

ALLIED HEALTH PROFESSIONS COUNCIL

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(A) Making a complaint

1. Before lodging a complaint against an allied health professional (AHP), please read and understand the following information.
2. The Allied Health Professions Council (“AHPC”) **does not** accept verbal complaints (i.e. phone calls or walk-ins).
3. Your complaint must be **type-written in English and supported by an original Statutory Declaration (“SD”)**. Otherwise, an authenticated English translation must be submitted together with the complaint.
4. Your complaint must contain the following information/ documents:
 - a) The **full name** of the allied health professionals (AHPs) who is/are the subject of the complaint;
 - b) The name of the healthcare institution(s);
 - c) The allegation(s) against the AHP(s), including the relevant details; and
 - d) Copies of supporting documents.

Please refer to the [Sample Letter](#) for an example of a complaint.

5. As an **independent** administrator of the disciplinary process, **the AHPC is unable to obtain the name of the AHP(s) for you and/or assist you to draft your complaint.** Where necessary, please contact the healthcare institution(s) concerned to find out the name of the AHP(s).
6. For a complaint to be investigated effectively, your complaint should be lodged **within six (6) years of the incident**, as the relevant evidence such as patient records and witness testimonies may become unavailable or difficult to secure as times passes.

(B) Making the Statutory Declaration

7. Under Section 39(1) of the Allied Health Professions Act (AHPA), a complaint must be supported by an SD. The SD is a written statement of facts which is signed and affirmed by the person making the declaration that the contents in the statement are true and accurate to the best of his knowledge and belief. It must be endorsed by a Commissioner for Oaths. You may visit [The Law Society of Singapore](#) for a list of Commissioner for Oaths in Singapore. Please ensure that your name, address and occupation are clearly stated on the SD.
8. Besides the SD form, you should also bring along this information sheet, your photo identification (e.g. identity card, passport), your type-written complaint and all the relevant supporting documents when visiting the Commissioner for Oaths to file your SD.

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(C) Submitting the complaint

9. Once the SD has been duly affirmed/ sworn, please scan and send to us the following documents **in colour**:

What to submit	Email address:
<p>a) The (i) Original SD, (ii) complaint letter and (iii) supporting documents consolidated in one PDF file; and</p> <p>b) A completed and signed copy of the <u>acknowledgement form</u> (see page 7)</p> <p>Note: Your email submission should contain only the two attachments referred to above.</p>	<p>ahpc@spb.gov.sg</p>

10. Please note that the AHPC will only be able to process your complaint when the above documents have been provided. *The AHPC also reserves the right to reject any complaint or SD not made in compliance with the Singapore law or in accordance with its requirement.*

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FREQUENTLY ASKED QUESTIONS

1. What is the function of the Allied Health Professions Council (AHPC)?

The AHPC is a professional board under the Ministry of Health (MOH) which governs and regulates their professional conduct and ethics of registered allied health professionals (AHPs).

2. Is the AHPC the right place for me to lodge my complaint?

By law, the AHPC can only consider complaints against **registered AHPs**.

Under Section 39(1) of the Allied Health Professions Act (AHPA), the AHPC only looks into issues related to:

- a) complaint touching on the conduct of a registered AHP in his professional capacity or on his improper act or conduct which brings disrepute to his profession;
- b) information on the conviction of a registered AHP of any offence in Singapore or elsewhere involving fraud or dishonesty, or implying a defect in character which makes him unfit for his profession;
- c) complaint that the professional services provided by a registered AHP is not of the quality which is reasonable to expect of him; or
- d) information touching on the physical or mental fitness to practise of a registered AHP.

The AHPC is **NOT EMPOWERED** to investigate complaints that pertain to the following:

- a) Complaints that primarily pertain to institutional policies (e.g. scheduling of appointments, delays in treatment due to institutional frameworks, billing issues arising from institutional policies);
- b) Complaints directed against a healthcare institution and not a registered AHP;
- c) Complaints against other healthcare professionals other than a registered AHP (e.g. doctors, nurses and healthcare institution staff); and
- d) Complaint against any other party who is not a registered AHP with the AHPC.

3. Can I lodge a complaint with AHPC even before trying to resolve the matter with the AHP and/or healthcare institution concerned?

While there is no requirement that you attempt to resolve the matter with the AHP and/or healthcare institution first, our experience suggests that complaints can be resolved to the satisfaction of all parties *via* an informal resolution of the matter with the AHP and/or healthcare institution concerned. This is especially since AHPC cannot provide the redress that some complainants want (see question 2 above). Therefore, we recommend that you highlight your concerns to the AHP(s) and/or healthcare institution(s) concerned in case the matter may be resolved without the need for you to make a complaint.

Where the case involves serious allegations of misconduct or where there is a serious defect in the quality of the services provided or a significant question of the

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physical or mental fitness of the AHP to practise his profession, we encourage you to report the matter to the AHPC **as soon as possible**.

That said, if the matter is serious, we recommend that you make a complaint to the AHPC whether or not you have tried to resolve the matter with the AHP(s) and/or healthcare institution(s) concerned.

4. Can I request financial compensation, an apology and/or personal explanation from the AHP by lodging a complaint to the AHPC?

Please note that the following outcomes are **not possible** even if your complaint is found to be supported by evidence:

- a) Requesting for refund of monies to the patient or a reduction in bill incurred by the patient;
- b) Requesting for compensation/ damages for any harm caused as a result of the AHP's misconduct or negligence;
- c) Retrieving medical records on the patient's behalf;
- d) Obtaining an explanation from the AHP(s) and/or healthcare institution(s) in respect of a treatment or procedure;
- e) Ordering that the AHP(s) perform a particular procedure or offer a certain treatment;
- f) Requesting an apology from the AHP(s) or healthcare institution(s);
- g) Revocation of license of the healthcare institution(s); and
- h) Criminal sanctions (e.g. imprisonment) against the AHP(s) and/or healthcare institution(s).

5. What are other avenues available for you to seek redress?

The AHPC process may not be appropriate for all complaints involving healthcare issues. There are other avenues that may be more suitable: -

a) Communicating with the AHP(s)/ healthcare institution concerned
Issues of miscommunication or those pertaining to a patient's desire for an explanation of certain medical matters are best resolved directly with the AHP or healthcare institution concerned. For that reason, we **strongly recommend** that you first attempt to resolve the dispute by approaching the parties concerned in such instances. The fact that you had attempted to resolve the matter with the AHP(s)/ healthcare institution concerned informally will **not** be taken against you if you do eventually decide to make a complaint.

b) Healthcare Mediation Scheme ("HMS") and Small Case Mediation Scheme ("SCMS") by the MOH Holdings
The HMS and SCMS promote the voluntary use of mediation to resolve disputes between patients and healthcare institutions. Mediation is a confidential, amicable process where a neutral and independent mediator helps parties to engage in a constructive discussion to resolve their differences. If you are keen to mediate, you may wish to contact the Healthcare Mediation Unit about the HMS or the SCMS. Both schemes are administered by the Singapore Mediation Centre, a subsidiary under the Singapore Academy of Law. For mor information, you can call the Healthcare Mediation Unit at 6622 3755 or email them at mediate@mohh.com.sg. You may also wish to refer to the [HMS website](#) for

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further information.

c) Filing a complaint with other regulators

For complaints against institutions, or other healthcare professionals, you may wish to file a complaint with the relevant regulatory agency in charge of the matters.

d) Filing a civil claim

If you are seeking damages or financial compensation from an AHP and/or a healthcare institution, you may wish to consider filing a civil suit instead. Depending on the quantum of the claim, you may have to file it in either the High Court or in the State Courts. You would have to seek independent legal advice should you decide to pursue this option.

e) Making a police report

In serious cases involving alleged criminal conduct on the part of an AHP, we recommend that you lodge a report with the Singapore Police Force (SPF).

6. How are complaints processed?

Every complaint will be reviewed by an independent Complaints Committee ("CC"), which comprises two senior AHPs in the same profession as the AHP being complained against and a layperson. Majority of the cases take **at least 9 months**. For more complex complaints, investigations may take **more than a year** to be investigated and concluded.

The CC's inquiry may be delayed if the subject matter of your complaint involves external proceedings such as a police investigation, Coroner's Inquiry or Court proceedings. Due to the formal and extensive nature of the fact-findings processes employed in those external proceedings (e.g. those by law enforcement agencies by the SPF and organs of state such as the Courts), a CC may decide to await such findings as it deems fits as part of its inquiry.

As all proceedings before the CC are confidential, **you will not receive periodic updates on the status of the investigations**. The CC is an independent and separate body from the AHPC, and the AHPC Secretariat is **NOT EMPOWERED** to release any information to you during the course of investigations. You will, however, be informed in writing of the outcome of the CC's deliberations as soon as a decision has been reached. We seek your understanding in this regard.

7. Will the AHP see my complaint against him?

As part of a fair and impartial investigation, the AHP may be called upon to answer any allegation made against him/her, and if so, **your complaint (including your identity and the details of your allegation(s)) must, by law, be furnished to the AHP**. The CC may also access your patient records as part of the investigations, though all documents before the CC (including your complaint and patient records) remain confidential and will not be disclosed to third parties other than the AHP(s) being complained against, except as required by law.

8. What are the possible outcomes after the CC completes its investigations?

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After the CC completes its investigations, it may:

- a) **Dismiss** the complaint;
- b) Refer the matter for mediation between the AHP and the complainant at the Singapore Mediation Centre;
- c) Issue the AHP with a **Letter of Advice**;
- d) Issue the AHP with a **Letter of Warning**;
- e) Refer the AHP to a **Disciplinary Tribunal** for a formal inquiry;
- f) Refer the AHP to a **Health Committee** for a formal inquiry (if the complaint touches on the AHP's physical or mental fitness to practise);
- g) Order the AHP to undergo medical or psychiatric treatment or counselling, undertake and complete specified further education or training, or report on the status of his practice and seek and take advice on the management of his practice.

9. What can I do if I am dissatisfied with the outcome of the complaint?

If you are dissatisfied with the order(s) of the CC made following the investigations, you may appeal to the Minister for Health in writing within 30 days after being notified of the CC's decision. Beyond which, the Minister does not have the statutory authority to look into your appeal. Please note that the Minister's decision is **final and conclusive** and the appeal should be submitted to the following address:

Minister for Health
Ministry of Health
16 College Road
College of Medicine Building
Singapore 169854

For queries pertaining to the appeal process, please contact the Ministry of Health directly at moh_qsm@moh.gov.sg.

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Note: Please complete this acknowledgement form and email it to ahpc@spb.gov.sg together with one consolidated PDF file containing the (i) original SD, (ii) complaint letter and (iii) supporting documents. All documents submitted to AHPC should be scanned in colour.

ACKNOWLEDGMENT

I have read and understood all the contents of the information sheet.

I am aware that the AHPC disciplinary process is suitable only for certain types of complaints, and have considered all the other avenues (e.g. approaching the healthcare institution directly for assistance, mediation schemes by the MOH Holdings) indicated.

I have duly noted the time (i.e. more than a year) that is typically taken for a complaint to be processed. I understand that the indicated timeline for the processing of complaints is an estimate and not a guarantee that an outcome will be issued within a certain period.

I understand and acknowledge that *the patient / my information may be provided to the allied health professional (AHP) (if necessary) and *the patient / my patient records may be requested and accessed by the Complaints Committee.

Please tick only if you are not the patient.

I confirm that I have sought the patient's consent to lodge the complaint on his/her* behalf and that his/her* medical information may be disclosed to me.

** please delete accordingly*

Signature of Complainant

Name:

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Date:

“A”

« Date of Statutory Declaration »

« Your name »

« Address 1 »

« Address 2 »

« Address 3 »

Chairman, Complaints Panel
Allied Health Professions Council
16 College Road, #01-01
College of Medicine Building
Singapore 169854

Please note that Complaints Committee may not be able to investigate the complaint without the full name of the Allied Health Professional (AHP).

Dear Sir

COMPLAINT AGAINST « FULL NAME OF AHP(S) »

1. Introduction (to provide the following information, where relevant)
<ul style="list-style-type: none">• State if you are the patient who was attended to by the above named AHP(s).• If you are not the patient, please state the following in the complaint:<ol style="list-style-type: none">a) <u>Full name</u> of the patient;b) The patient's NRIC or passport number;c) Your <u>relationship</u> with the patient (e.g. parent, child, spouse);d) Why the patient is unable to lodge the complaint personally; ande) Whether the patient has given consent for you (i) to lodge the complaint; and (ii) his/her medical information to be disclosed to you.f) In the event the patient is unable to give consent, please indicate the reason (e.g. patient has passed away)• Provide a summary of the date(s) and location(s) of the incident(s).
2. Summary of your complaint
<ul style="list-style-type: none">• Provide a summary of the date(s) and location(s) of the incident(s). <p>Example: <i>“I am the mother of the patient, « Name of patient in full » of Birth Certificate number: « BC number ». I am making this complaint as my daughter was one year old when the incidents happened between DDMMYYYY and DDMMYYYY at« Name of healthcare institution ».”</i></p>
3. Key allegations and details of your complaint
<ul style="list-style-type: none">• Provide a title for each allegation against each AHP, followed by the details.

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Example A (complaint against one AHP):

Title: Failure to provide professional service

Details: On DDMMYYYY, during my consultation with the AHP, he had made the wrong diagnosis of my condition which resulted in me undergoing unnecessary treatment.

Title: [Please provide title of the second allegation]

Details: [Please provide details of the second allegation]

Example B (complaint against more than one AHPs):

Title: Failure of « Name of first AHP » to diagnose my condition

Details: [Please provide details specific to this AHP's alleged failure]

Title: [Please provide title of the allegation against second AHP]

Details: [Please provide details of the allegation against second AHP]

Please state the page number on every page (including on all supporting documents)

4. Have you attempted to resolve the matter directly with the AHP and/or healthcare institution? Have you considered any of the mediation schemes by the MOH Holdings (see FAQ Question 5b) to resolve the matter?

- If yes, please state your reason why you decide to lodge a complaint with AHPC.
- If no, please state your reason why you decide not to do so.

5. Any police report made/ legal proceedings?

- Please indicate if you have made any police report(s) and/or commenced legal proceeding(s) against the named AHP(s) which arise from the same set of facts and particulars detailed in this complaint.
- If yes, please provide the police's and/or Court's reference number and attach a copy of the police report(s) and/or Court's documents.

Example:

"I have made a police report at « location of police station » and/or commenced legal proceedings against « Name of AHP(s) in full » at the State Courts/ High Court* which arise from the same set of facts and particulars detailed in my complaint. The police's*/ Court's* reference number is « reference number ».*

** Please delete where appropriate*

6. Any supporting documents?

Example:

[Annex A: Timeline of Events]

[Annex B: Discharge Summary dated DDMMYYYY]

[Annex C: Emergency Notes dated DDMMYYYY]

[Annex D: Medical Report dated DDMMYYYY]

[Annex E: Correspondences with AHP]

[Annex F: Correspondences with XXX Hospital]

[Annex G: Coloured Photographs of XXX dated DDMMYYYY]

Please refer to the template at Annex A

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Yours faithfully

[Signature]

[Name in full]

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Please annex your supporting documents accordingly

Annex A

TIMELINE OF EVENTS

S/N	Date	Occurrence
1	[DDMMYYYY]	<ul style="list-style-type: none"> - I visited the Rehabilitation Department of XXX Hospital at about 1.00am as I had just completed a surgery... - Saw AHP XXX at about 1.30am. Told him that I have been feeling pain on my knee since 11.00pm... - ... - ...
2	[DDMMYYYY]	<ul style="list-style-type: none"> - I returned to see AHP XXX at the Outpatient Clinic of XXX Hospital as scheduled. - ... - ... - ...

[Signature]