



Customer complaints management procedure

Version: 2.2 | Version effective: 09/08/2021

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). This procedure applies to schools and education centres, regions and divisions.

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:

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

Some complaints received by the department are not customer complaints and need to be managed in a different way. Refer to the [Excluded complaints factsheet](#) for additional information.

Complaints about harm, or risk of harm, to a student attending a state school must be dealt with in accordance with the [Student protection procedure](#). If the matter meets the definition of a customer complaint it must also be recorded as a customer complaint and included in departmental reporting.

Human rights complaints can also be a type of customer complaint. If a customer complaint is also a human rights complaint, it should be managed in accordance with this procedure.

Privacy complaints can also be a type of customer complaint. The process for managing them is contained in the [Information privacy and right to information procedure](#). Privacy complaints that are also a customer complaint (and not an employee-related privacy complaint) must be recorded as customer complaints and included in departmental reporting.

Responsibilities

Complainant

- cooperate in a respectful way and understand that unreasonable conduct will not be tolerated
- lodge a customer complaint with the school or education centre, region or division
- provide a clear idea of the problem and the desired solution
- provide all relevant information when the customer complaint is made
- understand that complex customer complaints can take time to assess, manage and resolve
- understand 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
- if dissatisfied with the outcome of the customer complaint, request an internal review within 28 days of receiving the complaint outcome.

All staff involved in managing customer complaints (complaints officers)

- manage customer complaints according to the department's [framework](#), [policy](#), [Internal review](#) and [Managing unreasonable complainant conduct procedures](#), and this 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
- decide if a customer complaint is also a human rights complaint
- consider human rights when responding to a customer complaint
- resolve customer complaints promptly and in accordance with framework timeframes
- advise the complainant that they can seek an internal review with 28 days if they are dissatisfied with the complaint outcome and/or the way the complaint was handled
- maintain appropriate records to support each step in the customer complaints and human rights complaints management processes and enable departmental reporting
- provide procedural fairness to complainants and persons who are the subject of the customer complaint
- keep an up-to-date customer complaints register
- consider customer complaints management as part of planning and risk management activities
- 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)
- escalate a request for an internal review to the regional office for management
- report to the regional director on customer complaints matters or seek advice 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 and management on customer complaints matters
- ensure information on how to make a customer complaint is available in the reception area
- review customer complaint information to inform improvements to service delivery.

Director-General

- publish annual customer complaints data on the department's website by 30 September, as required under section 219A(3) of the *Public Service Act 2008* (Qld).

Customer complaints coordinators, Strategy and Performance

- maintain customer complaints management resources, including policies, procedures, supporting materials and websites
- 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.

Process

The department's approach to handling customer complaints is based on the Australian/New Zealand Standard (AS/NZS ISO 10002:2014 – Guidelines for complaint management in organisations).

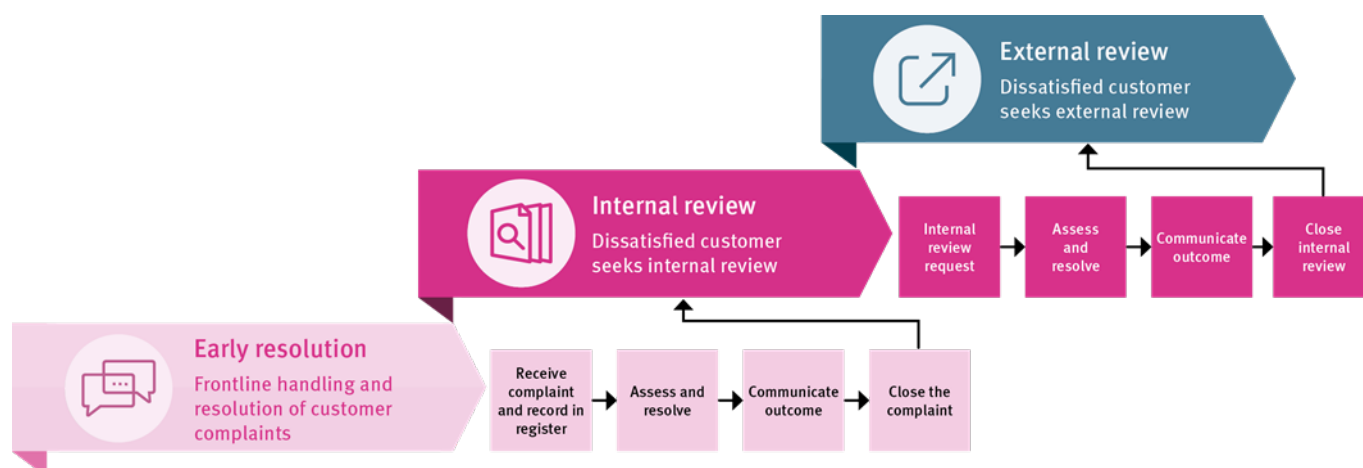


Image 1 Process review flowchart

1. Early resolution

a. Receive complaint and record in register

- The complainant will raise an issue with the department, either in writing, over the phone, or in person.
- The complaints officer must decide if the issue is a customer complaint.
 - It will be a customer complaint if 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
 - expressing a concern about a situation
 - 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 one of the approaches in the [Excluded complaints factsheet](#).
- The complaints officer must provide acknowledgement to the complainant that their customer complaint has been received. Acknowledgement can be provided in writing or verbally.

- 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 escalate to a manager to determine any action to take.

b. Assess and resolve

- The complaints officer should consider if the customer complaint is frivolous or vexatious.
 - If not frivolous or vexatious, proceed 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 complaint engages human rights.
 - The complaints officer must document their assessment and decision-making process for human rights complaints. The [early resolution outcome report template](#) (DoE employees only) can be used for this purpose.
- Customer complaints should be assessed and resolved at the point of receipt, where possible. The complaints officer should assess the customer complaint and determine the best way to resolve it by:
 - identifying each complaint issue
 - identifying relevant benchmarks, standards or criteria to assess the complaint against (for example, legislation, policies, or procedures)
 - gathering relevant information or documentation, including from the complainant.
- The complainant should be contacted by the complaints officer 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.
- Subject to the complexity and nature of the customer complaint and when the complaint is received (for example, in school holidays), the complaints officer should aim to resolve the customer complaint within the following framework timeframes:
 - simple complaint: up to 20 days
 - complaints requiring some inquiry: up to 45 days
 - complaints requiring investigation and referral: up to 90 days, or longer in some cases
 - complaints involving human rights issues: up to 45 business days.

- The complaints officer should keep the complainant informed of any changes or emergent issues that impact the resolution of their customer complaint.
- Options for resolving the customer complaint that may apply include:
 - providing an explanation to the complainant about the decision, action, etc. and reasons if not previously provided
 - dismissing the customer complaint (for example, if the decision complies with legislation, or policies or procedures of the government or department)
 - concluding that the customer complaint has been substantially resolved
 - reaching a compromise solution
 - upholding the customer complaint and implementing specific action, such as overturning a decision, giving an apology 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.

c. Communicate outcome

- The complaints officer must advise the complainant of the outcome of the assessment and resolution process. This should include:
 - a clear explanation of the final decision
 - any recommendations
 - any review options available to the complainant, including internal or external review.
- The complaints officer must ensure they keep appropriate records about the information provided to the complainant. This should be stored in the register and/or department's records management system.

d. 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.

2. Internal review

- If the complainant is dissatisfied with the outcome of their customer complaint and/or the way the customer complaint was handled by the department, the complainant can request an internal review. This request should be submitted within 28 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 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 (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).</p>
Complaint category	<p>Categories used to report on customer complaints at the organisational level:</p> <ul style="list-style-type: none"> • health and safety • staff and volunteers • services • policy and procedure • assets, infrastructure and information technology • procurement, fees and charges • third parties • privacy • other.
Complaints officer	<p>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.</p>

Term	Definition
Complaints requiring further action	<p>A reporting status applied when the complaint is closed. This is used in departmental reporting. Customer complaints will require further action if the complaint:</p> <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 (for example, by the Queensland Ombudsman or Queensland Human Rights Commission).
Complaints requiring no further action	<p>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 (for example, Queensland Ombudsman or Queensland Human Rights Commission).</p>
Complaints requiring investigation and referral	<p>A customer complaint that is complex or involves serious issues of complaint. It may require specialist advice or support to resolve. It should be possible to resolve within 90 days, but may take longer subject to complexity.</p>
Complaints requiring some inquiry	<p>A customer complaint that involves multiple issues of complaint or a complicated situation (for example, historical issues, factual disputes, multiple parties). It should be possible to resolve within 45 days.</p>
Customer complaint	<p>A customer complaint is defined within section 219(4) of the <i>Public Service Act 2008</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	<p>Depending on the nature of the complaint and the area managing the complaint, customer complaints will be managed within either working days (i.e. business days) or school days (i.e. days during the school term).</p>
External review	<p>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.</p>

Term	Definition
Feedback	Opinions, comments and expressions of interest or concern, 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 that is trivial or meritless in nature, 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.
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	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.
Procedural fairness	Providing any party who may be affected by a customer complaint with a fair hearing and a reasonable opportunity to respond to any claims. Procedural fairness is also known as natural justice.

Term	Definition
Protected information	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.
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) 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.</p>
Reporting status	An assessment of the customer complaint completed at the point of resolution which identifies if the complaint requires no further action, or requires further action.
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.
Simple complaint	A customer complaint that involves an uncomplicated matter or only one complaint issue. It should be possible to resolve within 20 days and will require no, or limited, inquiry to address.
System improvement	<p>System improvement may involve one or more of the following:</p> <ul style="list-style-type: none"> • referral for consideration of legislative or policy change • policy or program development, review or revision • process improvement (i.e. changes to procedures and workplace practices) • expert assistance, staff development or performance improvement • improved implementation (for example, issuing updated documentation or reminders) • monitoring compliance • other action to ensure that the matter is handled appropriately in future.
Unreasonable complainant conduct	Conduct is likely to be unreasonable where it involves actions or behaviours which because of the nature or frequency, raises substantial health, safety, wellbeing,

Term	Definition
	<p>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 Managing unreasonable complainant conduct procedure provides more information.</p>
Vexatious complaint	A vexatious complaint is a complaint that is not brought in good faith, and is instead designed to harass, annoy, or create a resource burden for the department.

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

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

Supporting information for this procedure

- [Child friendly complaint form](#)
- [Guide: Customer complaints management and human rights](#)
- [Making a customer complaint – Information for parents and carers](#)

Other resources

- [Customer complaints management framework](#)
- [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 – Guideline for complaint management in organisations
- [Compliments, suggestions and customer complaints](#)
- [Customer complaints management](#) (DoE employees only)
- [Excluded complaints factsheet](#)
- [Customer complaints early resolution outcome report template](#) (DoE employees only)
- [School complaints register](#) (DoE employees only)
- [Request for internal review form](#)
- [Internal review information sheet](#)
- [Internal and external review – CCMS guide](#) (DoE employees only)
- [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,

Visit 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.

2.0 Customer complaints management

1.0 Customer complaints management

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