

# Customer Complaints Management Policy

## 1. Statement

Health and Wellbeing Queensland (the agency) is committed to delivering high quality services to Queensland's public health system. The agency values the benefits of effectively managing feedback from our customers. We believe our customers should be able to provide feedback (both positive and negative) about our services and the way we provide them. Business enhancement, accountability and accessibility are central to an effective customer complaint management system.

The intent of our customer complaint management system is to continually improve and provide better services to our customers.

## 2. Purpose

This policy sets the overall direction for customer complaint management in the agency and supports compliance with section 264(1) of the *Public Sector Act 2022*. The policy also outlines the roles and responsibilities for customer complaint management in the agency on how to successfully manage customer complaints consistently, fairly, reasonably and on time.

## 3. Scope

This policy applies to all employees, volunteers, contractors, consultants, and board members of the agency who manage customer complaints about services provided, including whether an action or decision limits human rights.

This policy *does not* apply to:

- Complaints covered by existing statutory or policy obligations, for example, regarding corruption, fraud or right to information/privacy, complaints made by public servants regarding their employment/employer, or any other type of complaint already addressed by subject specific legislation and/or policies.
- Enquiries from a customer about a service or action of the agency, or its staff.

## 4. Principles

This policy aims to support and contribute to high performance, engagement with partners and continual improvement. The principles outlined below underpin the agency's approach to customer complaint management.

### Human rights

- The agency adheres to the *Human Rights Act 2019*.
- The agency will respect, protect, and promote human rights in our decision-making and actions in relation to customer complaint management.
- Staff handling complaints will properly consider human rights that are relevant to an action or decision taken by the agency in response to a customer complaint.

### People focus

- Everyone has a right to complain.

- The agency proactively seeks and receives feedback and complaints.
- People making complaints are treated with respect.
- Complainants are not adversely affected because of a complaint made by them or on their behalf.
- The agency will accept complaints from representatives of customers, including family members, friends and other people or organisations that act in support of the person.

### **Visibility, transparency and access**

- Information about how and where a complaint can be made is available on the agency's website.
- A complaint may be made to any employee of the agency in person, by phone, email, or letter.
- The agency will provide all reasonable and practical help and support to make it easy for all complainants to make a complaint by recognising the particular needs of people, including people with disability, people living in regional and remote areas, the aged and people from culturally and linguistically diverse backgrounds.
- A complainant will not be charged a fee to complain.

### **Responsiveness**

- The majority of customer complaints should be resolved at the point of contact, with training and guidance provided by management.
- Customer complaints are acknowledged promptly and responded to fairly, reasonably and in a timely manner. Timelines are determined based on complexity as detailed below in 5.3.
- Anonymous customer complaints are accepted and treated like any other complaint.
- Staff are aware of the policy and procedures available on the agency's website.
- Adequate resources, including trained staff, are available to manage complaints.
- Customer complaints are recorded and tracked, timeframes for resolution are monitored and complainants are entitled to reasonable progress reports.

### **Objectivity and fairness**

- Complaints are taken seriously and are handled fairly, objectively and without bias.
- Complaints are assessed and categorised on nominated criteria.
- Personal information is managed in line with the *Information Privacy Act 2009* and ethical obligations.
- Complaint managers may refuse to investigate a customer complaint if it is considered to be abusive, trivial or vexatious.
- The principles of natural justice and provision of avenues for review are applied to all complainants.
- Reviews of decisions will be made by people other than the original decision maker.

### **Feedback**

- Adequate and timely feedback is provided to all complainants about the progress of their customer complaint, the outcome reached by the agency and the reasons for the agency's decision.
- Complainants are notified of available review mechanisms. If a complainant is unsatisfied with the outcome of their customer complaint, they may request an internal review. If a complainant remains unsatisfied with the outcome after internal review, they may seek external review.
- The agency will seek regular feedback about the way it manages customer complaints.

### **Remedies**

- Appropriate remedies that are fair to both the complainant and the agency are offered. Complainants

are able to request a remedy that is considered as the first option.

- Informal resolution and compromise are attempted wherever possible.
- Similar remedies are offered to all persons in a similar situation.
- If a customer complaint cannot be resolved at the point of contact, it can be referred for further assessment, investigation or review.
- If a customer complaint is unable to be resolved internally, it may be referred for external review by an agency such as the Queensland Ombudsman.

#### Accountability, learning and prevention

- The customer complaint management system is reviewed regularly to ensure relevance and effectiveness.
- Mechanisms are in place to gather and record information to meet reporting requirements, identify customer complaint trends, monitor the time taken to resolve customer complaints and identify potential business improvements.
- Potential system improvements revealed by customer complaints are identified by the area responsible and reported regularly to management.
- Information about customer complaints in the agency will be published annually.

#### Skills development

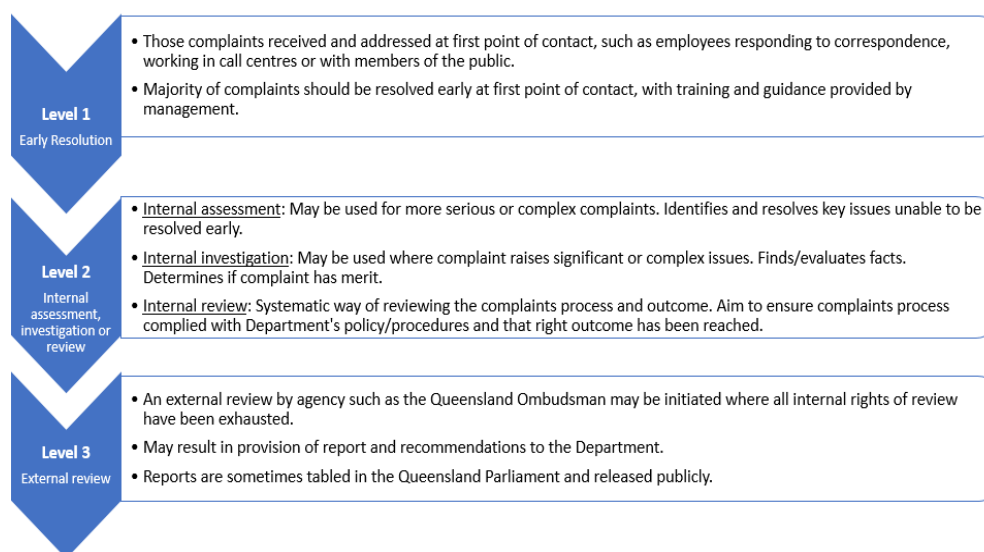
- Managers will provide opportunities for skills development to staff who manage customer complaints.

## 5. Requirements

This policy identifies the minimum mandatory requirements for the governance and management of risks, including the identification, reporting and communication of risk.

### 5.1 Agency Customer Complaint Management Model

The agency has adopted a three-level customer complaint management model (in a similar manner to the example below utilised by the Department of Health), which is designed to support the core principle of responsiveness by focusing on early resolution. The severity of the customer complaint should inform the management approach selected for each complaint. The model is outlined at figure 1.



**Figure 1** Customer Complaint Management Model

## 5.2 Customer Complaint Management Systems

The agency's complaints management system (CMS) must align with the Customer Complaint Management Model and focus on responsiveness to ensure the early resolution of complaints where possible.

The agency must have local processes in place for managing customer complaints (receiving, identifying, assessing, recording, reporting and responding to customer complaints).

Local processes must be compliant with this policy and align with the nine customer complaint management principles. Local processes must be documented, if they deviate from the policy and be readily available and easily accessible.

Staff must be aware of local processes and their roles and responsibilities in managing customer complaints.

Staff responsible for receiving, identifying, assessing, managing and responding to customer complaints must be appropriately trained and/or skilled.

## 5.3 Complexity and timeframes

Acknowledging the receipt of a complaint should be provided within three business days and where possible a resolution timeframe should be agreed with the complainant as soon as practicable (if it is unable to be resolved immediately).

The complexity of the complaint may help determine whether it should be managed initially as a Level 1 or 2 customer complaint, as per the customer complaint management model (section 5.1 above). A customer complaint would only be determined as a Level 3 customer complaint (external review) once all internal review processes had been exhausted.

The table below outlines customer complaint target resolution timeframes based on their complexity. Rationale for departures from these targets are to be communicated to the complainant and revised resolution timeframes agreed proactively.

<b>Simple</b>	A customer complaint which is able to be resolved early at the point of first contact.	Resolved immediately at point of service.
<b>Standard</b>	A customer complaint which may have more than one simple issue and requires further information and/or consultation to resolve.	Resolved within 10 business days of receipt.
<b>Complex</b>	A customer complaint that has multiple complex issues and/or is serious in nature and usually requires a formal investigation.	Resolved within 30 business days of receipt.

## 5.4 Managing the Complaint

The business area managing the customer complaint should promptly acknowledge the complaint and assess it using the complaint management model and complexity classifications to determine the most appropriate way to manage it through to resolution.

Complainants should be advised, as soon as practicable, where the business area is unable to deal with part or all of the customer complaint. The complainant can request for their complaint to be escalated to a Director at any time if they are dissatisfied with a resolution.

The business area must manage the complainant's expectations, including advising complainants about:

- The customer complaint process.

- Expected timeframes, including revised timeframes where relevant.
- Possible or likely outcomes where practicable.
- Customer complaints must be managed in an objective, equitable and unbiased manner.

The business area must provide explanations for any decisions made in response to the customer complaint.

## 5.5 Maintenance and Improvement

The use and maintenance of customer complaint records is the responsibility of the agency, and by proxy, the business area which receives, manages, and records the customer complaint.

Local processes must be capable of recording and reporting of information to assess, classify and analyse customer complaints to identify systemic, recurring, and single incident problems and trends.

Business Areas must conduct an analysis of aggregate local customer complaint data at least once a year to identify trends and themes in customer complaints to inform improvements to service delivery, policy, and operations.

Business Areas must review implementation of local processes at least every year to assess their effectiveness, efficiency, and satisfaction of complainants with the complaint management system.

Regular monitoring (including auditing and reviewing) of the agency's CMS as well as local processes will be coordinated by the agency's Corporate Services Manager.

## 5.6 Privacy

The agency must comply with the nine National Privacy Principles from the *Information Privacy Act 2009* (IP Act) when dealing with personal information. This necessarily includes dealing with personal information when administering a customer complaint. The obligations include the agency:

- only collecting personal information necessary to the administration of the complaint;
- informing parties to a complaint about the flow of personal information involved in the agency's administration of the complaint;
- storing personal information to prevent unauthorised access, use, modification and disclosure;
- taking reasonable steps to ensure the personal information is accurate, complete and up-to-date before use;
- not using personal information obtained in the complaints process for secondary purposes; and
- ensuring limited disclosure of personal information obtained in the complaint process to third parties.

Local processes should be assessed to identify whether they require a Privacy Impact Assessment (PIA). The Queensland Government's Privacy Impact Assessment Threshold Assessment tool can be used to determine whether a PIA is required.

## 5.7 Records

Local processes must comply with privacy and record keeping legislation, policy and principles. The agency is supported by the Corporate Administration Agency which can assist to appropriately record and report on complaints.

Comprehensive and timely recordkeeping is central to effective complaint management.

The *Public Records Act 2002* requires that departments/agency's make and keep full and accurate records of their activities.

The business area responsible for managing the customer complaint must ensure accurate records are made and kept for as long as they are required.

Customer complaints must be recorded with supporting information and assigned a unique identifier.

A public record can only be disposed of with the consent of the State Archivist, and with Director-General (or authorised delegate) approval in accordance with the Queensland State Archives General Retention and Disposal Schedule.

## 5.8 Minimum Data and Reporting Requirements

The agency has adopted the minimum complaint data requirements as outlined in AS/NZS 10002:2022. The following information must be collected for each customer complaint:

- Date complaint received.
- Complainant's name, address and contact details.
- How complaint was received or referral source.
- Who is handling the complaint.
- Dates/methods of follow up contact with complainant.
- Primary reason or cause of the complaint.
- Outcome (including 'no further action' or 'further action') and any remedies provided as a result of the complaint.
- Date complaint finalised.

Section 219a (3) of the *Public Sector Act 2022* requires the agency to publish the following information for the financial year by 30 September each year:

- The number of customer complaints received.
- The number of those complaints resulting in further action (see definitions).
- The number of those complaints resulting in no further action (see definitions).

Section 97 of the *Human Rights Act 2019* requires the agency to publish the following information in its annual report:

- Details of any actions taken during the reporting period to further the objects of the *Human Rights Act 2019*.
- Details of any human rights complaints received by the agency, including the number of complaints, the outcome of the complaints and other information prescribed by regulation.
- Details of review of policies, programs procedures, practices or services undertaken in relation to their compatibility with human rights.

The agency's Chief Executive is to provide an annual assurance statement to the Health and Wellbeing Board:

- The data outlined above as per legislative requirements.
- A summary of the trends, themes and proportion of complaints resolved within timeframes.
- Information about how HWQld's roles and responsibilities are discharged in relation to maintenance and improvement.

Divisions may be asked to report on other customer complaint related information to the Chief Executive (or delegate) from time to time.

## 6. Roles and Responsibilities

### Chief Executive

- Ensuring that a customer complaint management policy is established and maintained within the agency.



- Cultivating a customer focus throughout the agency.
- Appointing a senior executive (Senior Complaint Executive) with overall strategic responsibility and authority for customer complaint management within the agency.

### **Senior Complaint Executive**

- Ensuring staff are aware of the customer complaint management policy.
- Ensuring information about the customer complaint management process is easily accessible to members of the public and is communicated in an easy to understand manner.
- Overseeing the process for performance monitoring, evaluation and reporting on customer complaint management.
- Publication of the agency's complaints management data per s219A of the *Public Sector Act 2022* as required by 30 September each year.
- Provide advice and guidance on the customer complaint management system.
- Reporting to senior management and other relevant stakeholders on the effectiveness of and compliance with the complaint management system.

### **Corporate Services Manager**

- Ensuring local processes are implemented which are compliant with the requirements of the agency's complaint management policy and CMS.
- Ensuring staff are aware of the agency's customer complaint management process, the CMS and its intent and objectives.
- Ensuring staff handling customer complaints are appropriately trained and/or skilled and experienced.
- Where required, ensuring information about local process is easily accessible to staff.
- Ensuring there are processes in place to review trends and themes in customer complaints and the effectiveness and efficiency of local processes to inform annual maintenance and improvement activities.
- Ensuring there is a database or complaints register for recording customer complaint data. Refer to Complaints Management System log.
- Ensuring customer complaint data and related information is prepared for annual data reporting and publication as per s219A of the *Public Sector Act 2022*.

### **Staff Handling Complaints**

Generally, the Corporate Services Manager will handle complaints and should:

- Ensure complaints are managed according to the agency's customer complaint management policy and local processes, where applicable.
- Ensure the complaint is promptly acknowledged, assessed and resolved in a timely manner.
- Participate in training and have knowledge of customer complaint management processes relevant to their role and business area.
- Ensure minimum customer complaint data is captured and recorded.
- Treat complainants in a respectful and courteous manner.
- Be able to identify and effectively respond to people's support and communication needs and preferences in accordance with the principle of "Visibility, Transparency and Access".
- Ensuring the timely and appropriate notification to senior management of any significant customer complaints or systemic issues identified through complaints.

## All Staff

All staff in the agency should:

- Be aware of the agency's customer complaint management policy.
- Be aware of their business area's local processes, where applicable.
- Be aware of the value of complaints and feedback generally to the agency.
- Be aware of their roles, responsibilities, and authorities with respect to complaints.
- Be aware of the procedures to follow and the information to provide to complainants.
- Know how to recognise a customer complaint and have a general awareness of the various complaint types (e.g., customer, staff, corrupt conduct).

## 7. Legislation

- *Public Sector Act 2022*
- *Information Privacy Act 2009*
- *Public Records Act 2002*
- *Health and Wellbeing Queensland Act 2019*
- *Human Rights Act 2019*

Health and Wellbeing Queensland is committed to respecting, protecting, and promoting human rights in its decision-making and actions pursuant to the *Human Rights Act 2019*. This policy has been developed with reference to compatibility with human rights.

## 8. Supporting documents

- Health and Wellbeing Queensland Financial Management Practice Manual
- Health and Wellbeing Queensland Privacy Policy
- Health and Wellbeing Queensland Public Interest Disclosure Policy
- AS/NZS 10002:2022 Guidelines for complaint management in organisations
- Queensland Ombudsman's online Policy and Procedure Guide.



## 9. Definitions

Term	Definition
Complaint	Expression of dissatisfaction made to, or about, the agency, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
Complainant	Person, organisation or their representative (including clients, consumers, service users, customers, etc.) who is apparently directly affected by the service or action of the agency, making a complaint.
Customer Complaint	<p>A complaint about the service or action of an agency, or its staff, by a person who is apparently directly affected by the service or action.</p> <p>It includes, for example, a complaint about any of the following:</p> <ul style="list-style-type: none"> <li>a decision made, or a failure to make a decision, by a public service employee of the agency;</li> <li>an act, or failure to act, of the agency;</li> <li>the formulation of a proposal or intention by the agency;</li> <li>the making of a recommendation by the agency;</li> <li>the customer service provided by a public service employee of the agency.</li> </ul>
Complaints Management System (CMS)	The systems, processes and procedures used to manage customer complaints. The CMS must comply with the requirements outlined in the Australian Standard.
Customer	A consumer of the agency's products and/or services. This definition applies to both external customers (e.g. the public) and internal customers (e.g. employees, contractors and consultants).

## Version control

Version	Date	Comments
V0.1	31 March 2021	New policy
V0.2	16 January 2024	Updated by Senior Coordinator, Board and Executive Services