217 9451 for international callers

### Complaints Team

[complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au) or use the  
[complaints form](#)

***Telephone***

(02) 6217 9333, or 1800 646 726

***Postal***

Complaints Team  
National Health and Medical Research Council  
GPO Box 1421  
CANBERRA ACT 2601

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## 9. Other contacts

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### Australian Information Commissioner

GPO Box 5218  
SYDNEY NSW 2001

Telephone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

### The Commonwealth Ombudsman

GPO Box 442  
CANBERRA ACT 2601

Telephone: 02 6276 0111

Toll-free: 1300 362 072

Email: [ombudsman@ombudsman.gov.au](mailto:ombudsman@ombudsman.gov.au)

### Privacy Commissioner

GPO Box 5218  
SYDNEY NSW 2001

Telephone: 1300 363 992

Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)

### Scheme for Compensation for Detriment caused by Defective Administration

Applications under the Scheme for Compensation for Detriment caused by Defective Administration (the CDDA Scheme) should be made directly to the NHMRC. Further information about the CDDA Scheme is available at [www.finance.gov.au/resource-management/discretionary-financial-assistance/cdda-scheme/information-for-applicants-cdda](http://www.finance.gov.au/resource-management/discretionary-financial-assistance/cdda-scheme/information-for-applicants-cdda).

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## Attachment A

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### Complaints Form

Please complete this form if you would like to submit a complaint. Once completed, please email to [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au) or send to

Complaints Team  
NHMRC  
GPO Box 1421  
Canberra ACT 2601

Note: If you are an applicant for NHMRC funding or a recipient of NHMRC funding, and your complaint relates to any matter related to this funding, your complaint should be made through your Administering Institution's Research Administration Office (RAO). This can be done using this form or via email to [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au). From 1 January 2017, complaints about research funding will only be considered if they are made through the RAO. If you have questions about this policy, please email [complaints@nhmrc.gov.au](mailto:complaints@nhmrc.gov.au).

#### Personal details (All \* fields are required)

Title:

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First name:\*

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Last name:\*

---

Your email:\*

---

#### Address for correspondence

Street:

---

Suburb/Town:

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City:

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Country:

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State/Territory:

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Postcode:

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**Complaint details**

I wish to complain about:\*

- NHMRC, including our policies, services, guidelines and advice
- NHMRC research funding
- Other (please specify)

**Your complaint is:\***

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**What do you want as a result of your complaint:\***

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**Security Warning/Disclaimer:\***

I have read the security warning/disclaimer below and accept the risks and conditions outlined.

Data submitted through the form above will be used solely by the National Health and Medical Research Council for the purposes described above and detailed in the *NHMRC Complaints Policy*. There are security risks associated with transmission of information via the Internet. The NHMRC has taken reasonable steps to safeguard against unauthorised access, use, modification or disclosure of personal information we hold electronically. Before deciding whether to use this facility you should make your own assessment of the potential risks to the security of your information. Any personal information collected will be stored and used in accordance with NHMRC's obligations under the *Privacy Act 1988*, and in accordance with the [NHMRC Privacy Policy](#).

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