



Procedure

Customer complaints management procedure

Version: 3.1 | **Version effective:** 25/01/2024

Audience

Department-wide

Purpose

This procedure outlines the responsibilities and processes for the consistent management of customer complaints across the Department of Education (the department).

Overview

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. Customer complaints are an opportunity to identify issues and take action to improve service delivery and customer experiences, and drive a culture of continuous improvement.

This procedure should be read in conjunction with the:

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

Not all complaints received by the department are customer complaints. Other complaints need to be managed in a different way. Refer to the department's [Complaints and grievances management policy](#) for additional information.

Some complaints or matters may meet the definition of a customer complaint but also engage other processes. If the matter meets the definition of a customer complaint it must be recorded as a customer complaint and included in departmental reporting. These complaint types include:

- complaints about harm, or risk of harm, to a student attending a state school which are dealt with in accordance with the [Student protection procedure](#)
- human rights complaints, if also a customer complaint, will be managed in accordance with this procedure

- privacy complaints, if also a customer complaint, will be managed under the [Information privacy breach and privacy complaints procedure](#).

Responsibilities

Complainant

- visit the department's [website](#) for information about complaint processes or lodge a customer complaint with the school or education centre, region or division
- provide all relevant information including a clear idea of the problem and the desired solution
- cooperate in a respectful way and be aware that unreasonable conduct will not be tolerated
- understand that complex customer complaints can take time to assess, manage and resolve
- be aware that some decisions cannot be overturned or changed using the Customer complaints management framework
- inform the department of changes affecting the customer complaint, including if help is no longer required
- request an internal review within 20 days of receiving the outcome of the customer complaint if dissatisfied with the way the complaint was handled or if the outcome is unreasonable.

All staff involved in managing customer complaints (complaints officers)

- manage customer complaints according to this procedure and the department's [framework](#), [policy](#), [Internal review procedure](#) and [Managing unreasonable complainant conduct procedure](#)
- direct customers to the department's [website](#) if they are seeking information about making a customer complaint
- decide if a customer complaint is frivolous or vexatious
- assess if a customer complaint also engages another process, such as privacy complaints
- consider human rights when responding to a customer complaint
- ensure confidentiality of personally identifiable information about the complainant or any other person involved in the complaint
- provide procedural fairness to complainants and persons who are the subject of the customer complaint
- keep an up-to-date customer complaint register
- resolve customer complaints promptly and in accordance with timeframes
- advise the complainant that they can seek an internal review within 20 days if they are dissatisfied with the way their customer complaint was handled or believe the outcome was unreasonable
- maintain appropriate records to support each step of the process and enable accurate departmental reporting
- participate in customer complaint management training and awareness activities.

Additional responsibilities for principals or deputy principals

- ensure information about how to make a customer complaint and how a complaint will be managed is available at the school or education centre (for example, information displayed in the reception or a

school complaints process on the school or education centre website). School resources can be found [here](#) (DoE employees only).

- escalate a request for an internal review to the regional office for management
- report to the regional director on customer complaints matters as required
- seek advice on [complex matters](#) and alternative dispute resolution (DoE employees only), as required.

Additional responsibilities for complaints officers in regional offices and central office divisions

- undertake internal reviews as an internal review officer in accordance with the [Internal review procedure](#)
- report to Strategy and Performance on customer complaints matters
- ensure information about how to make a customer complaint is available in the reception area
- review customer complaint information to inform improvements to service delivery.

Supervisors and managers

- provide support and advice to complaints officers and implement appropriate health, safety and wellbeing arrangements
- ensure staff are provided with initial and ongoing complaints management training and are empowered to resolve complaints.

Director-General

- publish annual customer complaints data on the department's website by 30 September
- ensure a commitment to responding to and learning from complaints as part of the department's continual quality improvement.

Customer complaints coordinators, Strategy and Performance

- maintain customer complaints management resources
- provide system administration support for the Customer Complaints Management System (CCMS)
- manage quarterly and annual customer complaints and human rights reporting
- provide advice and guidance to staff involved in customer complaints management
- review customer complaints management activities to identify opportunities for better practice
- organise training to ensure staff understand the department's customer complaints management approach and their responsibilities
- seek and action feedback about the customer complaints management approach from complainants and staff.

Process

The department's approach to handling customer complaints is based on the Australian/New Zealand Standard (AS/NZS ISO 10002:2022 – Guidelines for complaint management in organisations).

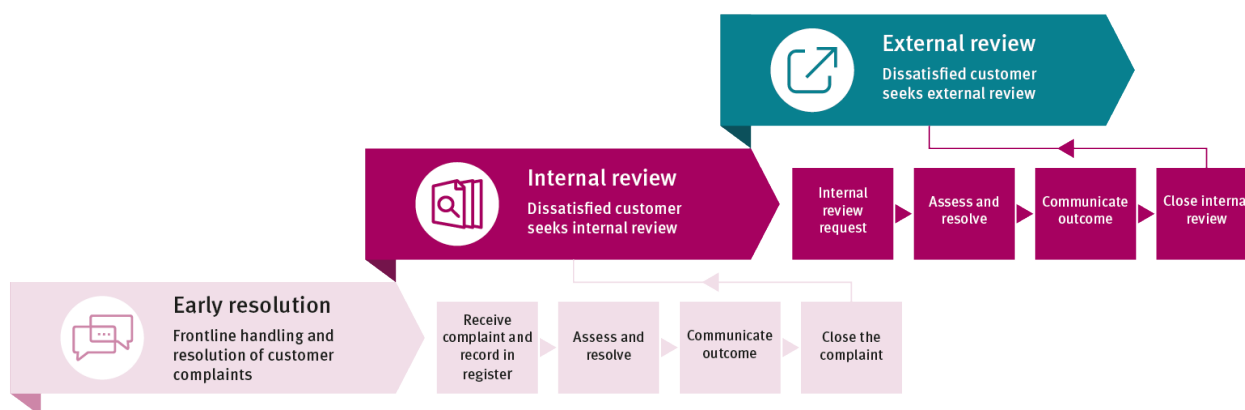


Image 1 Process review flowchart

1. Early resolution

Receive complaint, record in register and provide acknowledgement

- The complainant will raise an issue with the department, either in writing, over the phone, or in person.
 - The complaints officer should provide any necessary assistance to the complainant, including assisting those who may be vulnerable due to factors such as age, disability, location or issues accessing digital services, and offer support such as directing the person to interpreter services or support agencies or supporting the complainant to document the complaint.
- The complaints officer must decide if the issue is a [customer complaint](#).
 - It will be a customer complaint if all criteria below are met:
 - the complainant is dissatisfied with the service or action of the department or its staff
 - the complainant is directly affected by the service or action; and
 - some outcome is sought.
 - It will not be a customer complaint if the customer is:
 - requesting more information
 - requesting a change in services or requesting a new service
 - making a suggestion for improving the department's services
 - providing feedback on the department's performance
 - not directly affected by the decision or action of the department
 - providing information (for example, reporting an incident).
- If the issue is a customer complaint, the complaints officer must record the customer complaint in the register. Protected information must not be entered into the register.
 - Refer to the [Information security procedure](#) for information security classifications.
- If the issue is not a customer complaint, it must still be actioned, but it will either be dealt with as standard correspondence or under a different complaints process as outlined in the department's [Complaints and grievances management policy](#).

- Complainants should be advised, as soon as practicable if the department is unable to deal with their complaint.
- The complaints officer must provide acknowledgement to the complainant that the complaint has been received and will be treated as a customer complaint, in writing or verbally, within 3 days (where possible) of the complaint being received by the department.
 - Include information about the complaint process, expected timelines and complainant responsibilities.
- The complaints officer should consider if any health, safety, wellbeing or resourcing issues are raised by the complaint or the complainant's conduct, and if they are concerned they should consider the [Managing unreasonable complainant conduct procedure](#) or escalate to a manager to determine any action to take.
- The complaints officer should assess if they have any [conflicts of interest](#) with regards to the complaint. If any conflict exists, it should be declared and the complaint referred to someone else.

Assess and resolve

- The complaints officer will consider if the customer complaint is frivolous or vexatious.
 - If not frivolous or vexatious, proceed through the following steps to assess and resolve the complaint.
 - If the complaint is frivolous or vexatious, the complaints officer should advise the complainant that the complaint will not be examined. This must be recorded in the register or department's records management system. The remainder of this procedure does not need to be followed and the complaint is closed.
- The complaints officer must also decide if the complaint engages or limits human rights contained in 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 [Guide: Customer complaints management and human rights](#) provides more information about assessing if a customer complaint engages human rights. The complaints officer must document and save their assessment of [human rights considerations](#) (DoE employees only) in the department's records management system.

- Customer complaints should be assessed and resolved at the point of receipt, where possible. The complaints officer assesses the customer complaint and determines the best way to resolve it by:
 - considering the circumstances of the complaint, the parties involved, and the requested outcomes
 - identifying each complaint issue and who needs to resolve it
 - identifying relevant benchmarks, standards or criteria to assess the complaint against (for example, legislation, policies, or procedures); and
 - gathering relevant information or documentation, including from the complainant.
- The complaints officer will contact the complainant if additional information is required to confirm the complaint issues or the outcome sought, or to provide information about the customer complaints management process, such as timeframes and complainant responsibilities.

- The complaint officer will communicate with the complainant by the most appropriate medium, taking into consideration their needs and preferences where possible.
- The complaints officer will monitor and document any unreasonable conduct by the complainant and, if necessary, apply the [Managing unreasonable complainant conduct procedure](#).
- The complaint officer will keep and store appropriate records of all communication with the complainant. This includes recording supporting documentation if a complainant withdraws their complaint.
- The complaints officer must aim to resolve:
 - the customer complaint within 30 days, where possible. If these timeframes cannot be met (e.g. due to school holidays for school-related complaints), the complaint officer should contact the complainant to advise them of a new expected timeframe and a contact officer.
 - complaints involving privacy or human rights issues - within 45 business days.
- The complaints officer should assess whether the urgency of the issues raised requires the complaint be completed in shorter timeframes than those outlined above.
- When a complaint involves multiple organisations, or multiple areas of the department, where privacy and confidentiality obligations permit, communication with the complainant should be co-ordinated between all parties involved.
- Options for resolving the customer complaint should be tailored to the circumstances of the complaint and may include:
 - providing an explanation to the complainant about the decision, action, etc that is the subject of the complaint and reasons for the decision, if not previously provided
 - finding the customer complaint to be unsubstantiated (for example, the events did not happen as described)
 - reaching a compromise solution (for example, through alternative dispute resolution)
 - concluding the customer complaint be substantiated and implementing specific action, such as overturning a decision, apologising, or providing a service not previously provided
 - addressing or referring the issue for system improvement.
- The complaints officer must record appropriate notes in the register throughout the assessment and resolution phase.
- Procedural fairness must be afforded to a person who is the subject of the customer complaint and the complainant.

Communicate outcome

- The complaints officer must advise the complainant of the outcome of the assessment and resolution process, including:
 - a clear explanation of the final decision, including reasons
 - any recommendations, steps taken to address the complaint and undertakings or follow up actions
 - any internal or external review options available to the complainant

- the option to provide feedback on the complaint process via the department's customer satisfaction survey.
- An outcome can be provided verbally, [in writing](#) (DoE employees only), or in any other form of communication most suitable to the complainant.
- The complaints officer should consider whether privacy obligations to a particular staff member or student impact the information that can be given to the complainant.
- The complaints officer must keep appropriate records about the information provided to the complainant in the register and/or department's records management system.

Close complaint

- The complaints officer will close the complaint and record information in the register about the complaint outcome and any further activities that need to occur.
- If further activities are recommended, the complaints officer is responsible for implementing and monitoring the recommended action, or referring the matter to the responsible area for attention. The register should be updated once all outstanding actions are completed.

2. Internal review

- If the complainant is dissatisfied with the way the customer complaint was handled by the department or if they believe the outcome to be unreasonable, the complainant can request an internal review. This request should be submitted within 20 days of receiving the complaint outcome.
 - The internal review must be completed in accordance with the [Internal review procedure](#).

3. External review

- If an internal review is completed, and the complainant remains dissatisfied, they can seek an external review.
- The complaints officer must provide the complainant with details of external review agencies (such as the [Queensland Ombudsman](#), [Office of the Information Commissioner](#) or [Queensland Human Rights Commission](#)) to assist the complainant to seek an external review.
- If an external review agency accepts the request and requests information from the department to enable an external review to be conducted, the complaints or internal review officer must respond to the request and record the external review request in the register.

Definitions

Term	Definition
Complainant	<p>A person, organisation or their representative/advocate making a customer complaint.</p> <p>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 (for example, a student complaining about something that has happened to them at school), or they are authorised representative of someone who has been</p>

Term	Definition
	directly affected (for example, a parent complaining on behalf of their child).
Complaints officer	A complaints officer is a departmental employee who is involved in managing customer complaints. Complaints officers may work in schools or education centres, regions or divisions. Their functions may include, but are not limited to, intake, assessment, management, resolution, and data entry. The management of a customer complaint may involve one or more complaints officers.
Conflict of interest	A conflict of interest can occur when an employee has, or is seen to have, a private interest, either financial (pecuniary) or non-financial (non-pecuniary), which conflicts or may conflict with the discharge of the employee's official duties.
Customer complaint	<p>A customer complaint is defined within section 264 of the <i>Public Sector Act 2022</i> as a complaint about the service or action of a department, or its staff, by a person who is apparently directly affected by the service or action. Examples may include complaints about:</p> <ul style="list-style-type: none"> • a decision made, or failure to make a decision, by a departmental employee • an act, or failure to act, by 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.
Days	Depending on the nature of the complaint and the area managing the complaint, customer complaints will be managed within either working days (that is, business days) or school days (that is, days during the school term).
External review	A process conducted by an external review body (for example, Queensland Ombudsman or Queensland Human Rights Commission) to ensure departmental decision-making is fair, reasonable and proper.
Feedback	Opinions, comments and expressions of interest, made directly or indirectly, explicitly or implicitly to or about the department, its products, services, staff or its handling of a complaint. Feedback is not a customer complaint.
Frivolous complaint	A frivolous complaint is one with no serious purpose or value, and does not justify the resources that would be required to action it.
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.

Term	Definition
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>
Internal review officer	<p>An internal review officer is a departmental employee who conducts an internal review. The officer must be:</p> <ul style="list-style-type: none"> • independent from the original customer complaint; and • in a position equal to, or higher than, the original decision-maker and authorised to make internal review decisions, including recommendations, or be nominated by someone with this authority. <p>Internal review officers will be regional or divisional staff. An internal review may involve more than one internal review officer.</p>
Privacy complaint	<p>A complaint by an individual about an act or practice of an agency in relation to the individual's personal information that is a breach of the agency's obligation under the Information Privacy Act 2009 (Qld) to comply with the privacy principles or an approval under section 157 of the Act. See the Information privacy breach and privacy complaints procedure for more information.</p>
Procedural fairness	<p>Providing any party who may be affected by a customer complaint with a fair opportunity to be heard and a reasonable opportunity to respond to any claims. Procedural fairness is also known as natural justice.</p>
Protected information	<p>Very sensitive and confidential information, where unauthorised and/or premature disclosure might cause damage to one or more parties. Refer to the Information security procedure for more information.</p>
Register	<p>A tool used to capture and record customer complaints data, including information about the complainant, their complaint, how the department has resolved the matter, and any reviews undertaken.</p> <p>The Customer Complaints Management System (CCMS) (DoE employees only) is the department's enterprise system for recording, assessing, managing, resolving and reporting on customer complaints. The CCMS should be used as the register for regional and divisional customer complaints.</p> <p>Schools can record complaints in a school system or use a local register (DoE employees only).</p>

Term	Definition
Request for service	An application for a service related to an interest or a concern made directly or indirectly, explicitly or implicitly to or about the department, its products, services, staff or its handling of a complaint. A request for service is not a complaint.
Resolution	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.
System improvement	System improvement may involve a change to policy, procedure or process.
Unreasonable complainant conduct	<p>Conduct is likely to be unreasonable where 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"> • persistent contact (for example, excessive and unnecessary phone calls or emails) • demanding conduct (for example, demanding more reviews than departmental procedures allow, or demanding a different outcome without showing the original decision was incorrect) • unreasonable lack of cooperation (for example, refusing to identify the issue of complaint or providing disorganised information) • unreasonable arguments (for example, making irrational claims) • unreasonable behaviour (for example, aggression or violence to staff, or threatening harm to self and others). <p>The Managing unreasonable complainant conduct procedure provides more information.</p>
Vexatious complaint	A vexatious complaint is without reasonable or sound basis in fact, has little chance of succeeding, and is instead designed to harass, annoy, or create a resource burden for the department.

Legislation

- [Public Sector Act 2022 \(Qld\)](#) section 264
- [Education \(General Provisions\) Act 2006 \(Qld\)](#) section 46
- [Human Rights Act 2019 \(Qld\)](#) part 2 and sections 58(1), 63, 97

Delegations/Authorisations

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

Policies and procedures in this group

- [Complaints and grievances management policy](#)
- [Complaints and appeals – subclass 500 \(schools\) visa procedure](#)
- [Complaints involving the ‘public official’ \(Director-General\) procedure](#)
- [Customer complaints management - Internal review procedure](#)
- [Individual employee grievances procedure](#)
- [Information privacy breach and privacy complaints procedure](#)
- [Making and managing a public interest disclosure procedure](#)
- [Managing unreasonable complainant conduct procedure](#)
- [Reporting fraud and corruption procedure](#)

Supporting information for this procedure

- [Customer complaint management framework](#)
- [Guide: Customer complaints management and human rights](#)
- [Making a complaint – Easy guide](#)
- [Making a customer complaint – Information for parents and carers](#)

Other resources

- AS/NZS ISO 10002:2022 – Guideline for complaint management in organisations
- [Queensland Public Service Customer Complaint Management Framework](#)
- [Queensland Public Service Customer Complaint Management Guideline](#)
- [Compliments, suggestions and customer complaints](#)
- [Customer complaints management](#) (DoE employees only)
- [Customer complaints outcome report template](#) (DoE employees only)
- [School complaints resources](#) (DoE employees only)
- [Child friendly complaint form](#)
- [Creating a child-friendly complaints process](#) (DoE employees only)
- [Request for internal review form](#)
- [Internal review information sheet](#)
- [Complaints lifecycle guide – CCMS guide](#) (DoE employees only)

Contact

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

Uncontrolled copy. Refer to the Department of Education Policy and Procedure Register at <https://ppr.qed.qld.gov.au/pp/customer-complaints-management-procedure> to ensure you have the most current version of this document.

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

Visit one of [QGov's counters](#).

For departmental staff who would like more information about this procedure, please email

customercomplaintsgs@qed.qld.gov.au

Review date

22/01/2027

Superseded versions

Previous seven years shown. Minor version updates not included.

2.0 Customer complaints management

1.0 Customer complaints management

Creative Commons licence

Attribution CC BY

Refer to the [Creative Commons Australia](#) site for further information