



Procedure

Customer complaints management – Internal review procedure

Version: 2.1 | **Version effective:** 29/04/2024

Audience

Department-wide

Purpose

This procedure outlines the responsibilities and processes for internally reviewing a customer complaint.

Overview

An internal review is an impartial review of a customer complaint outcome or management process by an employee of the Department of Education (the department) who was not the original complaint officer. A complainant may request an internal review if they are dissatisfied with the way their customer complaint was handled by the department and/or they believe the outcome was unreasonable. In requesting an internal review, complainants must explain why an internal review is appropriate and what action the complainant would like taken to resolve the issue. If insufficient information is provided, the request may be declined.

An internal review is only available after the original customer complaint process has been finalised and can only be requested once. It is not a reinvestigation of the original complaint but establishes if the customer complaint management process for the original complaint was appropriate and/or whether the outcome reached was reasonable.

This procedure should be read in conjunction with the:

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

The following process does not apply:

- to customer complaints managed outside the department through an external review (for example, a complaint to the Queensland Ombudsman or Queensland Human Rights Commission)

- if the complainant is simply seeking clarification or explanation about the original decision or process. In these cases, the complainant should be referred back to the original complaints officer so clarification can be provided.

Responsibilities

Complainant

- cooperate in a respectful way and understand that unreasonable conduct will not be tolerated
- request an internal review within 20 days of receiving the complaint outcome, either by phone or by submitting an [internal review request form](#)
- provide a clear idea of the problem with the complaint outcome or handling and the desired solution, and understand that the internal review request may not be examined if this does not occur
- understand that an internal review is not a re-investigation of the original customer complaint
- provide all relevant information when requesting the internal review
- understand that complex internal reviews can take time to assess, manage and resolve
- understand that some decisions cannot be overturned or changed as a result of the internal review
- inform the department of changes affecting the internal review, including if help is no longer required.

Original complaints officer (school, region or central office division)

- cooperate with the internal review, including providing any relevant material to the internal review officer
- maintain independence by ensuring they do not conduct the internal review if involved in the original customer complaint.

Internal review officer (region or central office division)

- ensure they were not involved in managing the original customer complaint
- ensure they are in a position equal to, or higher than, the original decision maker and are authorised to make internal review decisions (including recommendations), or are nominated by such a person
- ensure they have completed appropriate departmental or other internal review training
- provide procedural fairness to complainants and persons who are the subject of the internal review
- provide reasonable assistance to complainants to make an internal review request, if assistance is required
- consider human rights when undertaking an internal review, including whether any human rights are impacted by the review and whether human rights were adequately considered during the management of the customer complaint
- advise the complainant and original complaints officer of the outcome of the internal review process
- advise the complainant that they can seek an external review if they remain dissatisfied after the internal review is conducted
- use a register to maintain appropriate records to support each step in the internal review process and enable departmental reporting.

Process



Image 1 Internal review process flowchart

1. Internal review request

A complainant

- who is dissatisfied with the way their customer complaint was handled or believes the outcome was unreasonable can request an internal review by submitting the [Request for internal review form](#) or lodging the request over the phone.
 - If the request is about a complaint managed at a school, the request should be lodged with the [regional office](#). Otherwise, the request should be lodged with the area that completed the original complaint.
 - The complainant's request must explain why an internal review is appropriate (i.e. why the original decision was unreasonable or the complaint handling process was unfair or deficient) and what action the complainant would like taken to resolve the issue. The complainant should respond to any requests for further information, or to confirm information provided by phone. If insufficient information is provided, the internal review request may be declined.
- should lodge the request within 20 days of receiving the original complaint outcome.
 - The internal review officer will consider requests lodged after this period on a case-by-case basis. These requests may be actioned if:
 - the complainant can provide a reasonable explanation for lodging a late request; or
 - the internal review officer considers the request can be productively resolved despite the delay.

Internal review officers

- will assess the complainant's request to ensure sufficient information has been provided to enable the internal review to be undertaken (for example, why the original decision was unreasonable or the complaint handling process was unfair or deficient). Internal review officers can reference the [Internal review guide](#) (DoE employees only) to ensure all appropriate steps are taken.
 - If the complainant requires assistance to request an internal review, the internal review officer should provide reasonable assistance, such as providing information about how to request a review, assistance to document internal review issues and allowing a support person if requested.
 - If the request is taken over the phone, the internal review officer should ask the complainant to confirm the information captured by the department before the internal review commences.
 - The internal review officer should contact the complainant if additional information is required or to provide information about the internal review process.

- If the complainant does not outline the grounds for the review or provides insufficient information, the internal review officer may advise the complainant that the internal review request will not be examined unless this information is provided. If the complainant does not cooperate, the remainder of this procedure does not need to be followed and the internal review is closed. The internal review officer should advise the complainant that the internal review will not be conducted using the [Declining an internal review template](#) (DoE employees only).
- If the internal review request is frivolous or vexatious, the internal review officer should advise the complainant that the internal review will not be conducted using the [Declining an internal review template](#) (DoE employees only). The remainder of this procedure does not need to be followed and the internal review is closed.
- Any decision not to proceed with an internal review request must be recorded in the register or the department's records management system. The record should include the decision not to proceed, the evidence considered as part of that decision, the reason why it was decided not to proceed with the review, and any other relevant information.
- If the complainant's request raises new customer complaint issue(s) that weren't considered as part of the original complaint, the internal review officer must tell the complainant the issue is out of scope for the internal review, but can be lodged by the complainant as a new customer complaint.
- will open the original complaint in the register and record the internal review request. Protected information must not be entered into the register (refer to the [Information security procedure](#) for information security classifications).
- must provide an acknowledgement to the complainant that the request has been received. This can be provided in writing or verbally but a record should be kept of the acknowledgement in either the register or the department's records management system.
- should consider if any health, safety or resourcing issues are raised by the internal review request or the complainant's conduct, and if they are concerned refer to the [Managing unreasonable complainant conduct procedure](#) for the process for dealing with unreasonable conduct.
- should consider if human rights are engaged by the internal review process and whether they were adequately considered during the management of the original complaint. These considerations must be appropriately documented. The [Guide: Customer complaints management and human rights](#) offers more information about considering human rights.

2. Assess and resolve

- The internal review officer must analyse the original customer complaint to determine if the customer complaints management process and/or the outcome reached was appropriate by considering and assessing:
 - information provided with the internal review request
 - material considered as part of managing the original customer complaint
 - if the [Complaints and grievances management policy](#) and [Customer complaints management procedure](#) were followed
 - whether human rights were engaged by the complaint, and if so, whether they were properly considered during the management of the complaint

- other information provided by relevant parties, (for example, the original complaints officer or complainant).
- The internal review officer must also consider whether any human rights are engaged or limited by the internal review process itself. The [Guide: Customer complaints management and human rights](#) offers more information about considering human rights.
- Subject to the complexity of the request, the internal review officer must aim to resolve the internal review within 20 days of receiving the internal review request.
 - The internal review officer should keep the complainant informed of any changes or emergent issues that will impact the resolution of the internal review, including a revised finalisation date if more time is required.
- Procedural fairness must be afforded to any person who is the subject of the internal review, and the complainant.
- Based on the assessment undertaken, the internal review officer should identify a suitable internal review outcome. This may include, but is not limited to:
 - finding the original decision was appropriate and the complaint does not merit further investigation
 - finding the original decision was unreasonable and should be amended
 - re-opening the original complaint
 - providing a clearer explanation of the original decision to the complainant
 - amending a policy, procedure or practice, or recommending such documents be amended
 - offering an apology or some other remedy; or
 - providing further assistance to address a service delivery complaint.
- The internal review officer must prepare an Internal review outcome report (DoE employees only) and save this in the register and/or the department's records management system.
- The internal review officer must record appropriate notes in the register throughout the internal review.

3. Communicate outcome

- Unless the complainant has requested some other form of communication, the internal review officer must advise the complainant in writing about the outcome of the internal review process. This should include:
 - a clear explanation of the final decision, which addresses each issue raised and provides reasons;
 - any recommendations or outcomes; and
 - any external review mechanisms available to the complainant.
- The internal review officer must also inform the original complaints officer about the outcome of the internal review.
- The internal review officer must keep appropriate records about the information provided to the complainant and original complaints officer. This should be stored in the register and/or the department's records management system.

4. Close internal review

- The internal review officer will close the internal review and record information in the register about the outcome and any further activities that need to occur.
- The internal review officer is responsible for implementing and monitoring any further action recommended, or referring the matter to the responsible area to action.

Definitions

Term	Definitions
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 procedure 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 an authorised representative of someone who has been 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, 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.
Customer complaint	A customer complaint is defined in 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 directly affected by the service or action. Examples may include complaints about: <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.
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.

Term	Definitions
Internal review	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.
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, or nominated by such a person. <p>Internal review officers will be regional or divisional staff. An internal review may involve more than one internal review officer.</p>
Internal review training	An internal review course offered by the Queensland Ombudsman, the department or self-directed learning using the internal review guide , resources on OnePortal (DoE employees only) and on-the-job training.
Involved in managing the original customer complaint	<p>To ensure independence, an internal review officer must not have been involved in managing the original customer complaint. Examples of 'involvement' include:</p> <ul style="list-style-type: none"> • providing advice on how the original customer complaint should be handled, or complaint findings • gathering information or evidence, or conducting interviews • providing a complaint outcome. <p>If an internal review officer has general awareness of a customer complaint, this does not constitute being 'involved' in the original complaint handling process. In these situations, the internal review officer can undertake the internal review without compromising the independence of the process. Examples of general awareness include:</p> <ul style="list-style-type: none"> • overhearing staff talking about the customer complaint • taking a phone message about the complaint • reading a file note • briefly discussing a complaint (for example, at a team meeting).
Procedural fairness	Providing any party who may be affected by an internal review with a fair opportunity to be heard and a reasonable opportunity to respond to any claims. Procedural fairness is also known as natural justice.
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.

Term	Definitions
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 (DoE employees only).</p>
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	<p>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.</p>

Legislation

- [Public Sector Act 2022 \(Qld\)](#) section 264

Delegations/Authorisations

- Nil

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 procedure](#)
- [Individual employee grievances procedure](#)
- [Information privacy and right to information 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 complaints management – Internal review information sheet](#)
- [Customer complaints: Request an internal review](#)

Other resources

- AS/NZS ISO 10002:2022 – Guideline for complaint management in organisations
- [Guide: Customer complaints management and human rights](#)
- [Compliments, suggestions and customer complaints](#)
- [Customer complaints management](#) (DoE employees only)
- Internal review outcome report template (DoE employees only)
- [Internal review letter template](#) (DoE employees only)
- [Declining an internal review template](#) (DoE employees only)
- [Internal review guide](#) (DoE employees only)
- [Making a customer complaint – Information for parents and carers](#)
- [Internal and external review – CCMS guide](#) (DoE employees only)

Contact

For customers who want to seek an internal review or want more information about the process, please contact the area that provided your original complaint outcome. For internal reviews about a complaint managed at a school, please lodge the request with the [regional office](#)

For departmental staff who would like more information about the customer complaints management process, please email customercomplaintsgs@qed.qld.gov.au.

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22/01/2027

Superseded versions

Previous seven years shown. Minor version updates not included.

1.0 Customer complaints management - Internal review

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