

Customer Complaint Internal Review

Department of Health Standard

QH-IMP-450-2

1. Statement

The Customer Complaint Internal Review Standard forms part of the Department of Health's (the department) Customer Complaint Management Framework (CCMF) and outlines the procedure and minimum requirements for internally reviewing a customer complaint.

An internal review is an impartial review of a customer complaint outcome or management process by an employee of the department who was not the original complaint officer and is not a re-investigation of the original customer complaint.

2. Scope

This standard applies to all employees, contractors and consultants within the department's divisions and business units.

The internal review process does not apply to complaints that involve, or may involve, corrupt conduct, as these are referred directly to the Crime and Corruption Commission.

The internal review process does not apply to complaints about human rights or privacy, as these are eligible for external review following their initial assessment by the department.

3. Requirements

3.1. Requesting an internal review

- 3.1.1. 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.
- 3.1.2. A complainant may request an internal review if they are dissatisfied with the way their complaint was handled by the department and/or believe the outcome was unreasonable.
- 3.1.3. 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.
- 3.1.4. An internal review must be requested by the complainant within 20 days of receiving the complaint outcome. The request for internal

review can be either by phone or email to the area that managed the original complaint.

3.1.5. Internal review requests lodged after 20 business days are considered 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.

3.1.6. In requesting an internal review, the complainant must provide the following information:

- The original complaint reference number.
- Details of the problem around the complaint outcome and/or handling of the complaint.
- Details of the complainant's desired outcome.

3.1.7. If insufficient information is provided, an internal review request may be declined.

3.2. Conducting the internal review

3.2.1. The business area responsible for the original complaint outcome must assign an officer who did not conduct the original complaint investigation, or provide the original review outcome, to conduct the internal review. This officer is the internal review officer.

3.2.2. The internal review officer must be either at the same level as the original complaint handling officer or more senior.

3.2.3. 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.

3.2.4. The internal review officer will review the information provided by the complainant and determine whether there is sufficient information to conduct the review.

3.2.5. The internal review officer must contact the complainant if additional information is required or to provide information about the internal review process.

3.2.6. Following contacting the complainant, the internal review officer may decide not to conduct the review for reasons under section 3.3 Decision to not conduct internal review.

- 3.2.7. The internal review officer must record the internal review request in the Customer Complaints Management register (the register) against the original complaint.
- 3.2.8. The internal review officer must provide an acknowledgement to the complainant that the request for internal review has been received. This can be provided in writing or verbally, but a record must be kept of the acknowledgement in either the register or the department's records management system.
- 3.2.9. In conducting the internal review, the internal review officer must consider if human rights are engaged by the internal review process and whether they were adequately considered during the management of the original complaint. Human rights considerations must be documented either in the register or the department's records management system, including if it is determined that human rights were not engaged as part of the internal review process.
- 3.2.10. The internal review officer must analyse the original customer complaint to determine if the complaints investigation 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 Customer Complaint Management Policy and Customer Complaint Management Standard 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 officer responsible for investigating the original complaint or complainant).
- 3.2.11. The internal review officer must record appropriate notes in the register throughout the internal review.
- 3.2.12. The internal review must be completed within 20 business days of receiving the internal review request. If this timeframe is unable to be met, the internal review officer must notify the complainant of the reason for the delay and updated anticipated review completion date.

3.3. Decision to not conduct internal review

- 3.3.1. The internal review officer may decide not to conduct an internal review for the following reasons:
- There is insufficient information to conduct the review.
 - The review request is frivolous or vexatious.

- The complainant's request raises new customer complaint issue(s) that weren't considered as part of the original complaint.
- 3.3.2. 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.
- 3.3.3. If the complainant 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 must advise the complainant that the internal review will not be conducted.
- 3.3.4. If the internal review request is frivolous or vexatious, the internal review officer must advise the complainant that the internal review will not be conducted.
- 3.3.5. 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 advise the complainant the issue is out of scope for the internal review but can be lodged by the complainant as a new customer complaint.

3.4. Internal review outcome

- 3.4.1. 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.
 - Providing further assistance to address a service delivery complaint.

3.4.2. The internal review officer must provide the complainant with written notice of the outcome of the internal review process. This must include:

- A clear explanation of the final decision, which addresses each issue raised and provides reasons.
- Any recommendations or outcomes
- Any external review mechanisms available to the complainant, including contact details of any suggested external review agencies.

3.4.3. The internal review officer must also inform the officer responsible for investigating the original complaint about the outcome of the internal review.

3.4.4. The internal review officer must keep appropriate records about the information provided to the complainant and officer responsible for investigating the original complaint. This information must be stored in the register and/or the department's records management system.

3.5. Closing the internal review

3.5.1. The internal review officer must close the internal review and record information in the register about the outcome and any further activities that need to occur.

3.5.2. The internal review officer is responsible for implementing and monitoring any further action recommended or referring the matter to the responsible area to action.

4. Human rights

Human rights are not limited by this standard.

This standard enhances the right to freedom of expression, by providing customers the opportunity to challenge when they consider a complaint has not been handled appropriately or when they consider the outcome to be unreasonable.

5. Legislation

- *Hospital and Health Boards Act 2011*
- *Queensland Human Rights Act 2019*
- *Information Privacy Act 2009*
- *Public Sector Act 2022*
- *Public Records Act 2002*

- *Right to Information Act 2009*
- *Victims' Commissioner and Sexual Violence Review Board Act 2024 (Victims' Charter Rights)*

6. Supporting documents

- [Customer Complaint Management Policy](#) (QH-POL-450)
- [Customer Complaint Management Standard](#) (QH-IMP-450-1)
- [Queensland Public Service Customer Complaint Management Framework and Guideline.](#)

7. Definitions

Term	Definition
Complainant	Person, organisation or their representative (including clients, consumers, service users, customers, etc.) who is apparently directly affected by the service or action of the department, making a complaint.
Complaint	Expression of dissatisfaction made to, or about, the department, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. (Source: AS 10002:2022 <i>Guidelines for complaint management in organizations.</i>)
Department's records management system	Department of Health systems incl. Content Manager and RiskMan.
External review	A process available to complainants where an oversight agency, such as the Queensland Ombudsman or other complaints handling organisation, investigates the handling of a complaint by an agency or deals with complaints that were previously the subject of a complaint to an agency.
Frivolous complaint	A complaint with no serious purpose or value and does not justify the resources that would be required to action it.
Internal review	Is a merits review that involves a consideration of whether, based on the information/facts available at the time, the decision made was the correct one (including whether the actions and decisions were lawful, reasonable, fair and not improperly discriminatory). It is not a re-investigation of the complaint; it is an impartial review of a decision made about a complaint undertaken by an appropriate officer independent from the original decision-maker.
Internal review officer	An internal review officer is a departmental employee who conducts an internal review. The officer must be:

Term	Definition
	<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>An internal review may involve more than one internal review officer.</p>
Register	A tool that is part of the department's CCMF and 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.
Vexatious complaint	A complaint 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.

8. Approval and implementation

Policy Custodian	Policy Contact Details	Approval Date	Approver
Executive Director, Governance, Assurance and Information Management Branch	GAIM-corro@health.qld.gov.au	20 December 2024	A/Deputy Director-General, Corporate Services Division

Version control

Version	Date	Comments
Version 1	20 December 2024	New document