



## Effective complaint handling guidelines – 2nd edition

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## Foreword

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Since establishment in 1975, the NSW Ombudsman has received over 230,000 formal complaints and over 380,000 informal complaints. We have investigated a wide range of matters concerning the conduct and administration of NSW public agencies and public officials, and more recently a large number of private organisations. While most matters have been resolved informally, we have made over 6,800 formal reports to agencies and ministers and over 200 reports to Parliament.

Using this extensive knowledge and experience, we have, for some years now, been promoting more effective complaint handling throughout the public sector as a means for providing client and customer service, reducing the cost of disputes and improving policies and procedures. We have done this by providing a range of training courses and developing a series of resources of which this is one.

Our experience suggests that an effective complaints handling system must address the three key issues of how to:

- deal with complainants
- deal with complaints, and
- resolve justified complaints.

*Effective complaint handling* provides practical assistance in addressing these topics. It deals with complaint handling and sets out the essential features of a complaint system, the reasons people complain, and how complainants should be treated.



Bruce Barbour

**Ombudsman**

## Glossary

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The following terms are used throughout this publication:

ADR	alternative dispute resolution
agency	may include government departments, statutory authorities, councils, schools and community sector organisations
ATSI	Aboriginal and Torres Strait Islander
CEO	refers to the Chief Executive Officer of an agency, including a Director-General, principal officer or general manager of a council
complaint	refers to complaints, disclosures, reports, allegations
FOI	freedom of information
GM	general manager
ICAC	Independent Commission Against Corruption
NESB	non-English speaking background

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## Introduction

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An effective complaints system is an essential part of the provision of quality service in the public and community sectors. It is one method of measuring customer and client satisfaction to provide a useful source of information and feedback for improving the agency's service.

These guidelines provide a model approach to complaint handling and set out the essential features of a complaint system. They also provide an analysis of the reasons people complain, and outline how complainants should be treated. Community service organisations have additional and specific obligations to develop complaint handling systems under the *Community Services (Complaints Reviews and Monitoring) Act 1993* (CS-CRAMA). We have developed a specialised brochure for those services – Complaint handling kit for community services. That brochure supplements the information in this publication.

Different organisations use different terms to refer to their customers, clients or consumers. We have used the generic term 'customer' to refer to all of these groups.





# 1. Complaint handling and quality service

## 1.1. Customer service in the public and community sector

People have become increasingly aware of their rights and the responsibilities of the public and community sector. Dramatic improvements in service levels in the private sector mean that people now expect all agencies to deliver their services in a similar, responsive fashion. We must take it as given that public and community sector agencies exist to serve the public, and the public has a right to expect quality service.

But what does quality customer service mean?

There are some basic principles of quality service on which there is wide agreement. In addition to high standards in service delivery and the importance of a customer focus, agreed principles include economy, efficiency, effectiveness, fairness, impartiality, accessibility and responsiveness.

Many program objectives will be based on these principles. Corporate plans and codes of conduct for staff may also incorporate such principles and are useful guidelines to the standards of service quality agencies can aim for and which the public can expect. Statements detailing the services of the agency and the levels of service it aims to provide also set useful benchmarks.

However, these objectives do not automatically lead to customer satisfaction. That comes from being responsive, as far as reasonably possible, to the expectations of an agency's customer group.

## 1.2. Relationship between complaint systems and provision of quality customer service

Knowing what the expectations of the customer are and the extent to which those expectations are being met is essential to improving service. When customers' expectations exceed what the agency is able or can afford to deliver, or what a particular program is designed to provide, it highlights areas that need corrective action. Either service levels have to increase or unrealistic expectations have to be better managed.

A complaint handling system is an organised way of responding to, recording, reporting and using complaints to improve service to customers. It includes procedures for customers to make complaints and guidelines for staff to resolve complaints, and provides information to managers and staff that can assist them to prevent customer dissatisfaction in the future.

An effective complaints handling system is an essential part of providing quality service. It is a measure of customer satisfaction. It provides positive feedback about aspects of the service that work well, and is a useful source of information for improvement.

An effective complaints system will benefit the agency in four important ways by:

- creating a second chance to provide service and satisfaction to dissatisfied customers
- identifying areas that need improvement
- providing opportunities to strengthen public support for the agency, and
- assisting in planning and allocation of resources.

Quality customer service consists of doing the job right or providing the appropriate service at the outset, most of the time. If and when things go wrong in this process, they can only be put right, and a quality service delivered, if the agency hears about it in the first place. One way to think about complaints is as opportunities for service recovery.

A useful customer satisfaction service formula, which explains part of the importance of complaint handling, is this one:

Doing the job right  
the first time + Effective customer contact/  
complaint handling = Increased customer  
satisfaction/support

Dissatisfied customers speak badly of an agency and usually will tell many other people. Customers who have problems which are quickly resolved tend to be at least as loyal and supportive as those who have never experienced a problem, usually more so. The way complaints are dealt with will therefore be of great significance to the agency's reputation and performance. If the agency operates in a competitive market, effective complaint handling will have a direct effect on long term profitability. Where customers feel 'tied' to or are dependent on the services provided by the agency, the effect will be felt in any ongoing interactions with those customers.

Poor service and ineffective communication may account for one-third of total workload

Complaints which are not swiftly resolved can generate significant additional workload for an agency. Research suggests that problems arising from poor service and ineffective communication may account for a significant part of an agency's total workload. This also impacts heavily on staff morale.

Complaints invariably represent the experiences and feelings of not just the complainants, but of others in similar circumstances who have chosen not to complain. While research indicates customers are increasingly prepared to complain, many still don't. If they have alternative sources for the service in the private sector, they simply don't come back. If they are 'captured' customers, which is the case with many public sector monopolies and community services, their dissatisfaction can fester and make further contacts difficult. As well they are likely to criticise the service to others.

Customer complaints should be acted on in two ways. Firstly, the specific grievance must be resolved if at all possible. Secondly, data about the nature of the complaint must be captured to provide feedback about the system and processes. Often the complaints you receive are an early warning system of concerns held by the large percentage of other customers who experienced similar dissatisfaction but had not bothered to complain.

#### Practical tip

##### Is the customer always right?

It is no longer enough to determine whether a complaint is 'justified' or not from the agency's point of view. It is almost certainly justified in the view of the customer.

**While the customer may not always be right, the customer is always the customer!**

Complaint data helps identify service deficiencies that need corrective action

As well as allowing the agency to take action to deal with the individual complaints, complaint data, if captured properly, can help to identify areas in the service that need corrective action. Alternatively, it may show where the customers' expectations of service levels exceed what the agency can afford to deliver, or what a particular program is designed to provide. Such data may indicate a need for better publicity about, or explanations of, service standards and priorities.

To effectively use complaint data for feedback, it is vital to log all complaints in a systematic way, so that information can be retrieved for later reporting and analysis.

Just how much information an agency receives from customers depends on how difficult, or how easy, it is for them to complain, and any prior experience they may have with how well an agency responded to their feedback.

A complaint handling system is only one way of obtaining feedback. Customer satisfaction can be measured via other means eg. surveys, suggestion boxes, or focus groups.

Most agencies will use more than one method, checking the results of each to develop a fuller picture.

Practical tip

#### **Customer feedback system**

The value of using a customer feedback system as an 'extra' satisfaction measurement tool is that it's free information – there's no need to run a special survey to obtain it.

#### Summary

The primary objectives of an in-house complaints system are to grasp service recovery opportunities and to improve service in all areas. By using complaints feedback data, the causes of complaints can be addressed and a better agency developed. An effective feedback database will provide a useful management tool and a means of evaluating the quality of the service. To improve the number of service recovery opportunities, an agency needs to make it easy and attractive for customers to provide feedback.



## 2. A model approach to complaint handling

Experience from successful complaint handling agencies suggests that a tiered or stage approach to complaint handling is the most effective.

The model looks like this:

### A model approach to complaint handling

#### The customer wants:

- a user friendly complaints system
- to be heard
- to be understood
- to be respected
- an explanation
- an apology
- action as soon as possible.

#### An agency needs:

- a user friendly system for accepting customer feedback
- clear delegations and procedures for staff to deal with complaints and provide remedies
- clear internal and external referral procedures if complaint is not resolved at frontline
- recording system to capture complaint feedback/data
- performance standards including timeframes for response and quality of response
- to systematically review complaint data to identify problem areas and analyse trends
- to act to improve service delivery in identified areas.

#### Tier 1: Frontline complaint handling

Staff empowered with clear delegations to resolve complaints wherever possible at first contact.

Staff log complaint details for later analysis.

#### Tier 2: Internal review, ADR or investigation

More senior staff or designated complaint officer reviews/resolves informally/investigates unresolved complaints.

#### Tier 3: Independent review

Still unresolved complaints referred externally:

- alternate dispute resolution procedure tried (eg. mediation)
- complaint referred to external agency (eg. Ombudsman)
- Complainant informed of appeal procedure or other legal remedy.

The system should aim to resolve the majority of complaints at the Tier 1, the frontline.

For this model to be effective, a complaints system will need to have:

- an easily understood procedure for customers to provide feedback to the agency:
  - feedback may take the form of complaints, suggestions, inquiries, recommendations or requests for action
- clear delegations to staff that define their responsibility for dealing with complaints and their ability to remedy problems:
  - delegations should detail the scope of staff decision making ability and limits on remedies they can authorise
- staff who are skilled, motivated and empowered to be sensitive to and welcome complaints and feedback
- training for staff about the system and in the skills of listening, problem solving, and conflict resolution
- procedures for conciliating and investigating complaints
- performance standards for complaint handling such as target turn around times, progress reports to complainants
- control systems to make sure complaints are dealt with, performance standards are met, and
- manual forms or a database for capturing customer complaint feedback data to enable problem identification and trend analysis for use in program improvement planning.

An effective complaint handling system will then pass two principal tests:

- it will help resolve customer dissatisfaction about the service they receive or believe they should receive, and
- the data will assist the agency to identify problems and change procedures to prevent similar dissatisfactions and complaints in the future.

## 3. Essential features of a complaint system

### What is a complaint?

**Any expression of dissatisfaction made to an organisation related to its product, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.**

Guidelines for complaints handling organisations  
Standards Australia, 2007

### 3.1. A definition of a complaint

How an agency defines a complaint will largely depend on what it wants its complaint system to achieve.

A complaints system based on a narrow definition will merely be a way of dealing with serious grievances about the agency. If it is to be a means of gaining insight into customers' levels of satisfaction with services so that they can be improved, a fairly wide definition is needed, like the following:

*An expression of dissatisfaction with the agency's policies, procedures, charges, employees, agents, quality of service or goods sold or provided.*

Each agency will differ as to what it records, and in what detail. It can be helpful to define what will not be registered as a complaint, e.g:

- a request for services (unless it's a second request, where there was no response to the first)
- a request for information or explanation of policies or procedures
- the lodging of an appeal in accordance with a standard procedure or policy (unless this is recorded as a complaint about the agency's decision making).

It may also be useful to develop a policy about how anonymous complaints should be dealt with. The Ombudsman generally only acts on anonymous complaints where the matter is relatively serious and there is sufficient information in the complaint to enable an investigation to be conducted. Similarly, a policy on how to deal with challenging complainants may be needed, (see *Managing unreasonable conduct practice manual*).

#### Practical tip

#### Complaint or feedback?

Many agencies do not just record complaints. They also keep track of compliments, inquiries, and suggestions.

In this way, they build a clearer picture of what customers like and don't like about their agencies, what they don't understand and what they want. Staff like it too, as a fully functioning feedback system will often provide more positive and neutral feedback than negative.

### 3.2. A user-friendly procedure for lodging complaints

A complaint system must be both visible and easily accessed by the public.

People basically need to be told they have a right to make a complaint and how to do it. Information about the agency's complaint handling system should be included in any customer service, or guarantee of service, statement.

Brochures, signs, advertised hotlines, and toll free numbers can assist in increasing the flow of information from customers. It is important to make clear to customers who they should approach if they wish to complain in person, and to whom and where they should write if they wish to be more formal. It is very helpful to give phone numbers, names and expected response times. If feedback or complaint forms are used, they should capture essential information about the problem and what the person expects to be done to remedy the situation.

It is important to consider the wording of forms. A form entitled 'complaint form' may be less enticing than something entitled 'tell us what you think' or 'your opinion counts'. Consideration should be given to publishing complaint forms and information in languages other than English if relevant to the customer base.

Assistance should be provided to help customers formulate and lodge complaints where necessary. If complainants are unable to write a complaint, they should be able to lodge it by telephone or face to face. Staff should be trained in identifying and accepting oral complaints.

Old approach	Best practice approach
Tendency to give priority to written complaints.	Complaints able to be lodged in person, by phone, via the internet, by email or in writing. All complaints given equal priority.

Sophisticated complaint systems allow customers to lodge complaints in many ways. There must, however, be good systems in place to capture and coordinate the complaints and make sure they are responded to.

### 3.3. A simple-to-understand process

Good systems provide at least three tiers of review. This should be clear to all users of the system, both complainants and complaint handlers.

#### Tier 1: Frontline complaint handling

Registration and attempted resolution by frontline staff.

#### Tier 2: Internal review, ADR or investigation

If a customer is still dissatisfied, his or her complaint is reviewed or investigated by an identified complaints officer or simply by someone who is more senior and the results of the review reported to the customer.

If the customer remains dissatisfied, further consideration should be given to options that may be available to achieve a settlement. This may include conciliation, mediation, or further direct negotiations over remedying the grievance.

#### Tier 3: Independent review

If the complaint can not be resolved within the agency, the complainant is referred to an outside agency such as the Ombudsman, or to some alternative dispute resolution procedure or, as a last resort, any legal remedy.



### 3.4. A means of recording

If complaint information is to be used to identify defects in service provision and to identify where customer expectations are not consistent with the standard of service being provided, the subject matter of complaints needs to be recorded.

Some agencies use complaint forms to make it easy for customers to lodge feedback. However, to enable proper tracking and analysis, you will usually need separate forms or data entry screens to log key elements of this information plus the oral complaints made. Careful planning will make the process easier for staff. Forms need to be user friendly, both for the customers and the staff member filling them out. It is important to regularly survey staff and customers as to whether complaint/feedback forms work, and make appropriate changes where necessary. Forms with check boxes work best when staff are under time pressure, or when they are recording very common complaints.

Management should also be asked for their input on what information will be useful in planning and systems improvement.

### 3.5. Commitment and clear lines of authority

Successful complaint systems are not just built on good policies and procedures. They must also be imbued with positive attitudes to welcoming feedback and solving people's problems. There needs to be a commitment to efficient and fair resolution of complaints by people at all levels in the organisation, starting with the chief executive officer.

Referral procedures should be known to all frontline staff

It is imperative that the system clearly defines who is responsible for dealing with complaints at each tier. It may be the responsibility of all staff to deal with Tier 1 complaints, or perhaps a special officer in a public sector agency or large community organisation, or a special officer in each section or branch should be designated. Wherever the responsibility lies, each person must be clear about what their role and duty is in dealing with a complaint. All staff must know who to refer complaints to if they cannot handle them themselves. Usually Tier 2 complaints should be dealt with by more senior staff.

### 3.6. Staff empowerment

Frontline staff who are responsible for trying to resolve grievances should be given training in customer contact and communication skills. An understanding of alternative dispute resolution approaches is also helpful. Refresher training is also recommended.

Management should assign specific accountabilities to staff, using job statements and team mission statements. Management must determine the particular skills and aptitudes necessary for frontline staff, and use selection and training procedures which are appropriate to recruit and retain the most suitable staff. Not everyone makes a good complaint handler. It can also be stressful work where burn out is a common problem that needs to be proactively managed.

Staff must have clear delegations to resolve complaints

Staff must be authorised and encouraged to deal with complaints in appropriate ways. Clear delegations must be issued that take into account the sorts of complaints and problems staff may be called upon to deal with. Supervision and feedback should be provided as to how well they are meeting outcome goals. Frontline staff who are positively supported by management are more likely to treat the agency's customers in a positive, helpful manner.

Maintaining positive morale is critical. Recognition is a great motivator and morale booster. Recognition can be achieved in many ways, such as personal notes from supervisors, customer service awards, presentations and other public pats on the back. Staff also respond well if given a sense of challenge.

## Looking after staff

Dealing with complainants, especially if complainants have been angry or aggressive, can be very stressful for staff and at times even frightening. It is perfectly normal for staff to get upset or experience stress in these situations. Everyone reacts differently to stressful events. Some people react immediately following an event while others react much later. Stress can also be cumulative, perhaps resulting in an extreme reaction to a minor event which follows a chain of stressful events. It is the role of supervisors to support staff through this process and identify the type of assistance and support needed. This can be achieved through:

- **Defusing** – giving the staff member an opportunity to express and release their feelings, thoughts and emotions in a non-judgemental way and safe space following an incident. This should ideally take place as soon as possible after the incident.
- **Debriefing** – analysing what occurred, identifying what may have triggered the complainant's/ staff member's reactions and identifying possible solutions (individual and systemic). This should ideally happen within three days.
- **Counselling** – sometimes we are not comfortable talking to our colleagues or supervisors and would prefer to talk to someone outside the service. Supervisors should consider referring the staff member to a recognised counselling service – some organisations provide a free service.

## 3.7. Remedies

Remedies should be appropriate and reasonable

As well as setting out who is responsible for dealing with complaints, the agency will also need to consider empowerment and authority for staff to take remedial action. A guiding principle is that where complaints are justified, you should try to put complainants in the position that they would have been in if things had not gone wrong. This may mean providing the desired service or changing a decision. In other cases, this will not be possible, so an alternative form of compensation may be required. In this case the complainant's input will always be useful. Remedies should be consistent and fair for both the agency and customers. (Further information on remedies can be found in *Options for redress*).

### Practical tip

#### **Always ask 'What is it you hope this agency can do to help resolve this for you?'**

The agency will get a lot of information, including a sense of how important the issue is to this particular customer. Answers to this question also allow the agency to correct any unreasonable or unrealistic expectations.

## 3.8. Performance standards

Time taken to resolve problems

### **Complaints must be dealt with quickly to ensure satisfaction**

The more promptly a grievance can be resolved, the more likely it is that the customer will be satisfied and think highly of the agency. Complainants expect their complaints to be resolved immediately by the first person they talk to. If that is not possible, then they expect a response promptly. Dissatisfaction rises sharply if a response takes an unreasonable time.

It is therefore extremely important to give realistic timeframes for inquiries and responses and to follow up with progress reports if there are any delays. Promises must be realistic and always followed through. People would rather be told a realistic time frame within which their complaint will be dealt with, than be given a promise which may not be fulfilled.

To encourage staff to resolve problems quickly, time limits should be set for each step in the complaint handling procedure eg. initial acknowledgments by phone, letter or email to the complainant; the return of internal requests for information; and final response to the complainant. If the complaint requires some form of investigation, performance standards should indicate that the complainant will be kept informed at regular intervals. Complainants or enquirers need to be assured that even if a problem cannot be immediately resolved, the agency is taking action. Complainants will appreciate ongoing feedback about progress.

### Quality of responses

When customers do get a response it must be comprehensive and deal with all the issues articulated in the complaint. Otherwise, second complaints are a high probability. The response must be accurate because an inaccurate response undermines the credibility of the agency.

## 3.9. Alternative remedies

The complaint system should cater for alternative remedies. Complainants should be told about alternative remedies, especially if the agency is unable to resolve the complaint. This may involve telling them about any rights of appeal or their right to make a complaint to the Ombudsman.

## 3.10. Policy and procedures

Agreed basic policies and procedures that are easy to understand and explain will assist staff in resolving, conciliating and investigating complaints from the simple to the complex. They should always be written down.

A policy should outline the service's commitment to resolving complaints fairly and quickly and provide a 'guarantee of service' to clients. It should also reinforce the important role that complaints play in improving services and systems.

A procedure describes the steps that need to be taken by staff and managers in implementing the aims of the policy.

It is important that policies and procedures include information such as:

- a definition of a complaint
- who can complain
- how people can complain
- an explanation of the complaint process
- avenues for review (both internal and external)
- communication requirements, including response times
- fairness and equity requirements
- privacy and confidentiality requirements
- the assistance available to make a complaint.

The Australian Standard in complaint-handling suggests that policies and procedures should include the following:

- **Commitment** – state the need to make a strong statement about a client’s right to complain and the commitment of the service to efficient and fair resolution of complaints. Complaints are to be encouraged and seen by everyone as an opportunity to improve services.
- **Visibility and access** – identify how information about the complaints policy will be made available and accessible to as many people as possible so that they are aware of how to complain, who to complain to and the information required in making a complaint. This may require the development of information in a variety of formats.
- **Responsiveness** – set timeframes for responding and identify the categories of complaints that may require a quicker response than others. In addition, highlight minimum requirements for communication regarding the progress of the complaint and discuss how complaints will be monitored and by whom.
- **Fairness** – include a commitment by the service to respond to complaints equitably, objectively and in an unbiased manner. In addition, include a statement that the complainant will not lose services or be disadvantaged because they have complained.
- **Resolutions** – state that appropriate resolutions will be offered that are fair to both the complainant and the service, that informal resolution will be attempted wherever possible, and that similar resolutions will be offered to all complainants in similar situations.
- **Service improvement** – state that senior management should regularly review complaints to identify and rectify any systemic or recurring service issues.
- **Data collection** – stipulate that all complaints, including verbal complaints, should be recorded. The policy and procedures should identify the documentation required to track complaints and their progression to resolution, the staff responsible for documentation and how frequently the information will be reviewed.
- **Accountability** – state that management should be given ongoing reports about the status of complaints, rectification action and service improvement issues. In addition, job descriptions should include statements about complaints management as a core element of their role and the role of supervision in supporting them.
- **Review** – contain information about the avenues for review including the involvement of senior management and external organisations if the complainant is not satisfied with the outcome of their initial complaint.
- **Assistance** – stipulate that all complainants should be offered support and any practical assistance required to make their complaints. This could be assistance with preparing written documents when clients have poor literacy. It could mean providing assistance through advocacy. As it may be inappropriate for the service to provide this assistance themselves, a referral list of local agencies such as advocacy services, interpreters, translation services and legal aide services would be useful.
- **Charges** – stipulate whether there are any costs involved in resolution options such as ADR or referrals to external organisations.

## 4. Understanding complainants

Effective complaint resolution requires responding to the complainant's needs as a person as well as responding to the identified problem. Fixing the problem alone will not necessarily produce customer satisfaction. How you treat the complainant in the process is equally important to complaint resolution and will be a prime factor in how that person relates to your organisation in the future.

### 4.1. Why people complain

People make complaints because they are unhappy with a decision, the way a service was delivered, the level of service they have received, or the behaviour of staff. It is important to find out precisely why they are unhappy.

It can be helpful to ask what they want done. Finding out what they want to happen, or what they believe should have happened, usually clarifies the reason for the complaint and helps determine an appropriate response.

It may become apparent that the resolution of a complaint involves giving more information, providing an explanation, suggesting a course of action, or expressing empathy and understanding in situations where there is no ready solution to the problem. Regardless of rights or wrongs, a sincere apology for any mistakes or misunderstandings usually works wonders.

If an agency knows what customers expect, it is more than halfway to knowing how particular service recovery opportunities can best be handled to produce a positive outcome.

Some agencies receive a lot of complaints about things which cannot be changed, perhaps because of inadequate resources or government policy. In these situations, the feedback a complaint gives is still valuable. Perhaps the policy needs to be reconsidered. Perhaps resources could be better targeted. In many cases, customer complaints will echo and reinforce staff complaints about similar matters. The feedback collected, properly reported, may itself be a catalyst for change.

The reason for a complaint may not always be clear at first. It is not uncommon to find at the bottom of a complaint a desire for justice, for fair play or for vindication. Sometimes, complainants can be quite altruistic. They realise something has gone wrong, and even if the wrong cannot be undone as far as they are concerned, they do not want to see the mistake or fault recur.

Many complaints arise from poor communication or inadequate information

The Ombudsman has found many complaints occur, or are exacerbated, simply because of poor communication or because of inadequate publicity about the services and policies and procedures of agencies. Customers should have clear information about what they have a right to expect from an agency and about the service levels it can provide. Any complaints they do make will be more focused.

Complaints can often be kept to a minimum if:

- an agency has appropriate and comprehensive policies which can be explained simply and easily to customers
- there are clear procedures for implementing policies which are well understood by all staff, and
- staff are able to communicate well both within the agency and with customers eg. they are skilled, knowledgeable, capable and courteous.

## 4.2. Why people don't bother to complain

When people are asked why they didn't complain about a genuine grievance or poor service, they consistently give one or more of the following reasons:

- there was no available information on how to make a complaint
- it was too difficult to find out who to ring or go to
- it would be too time consuming
- I was worried about retribution if I complained and I have to keep dealing with these people/organisation
- I doubted it would be taken seriously
- I didn't think it would make any difference so I didn't bother
- I had received a negative reception in the past when I raised problems
- I wanted to avoid further upset after experiencing rudeness
- I didn't want to be seen as a trouble maker
- I gave up after initial fob-offs and telephone transfers

It is useful to consider these barriers when thinking about how to encourage customer feedback. A good complaint handling system adopts procedures that make giving feedback easy.

Particular barriers in some sectors may include:

- **culture** – it is more acceptable to complain in some cultures than others and some may not even have the word in their vocabulary
- **sensory** – problems with vision, writing and hearing in particular can create hurdles for people
- **language** – confidence and competence in written or spoken English may make complaining difficult
- **power imbalance and fear** – customers may often be vulnerable people reliant on government-funded services for survival. They may fear that a complaint will lead to further marginalisation, retribution, or losing a service altogether
- **worker attachment** – customers may by necessity be in close dependent relationships with workers which makes complaining more difficult.

The onus is on the service organisation to be aware of these issues and to address them as far as is reasonably possible. Agencies need to be particularly aware of any obstacles that prevent communication with customers. There is a need to be innovative and flexible in developing strategies to avoid these problems. Make sure all aspects of service provision and complaints handling functions can be adapted to meet a customer's developmental age, physical or intellectual ability. Consider different formats or mediums of communication.

### 4.3. Responding to special circumstances

Staff need to be sensitive to information to be able to attend to certain types of complaints in special ways.

#### Complaint types

Some types of complaint may need to be treated in special ways eg. complaints involving urgent public safety issues. If a complaint concerns corrupt conduct within a public sector agency there is generally an obligation to notify the chief executive officer who must report the matter to the ICAC. If a complaint involves criminal action, the agency may wish to develop a policy whereby such complaints are automatically referred to the police. Special arrangements for keeping such complaints confidential may need to be set up in public sector or large community agencies. Different types of complaints may simply need to be referred to special sections of the agency eg. complaints of financial impropriety may be referred to the internal audit section.

Complaints about staff members can also create special tensions and may need special policies. An agency needs to welcome complaints while taking care that staff do not feel undervalued when management deals with the complainant in a customer focused way, even if the allegation is unproved. Basic questions such as 'Will staff always be notified of complaints about them?' and 'How will records of complaints about staff members be used?' must be addressed.

#### Complainants

Some people are less likely to make complaints. For example, certain sectors of our society may be fearful, or lack the resources to complain. It may be important to take special measures to encourage those groups to give feedback to the agency and to tag any complaint from these targeted groups. These complaints can then be analysed as perhaps representing an even wider group of non-complainants than is usual.

At the other extreme, some agencies may have to deal with complainants with challenging behaviour, or people who place unreasonable demands on the agency. A companion policy may need to be developed on the agency's response to such circumstances (**see Managing Unreasonable Complainant Conduct Practice Manual**).

Each agency should have policies for customer groups with special needs, such as young or older people, people with disabilities or people from ATSI or NESB backgrounds.

### 4.4. What complainants want when they do complain

One complainant described what they wanted this way:

*I want to be put through to the right person immediately. The right person would not be surly or defensive. They would ask, 'What is the problem you are experiencing?' It is very important that they have the right attitude, that they are receptive, that they are not dismissive when you explain the problem. They should actually try and help you clarify what your problem is. Is it procedure or policy? They should help you to work out the focus. Then they will tell you they will look into it and will let you know what they will do and when they will get back to you.*

What is being asked is 'please make it easier for me to make an enquiry or voice a complaint'. At the most simple level the person is really saying, 'be pleasant to me, help me as much as possible.'

Treat complainants pleasantly, respectfully and professionally

Some people find it quite difficult even to make a general enquiry, not knowing how to go about it or what to say, so making an actual complaint is a greater barrier. How the first contact is handled is vital. In fact the initial words or sentences are the most important in making customers less apprehensive about how they are going to be received.

When people complain they want certain essential things to:

- feel secure
- be listened to (patiently)
- be heard but not judged
- have their point of view understood (for some complainants, this may involve acknowledgements that allow them to 'save face')
- be treated with respect and courtesy, and as an individual
- be provided with an explanation
- be given an apology
- have corrective action taken as soon as possible, and while action is taken, to be kept up to date
- be treated fairly, and
- make sure the problem never happens again.

Even if the agency is unable to take the action they want, if the other elements are provided and the process seems fair, they will usually be reasonably satisfied.

#### Practical tip

##### **Sometimes resolving the complaint involves:**

- giving more information
- providing an explanation
- suggesting a solution
- expressing empathy and understanding where there is no solution
- regardless of rights or wrongs, giving an apology which can sometimes work wonders



## 5. Tier 1: Frontline complaint handling

The majority of complaints should be addressed by frontline staff. In order to achieve this, frontline staff must be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision. Staff need clear guidance about the type of complaints they can deal with directly and those that should be escalated to managers, as well as advice about the available resolution options they can pursue.

Frontline staff require training to develop good complaint handling skills. In order to handle complaints effectively, staff need to know how to:

- understand a complainant's needs
- build rapport
- listen effectively
- demonstrate empathy
- ask the right questions
- provide an apology.

### 5.1. Some guidelines for what staff should do

- treat complainants respectfully, pleasantly and professionally at all times
- give their names, greet the person courteously, and ask in a positive manner how they can help
- listen to what the person has to say:
  - everyone appreciates being listened to and seriously aggrieved customers may have an emotional need to vent their anger over what has happened, so give them time to tell their story
- arrange for sign/language interpreters or advocates if required
- use good listening skills, eg. use encouragers like nodding and saying 'I see'; maintaining eye contact, leaning forward if sitting down, adopting an open body posture, looking interested
- seek clarification of any points that are not clear in a non-judgemental way; use open-ended questions to do this, starting with how? when? where? who? why?
- make it clear the complaint has been understood by summarising the main points made and asking whether that's correct
- provide any relevant information that will assist complainants to better understand the decision or action that they are aggrieved about
- show empathy:
  - remember whether the complaint is justified or not, the person's sense of grievance is real and the agency's job is to deal with that grievance successfully, not just dismiss it out of hand
  - ask 'What do you want to happen?' or 'What do you want to be done?'
- try to meet any reasonable requests that would resolve the matter
- offer solutions which can be delivered
- decide the appropriate course to adopt and if possible gain the agreement of the customer to this action take this action and inform the complainant
- take responsibility for solving the problem on the spot if possible
- handle complaints quickly, within established timeframes, and
- log the complaint and action taken for later trend analysis.

## 5.2. Ways to increase the likelihood of success

### Give reasons

If a complaint is generated by misunderstanding, explain carefully why the action complained about was taken, having regard to the relevant policies, procedures and legislation of the agency. Often it is useful to provide the customer with a copy of a particular policy.

### Apologise

If errors have occurred and an apology is warranted, give it there and then in a sincere manner. The *Civil Liability Act 2002* provides that an apology does not constitute an admission of liability and will not be relevant to the determination of fault or liability in connection with civil liability. Even if an apology is not warranted, the act of apologising can be a potent weapon to appease an aggrieved person. In those cases, give an apology that does not accept blame for the agency eg. 'I'm sorry that this situation has made you dissatisfied with us.' An apology is a sign of confidence.

### Be positive

Be positive and focus on solving the problem rather than blaming or finding fault.

### Defuse anger

If the complainant is angry, try and defuse the anger before dealing with the issue. Courtesy, using good listening skills and showing empathy are extremely important when dealing with high levels of emotion. A good tactic is to agree with any statements they make that do not place blame on the agency. It is difficult to remain angry with a person who agrees with you. Use statements starting with 'I agree' or 'You are right' Statements of fact can usually be agreed with, as well as broad uncontroversial principles and the person's right to hold their own opinions. Don't debate the facts or ask 'Why?' questions until the person is settled.

### Take action

Take some particular action to fix the problem presented. This may involve providing the service not delivered, undertaking to review the decision or action complained about, undertaking to make sure outstanding action is taken in a defined time period (and doing so, even if the action is someone else's responsibility), providing some other remedy or compensation for actions that cannot be undone.

### Referral

If the complainant has to be referred to another staff member, this should be an appropriate person, who should be fully briefed before referral. Being transferred from person to person is perhaps the most frustrating aspect of complaining. Satisfaction decreases with every transfer even despite problem resolution in the end. People will generally tolerate one transfer if they don't have to explain everything again.

For a more detailed consideration of options for effectively dealing with complaints found to be justified see NSW Ombudsman's website - *Options for redress*

### 5.3. What to do when the customer is still not satisfied

It will not always be possible to satisfy complainants, or agree to all the terms of settlement that they want. Further action may not necessarily be needed as long as staff have properly listened to them, understood them, respected them, been fair in any decision and provided an appropriate explanation and apology.

The complainant should be told in clear terms what can and can't be done.

The complaint may need to be referred to the Tier 2 of the complaint handling system. If this is proposed, and there are other appropriate review mechanisms available, the complainant should be told.

### 5.4. When the problem should be automatically referred on

When the complaint is about a staff member's own conduct and he or she is not confident about dealing with it fairly, or if the complainant requests it, the problem should be automatically referred on. Unless the whole matter can be resolved by some kind of conciliation on the spot, staying involved will almost certainly make it harder to resolve the complaint and may encourage escalation of the dispute. In such circumstances, the staff member should politely suggest it would be better for the complainant if someone else reviewed the matter.

Automatically refer the problem on when:

- the problem is clearly outside a staff member's delegation or area of expertise
- there are established internal or external referral procedures (eg. for ICAC notifications)
- a staff member is alleged to have committed a criminal offence, acted corruptly, or engaged in other serious or controversial conduct, and/or
- significant disciplinary action is a possible outcome.

Whenever a problem is to be referred on, the complainants should be told exactly what they need to do, or what staff will do to refer the matter, and what action the complainants can expect.



## 6. Tier 2: Internal review, ADR or investigation

Almost all complaints should be capable of resolution by frontline staff. In some matters however, complainants will not be satisfied unless their problem has been dealt with by a more senior officer.

### 6.1. Review by a more senior officer or special complaints officer

The Tier 2 review is simply for a more senior or specialist officer to reconsider the original decision or action and take corrective action where appropriate. Generally a more senior officer will have a wider delegation to overturn previous decisions and apply remedies. The basic guidelines for frontline complaint handling apply equally to these cases.

### 6.2. Informal complaint resolution by a more senior officer

Interviews are the best cost-benefit complaint handling method

Complaints about staff, especially relating to rudeness or other improper conduct, often are more conducive to semi-formal resolution interviews, where a more senior officer has a face-to-face meeting with the complainant. This officer hears the complainant out, offers a formal apology on the part of the agency, and undertakes to take corrective action. The aim is principally to prevent the complaint from escalating into a larger and more time-consuming dispute.

It is best to use experienced people for this task, and preferably people with particular skills for it, whether because of temperament or training. There are some basic indicators for not attempting a resolution interview, including:

- the facts are likely to be in dispute and investigation may be needed because of the complexity of the matter
- disciplinary action is a strong possible outcome
- the outcome the complainant is demanding cannot be provided by this method
- questions of precedent for the agency may be involved.

Time-frames can also be relevant to success. Generally a speedy approach to the complainant following lodgement of a complaint will be better received and the complainant will be more open to resolution. Sometimes, however, passage of time can play an equally important role in resolving a complaint. It may allow tempers to cool, advice to be obtained and alternatives to be investigated and considered.

### 6.3. Investigation by a more senior officer

The majority of complaints can be dealt with speedily and simply. Where a more substantial inquiry is required, the following guidance may be helpful for investigating officers. (For a more detailed consideration of investigation procedures and good investigative practice, see NSW Ombudsman's *Investigating complaints*.)

Preparation:

- Check if there are any previous complaints from this person.
- Contact the complainant to:
  - clarify the complaint
  - clarify the outcome sought
  - check whether they need support of any kind, whether they have a sight impairment, hearing, or a language difficulty, and what they need to understand the discussion properly
  - explain the investigation procedure.

- Investigators need to brief themselves on the relevant legal and administrative background of the complaint.
- Assess whether the complaints procedure is the most appropriate way of handling this complaint. If it is not, discuss some alternatives (such as appealing to tribunals, legal action or police involvement) with the complainant.
- Consider whether the complaint could be resolved without further investigation.
- If the complaint is about action the agency proposes to take, consider whether the action should be deferred while the complaint is investigated.

### Evidence gathering and interviewing

- Obtain all relevant documents:
  - these may include files, log books and time sheets
  - get copies of all documents needed, but the originals should be sighted.
- Establish the relevant sequence of events from the files and also the names of officers or staff members most directly involved in the complaint.
- Where the document trail alone does not enable resolution, identify the people with relevant knowledge that you need to speak to:
  - prepare a line of questioning for each person to be interviewed
  - use open, not leading, questions
  - don't express opinions either in words or by body language
- ask single not multiple questions.
- Arrange the order of interviews so that witnesses are interviewed first, and those most directly involved in the complaint are interviewed last.
- Inform those to be interviewed that they can be accompanied by a person of their choice eg. a friend or union representative, provided the person is not in a supervisory position over the interviewee and explain the complaint clearly to them.
- Consider whether the investigator needs a witness for a particularly difficult interview.
- Conduct interviews in an informal and relaxed manner wherever possible:
  - questions should be persisted with if necessary, even if this means asking the same question twice
  - notes should be made of each answer.
- Try to separate hearsay evidence from fact by asking interviewees how they know a particular fact.
- At the end of the interview, summarise the main points covered by the interviewee and ask if he or she has anything to add.
- If appropriate, a formal record of the interview should be made from the written notes as soon as possible after the interview while memory is fresh:
  - this should never be left longer than the next day.
- Identify any facts or conflicts of evidence that need to be checked and validated.
- Deal with conflicts of evidence by seeking corroborative evidence.
- Analysis and report writing
- A report should be drafted, setting out the evidence obtained and conclusions
  - if adverse comment is intended about any person, provide an opportunity for the person to comment on the draft report before finalising it and making your recommendation.
- Suggest a remedy for the complainant wherever possible.

## 7. Tier 3: External review

Internal review, conciliation and investigation of complaints do not always result in resolution. When the complaint is serious or the complainant's demands will continue to impact on the time and resources of staff, recourse to external sources of review is appropriate. This can take a number of forms.

### 7.1. Alternative dispute resolution

Sometimes a neutral third party can help settle an escalating dispute. A number of both private and public sector bodies use the service of professional mediators in such situations. The mediator, through a formal face-to-face process of discussion, helps the parties to clarify issues and reach a solution agreeable to both sides.

### 7.2. Referral to external investigation agency

There are a number of accountability/complaint bodies established by the NSW government that receive and investigate complaints from the public and public sector agencies about the conduct of agencies and public officials. Dissatisfied complainants can be referred to these agencies or a joint approach made seeking an external review.

### 7.3. Other appeal mechanisms

Where rights of appeal to outside tribunals or other legal remedies exist, dissatisfied complainants should be advised of these avenues of redress after all others have been exhausted.





## 8. What can be learned from complaints and complainants

Complaints do two main things. They let an agency know where it went wrong and how it can do better in the future. Each is an important lesson to learn.

### 8.1. Where an agency went wrong

Start with these questions

- was this kind of problem or complaint foreseen?
- was there a system in place to deal with such problems?
- was the system operating as it should have?
  - if not, why did the system fail?

### 8.2. How an agency can do better in the future

Complaints can tell us what went wrong and how we can improve

Start with these questions:

- could this kind of problem or complaint happen again?
- how likely is that?
- what would prevent that?
- would the cure be worse than the problem?
  - eg. would the cost and complication of guarding against another mistake end up being counterproductive?



## 9. Complaints as a planning tool

### 9.1. Systematic logging of complaint data enables analysis of the cause of problems

The tendency is for most agencies to deal with complaints on an individual basis – a particular grievance is made and is dealt with. The cost to the agency of repetitive complaints and the failure to fix underlying problems is seldom calculated.

Complaint data can be recognised as a useful form of customer satisfaction research. If information on complaints raised with an agency is captured, classified and analysed, systemic and recurring problems will be more easily identified and rectified.

Systems for aggregating complaint data and performing trend analysis are central to this strategy. Whether a manual or computer system is used to log complaint data, the system needs to use simple, but meaningful, classifications and codes to categorise complaints. Apart from the usual identification information used to monitor the progress of individual complaints, the critical variables that usually need to be captured are:

- nature of complaint
- mode of complaint eg. oral or written
- services, practices or products identified in complaint
- location – branch, section, responsible officer
- action taken and response time
  - outcome provided to complainant
  - underlying causes and rectifications.

If the agency is in a competitive industry, using complaint data to calculate the potential market damage of not fixing customer problems will be an important means of prioritising the allocation of customer service resources.

#### Practical tip

#### Use complaint data to identify opportunities for system improvements

- Are all complaints, including oral ones, recorded comprehensively?
- Is this collected data analysed on a regular basis?
- Are root causes of complaints identified and addressed?
- Does management receive and consider this analysis on a regular basis?
- Is there a widespread exchange of information within the agency, eg:
  - complaint register
  - analysis reports
  - management reports
  - solution reports.



## 10. Conclusion

### 10.1. Complaints must be welcomed in order to prevent them

Frontline complaint procedures should be employed to address the majority of complaints an agency receives. To achieve agreement, or some other resolution of a complaint, it may simply be necessary to explain why action was taken in a particular way, the legal or procedural requirements of the situation, to offer advice or to tender an apology when a satisfactory level of service has not been delivered.

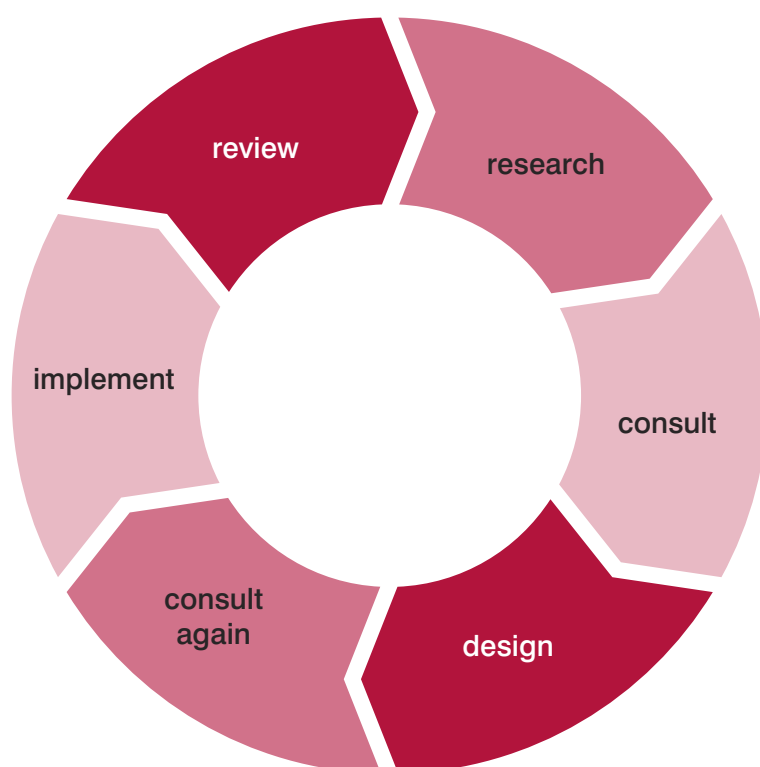
There are considerable benefits, in terms of cost savings and better relations with customers, whenever a complaint can be resolved without resorting to formal investigative processes. One way of improving customer satisfaction with the agency's services is not only to address particular grievances, but to prevent the problems that gave rise to them from recurring. There must be a focus on both the resolution and the subsequent prevention of complaints, through a problem-solving approach. This should result in greater public confidence and a more professional and effective functioning of the agency.

More serious complaints should remain subject to full investigation, whether by the agency, or by external bodies such as the Ombudsman. Where criminal or corrupt conduct is alleged, it should be investigated by more specialised agencies, such as the police or the ICAC in the case of public sector agencies.

However, where staff of the agency make honest mistakes or errors of judgment in their day-to-day duties, the emphasis should be on resolving and preventing similar complaints, rather than proving guilt or innocence.

The agency is much more likely to have the confidence of its customers and the public if it listens to complaints and moves quickly to resolve or deal with them appropriately.

#### Continuous improvement cycle:





## 11. Assessing your complaint system

Use the following checklist to see how well your complaint system measures up to best practice standards.

### 11.1. Complaint handling system checklist

#### Complaint handling system

1.	Customer/client service or guarantee of service policy/program invites complaints/feedback.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
2.	Organisation has a policy on complaint handling.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	a) Policy is documented.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	b) Policy available to all staff and customers.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	c) Policy is reviewed at least every two years.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	d) Policy is written in plain English.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
3.	Organisation wide complaint handling system or main complaint system has the following features:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	a) Caters for complaints from the public.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	b) Caters for complaints from internal customers, or other agencies served	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	c) A clearly understood procedure for people to make complaints or suggestions for improvement.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	d) A statement of who is responsible for dealing with complaints.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	e) Procedures for resolving or conciliating and investigating complaints depending on their seriousness and complexity.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	f) A system for keeping the complainants informed of what is happening.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	g) A system for recording complaints/suggestions and outcomes.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	h) Procedures for protecting confidentiality of complainant details	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	i) A system of feedback to relevant areas of management and operations so that the problem and trends identified from complaints can be incorporated into planning activities.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	j) A comprehensive definition of a complaint to guide staff on when to use complaint procedures.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

## System and staff management

4.	Effective complaint handling is supported by published statements from the CEO/GM or the Board/Council/Management Committee.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
5.	A senior manager is responsible for the effective operation of the complaint system.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
6.	Policy and procedures associated with your complaint handling system are communicated to all staff.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
7.	Adequate resources are allocated to enable complaint system to function effectively.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
8.	Complaint handling responsibilities, including performance indicators, are incorporated into staff position descriptions.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
9.	Complaint handling skills or experience incorporated into selection criteria for recruitment of staff that have complaint handling responsibilities.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
10.	Frontline staff (eg. telephonist/receptionist, counter staff, direct care worker) have specific instructions on how to handle/refer complaints.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
11.	Staff are issued with written delegations relating to complaint handling.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
12.	Organisation provides training in complaint handling skills for staff.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
13.	Internal reviews are carried out where complainants are dissatisfied with the initial response of the organisation.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
14.	a) Reviews are carried out by a more senior officer than original case officer.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	b) Review officer has power to overrule the previous decision.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
15.	a) There is a comprehensive complaint handling instructions manual for staff.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	b) The complaint procedures manual is regularly reviewed and updated.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	c) The complaint procedures manual is easily accessible to any staff member dealing with internal or external customers.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
16.	The procedures or complaint policy provides guidance on:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	a) What is a complaint?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
	b) What information to collect from complainants?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
17.	The procedures or complaint policy provides guidance on what remedies can or should be used to resolve complaints.	Yes <input type="checkbox"/>	No <input type="checkbox"/>



## Advice to customers

18. Customers are told how to make a complaint/suggestion.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
a) Information brochure on the complaint system is available to users.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b) Feedback/complaint forms are available to customers.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c) Complaint forms or signs are displayed prominently in public areas and are readily accessible.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d) A complaint 'hotline' or toll free number is advertised.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e) Names of contact people for complaints or inquiries published and where appropriate displayed in public areas.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f) Complaint information included on organisation's web page.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
g) Complaint handling information available in community languages.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
19. Customers are able to lodge complaints:	Yes <input type="checkbox"/>	No <input type="checkbox"/>
a) in writing	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b) by email	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c) by fax	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d) by telephone	Yes <input type="checkbox"/>	No <input type="checkbox"/>
e) in person	Yes <input type="checkbox"/>	No <input type="checkbox"/>
f) via organisation's web page	Yes <input type="checkbox"/>	No <input type="checkbox"/>
20. Customers are provided with assistance to make complaints where needed.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
21. Complaint system is accessed free of charge.	Yes <input type="checkbox"/>	No <input type="checkbox"/>
22. External avenues to deal with complaint are advised to customers.	Yes <input type="checkbox"/>	No <input type="checkbox"/>

## Recording

- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 23. All complaints are recorded.                                     | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| a) Complaints are logged into a computerised case management system. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Inquiries/suggestions and recommendations are also recorded.      | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| c) Issues of complaint are categorised in the record.                | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| d) The type of service and delivery point is recorded.               | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| e) The outcomes and responses to complaints are recorded.            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
- 

## Performance standards

- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 24. There are performance standards in place for the way in which complaints are dealt with:     | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| a) Acknowledgement of receipt within a certain time.   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Completion/resolution within a certain time.  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| c) Interim or progress reports to complainant in a certain time.                                 | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 25. There is a quality control system in place to:   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| a) Check if all complaints have been dealt with or acted upon.                                   | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| b) Check if all aspects of a complaint have been addressed.                                      | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| c) Check if all necessary follow up action has been taken.                                       | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| d) Check if there are any other similar affected parties who should be offered similar remedies. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| e) Check that underlying problems have been identified and acted upon.                           | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
-

## Analysis and feedback

- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 26. Complaints are analysed in a systematic way. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 27. Someone is responsible for identifying complaint trends and underlying causes. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 
- |   |                              |                             |
|---|------------------------------|-----------------------------|
| 28. Regular internal reports on complaints are produced for senior management and management boards or committees | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---|------------------------------|-----------------------------|
- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 29. Complaint reports include data on: | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 
- |                                       |                              |                             |
|---------------------------------------|------------------------------|-----------------------------|
| a) Numbers of complaints/suggestions. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---------------------------------------|------------------------------|-----------------------------|
- 
- |   |                              |                             |
|---|------------------------------|-----------------------------|
| b) Compliance with performance standards. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---|------------------------------|-----------------------------|
- 
- |                                 |                              |                             |
|---------------------------------|------------------------------|-----------------------------|
| c) Issues raised in complaints. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---------------------------------|------------------------------|-----------------------------|
- 
- |                                    |                              |                             |
|------------------------------------|------------------------------|-----------------------------|
| d) Trends in complaints over time. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|------------------------------------|------------------------------|-----------------------------|
- 
- |                              |                              |                             |
|------------------------------|------------------------------|-----------------------------|
| e) The causes of complaints. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|------------------------------|------------------------------|-----------------------------|
- 
- |   |                              |                             |
|---|------------------------------|-----------------------------|
| f) Whether remedial action was warranted. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---|------------------------------|-----------------------------|
- 
- |                                     |                              |                             |
|-------------------------------------|------------------------------|-----------------------------|
| g) What redress was actually given. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|-------------------------------------|------------------------------|-----------------------------|
- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| h) Recommendations/strategies to prevent or limit recurrences. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 
- |   |                              |                             |
|---|------------------------------|-----------------------------|
| i) Service improvements initiated due to complaints data. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|---|------------------------------|-----------------------------|
- 

## External reporting

- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 30. Reports about complaints/suggestions received by the organisation are made public. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 
- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 31. Reports on complaints/suggestions are included in the annual report. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
- 

## Evaluation

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- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 32. Effectiveness of the complaint handling system as a management tool is evaluated periodically. | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
|--|------------------------------|-----------------------------|
-



## 12. Useful resources

Our website has a comprehensive list of compliant handling bodies, visit [www.ombo.nsw.gov.au/complaints/complainhandlinbod.html](http://www.ombo.nsw.gov.au/complaints/complainhandlinbod.html)

### External investigation agencies

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NSW Public sector accountability bodies:

#### **NSW Ombudsman**

For matters of maladministration, police misconduct

Level 24, 580 George Street  
Sydney NSW 2000  
Phone: (02) 9286 1000  
Toll free: 1800 451 524  
TTY: (02) 9264 8050  
Fax: (02) 9283 2911  
Email: [nswombo@ombo.nsw.gov.au](mailto:nswombo@ombo.nsw.gov.au)  
Web: [www.ombo.nsw.gov.au](http://www.ombo.nsw.gov.au)

#### **Auditor-General**

Audits financial operations and effectiveness, efficiency, economy and compliance; waste of public money

Level 15, 1 Margaret Street  
Sydney NSW 2000  
Phone: (02) 9275 7100  
Fax: (02) 9275 7200  
Email: [mail@audit.nsw.gov.au](mailto:mail@audit.nsw.gov.au)  
Web: [www.audit.nsw.gov.au](http://www.audit.nsw.gov.au)

#### **Office of the Information Commissioner NSW**

Supporting access to and disclosure of government information; encouraging an open government culture and ensuring compliance with right to information laws; and defending the public's right to information.

Level 11, 1 Castlereagh Street  
Sydney NSW 2000  
Free call: 1800 463 626  
Email: [oiinfo@oic.nsw.gov.au](mailto:oiinfo@oic.nsw.gov.au)  
Web: [www.oic.nsw.gov.au](http://www.oic.nsw.gov.au)

#### **Commonwealth Ombudsman**

Considers and investigates complaints from people who believe they have been treated unfairly or unreasonably by an Australian Government department or agency, including the Australian taxation office, Australia post, Centrelink, Child Support agency and Department of immigration and citizenship.

Level 7, North Wing, 477 Pitt Street  
Sydney NSW 2000  
Toll free: 1300 362 072  
Fax: (02) 9211 4402  
Email: [ombudsman@ombudsman.gov.au](mailto:ombudsman@ombudsman.gov.au)  
Web: [www.ombudsman.gov.au](http://www.ombudsman.gov.au)

#### **Independent Commission Against Corruption (ICAC)**

The ICAC investigates corrupt conduct in the NSW public sector.

Level 21, 133 Castlereagh Street  
Sydney NSW 2000  
Phone: (02) 8281 5999  
Toll free: 1800 463 909  
TTY: (02) 8281 5773  
Fax: (02) 9264 5364  
Email: [icac@icac.nsw.gov.au](mailto:icac@icac.nsw.gov.au)  
Web: [www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)

## Others

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Other bodies having some sector specific complaint handling functions:

### **Anti-Discrimination Board (NSW)**

Level 4, 175 Castlereagh Street  
Sydney NSW 2000  
Phone: (02) 9268 5555  
Toll free: 1800 670 812  
TTY: (02) 9268 5522  
Fax: (02) 9268 5500  
Email: [adbcontact@agd.nsw.gov.au](mailto:adbcontact@agd.nsw.gov.au)  
Web: [www.lawlink.nsw.gov.au/adb](http://www.lawlink.nsw.gov.au/adb)

### **Division of Local Government (NSW)**

Level 2, 5 O'Keefe Street  
Nowra NSW 2541  
Phone: (02) 4428 4100  
TTY: (02) 4428 4209  
Fax: (02) 4428 4199  
Email: [dlg@dlg.nsw.gov.au](mailto:dlg@dlg.nsw.gov.au)  
Web: [www.dlg.nsw.gov.au](http://www.dlg.nsw.gov.au)

### **Health Care Complaints Commission (NSW)**

Doctors, other health care providers, hospitals or health services.

Level 13, 323 Castlereagh Street  
Sydney NSW 2000  
Phone: (02) 9219 7444  
Toll free: 1800 043 159  
TTY: (02) 9219 7555  
Fax: (02) 9281 4585  
Email: [hccc@hccc.nsw.gov.au](mailto:hccc@hccc.nsw.gov.au)  
Web: [www.hccc.nsw.gov.au](http://www.hccc.nsw.gov.au)

### **Judicial Commission of NSW**

Level 5, 301 George Street  
Sydney NSW 2000  
Phone: (02) 9299 4421  
Fax: (02) 9290 3194  
Email: [judcom@judcom.nsw.gov.au](mailto:judcom@judcom.nsw.gov.au)  
Web: [www.judcom.nsw.gov.au](http://www.judcom.nsw.gov.au)

### **Privacy NSW**

Privacy NSW is the Office of the NSW Privacy Commissioner. Our aim is to protect and promote privacy rights in NSW.

Level 11, 1 Castlereagh Street|  
Sydney NSW 2000  
Phone: (02) 8019 1600  
Fax: (02) 8114 3755  
Email: [privacy\\_nsw@agd.nsw.gov.au](mailto:privacy_nsw@agd.nsw.gov.au)  
Web: [www.lawlink.nsw.gov.au/privacynsw](http://www.lawlink.nsw.gov.au/privacynsw)

### **Police Integrity Commission**

For complaints about serious police corruption and misconduct.

Level 3, 111 Elizabeth Street  
Sydney NSW 2000  
Phone: (02) 9321 6700  
Free call: 1800 657 079  
Fax: (02) 9321 6799  
Email: [contactus@pic.nsw.gov.au](mailto:contactus@pic.nsw.gov.au)  
Web: [www.pic.nsw.gov.au](http://www.pic.nsw.gov.au)



