



# Complaints and feedback management policy

## Purpose

This policy outlines the approach adopted by the Department of the Premier and Cabinet (DPC) to effectively manage customer complaints and feedback.

Research consistently shows that customers who have experienced a well-managed complaint have a higher level of satisfaction than if they never made a complaint in the first place.<sup>1</sup>

DPC is committed to making its complaints and feedback process transparent, accessible, inclusive and responsive. This policy applies to all DPC employees.

The policy conforms to the guiding principles of the Australian and New Zealand Standard on Guidelines for Complaints Management in Organisations (AS/NZS 10002:2014) as described in SA Ombudsman's Complaints Management Framework (March 2016) (Appendix 1).

The Complaints and Feedback Management Policy (the policy) responds to the requirements of *PC Circular 039 – Complaints management in the South Australian public sector*. DPC's complaints management system (CMS) is part of the department's broader customer excellence program aimed at improving the quality of our customers' experience.

Local complaint management procedures, as required by PC Circular 039, must be consistent with this policy's Guiding Principles and definitions.

## Scope

Matters in scope for this policy relate to services or products provided by the Department of the Premier and Cabinet (DPC).

For the purposes of this DPC Complaints and Feedback Management Policy, matters considered out of scope include those relating to administrative law, appeal decisions, judicial decisions, employment decisions or [Public Interest Disclosure](#).

In terms of employment decisions, Section 61 of the *Public Sector Act 2009* provides that an employee aggrieved by an employment decision of a public sector agency which directly affects the employee may apply for an [internal review](#) of the decision. An employment decision means an administrative decision relating to the employment of a person, including an administrative decision relating to the engagement, promotion, transfer, remuneration, entitlements or termination of employment of a person and a decision to take disciplinary action against a person.

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<sup>1</sup> South Australian Customer Satisfaction Measurement Survey. Government of South Australia 2017

In relation to Public Interest Disclosure, public authorities and public officers have obligations to report conduct where they reasonably suspect it amounts to corruption and other criminal conduct, misconduct or maladministration, in accordance with the [Code of Ethics for the South Australian Public Sector](#) and the [Directions and Guidelines issued by Independent Commissioner Against Corruption](#).

The *Public Interest Disclosure Act 2018* establishes a scheme that encourages and facilitates the disclosure of public interest information to certain persons or authorities. It provides protections for those who make appropriate disclosures and sets out processes for dealing with those disclosures. There are two types of public interest information. The first is environmental and health information. The second is public administration information. For further information, please refer to the [Public Interest Disclosure Guidelines](#).

Where an alternative whole of government complaints management policy is mandated, the DPC policy is not applicable.

## Definitions

- **Customer:** the people who receive or use our services; they can be individuals or organisations who are directly affected by our services, policies or programs. Customers can be internal or external to government.
- **Complaint:** an expression of dissatisfaction about the service or action of a South Australian public-sector agency, or its employees, by a person or organisation directly affected by the service or action where a response or resolution is explicitly or implicitly expected or legally required.
- **Feedback:** any opinion, comment/suggestion, compliment or expression of interest/concern made directly or indirectly by a customer where a response or resolution is not explicitly or implicitly expected or legally required.
- **Complaint management system (CMS):** comprises policies, procedures, organisational culture, our employees, and the hardware and software needed to manage complaints and feedback in a responsive, timely and effective way.
- **Public Officer:** includes public sector employees and contractors performing contract work for a public authority or the Crown.
- **Procedure:** instructions that set out how policies will be implemented and by whom

## Roles and responsibilities

**The Chief Executive** is accountable for the effective implementation of the policy within the Department of Premier and Cabinet. The Chief Executive promotes a culture that values complaints and their effective resolution. The Chief Executive supports the use of complaints data to inform service improvements leading to better customer service overall.

**Executive Directors, Directors and Managers** are responsible for ensuring the policy and procedures are visible, accessible, and promoted throughout the department and to customers. They ensure the community can access the complaints process easily and in a way that meets the customers' needs. They also ensure complaint and feedback data is collected, analysed and used to identify opportunities for systematic service improvements. They ensure employees managing complaints are resourced appropriately and supported in a timely manner.

**Team leaders and Supervisors** are responsible for ensuring that the policy is implemented within their teams, and that business unit procedures are in place to support employees to

deliver services effectively including complaints from their customers. They ensure fair, effective and efficient complaints management within their teams in accordance with this policy, and actively provide training, support and timely advice to employees who are managing complaints.

**DPC employees** are required to comply with the policy, and any related local procedures. Employees must treat customers with respect and assist customers to make complaints and provide feedback where appropriate. Employees respond promptly to complaints, resolve issues in a timely manner and help to make service improvements based on customer complaints data. They promptly support colleagues who have an active complaints management role.

## Policy

DPC applies a three-level model for complaint handling.



DPC's preferred response to complaints is resolution at first point of contact wherever possible.

## Timeframe

DPC aims to resolve an escalated complaint within 21 working days. Where a complaint cannot be resolved within 21 working days, we will advise the person and negotiate an interim response with an indicative timeframe as to when a full response can be expected.

## Initial assessment

After receiving a complaint or feedback, employees will confirm with the customer whether the issues raised are within their area's responsibility. If not, employees will advise the person making the complaint and provide specific assistance to forward the complaint to the correct area.

Each business unit must have a clearly defined procedure to assist employees to transfer or escalate complaints in a timely and sensitive manner.

DPC employees need to show consideration to the cultural sensitivities and complexity experienced by Aboriginal customers. Customers who are culturally and linguistically diverse, disadvantaged or vulnerable may also need support to make a complaint to DPC. We will ensure our processes are flexible and sensitive to individual requirements, and that customers' rights to make complaints are supported.

## **Receipt of complaints**

Employees managing complaints will record the customer's complaint or feedback and any supporting information in DPC's Objective or similar online records management systems as per the *State Records Act 1997*.

At a minimum, the complaint record will include:

- the customer's details (noting some complaints are made anonymously)
- the date of the contact (to establish response timeframes)
- the nature of the contact (adding keywords 'complaint', 'suggestion' or 'enquiry')
- the action sought by the customer (if a complaint)
- the outcome and decision of the complaint (once the investigation is completed), and
- any other information required to properly respond to the matter.

## **Acknowledgement of complaints**

DPC will acknowledge receipt of complaints or feedback within three (3) working days. Employees should use the customer's preferred communication method to acknowledge the complaint and to keep in contact. Regular and responsive communication can reduce complaint escalation.

## **Investigating complaints**

We will address each complaint with integrity and in an equitable, objective and unbiased manner. We may

- give the person information or an explanation
- gather information from the person or area that the complaint relates to
- investigate the claims made in the complaint.

Our investigations will be outcome focused. If there are any delays, we will keep the customer up-to-date with progress. Investigation records will be complete and informative.

## **Providing reasons for decisions**

Following consideration of the issues raised, we will contact the customer and advise them of:

- the outcome of the complaint and the action we took
- the reasons for our decision
- the remedy or resolutions that we have proposed or put in place
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

Where appropriate, we will provide an apology to the customer. The form and method of communication will depend on the circumstances of the case, the harm or impact to the customer, and what is hoped to be achieved by giving the apology.<sup>2</sup>

## **Closing the complaint**

We will keep complete records about:

- how we managed the complaint
- the outcome of the complaint (including whether it or any aspect of it was substantiated), any recommendations made to address problems identified and any decisions made on those recommendations
- any outstanding actions that need to be followed up.

At the end of the investigation, we will review the cause of the complaint. We will ensure our records includes a complaint category to assist us track trends and flag opportunities for service improvement. We will ensure that complaint outcomes are properly implemented, monitored and reported to senior management.

## **Complaints review**

We will inform customers who make complaints about the internal and external review options available to them, including to the SA Ombudsman at [www.ombudsman.sa.gov.au](http://www.ombudsman.sa.gov.au).

## **Reporting**

Half yearly reports on complaints data and service improvements will be provided to DPC's Executive group. These reports can include:

- the number and types of complaints received
- the outcome of complaints, including matters resolved at first point of contact
- any systemic issues identified
- any service improvements made resulting from customer complaint or feedback
- the number of requests received for internal and/or external review.

This information will also be used to meet DPC's annual reporting requirements. As our complaints management maturity improves, we may add or change our reporting metrics and requirements.

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<sup>2</sup> AS/NZS 10002:2014. Appendix 2: Effective Apologies.

## Related documents

- Australian/New Zealand Standard: Guidelines for complaint management in organisations (AS/NZS 10002:2014)
- Department of the Premier and Cabinet Circular 039 – Complaint Management in the South Australian Public Sector
- Premier and Cabinet Circular PC013 - Annual Reporting Requirements
- SA Ombudsman's Complaints Management Framework (March 2016)
- State Records Act 1997
- Premier and Cabinet Circular PC012 — Information Privacy Principles (IPPS) Instruction.
- [Code of Ethics for the South Australian Public Sector](#)
- [Directions and Guidelines issued by Independent Commissioner Against Corruption](#)
- Public Interest Disclosure Guidelines

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## Appendix 1: Guiding principles

DPC employees are guided by the following principles when handling and resolving complaints and receiving customer feedback<sup>3</sup>.

### 1- Facilitate complaints

**People focus:** We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in complaints will be dealt with within 21 days.

People making complaints will be:

- acknowledged in the first instance
- provided with information about our complaint handling process
- provided with multiple and accessible ways to make complaints
- listened to and treated with respect by employees
- actively involved in the complaint process where appropriate
- provided with reasons for our decisions/s and any options for redress or review

**No detriment to making complaints:** We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

**Anonymous complaints:** We accept anonymous complaints where they raise significant issues and there is enough supporting information to investigate the issues raised.

**Accessibility:** We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems for making complaints are easily understood and accessible to everyone and will help people who need assistance to formally make complaint.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (for example advocate, family member, legal or community representative, member of Parliament, another organisation).

**No charge:** Complaining to us is free.

### 2- Respond to complaints

**Early resolution** Where possible, complaints will be resolved at first contact with DPC.

**Responsiveness** We will promptly acknowledge receipt of complaints. We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issue raised. If the matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

<sup>3</sup> *Australian and New Zealand Standard on Guidelines for Complaints Management in Organisations (AS/NZS 10002:2014)* as described in *SA Ombudsman's Complaints Management Framework (March 2016)*



We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process and the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for the delay.

**Objectivity and fairness:** We will address each complaint with integrity and in an equitable, objective and unbiased manner. Where the complaint relates to an employee's service or conduct, the complaint will be handled by another employee. Conflicts of interest, whether actual or perceived, will be managed responsibly. Internal reviews of how a complaint was managed will be conducted by a person who did not make the original decision.

**Responding flexibly:** DPC employees are empowered to resolve complaints promptly and as simply as possible, while still maintaining good records management. We will adopt flexible approaches to service delivery and problem solving to ensure accessibility for people making complaints and/or their representatives. We will assess each complaint on its merits and as far as possible involve people making complaints and/or their representatives in the process.

**Confidentiality:** We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by DPC as permitted under the relevant privacy laws, secrecy provisions and relevant confidentiality obligations.

### **3- Manage the parties to a complaint**

**Complaints involving multiple agencies:** Where a complaint involves multiple organisations, DPC will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within DPC, a coordinated approach will be taken when communicating with the person making the complaint and/or their representative.

DPC expects any contracted service providers to have an accessible and comprehensive complaint management system. Where a complaint is received by a contracted service provider, DPC will coordinate a response with the service provider.

**Complaints involving multiple parties:** When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

**Empowerment of employees:** All employees managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities. Employees are encouraged to provide feedback on the effectiveness and efficiency of all aspects of the DPC complaint management system.



**Managing unreasonable conduct by people making complaints:** DPC is committed to being accessible and responsive to all people who approach us with feedback or complaints.

At the same time success depends on:

- the ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of employees
- their ability to allocate resources fairly across all the complaints we receive. When people behave unreasonably in their dealings with us, this can significantly affect the progress in resolving the complaint.

As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this