

# Customer Complaint Management

# Standard

QH-IMP-450-1:2017

## 1. Statement

This standard provides the minimum actions required to comply with the Customer Complaint Management Policy for the Department of Health (the department). The objective of customer complaint management in the department is to provide a system which facilitates communication between customers and the organisation, and to agree on a resolution to a problem which suits both parties. Complaints and/or the receipt of feedback provide an opportunity for continuous improvement to the services, policies and operations of the department.

The standard seeks to provide:

- enhanced public confidence
- recognition of the needs and expectations of complainants
- open, accessible and effective complaints management processes
- a system that can be used to analyse, evaluate and audit complaints in order to deliver service improvements

The Complaints Management Policy, Standard and Guideline (the framework) outlines the intent, roles, responsibilities and operational guidance for complaint management in the department. The framework is based on the Australian/New Zealand Standard, Guidelines for Complaint Management in Organisations (AS/NZ 10002:2014).

## 2. Scope

This standard applies to all employees, contractors and consultants within the Department of Health divisions and commercialised business units.

This standard does not apply to employees, contractors and consultants of Queensland Hospital and Health Services (HHSs).

This standard does not replace or interfere with existing statutory or policy obligations the department has in relation to other types of complaints which have established complaint management processes, pathways and reporting obligations.

### 3. Principles

Principle	What this means in the department
<b>People focus</b>	<ul style="list-style-type: none"> <li>• Everyone has a right to complain.</li> <li>• The department proactively seeks and receives feedback and complaints.</li> <li>• People making complaints are treated with respect.</li> <li>• Complainants are not adversely affected because of a complaint made by them or on their behalf.</li> <li>• The department will accept complaints from representatives of customers, including family members, friends and other people or organisations that act in support of the person.</li> </ul>
<b>Visibility, transparency and access</b>	<ul style="list-style-type: none"> <li>• Information about how and where a complaint can be made is made available on the department's websites and made available (both in writing and verbally) at frontline service locations.</li> <li>• A complaint may be made to any employee of the department in person, by phone, email, letter or using the online form on the department's websites.</li> <li>• The department will provide all reasonable and practical help and support to make it easy for all complainants to make a complaint by recognising the particular needs of people, including people with disability, people living in regional and remote areas, the aged and people from culturally and linguistically diverse backgrounds.</li> <li>• A complainant will not be charged a fee to complain.</li> </ul>
<b>Responsiveness</b>	<ul style="list-style-type: none"> <li>• Complaints are acknowledged promptly and responded to fairly, reasonably and in a timely manner.</li> <li>• Anonymous complaints are accepted and treated like any other complaint.</li> <li>• Staff are aware of the policy and procedures available on the department's websites and intranet.</li> <li>• Adequate resources, including trained staff, are available to manage complaints.</li> <li>• Complaints are recorded and tracked, timeframes for resolution are monitored and complainants are entitled to reasonable progress reports.</li> </ul>
<b>Objectivity and fairness</b>	<ul style="list-style-type: none"> <li>• Complaints are taken seriously and are handled fairly, objectively and without bias.</li> <li>• Complaints are assessed and categorised on nominated criteria.</li> <li>• Personal information is managed in line with the <i>Information Privacy Act 2009</i> and ethical obligations.</li> <li>• Managing officers may refuse to investigate a complaint if it is considered to be abusive, trivial or vexatious.</li> <li>• The principles of natural justice and provision of avenues for review are applied to all parties to a complaint.</li> <li>• Reviews of decisions will be made by people other than the original decision maker.</li> </ul>

Principle	What this means in the department
<b>Feedback</b>	<ul style="list-style-type: none"> <li>Adequate and timely feedback is provided to all complainants about the progress of their complaint, the outcome reached by the department and the reasons for the department's decision.</li> <li>Complainants are notified of available review mechanisms. If a complainant is unsatisfied with the outcome of their complaint they may request an internal review. If a complainant remains unsatisfied with the outcome after internal review, they may seek external review.</li> <li>The department will seek regular feedback about the way it manages complaints.</li> </ul>
<b>Remedies</b>	<ul style="list-style-type: none"> <li>Appropriate remedies that are fair to both the complainant and the department are offered. Complainants are able to request a remedy that is considered as the first option.</li> <li>Effective resolution and compromise is attempted wherever possible.</li> </ul>
<b>Accountability, learning and prevention</b>	<ul style="list-style-type: none"> <li>The complaint management framework is reviewed regularly to ensure relevance and effectiveness.</li> <li>Mechanisms are in place to gather and record information to meet reporting requirements, identify complaint trends, monitor the time taken to resolve complaints and identify potential business improvements.</li> <li>Potential system improvements revealed by complaints are identified by the area responsible and reported regularly to the executive.</li> <li>Information about complaints in the department will be published annually.</li> </ul>
<b>Skills Development</b>	<ul style="list-style-type: none"> <li>Staff who manage customer complaints need to develop and maintain skills in complaints handling and be supported in doing so.</li> </ul>

## 4. Roles and Responsibilities

### 4.1 Director-General

The Director-General is responsible for the following:

- ensuring that a complaint management framework is established and maintained within the department
- cultivating a customer focus throughout the department
- appointing a senior executive (Senior Complaint Executive) with overall strategic responsibility and authority for complaints management within the department.

### 4.2 Senior Complaint Executive

The Senior Complaint Executive (Deputy Director-General, Corporate Services Division) is responsible for the following:

- ensuring the promotion of awareness of the complaint management framework within the department
- ensuring that information about the complaint management framework is easily accessible to members of the public and is communicated in an easy to understand manner

- c) ensuring there is a process in place for timely and appropriate notification to senior management of any significant complaints or systemic issues identified through complaints
- d) ensuring that there is a process for regular reporting on complaint management generally, and as per the Minimum Reporting Requirements (refer section 5.1)
- e) ensuring that complaints are managed effectively
- f) establishing a process of performance monitoring, evaluation and reporting
- g) reporting to the Director-General on the operation of the complaint management system
- h) reporting to staff and other relevant stakeholders about issues of concern identified through the complaint management system.

#### **4.3 Deputy Directors-General**

Deputy Directors-General are responsible for the following:

- a) ensuring the overall efficiency of the complaint management system within their Divisions or Commercialised Business Units
- b) ensuring their Divisions or Commercialised Business Units facilitate compliance with the department.
- c) supporting the role of the Senior Complaints Executive within their Divisions or Commercialised Business Units
- d) fostering an effective and efficient complaint management culture within their Divisions or Commercialised Business Units
- e) ensuring systemic recommendations arising from complaints are implemented effectively and efficiently
- f) liaising with the department's Senior Complaint Executive

#### **4.4 Business Unit Managers**

Business Unit Managers should, as applicable within their area of responsibility, be responsible for the following:

- g) ensuring a complaint management system is implemented which is compliant with the requirements of the department's complaint management framework
- h) ensuring their staff are aware of the organisation's complaint management framework and the benefits of receiving complaints
- i) ensuring information about the business area's complaint management processes, including the department's complaint management framework, is easily accessible to staff
- j) ensuring that monitoring of the business area's complaint management process is undertaken and recorded
- k) ensuring the business unit has a complaints register for recording complaint data
- l) ensuring that complaints are recorded and corrective action is taken to prevent a problem from reoccurring
- m) ensuring that complaint management data is available for review by senior management
- n) ensuring staff handling complaints are appropriately skilled and experienced

#### **4.5 Staff handling complaints**

All staff handling complaints should:

- a) have appropriate skills or experience in complaint management and the implementation of complaint management procedures relevant to their role and business area
- b) capture minimum complaint data (refer section 5)
- c) treat complainants in a respectful and courteous manner
- d) comply with the department's complaint management data and reporting requirements
- e) comply with the department's Customer Complaint Management Policy and procedures

## 5. Minimum Complaint Data Requirements

The department has adopted the minimum complaint data requirements as outlined in AS/NZS 10002:2014. It is recommended the following information is collected for each complaint:

- a) Date complaint received
- b) Complainant's name, address and contact details
- c) How complaint was received or referral source
- d) Who is handling the complaint
- e) Dates/methods of follow up contact with complainant
- f) Primary reason or cause of the complaint
- g) Outcome (including 'no further action') and any remedies provided as a result of the complaint
- h) Date complaint finalised.

### 5.1 Minimum Reporting Requirements

Section 219a(3) of the *Public Service Act 2008* requires the department to publish the following information for the financial year by 30 September each year:

- a) the number of customer complaints received
- b) the number of those complaints resulting in further action
- c) the number of those complaints resulting in no further action.

## 6. Privacy and Records

The National Privacy Principles (NPPs) contained within the *Information Privacy Act 2009* must be applied when managing customer complaints. These are essentially rules about how the department must handle all personal information including collection, storage, use and disclosure of personal information. The department has a dedicated Privacy and Confidentiality Contact Officer: the Manager, Privacy and Right to Information Unit.

Appropriate recordkeeping is the responsibility of all staff. Records associated with complaints must be managed in accordance with the *Public Records Act 2002*. The business area responsible for managing the complaint must ensure accurate records are made and kept for as long as they are required. A public record can only be disposed of with the consent of the State Archivist.

If a complaint is referred from one business unit to another, a record of the transfer of the complaint should be kept so there is an auditable trail of the complaint through the department.

## 7. Legislation

- *Public Service Act 2008*
- *Information Privacy Act 2009*
- *Hospital and Health Boards Act 2011*
- *Public Records Act 2002*

## 8. Supporting documents

The department's Complaint Management Standard is supported by:

- Department of Health Customer Complaint Management Policy
- Department of Health Customer Complaint Management Guideline
- AS/NZS 10002:2014 Guidelines for complaint management in organisations.

## 9. Definitions

Term	Definition	Source
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.	AS/NZS 10002:2014 <i>Guidelines for Complaint Management in Organisations</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.	AS/NZS 10002:2014 <i>Guidelines for Complaint Management in Organisations</i>
Customer Complaint	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. It includes, for example, a complaint about any of the following: (i) a decision made, or a failure to make a decision, by a public service employee of the department; (ii) an act, or failure to act, of the department; (iii) the formulation of a proposal or intention by the department; (iv) the making of a recommendation by the department; (v) the customer service provided by a public service employee of the department.	<i>Public Service Act 2008</i>
Complaint Management Framework	Comprised of the Customer Complaint Management Policy, Standard and Guideline.	NA
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. department business areas providing services to other department business areas, employees, contractors and consultants).	NA
Enquiry	Contact or correspondence from a customer seeking information.	NA
External Review	A review of the management of a complaint by an entity external to the department.	NA
Further Action	The complaint was accepted and the complainant received a response and/or outcome advice after the complaint was finalised.	NA

Term	Definition	Source
No Further Action	It was not possible and/ or appropriate to accept, consider and/or respond to the complaint. This may be due to insufficient information to follow up, vexatious, threatening or abusive complaints.	NA
Vexatious Complaint	A complaint without grounds made to cause annoyance, frustration or worry.	<i>Oxford Dictionary</i>

## Version Control

Version	Date	Comments
1.0	5 July 2017	Endorsed first version