

Customer Complaint Management

Department of Health Policy

QH-POL-450

1. Statement

The Department of Health (the department) is committed to listening and responding to customer feedback. Feedback (including compliments and complaints) creates a valuable opportunity to identify what good service looks like and where the department can improve.

The department supports and acknowledges the right of customers to make a complaint and is committed to managing these matters in an accountable, transparent, timely and fair manner that is compatible with human rights.

2. Purpose

The Customer Complaint Management Policy forms part of the department's Customer Complaint Management Framework (CCMF) and specifies the principles of complaint management and resolution.

This policy adheres to section 264 of the *Public Sector Act 2022*, is compatible with the *Human Rights Act 2019*, the Queensland Public Service Customer Complaint Management Framework and Guideline, and the Australian Standard Guidelines for complaint management in organisations 10002:2022.

3. Scope

This policy applies to all employees, contractors and consultants employed within the department.

The department defines a complaint as an expression of dissatisfaction about a service or action of the department and/or its staff. This may include, for example, a complaint about:

- a decision made, or a failure to make a decision
- an act, or failure to act
- the policies, procedures, products, projects or services delivered by the department
- the formulation of a proposal or intention by the department
- a recommendation made by the department
- staff conduct, or the customer service provided by the department's staff.

The department can receive customer complaints lodged online, via email or social media, in writing, over the phone, in person (verbally or in writing), or received by Ministerial or Director-General correspondence or contact.

3.1. Out of scope

This policy does not apply to:

- Complaints about the products, services or staff of Hospital and Health Services or the Queensland Ambulance Service.
- Complaints covered by existing statutory or policy obligations, such as regarding corruption, fraud or right to information/privacy, public interest disclosures, complaints made by public servants regarding their employment/employer, complaints that are contractual in nature, or any other type of complaint already addressed by subject specific legislation and/or policies.
- Complaints subject to legal proceedings.
- Enquiries from a customer about a service or action of the department, or its staff.

4. Principles

In line with the Queensland Public Service Customer Complaint Management Framework, the department's guiding complaints management principles are:

- **Customer focused** – people should be able to make a complaint via clear and accessible agency complaint management systems, with complainants respected and responses addressing all issues raised.
- **Timely and fair** – complaint handling processes are clear, impartial, and confidential, with timely acknowledgements and responses.
- **Clear communication** – there are clear and communicated expectations and standards for all parties involved in a complaint.
- **Accountable** – agency roles and responsibilities for complaint management are clear and publicly available.
- **Improving services** – complaints improve existing, and inform new, quality services, with CCMFs helping agencies prevent potential ongoing disputes.

5. Responsibilities

5.1. Complainant

5.1.1. The complainant must:

- 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 CCMF.
- 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.

5.2. All Staff

5.2.1. All staff must:

- Be aware of the CCMF.
- Be aware of their business area's local processes, where applicable.
- Be aware of the value of complaints and feedback generally to the department.
- Be aware of their roles, responsibilities, and authorities with respect to complaints.
- Be aware of the procedures to follow and the information to provide to complainants.
- Know how to recognise a customer complaint and have a general awareness of the various complaint types (e.g. customer, staff, corrupt conduct).

5.3. Staff handling complaints

5.3.1. Staff handling complaints must:

- Ensure complaints are managed according to the requirements outlined in the CCMF. This includes the consideration of any Human Rights and Victims' Rights relevant to customer complaints.
- Have knowledge of Customer Complaint Management processes relevant to their role and business area.
- Ensure minimum customer complaint data is captured and recorded.
- Treat complainants in a respectful and courteous manner.
- Be able to identify and effectively respond to people's support and communication needs and preferences.
- Ensure the timely and appropriate notification to senior management of any significant customer complaints or systemic issues identified through complaints.

5.4. Staff handling internal review

5.4.1. Staff handling internal reviews of a customer complaint process or outcome must:

- Ensure internal reviews are managed according to the requirements outlined in the Customer Complaint Internal Review Standard (QH-IMP-450-2) and the CCMF. This includes the consideration of any Human Rights relevant to internal reviews.
- Have knowledge of internal review processes relevant to their role and business area.
- Ensure minimum internal review data is captured and recorded.
- Treat complainants in a respectful and courteous manner.
- Be able to identify and effectively respond to people's support and communication needs and preferences.

5.5. Deputy Directors-General (or delegates)

5.5.1. Deputy Directors-General or equivalent (or delegates) must, as applicable within their area of responsibility:

- Ensure local processes are implemented which are compliant with the requirements of the CCMF.
- Ensure local processes relating to customer complaint management are reviewed at least annually.
- Ensure their staff are aware of the CCMF and its intent and objectives.
- Ensure staff handling customer complaints are appropriately trained and/or skilled and experienced.
- Ensure information about local processes is easily accessible to staff.
- Ensure there are processes in place to review trends and themes in customer complaints and the effectiveness and efficiency of local processes to inform annual maintenance and improvement activities.
- Ensure there is a database, or complaints register for recording customer complaint data that is appropriately maintained.
- Ensure customer complaint data and related information is prepared for annual data reporting and publication as outlined in section 6.3 of this policy.

5.6. Senior Complaint Executive

5.6.1. The Senior Complaint Executive (Deputy Director-General, Corporate Services Division or delegate) must:

- Ensure staff are aware of the CCMF.
- Ensure information about the CCMF is easily accessible to members of the public and is communicated in an easy-to-understand manner.
- Oversee the process for performance monitoring, evaluation and reporting on customer complaint management.
- Publish the department's complaints management data as per the *Public Sector Act 2022* as required by 30 September each year.

- Publish the department's human rights complaints data in the Annual Report as required by the *Queensland Human Rights Act 2019*.
- Publish the department's victims of crime complaints data in the Annual Report as required by the *Victims' Commissioner and Sexual Violence Review Board Act 2024 (Victims' Charter Rights)*.
- Provide advice and guidance on the CCMF.
- Report to senior management and other relevant stakeholders on the effectiveness of, and compliance with, the CCMF.

5.7. Director-General

5.7.1. The Director-General must:

- Ensure that a CCMF is established and maintained within the department.
- Cultivate a customer focus throughout the department.
- Appoint a senior executive (Senior Complaint Executive) with overall strategic responsibility and authority for customer complaint management within the department.

6. Requirements

This Policy requires compliance with the Customer Complaint Management Standard (QH-IMP-450-1) and the Customer Complaint Internal Review Standard (QH-IMP-450-2).

6.1. Complaint Process

6.1.1. The Customer Complaint Management Standard (QH-IMP-450-1) outlines the minimum mandatory requirements for managing customer complaints, including the steps involved in the complaint process.

6.1.2. The department follows the complaint management life cycle, as outlined by the Queensland Public Service Customer Complaint Management Framework. Steps involved in the complaint process include:

- receipt
- assistance
- acknowledgement
- assessment
- response
- reporting
- learning and improvement.

While the progression of these stages will not always be linear, each step ensures that complaints are received and appropriately investigated, complainants are kept up to date with the progress of their complaint and the department continues to learn and improve.

6.1.3. Acknowledgement of a complaint must be made to the complainant. This should occur within three (3) business days of receipt.

6.1.4. Complaints should be resolved within 30 business days of receipt of the complaint unless they are determined to be complex and require further investigation, or other timeframes apply as prescribed by legislation (e.g. complaints involving privacy or human rights issues should be resolved within 45 business days). In these cases, the complainant must be notified of the new anticipated resolution timeframe.

6.2. Review mechanism

6.2.1. If a customer is dissatisfied with the outcome of their complaint, they may request that the department conduct an internal review.

6.2.2. The Customer Complaint Internal Review Standard (QH-IMP-450-2) outlines the minimum mandatory requirements for the department's internal review of complaints.

6.2.3. Requests for an internal review must be made by the customer/complainant within 20 business days of receiving a complaint outcome. The department will complete the internal review within 20 business days of receiving the request. If it is not possible for the department to complete the review within this timeframe, the complainant will be advised of the reason for the delay and an anticipated review completion date.

6.2.4. If a customer is dissatisfied with the outcome of an internal review, they may request an external review via:

- the Queensland Ombudsman; or
- the Office of the Health Ombudsman; or
- if the complaint related to corrupt allegations, the Crime and Corruption Commission; or
- if the complaint relates to human rights, the Queensland Human Rights Commission; or
- if the complaint relates to victims' rights, the Queensland Office of the Victims' Commissioner.

6.3. Reporting

6.3.1. The Governance Assurance and Information Management (GAIM) Branch is responsible for collation, reporting and the external publication of the department's complaints data, as defined under *the Public Sector Act 2022*, the *Victims' Commissioner and Sexual Violence Review Board Act 2024* and the

Queensland Human Rights Act 2019. The complaints data that is provided by business areas is used to create these reports.

6.3.2. GAIM will report on the data provided by the business areas to the Executive Leadership Team biannually.

7. Human Rights

The department will respect, protect and promote human rights in our decision-making and actions in accordance with the *Queensland Human Rights Act 2019*, in response to a complaint.

This policy does not limit human rights, as outlined in the *Queensland Human Rights Act 2019*. This policy enhances the right to recognition and equity before the law and right to freedom of expression, by ensuring the Customer Complaint Management Policy and supporting standards are clear and accessible to all, and complaint handling processes are clear, impartial, and confidential.

8. 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)

9. Supporting documents

- Australian Standard Guidelines for complaint management in organisations 10002:2022
- [Department of Health Customer Complaint Management Standard](#) (QH-IMP-450-1)
- [Department of Health Customer Complaint Internal Review Standard](#) (QH-IMP-450-2)
- [Queensland Ombudsman Managing unreasonable complainant conduct](#)
- [Department of Health Customer complaints: Identifying human rights complaints fact sheet](#)
- [Office of the Victims' Commissioner – Know your rights](#)
- [Queensland Public Service Customer Complaint Management Framework and Guideline.](#)

10. Definitions

Term	Definition
Accessible	Easily available and understood.
Agency	Refers to a public service entity as per section 9 of the <i>Public Sector Act 2022</i> .
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: Australian Standard 10002:2022 <i>Guidelines for complaint management in organisations</i>)
Customer	A consumer of the department's products and/or services. This definition applies to both external customers (e.g., the public) and internal customers (e.g., employees, contractors and consultants).
Customer complaint	(see section 264(4) of the <i>Public Sector Act 2022</i>) means a complaint about the service or action of a public sector entity, or its staff, by a person who is apparently directly affected by the service or action.
External review	A process available for specific types of complaints 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. An external review will only occur after the complainant has progressed through the agency's complaint process in the first instance and exhausted any other internal right of review.
Human Rights	Human rights means the rights stated in part 2, divisions 2 and 3 of the <i>Queensland Human Rights Act 2019</i> .
Internal review	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.
Unreasonable complainant conduct	Is any behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues. Examples of unreasonable complainant conduct can include unreasonable persistence; unreasonable demands; unreasonable lack of cooperation; unreasonable arguments; and unreasonable behaviour (Australian Standard 10002:2022 <i>Guidelines for complaint management in organisations</i>).
Vexatious complaint	A complaint without grounds made to cause annoyance, frustration or worry.

Term	Definition
Victims' Rights	Victims' rights means the rights outlined in the Queensland Charter of Victims' Rights

11. Approval and implementation

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

Version control

Version	Date	Comments
4.0	20 December 2024	Policy review to align with the Queensland Public Service Complaint Management Framework and Guideline. Affected documents are DoH Customer Complaint Policy and Standards.
3.0	10 December 2019	Policy review to incorporate requirements of the Human Rights Act 2019.
2.0	21 February 2019	Policy review incorporating recommendations from the Queensland Ombudsman, further guidance on receiving, recording, assessing, reviewing, responding and evaluating complaints and updated definitions.
1.0	5 July 2017	Endorsed first version.