



Customer complaints management policy

Version: 2.1 | Version effective: 07/01/2020

Audience

Department-wide

Purpose

This policy supports the Department of Education's (the department) obligations to implement a customer complaints management system that complies with the Australian/New Zealand Standard on complaints management (AS/NZS ISO 10002:2014 – Guidelines for complaint management in organisations).

Policy statement

The department is committed to effective and efficient customer complaints management. The department strives to manage customer complaints in an accountable, transparent, timely and fair manner that is compatible with human rights, and complies with the department's suite of customer complaints management resources:

- Customer complaints management [framework](#) and [procedure](#)
- [Internal review procedure](#)
- [Managing unreasonable complainant conduct procedure](#)

Principles

The department's customer complaints management principles are aligned to the guiding principles as set out in the Australian/New Zealand Standard on complaints management.

| Principle | What this means for the department |
|-----------------------|--|
| Customer focus | <ul style="list-style-type: none"> • Our customers, including children, have a right to complain and to not be adversely affected by their customer complaint. • All customers making a complaint are treated with respect. • Our actions and decisions consider, and are compatible with, the human rights of our customers. |

| Principle | What this means for the department |
|--|--|
| | <ul style="list-style-type: none"> The department proactively seeks and receives feedback and complaints from customers. |
| Accessibility and transparency | <ul style="list-style-type: none"> The department's customer complaints process is free and accessible. The department clearly displays information about how and where a customer complaint may be made on the department's website and at frontline service delivery locations. The department provides all reasonable assistance and support to make it easy for all customers, including children, to make a customer complaint. Customer complaints can be made anonymously. |
| Responsiveness | <ul style="list-style-type: none"> Customer complaints are acknowledged and responded to fairly, reasonably and in a timely manner. Customers are kept informed about the progress of their complaint, and advised about the outcome reached, reasons for the department's decision, and any review options available. Customer complaints are recorded and tracked, and timeframes for resolution are monitored. |
| Objectivity, fairness and equity | <ul style="list-style-type: none"> Customer complaints are managed objectively, without bias and in a way that is compatible with, and properly considers human rights. The department respects the confidentiality of personal information about the complaint and others involved in the complaint. Natural justice and procedural fairness are embedded in customer complaint management activities. If the complainant's conduct is unreasonable, the department may implement strategies to manage the conduct so the customer complaint can be productively resolved and staff welfare and wellbeing is protected. |
| Accountability, continuous improvement and prevention | <ul style="list-style-type: none"> The department uses formal, documented processes to manage customer complaints. Departmental resources are regularly reviewed to ensure relevance, accuracy and effectiveness. Customer complaints are recorded and data is regularly analysed to understand performance and drive improvement. Data is regularly reported internally and externally to ensure visibility of customer complaints trends and meet legislative reporting obligations. |

| Principle | What this means for the department |
|-----------------------------------|---|
| Staff training and support | <ul style="list-style-type: none"> The department trains staff to manage customer complaints in accordance with, the department's customer complaints framework, policy and procedures. A centralised departmental complaints coordinator is available to provide advice, support and guidance to staff involved in customer complaints management. |

Requirements

1. Complaints management system for customer complaints

Sections 219A(1)-(2) of the [Public Service Act 2008 \(Qld\)](#) requires the department to establish and implement a system for dealing with customer complaints. The department's system must enable the department to:

- manage the receipt, processing and outcome of a customer complaint
- comply with the Australian Standard for customer complaints management
- notify a complainant about the outcome of their complaint (unless the complaint was anonymous).

The department is also required to comply with section 46 of the [Education \(General Provisions\) Act 2006 \(Qld\)](#) for school complaints, and the [Human Rights Act 2019 \(Qld\)](#) for customer complaints that are also human rights complaints.

2. Customer complaints within and outside the scope of this policy

Only customer complaints are to be managed using the department's system for customer complaints. A complaint is a customer complaint if it involves an expression of dissatisfaction about the service or action of the department, or its staff, and the complainant is directly affected by the service or action. Examples include:

- a decision made, or failure to make a decision, by a departmental employee
- an act, or failure to act, of the department
- the formulation of a proposal or intention by the department
- the making of a recommendation by the department
- the customer service provided by a departmental employee.

The following are not customer complaints, so the department will manage these matters in a different way, using relevant legislation, policies or procedures:

- complaints under [Education and Care Service Act 2013 \(Qld\)](#) and the Education and Care Services National Law
- complaints about certain decisions made under legislation
- complaints about decisions made under a contract
- employee complaints about their employment ([Public Service Act 2008 \(Qld\)](#) and Public Service Commission Directives)

- corrupt conduct ([Crime and Corruption Act 2001 \(Qld\)](#))
- public interest disclosures ([Public Interest Disclosure Act 2010 \(Qld\)](#)).

The [Excluded complaints factsheet](#) contains more information about each excluded type of complaint.

3. The department's customer complaints handling approach

The department must manage customer complaints in accordance with the customer complaints management framework, policy and procedures. Under this approach, the department aims to resolve customer complaints quickly at the frontline or the point where the complaint is received. If the complainant is dissatisfied with the outcome of their customer complaint and/or the way their complaint was handled, they may request an internal review. If a complainant remains dissatisfied after an internal review, they may seek an external review.

The department's approach ensures:

- customer complaints are managed consistently and responsively
- risks are mitigated because trends and issues can be identified, and effective solutions can be put in place
- staff are empowered to resolve complaints promptly, effectively and efficiently.

4. Complainant rights and responsibilities

When managing a customer complaint, the department must appreciate and acknowledge that the customer has a right to:

- complain
- be treated with respect and courtesy
- be treated equitably and fairly
- be informed of the conduct that is expected of them.

Complainants have balancing sets of responsibilities, which the department should make the complainant aware of. These responsibilities are outlined in the [Customer complaints management, Internal review](#) and [Managing unreasonable complainant conduct procedures](#), and on the department's [website](#).

Complainant responsibilities of particular importance include that the complainant must work productively with the department so the customer complaint can be resolved, and the complainant's conduct must not be unreasonable. The department will not tolerate conduct that is abusive, threatening, unreasonable, vexatious, or makes inappropriate demands on the department's time, resources or staff. Staff safety and wellbeing is paramount and if complainant conduct creates an unacceptable risk, the department may discontinue contact with the complainant.

5. Recording and reporting

The Customer Complaints Management System (CCMS) is the department's enterprise system for recording and managing customer complaints received and resolved in regions and divisions. The CCMS complements the customer complaints management framework approach, and enables the department to identify trends and issues, and measure performance.

Customer complaints data must be reported quarterly to the Executive Management Board to inform activities, such as risk management and strategic and operational planning, and drive service delivery improvements.

The department must also publish its annual customer complaints data on its website, as required under section 219A(3) of the [Public Service Act 2008 \(Qld\)](#), to show:

- the number of customer complaints received by the department in the year
- the number of those complaints resulting in further action
- the number of those complaints resulting in no further action.

6. Monitoring and review

The department's customer complaints approach is to be reviewed at least every three years to ensure it continues to meet departmental needs and requirements. 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.

Definitions

| Term | Definition |
|---|--|
| Complaints management system | Encompasses all aspects of the policies, procedures, practices, staff, hardware and software used by an organisation for the management of complaints. |
| Complainant | A person, organisation or their representative/advocate making a customer complaint. A complainant is a 'customer' for the purposes of the customer complaints management framework if they are directly affected by the issue they are complaining about (e.g. a student complaining about something that has happened to them at school), or they are authorised representative of someone who has been directly affected (e.g. a parent complaining on behalf of their child). |
| Complaints requiring further action | A reporting status applied when the complaint is closed. This is used in departmental reporting. Customer complaints will require further action if the complaint: <ul style="list-style-type: none"> • is subject to internal review; • has resulted in changes to departmental policies, procedures or practices; or • is subject to an external review (e.g. by the Queensland Ombudsman). |
| Complaints requiring no further action | A reporting status applied when the complaint is closed. This is used in departmental reporting. Customer complaints require no further action if the department has resolved/finalised the complaint at the point of service and there is no request for further action by the complainant or others (e.g. Queensland Ombudsman or Queensland Human Rights Commission). |
| External review | A process conducted by an external review body (e.g. Queensland Ombudsman or Queensland Human Rights Commission) to ensure departmental decision-making is fair, reasonable and proper. |

| Term | Definition |
|---|---|
| Human rights complaint | <p>A complainant can make a human rights complaint if the department has:</p> <ul style="list-style-type: none"> • acted or made a decision in a way that is not compatible with human rights; or • failed to give proper consideration to a relevant human right when making a decision. |
| Internal review | <p>A process conducted by appropriately trained departmental staff on request from the complainant which examines if the complaint management process for the original customer complaint was appropriate and/or if the outcome reached was reasonable. An internal review is not a re-investigation of the original customer complaint.</p> <p>The department's Internal review procedure provides more information about the internal review process.</p> |
| Resolution | <p>A customer complaint is resolved when the issue raised is dealt with in line with the department's customer complaints management approach. The resolution may or may not be to the complainant's satisfaction.</p> |
| Unreasonable complainant conduct | <p>Conduct is likely to be unreasonable if it involves actions or behaviours which, because of the nature or frequency, raises substantial health, safety, wellbeing, resource or equity issues for the department, its staff, other service users or the complainant themselves. Examples include:</p> <ul style="list-style-type: none"> • unrelenting contact (e.g. excessive and unnecessary phone calls or emails) • demanding conduct (e.g. demanding more reviews than departmental procedures allow, or demanding a different outcome without showing the original decision was incorrect) • unreasonable lack of cooperation (e.g. refusing to identify the issue of complaint or providing disorganised information) • unreasonable arguments (e.g. making irrational claims) • unreasonable behaviour (e.g. aggression or violence to staff, or threatening harm to self and others) <p>The department's Managing unreasonable complainant conduct procedure provides more information.</p> |

Legislation

- [Public Service Act 2008 \(Qld\)](#) section 219A
- [Education \(General Provisions\) Act 2006 \(Qld\)](#) section 46
- [Human Rights Act 2019 \(Qld\)](#) part 2 and sections 58(1), 63, 97
- [Crime and Corruption Act 2001 \(Qld\)](#)
- [Public Interest Disclosure Act 2010 \(Qld\)](#)

- [Education and Care Services Act 2013 \(Qld\)](#)

Delegations/Authorisations

- [Delegation of Director-General's powers under Education \(General Provisions\) Act 2006](#) section 46

Policies and procedures in this group

- [Customer complaints management - Internal review procedure](#)
- [Customer complaints management - Managing unreasonable complainant conduct procedure](#)
- [Customer complaints management procedure](#)

Supporting information for this policy

- [Customer complaints management framework](#)
- [Excluded complaints factsheet](#)

Other resources

- [Enterprise risk management policy](#)
- [Enterprise risk management framework](#)
- [Managing employee complaints policy](#)
- [Early childhood education and care complaints management policy](#)
- [Managing employee complaints procedure](#)
- [Education Queensland International – Complaints and appeals](#)
- [Enterprise risk management procedure](#)
- [Student protection procedure](#)
- AS/NZS ISO 10002:2014 – Guidelines for complaint management in organisations
- [Guide: Customer complaints management and human rights](#)
- [Compliments, suggestions and customer complaints](#)
- [Customer complaints management](#) (DoE employees only)
- [Making a customer complaint – Information for parents and carers](#)
- [Child friendly complaint form](#)
- [Excluded complaints factsheet](#)
- [Complaints lifecycle guide – CCMS guide](#) (DoE employees only)

Contact

For customers who wish to make a customer complaint, please:

complete the form on the [Queensland Government – complaints and compliments webpage](#)
call 13QGOV (13 74 68) within Australia
call +61 7 3328 4811 (+10 hours UTC) for international callers
visiting one of [QGov's counters](#).

For departmental staff who would like more information about the framework, policy or procedures, please email customercomplaintsgs@qed.qld.gov.au

Review date

15/10/2022

Superseded versions

Previous seven years shown. Minor version updates not included.

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