

Policy and procedure guide

[Checklist for developing your policies \(PDF 63.3KB\)](#)

This guide is designed to help organisations develop effective policy and procedures for their complaints management system (CMS).

Policy and procedures are an important element of an effective CMS.

The policy should set the direction on complaints management. It should outline an organisation's commitment to the principles that underpin the complaints management framework.

The procedures should identify the steps involved in managing

complaints. They should be consistent with the policy commitments and objectives.

Organisations may determine the substance, form and complexity of their complaints management policy and procedures, subject to legislative requirements. The policy and procedures may be one document or separate documents.

Legislative requirements

Organisations may be required by legislation to establish and maintain a CMS, including policy and procedures.

State agencies

The *Public Sector Act 2022* (PSA) requires state government departments and public service offices to have a CMS for customer complaints that complies with the current Australian Standard.

The current Standard is AS 10002:2022 Guidelines for complaint management in organizations. It provides that an organisation should have a complaints management policy with supporting procedures.

Local government

The *Local Government Act 2009* (LGA) requires councils to adopt a process for resolving administrative action complaints. Councils must have written policies and procedures that support the complaints management process.

Public universities

The National Code of Practice for Registration Authorities and

Providers of Education and Training to Overseas Students requires public universities to have a process for students to lodge a formal complaint or appeal if a matter cannot be resolved informally. For equity and fairness, Queensland public universities have adopted student grievance and appeals processes that apply to all students.

We can offer free advice about effective complaint management, managing unreasonable complainant conduct and developing effective complaint management systems.

[Email](#) for more information about this service.

Policy and procedures: key elements

1. Authority

The legislative authority for the policy and procedures should be clearly stated. This includes the approving body or person and the approval, commencement and review dates.

2. Commitment

The policy should set out the organisation's commitment to effective complaints management.

Commitment to effective complaints management involves:

- the active interest and support of management
- effective policy and procedures
- a positive environment that encourages and helps people make complaints
- adequate resources, training and support for staff.

3. Principles

The policy should outline the legislative requirements and guiding principles that underpin the CMS. The Standard sets out 17 guiding principles relating to enabling complaints, managing complaints, managing the parties and accountability, learning and prevention.

4. Objectives

The policy should state and define the objectives, which should be linked to clear and specific performance indicators that help evaluate the effectiveness of the CMS. CMS objectives may relate to accessibility, responsiveness, fairness, process, outcomes, improvements and customer satisfaction.

5. Scope

The scope of the policy and procedures, including the definition of complaints and the types of complaints covered and excluded, should be clearly outlined.

Legislative requirements may define a complaint differently to the Standard. Excluded complaints may include corrupt conduct complaints, public interest disclosures and complaints with specific statutory rights of review or appeal. The relevant legislative provisions or related policies and procedures for dealing with excluded complaints should be identified in the policy.

6. Availability

The policy should provide that it is readily accessible and outline available sources (e.g. organisation's website and public offices). For councils, both the policy and procedures are to be available to the public via their website and public offices.

7. Resources and training

Staff are the single most important resource in the CMS. Resources for managing complaints should be regularly reviewed and staff trained in the policy and procedures. The policy should address resources and training for complaint management.

8. Managing unreasonable conduct

The policy should address how to manage unreasonable conduct by complainants. The policy should refer to the organisation's guidelines on the behaviour expected of staff and complainants and the health and safety of complaints management staff.

9. Complaints model

The policy and procedures should outline the complaints model. It should be easy to follow and understand by customers and staff.

The Standard provides a three level model of complaint management:

- Level 1: Frontline complaint handling – early resolution
- Level 2: Internal assessment, investigation or review
- Level 3: External assessment, investigation or review.

10. Responsibility and authority

An effective CMS should include clear lines of responsibility and appropriate delegations. The policy and procedures should clearly outline the responsibility and authority for management

and staff.

11. Operation

The procedures should clearly outline the operation of the CMS, including the key steps and any legislative requirements involved.

Communication

- publicly available information about the CMS
- available channels to make complaints
- representative and anonymous complaints

Assistance

- practical support to help people make a complaint
- special assistance available

Early resolution

- complaints suitable for handling by frontline staff
- receiving, understanding and recording complaints
- managing complainant expectations
- assessing complaints, including declining and referring complaints
- resolving complaints, including authority and range of remedies available

Receipt

- recording complaints information and assigning unique identifier to the complaint
- register complaints in a database for monitoring, analysis

and reporting

Tracking

- tracking progress of complaint
- updating complainant on status/progress

Acknowledgement

- acknowledging receipt of complaint
- acknowledgement information, appropriate mediums and timeframe

Assessment

- confirming/clarifying issues and requested outcomes with the complainant
- assessing the complaint against established criteria, including grounds to decline complaint
- determining what complaint issues should be actioned if so, how and by whom
- advising assessment outcome, including reasons and review options

Considering – investigation and internal review

- considering how to address complaint issues
- investigation, including planning, information gathering, natural justice, reporting and timeframe
- internal review, including scope, process, reporting and timeframe

Addressing - rectification

- determining the appropriate complaint

outcomes/remedies – range of direct remedies available

- addressing the underlying cause of complaint – systemic remedies

Communicating with the complainant

- using appropriate medium that considers complainant's needs and views
- advising complainant of actions taken, complaint decision, reasons for decision, any remedy and review options
- communication timeframe.

Closing the complaint

- recording steps to address the complaint, outcome and any follow up action

Monitoring implementation of recommendations

- ensuring outcomes are properly monitored and reported

12. Maintenance and improvement

Regular monitoring, review and reporting are necessary to continuously improve the CMS. Complaints data offers a valuable source of information on where and how an organisation can improve service delivery, systems, policies and decision-making.

The policy should specifically address maintenance and improvement of the CMS, including information collection, analysis and evaluation of complaints data, evaluating complainant satisfaction, monitoring, internal auditing and management review of the CMS.

13. External reporting

State agencies and councils are required to externally report on the operation of their CMS. Even if there is no legal requirement to do so, organisations should externally report on their CMS for accountability and transparency purposes.

The policy should address external reporting on the CMS, including the types of information to be disclosed.

14. Definitions, references and related documents

The policy and procedures should define all key terms used throughout the document to help staff correctly interpret and apply them when managing complaints. Definitions should be consistent with any relevant legislation and standard.

Training courses

We deliver the following training:

- [Good decision](#) is a program designed to help officers make better decisions. The training is suitable for all public sector decision-makers, including supervisors and managers.
- [Managing unreasonable complainant conduct](#) is a half-day course designed to help officers manage unreasonable conduct they may encounter when delivering services to the public.