

# Customer Complaints Management Policy and Procedure – PPO-0033

## Scope

Applies to all QLeave employees.

## Purpose

To provide a consistent approach for managing customer complaints and to ensure the customer complaints system is aligned to the Queensland government framework, guidelines and the *Public Sector Act 2022* (PS Act).

## Policy Statement

QLeave is committed to providing high quality customer service and is committed to the effective and timely resolution of complaints. Customer feedback and complaints provide an opportunity to improve service delivery.

## Responsibilities

### Complainant

- Provide all relevant information regarding their complaint to QLeave, including details of the issue and what outcome is being sought.
- Cooperate with QLeave staff in a considered and respectful manner. QLeave reserves the right to take appropriate action to manage a customer's impact on the wellbeing or safety of its staff.
- Inform QLeave of any circumstances or changes affecting the complaint submitted, including if the complaint may be withdrawn.
- If requesting an internal review of a decision or outcome the subject of a complaint, do so within 20 business days of receiving notification of the complaint outcome.

### QLeave employees

- Ensure complaints are managed and resolved promptly, in a respectful, impartial and professional manner.
- Guide customers wishing to lodge a complaint to the complaints page on QLeave's website and/or register the complaint in QLeave's customer complaints register via the service desk portal.
- Ensure customer complaints are registered in QLeave's customer complaints register via the service desk portal and any applicable records are maintained in QLeave's records management system.
- Ensure relevant feedback that may cause a risk or could assist with improving the customer experience or service delivery improvements are escalated to the relevant manager.

### Managers

- Ensure customer complaints referred to their teams are managed and resolved in a timely manner and in line with this document.
- Ensure the customer is kept informed throughout the complaint management process.

<b>Version number:</b> 2.0	<b>Version effective:</b> 31.01.2024	<b>Next scheduled review:</b> 31.01.2025
<b>Document ID:</b> PPO-0033	<b>Approved by:</b> General Manager	<b>Content owner:</b> Policy and Resolutions

- Provide regular status updates on the progress of complaints to the Policy & Resolutions team (P&R team), as requested.
- Identify whether any complaints raise larger issues that may impact on QLeave's risk management framework and make recommendations to their Director regarding possible improvements.
- Support and empower staff to resolve complaints, and support those who may be the subject of a complaint.
- Ensure written responses and outcome letters to complainants are approved in accordance with QLeave's Delegations and Authorisations Manual.

### **Policy & Resolutions team**

- Coordinate and monitor complaints registered on QLeave's complaints register to ensure complainants have received an acknowledgement and that the complaint is managed and resolved by the applicable business unit.
- Provide advice, training and guidance to business units about complaints management.
- Arrange for the publishing of annual complaints data on QLeave's website, as required by the PS Act.
- Provide internal reports on customer complaints on a regular basis, or as required to the Executive Leadership Team (ELT).

### **General Manager**

- Approve QLeave's annual customer complaints report to be published on QLeave's website, as required by the PS Act.
- Reinforce QLeave's commitment to responding to and learning from complaints.

## **Procedure**

### **1 Customer complaints**

A customer complaint is an expression of dissatisfaction about a service or action by QLeave or its employees where the customer is directly affected by the service or action. It will be considered a customer complaint if the complainant is dissatisfied with the service or action of QLeave or its staff, the complainant is directly affected by the service or action, and some outcome is sought. A complainant may also express dissatisfaction about a decision made, or a failure to make a decision.

Matters that are not considered customer complaints include where the customer is:

- requesting more information
- requesting a change in service or requesting a new service
- making a suggestion to improve QLeave services
- expressing a concern about a situation
- not directly affected by the decision or action of QLeave
- providing information (for example, reporting an incident).

The following are also not customer complaints and will be managed using different procedures:

- complaints about certain decisions under legislation that may be considered by an internal review process
- QLeave employee grievances
- information privacy complaints
- corrupt conduct
- ministerial requests
- public interest disclosures.



Customer complaints provide an opportunity for QLeave to take action to improve the customer experience or to improve service delivery. QLeave customers or members of the public can make a complaint to QLeave.

QLeave's customer complaints system encompasses all aspects of any policies, procedures, practices, staff, systems and resources used in the management of customer complaints and are outlined throughout this document.

## 1.1 Customer complaints register

Any matters received and assessed as being a customer complaint must be recorded on the customer complaints register. The customer complaints register records the nature of the complaint, time taken to resolve the complaint, and any further actions.

Customer complaints data is reported on a regular basis (e.g. at least monthly) to the ELT to inform decision-making activities, such as risk management, strategic and operational planning, and to drive service delivery improvements. QLeave must also publish its annual customer complaints data on its website, as required under section 264 of the PS Act, to show:

- the number of customer complaints received by QLeave during the financial year;
- the number of those complaints resulting in further action; and
- the number of those complaints resulting in no further action.

## 2 Complaints handling

QLeave aims to resolve complaints early and at the first point of contact where possible and complaints are typically handled by service delivery areas. Some complaints may be resolved through escalation to a supervisor and some intermediary steps. Most complaints will have early resolution. If a complaint remains unresolved and requires further investigation or actions, it should be formally registered.

### 2.1 Receive and acknowledge

A complainant may provide feedback, raise an issue, or a complaint with QLeave. This may occur in writing, online, over the phone, or in person. Where appropriate the complainant should be referred to lodge their complaint in writing using the online form on QLeave's website. The P&R team coordinate and allocate any complaints received to the relevant business areas for resolution.

If the matter is not a customer complaint, it must still be actioned, but it will either be dealt with as standard correspondence or under a different approach including as outlined within an applicable policy and procedure.<sup>1</sup>

If a complaint is received by a QLeave employee and cannot be resolved through early resolution such as immediate action or escalation, it is to be added to the customer complaints register.

The respective business unit must provide acknowledgement to the complainant within three business days of receipt of the complaint. Acknowledgement can be provided verbally or in writing and should usually be in the same format that the complaint was received. Details of any verbal acknowledgements should be documented in the customer complaints register.

### 2.2 Communicate, assess and resolve

After the acknowledgement of a complaint, the person handling the complaint should seek to understand the matter to work towards resolution. The customer complaint should be assessed to determine the best way to resolve it by:

- identifying the complaint issue or issues
- identifying relevant benchmarks, standards or criteria to assess the complaint against (for example, legislation, policies, or procedures)

---

<sup>1</sup> For example, a policy and procedure relevant to the matters outlined at 1, above, that fall outside of the definition of a customer complaint.



- gathering relevant information or documentation, including from the complainant or QLeave systems.

The complainant should be contacted by the employee handling the complaint if additional information is required to confirm the complaint issue/s or the outcome sought. The complainant should be provided with information about the customer complaints management process, such as expected timeframes, complainant responsibilities or delays to resolution.

In accordance with Queensland Government guideline timeframes, the customer complaint should receive a final response within 30 business days of receipt. However if a complaint is determined to be of a complex nature and is unable to be resolved within the 30 business days, the person responsible for resolving the complaint must keep the complainant informed of any changed or continued delays. Status updates should be provided to the complainant, preferably fortnightly or at least at 30 day intervals, with a summary of the contact recorded in QLeave's records management system.

A customer complaint may be resolved by:

- providing an explanation to the complainant about a decision or action, and the reasons, if not previously provided
- providing information and options regarding the complainants' potential ability to have certain decisions reviewed via an internal review, if applicable
- acknowledging the customer complaint and concluding that the customer complaint has been substantially resolved (for example, if the decision complies with legislation, or policies or procedures of QLeave) or other relevant action taken
- upholding the customer complaint and implementing specific action, such as overturning a decision, giving an apology, updating website information, or providing a service not previously provided
- addressing or referring the issue for system improvement.

Procedural fairness must be afforded to a person who is the subject of the customer complaint, and the complainant. This includes giving the complainant an opportunity to be heard, considering relevant evidence, avoiding conflicts of interest and providing reasons for a decision.

The P&R team will record appropriate notes in the register throughout the assessment and resolution phase. The P&R team and the person handling the complaint will also assess the complaint for human rights with reference to Part 2 of the *Human Rights Act 2019* (Qld) by considering the following questions:

- Are any human rights engaged or impacted by the decision or action complained about?
- If so, did the decision or action being complained about limit those human rights?
- If so, was the limitation lawful, justified and reasonable in the circumstances?

The QLeave employee must document their assessment and decision-making process for human rights complaints and save the documentation in the register and QLeave's records management system.

### 2.3 Outcome

The employee handling the complaint must advise the complainant of the outcome following the assessment and resolution process. This should include:

- a clear explanation of the final decision or outcome
- any recommendations and actions to be undertaken by QLeave as a result of the complaint, if applicable
- a clear outline of both internal and external review<sup>2</sup> options available to the complainant, including the timeframe for lodgement of any internal review of a complaint outcome request (20 business days, in writing).

---

<sup>2</sup> Where potential information privacy and human rights issues arising during review of the customer complaint, complainants should be advised that an external review/oversight in relation to these issues may be available to a complainant prior to completion of an internal review process.



The complaints officer must ensure they keep appropriate records about the information provided to the complainant. This should be stored in the register and QLeave's records management system.

## 2.4 Close

On closing the complaint in the customer complaints register, the P&R team will note the complaint outcome and whether any further action applied to the matter or not, along with whether the complaint involved or impacted a complainant's human rights. This is necessary for annual reporting requirements.

If further action or activities, such as a business improvement, are recommended, the relevant Manager is responsible for implementing and monitoring the recommended action, or referring the matter to another responsible Manager for attention.

## 3 Internal review of a complaint outcome

If the complainant is dissatisfied with the outcome of their customer complaint and/or the way the customer complaint was handled by QLeave, the complainant can request an internal review of a complaint outcome. This request should be submitted in writing within 20 business days of receiving the complaint outcome, however any requests received outside this period will still need to be considered when there are reasonable grounds to do so or exceptional circumstances (e.g. illness, natural disaster, or other circumstances impacting the ability to submit the request sooner). The complainant should clearly outline why the internal review is being requested, along with what outcome/s is being requested by the complainant.

The internal review is a merits-based review to assess and consider all aspects of the initial complaint, including the outcome itself and the way in which the complaint itself was handled. Any internal review of a complaint outcome will need to be conducted by an appropriate officer, either at the same level or higher than the original decision maker and independent from the original process. The P&R team will coordinate the allocation of the complaint by seeking endorsement from relevant Director/s.

Once completed, the outcome of the review is to be communicated to the complainant with reference to an external review if there is still dissatisfaction with the internal review outcome.

## 4 External review

A complainant can seek an external review. This may include circumstances where the complainant remains dissatisfied after an internal review of a complaint outcome is provided.

The employee who has been assisting the complainant, must provide the complainant with the details of relevant external review agencies should they be considering submitting an external review. Relevant agencies may include the Queensland Ombudsman, Office of the Information Commissioner, or the Queensland Human Rights Commission.

If an external review has been submitted and accepted by another agency, further information may be sought from QLeave to enable an external review to be conducted. The customer complaints register should be updated to note this has occurred.

## 5 Monitoring and review

QLeave's customer complaints management system is to be reviewed annually to ensure it continues to meet the needs and requirements for the organisation and customers. Information to inform the review may include:

- feedback from customers and staff
- the results of internal or external audits, or evaluations
- any changes in policy, legislation or organisational structure.

## Legislation

- *Human Rights Act 2019*
- *Public Records Act 2002*
- *Public Sector Act 2022.*



## Other related documents

- Complaint status and outcomes - what can you tell complainants? (Guideline issued by the Queensland Office of the Information Commissioner)
- Guidelines for complaint management in organisations – Australian standard (ISO 10002:2022)
- How to deal with unreasonable client behaviour policy and procedure – PPO-0029
- Queensland Public Service Customer Complaint Management Framework
- Queensland Public Service Customer Complaint Management Guideline.

## Definitions

Term	Definition
<b>Complainant</b>	A complainant is a customer for the purposes of the customer complaints management policy and procedure, if they are directly affected by the issue they are complaining about, or they are the authorised person of someone who has been directly affected (e.g. a spouse complaining on behalf of a worker). A complainant may be an individual, organisation or their representative.
<b>Customer Complaint</b>	Under subsection 264(4) of the PS Act a customer complaint means a complaint about the service or action of a public sector entity, or its staff, by a person who is apparently directly affected by the service or action. Examples include a complaint about: <ul style="list-style-type: none"> <li>• a decision made, or a failure to make a decision, by a public sector employee of the public sector entity;</li> <li>• an act, or failure to act, of the public sector entity;</li> <li>• the formulation of a proposal or intention by the public sector entity;</li> <li>• the making of a recommendation by the public sector entity;</li> <li>• the customer service provided by a public sector employee of the public sector entity.</li> </ul>
<b>Customer Complaints Management System</b>	Encompasses all aspects of the policies, procedures, practices, staff, systems and resources used by QLeave for the management of customer complaints.
<b>Customer Complaints Register</b>	A system or platform used to capture customer complaint information and data, including complainant details, timeframes and outcomes.
<b>Customer</b>	A customer may be an individual, organisation or their representative and uses QLeave's services or may have obligations to QLeave. Customers may include members of the public, workers, employers, or levy payers.
<b>External review</b>	A formal process conducted by an external review body (e.g. Queensland Ombudsman, Office of the Information Commissioner Queensland Human Rights Commission) to ensure that QLeave's decision making is fair and reasonable and that proper procedures are followed in making decisions including internal review decisions.
<b>Feedback</b>	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about QLeave, its products, services, staff or its handling of a complaint. Feedback is not a complaint.
<b>Further action</b>	Refers to where a complaint requires further actions or steps to resolve. This may include: <ul style="list-style-type: none"> <li>• requires an internal review or assessment; or</li> <li>• results in changes to QLeave's policies, procedures or practices; or</li> </ul>



Term	Definition
	<ul style="list-style-type: none"> <li>is referred for external review (e.g. Queensland Ombudsman, Office of the Information Commissioner or Queensland Human Rights Commission).</li> </ul>
<b>Human Rights complaint</b>	<p>A complainant can make a human rights complaint if QLeave has:</p> <ul style="list-style-type: none"> <li>acted or made a decision in a way that is not compatible with human rights; or</li> <li>failed to give proper consideration to a relevant human right when making a decision.</li> </ul> <p>A complaint can still be a human rights complaint irrespective of whether the complainant raises any potential human right impacts. The onus rests with QLeave to assess whether any human rights are impacted for every complaint received.</p>
<b>Internal review of a complaint outcome</b>	<p>A formal process conducted by an appropriate person which seeks to establish whether the complaint outcome reached was correct and reasonable and that the customer complaints management process was followed. An internal review must be conducted by an officer of equal or higher position and independent from the original customer complaint.</p>
<b>No further action</b>	<p>A complaint resolved at the point of service or resolved without requiring any further action.</p>
<b>Resolution</b>	<p>A complaint is resolved when the issue or matter raised by the complainant is dealt with by QLeave in line with its Customer Complaints Management processes. The resolution of a complaint may not be to the satisfaction of a complainant.</p>
<b>Unreasonable complainant behaviour</b>	<p>Conduct is likely to be unreasonable where it involves actions or behaviours which because of its nature or frequency, raises substantial health, safety, resource or equity issues for QLeave's staff, other service users or the complainant themselves. Examples include:</p> <ul style="list-style-type: none"> <li>the use of inappropriate language, whether verbal or written</li> <li>unnecessarily lengthy or excessive correspondence</li> <li>a client exhibiting rudeness, anger, aggression and/or a refusal or unwillingness to cooperate</li> <li>expectation of unrealistic and unachievable outcomes</li> <li>refusal to accept decisions and resubmitting the same issues</li> <li>threats of harm to workers, themselves, or others.</li> </ul>

## Content Owner

For further information, please contact:

Principal Policy Officer, Policy and Resolutions team

policyresolutions@qleave.qld.gov.au

## Version Control

Version	Effective Date	Comments
1	15 June 2020	Document approved.
2	31 January 2024	Document updated to align to Controlled Documents Framework (CDF) and Queensland public service framework and guideline.

