

# Customer complaint management

Department of Health Guideline  
QH-GDL-450-2:2017

## 1. Statement

The Customer Complaint Management Guideline (the guideline) provides advice on best practice for customer complaint management within the Department of Health (the department). The guideline supports the Customer Complaint Management Policy and Standard, which together comprise the Customer Complaint Management Framework

## 2. Scope

This guideline applies to all employees, volunteers, contractors and consultants within the department's divisions and commercialised business units managing customer complaints about staff, products and/or services they provide, including whether an action or decision limits human rights.

Compliance with this guideline is not mandatory, but sound reasoning must exist, and be documented, for departing from the recommended principles within the guideline.

This guideline *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, for example; regarding corruption, fraud or right to information/privacy, complaints made by public servants regarding their employment/employer or any other type of complaint already addressed by subject specific legislation and/or policies
- enquiries from a customer about a departmental service or action of the department, or its staff.

## 3. Requirements

Effective complaints resolution is about achieving the right outcomes in a fair and timely way and providing meaningful responses. Central to effective complaints resolution is the receiving, recording, assessing, reviewing and responding stages of the complaints process. The following requirements provide best practice guidance for the management of customer complaints in the department. It is acknowledged that business areas may already have established local systems and processes in place for managing complaints, and/or may already be required to receive and manage complaints in accordance with legislation. These guidelines are not intended to replace existing processes and procedures if they are already operating effectively and meet the minimum requirements as outlined in the Customer Complaint Management Policy and Standard.

### 3.1 Accessibility and usability

It is important people feel encouraged to voice concerns and provide feedback. The process for making a complaint should be easy to access, understand and use. Consideration should be given to alternative approaches to communicating the complaint process, to ensure equitable access to the complaint management process. Alternative approaches may include:

- Large print on brochures or web pages.
- Braille, audio formats for vision or hearing-impaired people.
- Use of simple English and illustrations.
- Access to an interpreter service.

### 3.2 Identification of a complaint

An important first step in the complaint management process is the identification of a complaint. Customer complaints can be made in a number of ways and should be treated in accordance

with the principles outlined in the Customer Complaint Management Policy, regardless of how the complaint is made. To correctly identify a customer complaint, staff should be familiar with the definition of a customer complaint as defined by the *Public Service Act 2008* i.e. “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”. Some of the more common methods for making a complaint include:

- Via written correspondence (e.g. email, letter) to the department or Minister’s office
- Phone call (to a call centre, division or business area)
- Online (e.g. via an online form or social media)
- In person (particularly when the complainant is internal)

When managing complaints, staff should also consider and identify any human rights relevant to a complaint.

Whilst this guideline is specific to customer complaints, it’s important to be aware of other types of complaints which require referral to specific areas within the department for management e.g. complaints of corrupt conduct, Right to Information/Privacy, staff grievances. Managers should ensure staff have a general understanding of the different types of complaints and complaint pathways.

### **3.3 Receipt and recording of customer complaint**

The area receiving the customer complaint should record the complaint with its supporting information. In addition to the minimum data requirements outlined in the standard, it is good practice to record upfront:

- a. The outcome sought by the complainant
- b. Any other information required to properly respond to the matter
- c. Any support requirements needed by the complainant

Depending on the volume and complexity of complaints, business areas may opt to utilise a simple spreadsheet to record complaint information or use a dedicated complaint management information system. The department has a supported complaint management information system (RiskMan) which is available to appropriately record and report on complaints.

To support management analysis and identify trends it is recommended that business areas designate standard customer complaint types suited to their business context (e.g. customer service, service, product, process). These types may be drawn from existing information systems or developed and added to spreadsheets as appropriate for the business area. The human rights related complaints should be separately identifiable in the system and reports. For information about the type of data which needs to be captured, please refer to the Customer Complaint Management Standard.

### **3.4 Tracking of customer complaint**

The business area managing the customer complaint should track the progress of each complaint until its finalisation. An up-to-date status should be made available to the complainant upon request and/or at regular intervals. Tracking of customer complaints can be recorded on a log (or similar) and may be useful if the complaint (or part thereof) is referred to other areas within the department to respond to.

### **3.5 Acknowledgement of customer complaint**

The business area should promptly acknowledge receipt of a customer complaint. This is particularly important for those customer complaints which are unable to be resolved immediately at the first point of contact with the department. Consideration should be given by

the business area to the most appropriate medium for communicating with the complainant, taking into account departmental policy regarding correspondence and the needs and expressed views of the complainant. For example, acknowledging a complaint using the same medium by which the complaint was made, or by a medium requested by the complainant (such as by way of post, phone or email).

### **3.6 Guidance for managing the customer complaint**

#### **3.6.1 Initial Assessment**

After receipt, the business area should assess whether there is more than one issue raised in the complaint, and if so, whether each issue needs to be separately addressed. It is important at the assessment stage to again consider the type of complaint being made including identification of human rights relevant to the complaint. This should occur initially at the identification stage (refer s3.2), however it is worth confirming as part of the assessment process. A structured assessment process may reveal other aspects to the complaint which were not previously considered earlier on when it was identified.

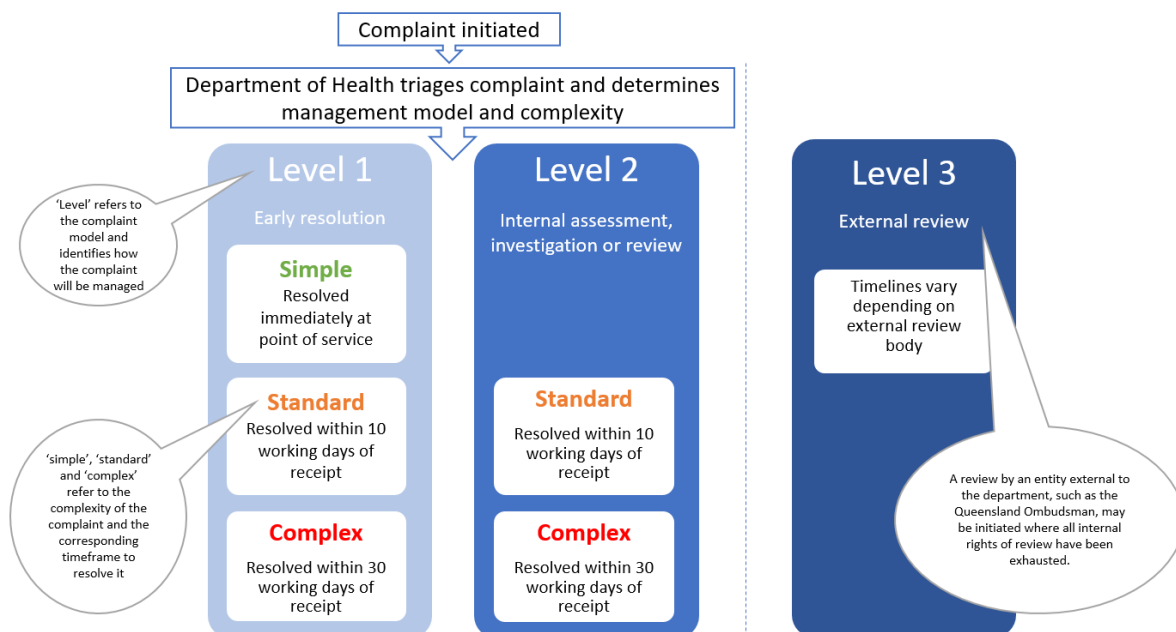
To determine the most appropriate way to manage a complaint, it should be assessed in terms of criteria such as:

- a. whether human rights are engaged or limited
- b. health and safety (including patient safety) implications
- c. complexity (is it simple, standard or complex?)
- d. impact on the individual, the general public or the department
- e. potential to escalate
- f. the need and possibility of immediate action
- g. jurisdiction if applicable (this is particularly relevant if the complaint is identified as other than a customer complaint as identified in the *Public Service Act 2008*)
- h. the outcomes sought by the complainant
- i. whether other agencies or areas within the department need to be involved.

#### **3.6.2 Customer complaint management model**

After the initial assessment, the business area should appropriately consider how to address the issues raised in the complaint. This could include working with the complainant to see if the issues can be appropriately addressed, informal inquiries, or a formal investigation into the complaint. The nature and scope of any enquiry or investigation will depend on the circumstances of each case, the issue complained about, the parties involved, and the likely outcome.

Figure 1 below shows the inter-relationship between the complaint management model and the complexity assessment and how they inform the timeframe for the complaint to be resolved.



**Figure 1** Customer Complaint Management Matrix

A customer should raise a human rights complaint with the department initially before making a complaint to the Queensland Human Rights Commission. The department has 45 business days to resolve the human rights complaint

### 3.6.3 Addressing the customer complaint

The business area should handle all complaints in a manner intended to lead to their effective resolution as quickly as possible. Wherever possible, complaint outcomes should be tailored to the underlying cause of each complaint, whether it was raised by the complainant or not.

### 3.6.4 Communicating with the complainant

The business area with primary responsibility for the management of the customer complaint should actively communicate its progress to the complainant, particularly where progress has been delayed.

The business area should communicate the outcome to the complainant using the most appropriate medium. The outcome advice should advise the complainant of:

- what actions were taken by the department in response to the complaint
- the outcome(s) of the complaint
- the reasons for any decisions that have been made
- any remedy or resolutions that have been offered
- information about other remedies that may be available to the complainant, such as seeking an internal or external review

## 3.7 Objectivity

It is important that complaints are handled in an equitable, unbiased and objective manner. This helps ensure the department's complaint management system is, and is perceived to be, fair and reasonable. The following principles can assist complaint managers to remain objective whilst they are managing complaints:

- Openness: the complaint process should be clear and well publicised
- Impartiality: avoid bias and place emphasis on the issues raised and facts which can be proven. Complaint Managers with a potential or actual conflict of interest related to the complaint or the complainant must declare the conflict and refer the matter to an equivalent or more senior manager
- Confidentiality: the process should protect the complainant's identity as far as reasonably possible
- Completeness: Obtaining a complete picture and finding the relevant facts.

### **3.8 Closing the customer complaint, review and record keeping**

At the time of closing the customer complaint, the business area should record the following:

- a. steps taken to address the complaint(s)
- b. the outcome of the complaint(s)
- c. any undertakings or follow up action required.

Information recorded in closing a complaint may assist the department to respond to any further reviews or appeals, as well as assist in the analysis of customer complaint data which in turn can lead to quality improvements. The data referred in the Customer Compliant Management Standard must be retained.

### **3.9 Internal and External Review**

If the complainant is dissatisfied with the outcome determined for their original customer complaint, they may request an internal review. The internal review should:

- a. be made within a reasonable timeframe after the original decision having regard to any circumstances that may have contributed to any delay
- b. be conducted by an independent and more senior officer who is appropriately trained and has authority to overturn the previous decision and apply remedies, if necessary
- c. assess the reasons why the complainant is dissatisfied with the outcome, identify the relevant information supporting their complaint and the outcome requested
- d. be a systemic assessment of the process and/or merits of the original decision to ensure that it complied with policy or procedural requirements and the outcome reached was reasonable
- e. communicate the outcome, including explanation of the process taken to conduct the internal review and provide details of the relevant external review authorities with the complainant
- f. close the internal review in the same manner as 3.8.

### **3.10 Monitoring implementation of recommendations/remedies**

Deputy Directors-General or equivalent should ensure systems/processes are put in place to ensure implementation of outcome(s) are properly monitored.

### **3.11 Collection of information**

The business area should develop systems and processes for identifying, gathering, classifying, maintaining, storing, securing and disposing of complaint related records in accordance with the *Information Privacy Act 2009*, the *Public Records Act 2002* and the *Human Rights Act 2019*.

The use and maintenance of these records is the responsibility of the business area.

Points to consider regarding the collection and management of complaint related information include:

- Specifying steps for identifying, gathering, classifying, maintaining, storing and disposing of records

- Recording the handling of each complaint and appropriately maintaining these records
- Maintaining records of the type of training and instruction that individuals involved in the complaint management system have received
- Familiarisation with processes regarding requests for information, for example, Right to Information applications for complaint data
- Specifying how and when de-identified complaint data may be disclosed to the public or other organisations.

### 3.12 Analysis and evaluation of complaints

If there are a number of complaints about a similar issue, or a single complaint with the potential to impact the department's business or people, it is important to find out the cause of the problem so it can be remedied. Likewise, it is important to continually monitor the effectiveness and efficiency of local complaint management systems and processes. This should include the degree of complainant satisfaction, whether the complaint was correctly assessed, and the time taken to respond to complaints.

Root cause analysis (RCA) is one common technique which can be used to assist in identifying why a problem has occurred. It requires looking beyond the problem and examining the human and organisational processes and systems that might have caused it. RCA uses a specific set of steps to find the primary cause of a problem so that the organization can:

- determine what happened;
- determine why it happened; and
- figure out what to do to reduce the likelihood that it will happen again.

An effective RCA process can:

- remedy significant and recurring problems
- encourage quality service throughout the department
- lessen unacceptable and foreseeable risks
- reduce waste and lower costs
- improve complainant relations, satisfaction and experience
- improve relationships amongst internal stakeholders and provide opportunities to collaborate
- improve staff morale by focusing on service improvement rather than attributing blame.

It is important that at least the minimum data is collected, stored and maintained to facilitate an analysis process. Complaints should be analysed to identify systemic, recurring and single incident problems and trends. When assessing the effectiveness of local systems and processes, this may take the form of case reviews, self-assessments, staff and complainant satisfaction surveys. Analysis and evaluation should be undertaken by the business area annually as a minimum, and more frequently if the business area receives a high volume of complaints or feedback.

### 3.13 Unreasonable and/or unacceptable complainant conduct

There may be occasions where the conduct of a complainant may be considered unreasonable or unacceptable. For example, they may be aggressive, threatening and verbally abusive towards staff. Complainant conduct may be considered unreasonable or unacceptable where it involves behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the department and its staff or other service users.

Key principles for dealing with unreasonable or unacceptable complainant conduct should include the following:

- a. Recognition that complainants must comply with the law and reasonable community standards
- b. Instruction and training to complaint handlers to ensure focus is placed on observable conduct and the content of communications, not the individual
- c. A willingness to modify communication with the complainant depending on the complainant's conduct
- d. Recognition that all parties to a complaint have certain rights and responsibilities
- e. Communication with complainants to advise them of their right to communicate with the department and the way in which service will be provided to them, subject to their reasonable compliance with acceptable standards of conduct
- f. Recognition that a healthy and safe work environment for staff requires regular risk assessments
- g. Complainants who are internal (e.g. employees, volunteers, contractors and consultants of the department) are obliged to conduct themselves in line with the Code of Conduct for the Queensland Public Service.

## 4. Legislation

- *Public Service Act 2008*
- *Information Privacy Act 2009*
- *Hospital and Health Boards Act 2011*
- *Public Records Act 2002*
- *Human Rights Act 2019*

## 5. Supporting documents

- Department of Health Customer Complaint Management Policy
- Department of Health Customer Complaint Management Standard
- Quick Guide for Customer Complaint Management
- *AS/NZS 10002:2014 Guidelines for complaint management in organizations*
- Queensland Ombudsman's online guide to identifying and managing unreasonable complainant conduct
- Queensland Ombudsman's online Policy and Procedure Guide
- Queensland Government Guide: Handling human rights complaints.
- Department of Health human rights complaints guide

## 6. 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.	<i>AS/NZS 10002:2014 Guidelines for Complaint Management in Organisations</i>

Term	Definition	Source
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: <ul style="list-style-type: none"> <li>i. a decision made, or a failure to make a decision, by a public service employee of the department</li> <li>ii. an act, or failure to act, of the department</li> <li>iii. the formulation of a proposal or intention by the department</li> <li>iv. the making of a recommendation by the department</li> <li>v. the customer service provided by a public service employee of the department.</li> </ul>	<i>Public Service Act 2008</i>
Customer Complaint Management Framework	Comprised of the Complaint Management Policy, Complaint Management Standard and Complaint Management Guideline.	NA
Complaint Management System (CMS)	The systems, processes and procedures used to manage customer complaints. The CMS must comply with the requirements outlined in the Australian Standard.	NA
Customer	A consumer of the department's products and/or services	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 resulted in remedial or improvement action.	NA
Internal Review	An internal review is an objective, independent and impartial merits review of the complaint process and outcome. It is not a re-investigation.	NA
Human Rights	Human rights means the rights stated in part 2, divisions 2 and 3 of the <i>Human Rights Act 2019</i> .	<i>Human Rights Act 2019</i>
Local systems and processes	Systems, processes and procedures developed at divisional and/or commercialised business unit level to manage customer complaints. Local systems and processes must comply with the requirements outlined in the Complaint Management Framework.	NA



Term	Definition	Source
No Further Action	The complaint was accepted and resolved immediately at the point of service.	NA
Vexatious Complaint	A complaint without grounds made to cause annoyance, frustration or worry.	Oxford Dictionary

## Version Control

Version	Date	Comments
1.0	5 July 2017	Endorsed first version
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
3.0	10 December 2019	Policy review to incorporate requirements of the <i>Human Rights Act 2019</i>