

## Policy

# Complaints Management

## Purpose

The Department is committed to the highest standard of customer service and to managing feedback and complaints in a manner consistent with the principles of natural justice and equity of access. The Department values and encourages feedback and complaints and uses these to drive improvements to our practices, procedures and systems, and to assist us to evolve our customer service experience, services and behaviours.

This Policy provides a valuable mechanism for continuous improvement and development. This Policy conforms to the principles of the Australian/New Zealand Standard: Guidelines for Complaint Management in Organisations (AS/NZS 10002:2022) (the Standard), and the Ombudsman SA Complaints Management Framework and Department of the Premier and Cabinet Circular *PC039 Complaint Management in the South Australian Public Sector*.

## Scope

This Policy will apply to all areas of the Department, employees and contractors.

The Policy is applicable to all Department employees who may receive, manage, investigate and respond to complaints and feedback from members of the public. Where a fit for purpose alternative complaint and feedback policy and procedure for a Departmental group is implemented, the guiding principles of this policy are to be included.

This Policy, and the associated Procedure, comply with the Standard, and the Ombudsman SA Complaints Management Framework and Department of the Premier and Cabinet Circular *PC039 Complaint Management in the South Australian Public Sector*.

This Policy does not apply to complaints relating to administrative law, appeal decisions, judicial decisions, internal staff complaints, panel selection grievances, Freedom of Information determinations, official misconduct or matters relating to the *Public Interest Disclosure Act 2018*. Matters concerning the conduct and practices of public officers and public authorities in relation to corruption must be reported to the Office for Public Integrity. Matters concerning the conduct and practices of public officers and public authorities in relation to misconduct and maladministration, can be reported to the Office for Public Integrity or Ombudsman SA.

This Policy also establishes a protocol for trends in numbers and types of feedback, complaints and compliments to be reported and assessed on an annual basis.,.

Overall, results show mature agencies have:

- dedicated complaints and customer experience models with agency leadership
- regularly tested understanding of customer needs
- integrated complaints management into wider customer experience program

- regular training and upskilling for frontline staff
- investments in technology to keep clear records of complaints with trends analysed on a regular basis; and
- KPI targets including the customers effort/experience process quality.

## Policy detail

The Department is committed to managing feedback, complaints and compliments in a manner which is fair, courteous and respectful. The Department will promote a culture that values complaints by establishing and managing an effective customer service system that links service delivery improvements directly to feedback.

This Policy establishes a uniform approach in the management of feedback, complaints and compliments across the Department, including outlining staff responsibilities in managing feedback and complaints. It also aims to improve access for Aboriginal people, people from culturally and linguistically diverse communities, people with disabilities, and people from vulnerable and disadvantaged groups, and enhance the transparency and responsiveness of the complaint handling process.

### 1. Complaints

The *Code of Ethics for the South Australian Public Sector* requires all public-sector employees to comply with the principles and values of public sector behaviour. Public officers are to exhibit the highest standards of professional conduct in undertaking their duties.

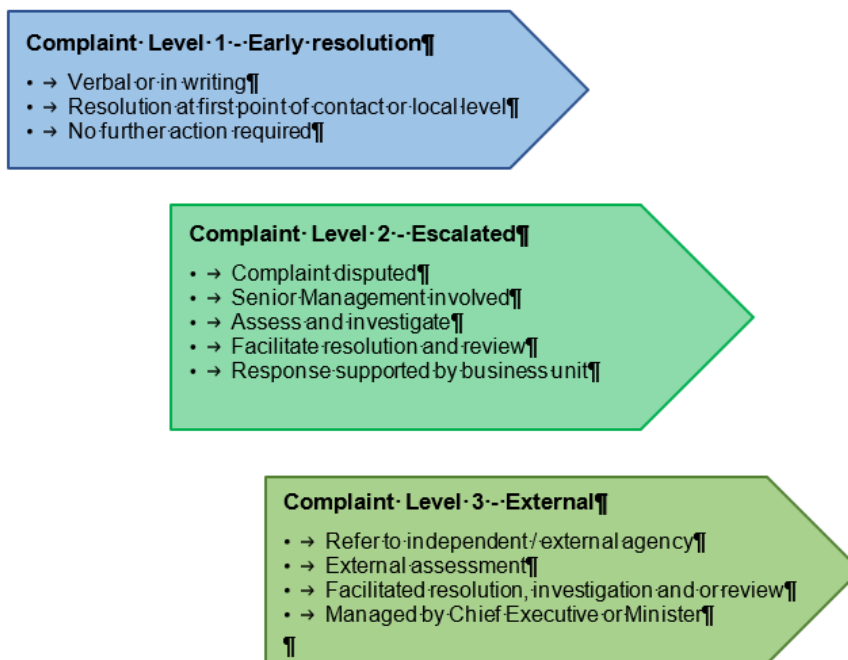
The Department values complaints as it allows us to identify areas for improving our processes and services and focus on ensuring our customers have the best experience possible when dealing with us.

People making complaints or providing feedback to the Department will be:

- provided with information about the process on our website
- provided with multiple and accessible ways to make complaints:
  - online feedback form
  - email
  - post
  - telephone; and
  - personal appointment.
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate
- provided with updates as to the progress of their complaint; and
- provided with reasons for our decision/s and any options for redress or review.

Business units across the department manage complaints and feedback received directly, ensuring they are referred to the appropriate officer for investigation, resolution and reporting on outcomes for continuous improvement.

The Department follows the three-level model detailed below for handling feedback and complaints. It aims for resolution of complaints at Level 1, wherever possible.



## 2. Feedback/Complaint Handling Process

Department employees may need to provide additional support to customers who are Aboriginal, from culturally and linguistically diverse communities, with disabilities, or from vulnerable and disadvantaged groups. During the complaint management process, employees should be sensitive to the individual requirements of the customer.

Complaints can be made or assisted by another person or organisation, e.g. an advocate, family member or community representative. Aboriginal customers can be offered a call back or personal interview from one of the Department's Aboriginal employees.

The Complaints and Feedback page on the Department website provides information on how to make a complaint, what to expect during the process, and options available for making complaints, including the Interpreting and Translating Service and the National Relay Service.

There are five major stages in the feedback/complaint handling process:

1. Receive the feedback/complaint
2. Assess the feedback/complaint
3. Investigate the feedback/complaint
4. Resolve, respond and record the feedback/complaint; and
5. Continuous improvement of services and processes.

### 3. Receipt of Feedback/Complaint

Online complaints will receive an automatic acknowledgement upon submission. Complaints made by other means will be acknowledged within three working days using the customer's preferred method.

The Department aims to resolve complaints within 10 working days wherever possible. Where the complaint is more complex and additional time is required for research and/or consultation, the Department will contact the customer and provide an interim response and an indication of the additional time required to provide a final response.

Details of all complaints and feedback will be recorded by each business unit. As some business units receive minimal complaints, these are recorded centrally by the Office of the Chief Executive.

### 4. Assessment of Feedback/Complaint

Complaints and feedback received via the specific contact details provided on the website, will be assessed by nominated staff and referred to the appropriate business unit for actioning.

Any complaints or feedback received directly by a business unit will be assessed to determine if the issue raised is the responsibility of their business unit. If it is their responsibility, the business unit will action the complaint using the complaint handling process. If the issue is the responsibility of another business unit, the employee will advise the customer and provide a handover to the relevant business unit.

### 5. Investigation of Feedback/Complaint

All complaints will be investigated in a manner that is objective, respectful and professional, in a way that upholds the *Code of Ethics for the South Australian Public Sector*, Departmental values, and the Principles and Standards outlined in this Policy.

The Department will communicate with the customer using their preferred method to gain or provide additional information, provide progress updates, and advise any extension of time required to resolve the issue.

If the initial investigation determines the complaint relates to corruption, misconduct or maladministration by a public officer, the customer will be referred to the Office for Public Integrity or Ombudsman SA or (for misconduct and maladministration only).

If the issue relates to an area where a 'whole of government' complaints management policy exists the customer will be referred to the administering body.

### 6. Resolution and Response of Feedback/Complaint

Once the investigation has been completed, the Department will contact the customer and provide them with the outcome of their complaint. This may include:

- the decisions made because of the investigation
- any actions taken by the Department

- reasons for taking the actions; and
- the options available to the customer if they are unhappy with the decisions.

Where appropriate, customers may be offered an apology for any inconvenience or harm caused resulting from the initial issue.

## 7. Further Action

Customers wishing to take the matter further following the completion of the Department investigation may request a higher-level review by the Department or make a complaint to an external body such as the Ombudsman SA. Accordingly, detailed records should be kept in the Complaints Management System, that show:

- how the complaint was managed
- outcomes from the investigation
- decisions, actions and recommendations made; and
- any outstanding actions requiring follow-up.

Implementation of this Policy will ensure the following standards are met:

- increase customer satisfaction with the Department's services
- a fair, efficient and transparent approach to handling feedback and complaints
- respect the privacy of the customer; and
- use customer feedback to improve processes and services.

## 8. Feedback and Compliments

The Department values feedback and compliments. These provide a valuable source of information for recognising service excellence and afford the opportunity to understand good practice or good service delivery in the Department via our customer feedback.

### 9. feedback received will be acknowledged and forwarded to the appropriate executive for notification. **Social Media**

Social media is a powerful tool to facilitate and enhance communication and learning, as well as build connected communities. It is a mechanism which enables public comment across a wide spectrum of view and opinions.

Social media platforms are not considered a suitable vehicle for complaint management responses. Any feedback or complaints received are to be acknowledged and directed to the Department's formal process.

## 10. Recording and Reporting

In accordance with the PC 013 – Annual Reporting Requirements, South Australian government agencies are expected to report annually on complaint and feedback data and to address system improvements planned for the next financial year.

Feedback, specifically complaints will be referenced in the Department's Annual Report and will include as a minimum:

- number of complaints received
- category of complaints received; and

- examples of service improvements made as a result.

All documentation regarding complaint and feedback management is to be retained in accordance with the *State Records Act 1997* and the details of the incoming complaint are to be recorded in an approved records management system – refer to the Department’s *Complaints Management Procedure*.

### 11. Use of Disclaimers

Matters not considered applicable to this Policy are complaints relating to administrative law, appeal decisions, judicial decisions, internal staff complaints, panel selection grievances, Freedom of Information Determinations, official misconduct or matters relating to the *Public Interest Disclosure Act 2018*.

Where an alternative whole of government Complaints Management Policy is mandated, this Policy is not applicable.

## Roles and responsibilities

Roles	Responsibilities
<b>Chief Executive</b>	<ul style="list-style-type: none"> <li>• Ensuring the management of feedback, complaints and compliments is consistent with this Policy</li> <li>• reporting on the number and type of complaints received each year and related service; and</li> <li>• improvements in the Department’s annual report in accordance with PC013-Annual-Reporting-Requirements.</li> </ul>
<b>Deputy Chief Executive, Chief Operating Officer and Executive Directors</b>	<ul style="list-style-type: none"> <li>• Ensuring the Complaints Management Policy and Procedure is visible, accessible, communicated and promoted throughout the Department</li> <li>• encouraging an environment where feedback and complaints are handled promptly and fairly</li> <li>• ensuring responses to complaints and feedback are signed by a senior officer within the business unit the complaint or feedback relates to</li> <li>• ensuring staff act in accordance with the Policy and Procedure</li> <li>• ensuring staff are supported and their obligations under the Policy and Procedure are communicated</li> </ul>



Roles	Responsibilities
	<ul style="list-style-type: none"> <li>ensuring staff are adequately resourced, trained and engaged to manage feedback, complaints and compliments; and</li> <li>where required, ensuring escalated and unresolved complaints are effectively managed.</li> </ul>
<b>Senior Executives, Directors and Managers</b>	<ul style="list-style-type: none"> <li>Ensuring an efficient management of feedback and complaints within their areas of control in accordance with the principles and standards as set out in this Policy and the related Procedure</li> <li>ensuring complaints are recorded in accordance with the Procedure, and data is provided for annual reports or as requested</li> <li>identify complaint trends to enable corrective action and prevent a problem from recurring</li> <li>appointing and empowering staff with the authority to resolve complaints quickly and effectively ensuring all complaints are responded to in an efficient and timely manner</li> <li>monitoring progress of the complaints handling process</li> <li>developing and implementing continuous improvements to services that are the cause of complaints; and</li> <li>providing support and advice to staff managing consumer complaints, including providing training and tools to manage complaints and feedback.</li> </ul>
<b>All employees</b>	<ul style="list-style-type: none"> <li>Treating complainants with respect</li> <li>respecting requests from a complainant that their complaint be handled confidentially or anonymously in accordance with Privacy Principles</li> <li>communicating with the complainant throughout the process to help avoid complaints escalating further</li> </ul>



Roles	Responsibilities
	<ul style="list-style-type: none"> <li>• complying with the principles of this Policy and ensuring complaints are operated in accordance with the associated Procedure</li> <li>• developing a good understanding of the ethical issues that might arise as part of their role, including (not limited to) conflict of interest, procedural fairness, confidentiality and privacy, fiduciary obligations and understanding their own responsibilities under the Policy</li> <li>• recording feedback, complaints and compliments in accordance with the Policy and Procedure and the Department's Record Management Policy; and</li> <li>• treating all complaints fairly and impartially in accordance with the obligation in the <i>Code of Ethics for the South Australian Public Sector</i>.</li> </ul>

## Related documents

- *AS/NZS 10002:2022 – Guidelines for complaint management in organisations* ('the Australian standard')
- *Ombudsman SA Complaint Management Framework*
- *PC013-Annual-Reporting-Requirements*
- *PC039 Complaint Management in the South Australian Public Sector*
- *State Records Act 1997*
- *Code of Ethics for the South Australian Public Sector*
- *Complaints Management Procedure*

## Terms and Definitions

Term	Definition
<b>Customer</b>	The people who receive or consume our services; they can be individuals or organisations who are directly affected by our services, policies or products. Customers can be internal or external to government.
<b>Complaint</b>	Expression of dissatisfaction about the service or action of a South Australian public-sector agency, or its staff, by a person or organisation that is directly affected by the service or action.
<b>Complainant</b>	Person, organisation or their representative (including clients, consumers, service users, customers, etc.) making a complaint.
<b>Complaint management system</b>	Encompasses all aspects of the policies, procedures, practices, staff, hardware and software used by an organisation for the management of complaints.
<b>Compliment</b>	An expression of praise, admiration or acknowledgement of professional service excellence.
<b>Dispute</b>	Unresolved complaint escalated internally or externally, or both.
<b>Feedback</b>	Any opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about the organisation, its products, services, staff or its handling of a complaint. Note that any such feedback can be chosen to be managed as a complaint.
<b>Public Officer</b>	Includes public sector employees and contractors performing contract work for a public authority or the crown.

## Principles and Standards

Principles	This means we will...
<b>1. People focus</b>	<ul style="list-style-type: none"> <li>Recognise and respect everybody's right to provide feedback.</li> <li>Adopt a people-focussed and proactive approach to seeking feedback and receiving complaints.</li> <li>Demonstrate a commitment to addressing feedback in a timely manner and without charge.</li> <li>Involve the customer in the process as far as is practicable and appropriate.</li> </ul>
<b>2. Remedies and communication</b>	<ul style="list-style-type: none"> <li>Attempt early, informal resolution and compromise wherever possible.</li> <li>Offer remedies that are fair to all parties, minimising the possibility of ongoing dispute.</li> <li>Notify customers of their internal and external review options.</li> <li>Communicate the reason behind a decision to the claimant, so they understand the facts and reasoning that formed the basis for the decision.</li> <li>Where a staff member has been named in a complaint or feedback, provide them with sufficient information to enable them to understand and respond to the complaint made against them.</li> </ul>
<b>3. Visibility and access</b>	<ul style="list-style-type: none"> <li>Seek and welcome feedback and suggestions to improve services proactively.</li> <li>Ensure clear information is available on the Department's website about how and where to make a complaint and how complaints are managed.</li> <li>Provide reasonable assistance to vulnerable groups or customers with special needs in making complaints.</li> <li>Recognise and address complaints provided anonymously, or through an authorised third party in the same manner as any other complaint.</li> </ul>
<b>4. Responsiveness</b>	<ul style="list-style-type: none"> <li>Promptly acknowledge each feedback, complaint and compliment.</li> <li>Ensure that the customer is aware of the process, timeframes, their likely involvement, the possible outcomes of the complaint and any other necessary information.</li> <li>Record and, track, the complaints process and timelines, in accordance with the <i>Complaints Management Procedure</i>.</li> </ul>
<b>5. Objectivity and fairness</b>	<ul style="list-style-type: none"> <li>Manage each complaint objectively, respectfully and fairly, in accordance with the principles of natural justice; and where conflicting interests do not interfere with, or are perceived to interfere with the management and resolution of complaints.</li> </ul>

Principles	This means we will...
	<ul style="list-style-type: none"> <li>Take all reasonable steps to ensure that a customer is not adversely affected.</li> <li>Operate from the view that a person who makes a complaint is entitled to a review of the issues raised and a considered response.</li> </ul>
<b>6. Privacy and disclosure</b>	<ul style="list-style-type: none"> <li>Personal information should only be disclosed or used according to relevant privacy laws/principles.</li> <li>All complaints should be treated in strictest confidence and only disclose information and the customer's personal information to officers who have a need to know.</li> </ul>
<b>7. Monitoring and reporting</b>	<ul style="list-style-type: none"> <li>Ensure accountability of the operation of the complaints management system is clear, including record keeping obligations.</li> <li>Collect and record data on complaints lodged and outcomes, to assist in the identification of system and recurring problems and /or potential improvement to service delivery and customer relations.</li> <li>Commit to using feedback as an essential tool for continuous improvement.</li> </ul>
<b>8. Resources and training</b>	<ul style="list-style-type: none"> <li>Ensure adequate resources (including training where required) are available.</li> <li>Empower staff to implement the Policy as appropriate.</li> </ul>

Concerns raised in feedback or complaints will be dealt with at first point of contact where possible. The Department is committed to and will adhere to the following:

Standards	This means ...
1.	We will ensure customers are able to easily contact / submit or provide a complaint or feedback verbally or in writing and include external reviews such as those undertaken by the South Australian Ombudsman's office.
2.	We will acknowledge written correspondence within three working days for all forms of feedback.
3.	We will log and record all feedback and complaints in the Department's Records Management System.
4.	We will resolve within 10 working days complaints that are not of a serious nature and/or not requiring extensive investigation or consultation.
5.	We will provide notice to a customer within 10 working days if there is a delay in responding and provide an explanation and timeline for when the matter is likely to be resolved. Regular updates on the progress of the complaint to be provided to the customer.
6.	We will adopt a customer focused approach and treat our customers with dignity and in an unbiased, non-discriminatory and fair manner.



7.	We will be accountable and undertake continuous and regular monitoring of data to use for service and training improvements.
8.	We will not disclose personal information or data in accordance with the State Government Information and Privacy Principles.
9.	We will undertake formal reviews every two years of the Complaints Management system to ensure consistency and best practice.

## Improvement

The Policy is designed to identify opportunities for improving customer's experience and satisfaction with the delivery of services.

Feedback, complaints and compliments data will be reviewed and analysed quarterly to:

- identify systemic issues to be addressed to improve performance
- identify trends and frequency of repeat complaints
- determine resolution of outcomes of complaints
- determine improvements to remedy issues; and
- identify areas of best practice and promote learning.

---

## Document control

Approved by: Tricia Blight	Title: Chief Operating Officer
Responsible person: Katrina Johnson	Title: Strategy and Governance Officer
Directorate: Office of the Chief Executive	Date of approval: 08/01/2025
Review number: 1.0	Date of review:
Next review date:	07/01/2028
	<i>Policies are to be reviewed every three years or earlier if required.</i>

---