



## **Complaints Management Policy**

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### **Policy Statement**

The Department for Innovation and Skills is committed to the highest standards of customer service. The Department is committed to the management of feedback and complaints in a manner consistent with the principles of natural justice and equity of access, including being fair, courteous and respectful. The Department promotes a culture that values complaints and has established an effective customer service system that links service delivery improvements directly to feedback.

We will build a culture of customer service excellence through leadership, knowledge, empowerment and enhancing our skills. We value and encourage feedback and complaints and use these to drive improvements to our practices, procedures and systems, and to assist us to evolve our customer service experience, services and behaviours.

The Policy provides a valuable mechanism for continuous improvement and development. This policy conforms to the principles of the Australian/New Zealand Standard: Guidelines for Complaint Management in Organisations (AS/NZS10002:2014) (the Standard), the Commonwealth Ombudsman Complaint Management Framework, and the Department of the Premier and Cabinet Circular *PC039 – Complaint Management in the South Australian Public Sector*.



## Policy Scope

The Complaints Management Policy is applicable to all Department for Innovation and Skills (DIS) employees and contractors who may receive, manage, investigate and respond to complaints and feedback from members of the public.

This policy does not apply to complaints relating to administrative law, appeal decisions, judicial decisions, internal staff complaints, panel selection grievances, official misconduct or matters relating to the *Whistleblowers Protection Act 1993*. Matters concerning the conduct and practices of public officers and public authorities, specifically corruption, misconduct and maladministration, can be reported via the [Independent Commissioner Against Corruption](#) (ICAC).

## Purpose

This policy establishes a uniform approach in the management of feedback and complaints across the Department, including outlining staff responsibilities in managing feedback and complaints. It also aims to improve access for Aboriginal people, people from culturally and linguistically diverse communities, people with disabilities, and people from vulnerable and disadvantaged groups and to enhance the transparency and responsiveness of the complaint handling process.

This policy is designed to identify opportunities for improving customer's experience and satisfaction with DIS service delivery. Implementation of this policy will ensure:

- Increased customer satisfaction with the Department's services,
- A fair, efficient and transparent approach to handling feedback and complaints,
- Respect for the privacy of the complainant, and
- Improved processes and services from customer feedback.

Feedback and complaints can be received through online forms, letters, phone calls or in person. Social media platforms are not considered suitable for managing complaints. Any feedback or complaints received on social media platforms are to be acknowledged and customers should be re-directed to DIS's formal Feedback and Complaints webform.

## Terms and Definitions

- **Customer:** individuals or organisations (internal or external to government) who receive or utilise our services, or are directly affected by our services, policies or products.
- **Complaint:** expression of dissatisfaction about the service or action of a South Australian public-sector agency, or its staff, by a person or organisation directly affected by the service or action.
- **Complainant:** person, organisation or their representative (including clients, consumers, service users, customers, etc.) making a complaint.
- **Complaint management system:** encompasses all policies, procedures, practices, staff, hardware and software used by an organisation for the management of complaints.
- **Dispute:** unresolved complaint escalated internally or externally, or both.
- **Feedback:** any opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about the organisation, its products, services, staff or its handling of a complaint. Feedback can be managed as a complaint.
- **Public Officer:** includes public sector employees and contractors performing contract work for a public authority or the Crown.



## Responsibilities

- **The Chief Executive** ensures the policy is effectively implemented within the Department and promotes a culture of valuing feedback and complaints. The Chief Executive supports the use of complaints and feedback data and related service improvements to drive efficiency and customer satisfaction in the Department.
- **Executive Directors/Directors** are responsible for ensuring the complaints management policy and procedures are accessible and promoted to staff and to customers. They ensure complaints and feedback data are recorded, analysed and related service improvements implemented and reported.
- **Managers/Senior Staff** are responsible for ensuring complaints and feedback in their areas of control are handled in accordance with the complaints management policy and procedures. They appoint, empower and train staff to effectively resolve complaints and provide support and advice where required.
- **Staff** investigating and responding to the complaint, such as the Complaints Management Officers [CMOs] and assigned investigative officers are required to comply with the policy, procedures and any related local guidelines in treating complainants fairly, impartially and in accordance with the obligations in the [Code of Ethics for the South Australian Public Sector](#). They respond promptly to complaints, resolve them in a timely manner and record complaints and outcomes for reporting purposes.
- **The central DIS Feedback Response Officer** triages the feedback received to the relevant CMO and ensures that the agency responds within the 10 day timeframe to the complainant. The DIS Feedback Response Officer is responsible for:
  - Recording feedback on the DIS Central Register to capture and record the outcomes for reporting purposes.
  - Liaising with the CMO closer to the end of the 10-day timeframe if a response has not been sent to the complainant.
  - Regular electronic filing of case files in both Content Manager and the DIS:Feedback team mailbox when closing a case and noting the outcome on the central register.

## Complaints and Feedback

DIS follows the three-level model detailed below for handling feedback and complaints. DIS aims for resolution of complaints at Level 1, wherever possible.

### Complaint Level 1 – Early resolution

- Verbal or in writing
- Resolution at first point of contact or local level
- No further action required

### Complaint Level 2 – Escalated

- Complaint disputed
- Senior Management involved [Director]
- Assess and investigate
- Facilitate resolution and review
- Response supported by business unit

### Complaint Level 3 – External

- Refer to independent / external agency
- External assessment
- Facilitated resolution, investigation and or review
- Managed by Chief Executive or Minister



## ***Principles and Standards***

The Code of Ethics requires all public-sector employees to comply with the principles and values of public sector behaviour. Public officers are to exhibit the highest standards of professional conduct in undertaking their duties. All complaints will be investigated in a manner that is objective, respectful and professional, in a way that upholds the Code of Ethics, DIS values and our Principles and Standards, outlined below.

### ***Our Principles***

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|-------------------------------|-----------------------------|
| 1. People focus               | 5. Objectivity and fairness |
| 2. Remedies and communication | 6. Privacy and disclosure   |
| 3. Visibility and access      | 7. Monitoring and reporting |
| 4. Responsiveness             | 8. Resources and training   |

### ***Our Complaints Management Standards***

1. We will ensure customers are able to easily contact or submit or provide a complaint or feedback verbally or in writing and include external reviews such as those undertaken by the Ombudsman South Australia office. Customers will be provided with information about the process on our website.
2. We will acknowledge all forms of feedback within **3 working days**.
3. We will log and record all feedback and complaints in Content Manager records management system.
4. We will resolve complaints that are not of a serious nature and/or not requiring extensive investigation or consultation within **10 working days**.
5. We will provide notice to a complainant within **10 working days** if there is a delay in responding and provide an interim response with an explanation and timeline for when the matter is likely to be resolved. Regular updates on the progress of the complaint will be provided to the complainant.
6. Complainants will not be charged a fee to complain. DIS will take all reasonable steps to ensure that complainants are not adversely affected because of a complaint made by them or on their behalf.
7. We will adopt a customer focused approach and treat our customers with dignity and in an unbiased, non-discriminatory and fair manner. We are sensitive to individual requirements of the customers, including support for those who are Aboriginal, from culturally and linguistically diverse communities, with disabilities, or from vulnerable and disadvantaged groups.
8. We will be accountable and undertake continuous and regular monitoring of data to use for service and training improvements.
9. We will not disclose personal information or data in accordance with the State Government Information and Privacy Principles.
10. We will undertake quarterly formal reviews of the Complaints Management system to ensure consistency and best practice.



Complaints can be made or assisted by another person or organisation, e.g. an advocate, family member or community representative. Aboriginal customers can be offered a call back or personal interview from one of DIS' Aboriginal employees.

### **Process Overview**

There are five major stages in the complaint or feedback handling process:

1. Receive the complaint or feedback,
2. Assess the complaint or feedback,
3. Investigate the complaint,
4. Resolve, respond and record the complaint or feedback, and
5. Continuous improvement of services and processes.

### **Receive the complaint or feedback**

Complaints and feedback will be triaged by a central customer service unit and referred to the appropriate business unit for investigation, resolution and reporting on outcomes for continuous improvement.

### **Assess the complaint or feedback**

In the first instance, the complaint or feedback will be assessed by the CMO of the relevant division within DIS to consider the complaint or feedback, identify the parties involved, transfer to the appropriate officer or area and to determine a course of action.

### **Investigate the complaint**

Where further information is required, DIS will investigate the complaint or feedback, and gather necessary evidence.

If the initial investigation determines the complaint relates to corruption, misconduct or maladministration by a public officer, the customer will be referred to the [Independent Commissioner Against Corruption \(ICAC\)](#). If the issue relates to an area where a 'whole of government' complaints management policy exists, such as the [State Procurement Board's](#) Supplier Complaints Policy, the customer will be referred to the administering body.

### **Resolve, respond and record the complaint or feedback**

After the investigation, DIS will contact the customer and provide them with the outcome of their complaint. This may include:

- Where appropriate, an apology for any inconvenience or harm caused from the initial issue
- Decisions, and reasons for those decisions, made because of the investigation
- Any actions taken by the Department, and reasons for taking the actions and
- Options available to the customer, if they are unhappy with the decisions, including options for redress or review.

Customers wishing to take the matter further may request a higher-level review by the Department or make a complaint to an external body such as the [Ombudsman SA](#).

All documentation relating to complaints and feedback will be retained in accordance with the *State Records Act 1997* and the details of the incoming complaint will be recorded in an approved records management system.

### **Investigation by the Ombudsman**

In the instance when the complainant has simultaneously lodged a complaint with the Ombudsman, DIS are still required to follow the procedure, complete the investigation and respond to the complainant as per our internal timeframe of 10 days.



The investigation undertaken by the Ombudsman is a parallel process to the DIS investigation. The Ombudsman will contact us once the complainant has advised them that DIS has responded to the original complaint.

### ***Unreasonable Complainant Behaviour***

DIS recognises that a small number of complainants may act unreasonably in seeking to have their concerns addressed. Complainant conduct that involves behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for DIS, our staff, and/or other service users is likely to be deemed unreasonable. Unreasonable behaviour by complainants does not preclude valid issues being addressed by DIS.

DIS will put in place appropriate strategies for managing unreasonable behaviour in a manner that is fair, reasonable and ethical.

### ***Continuous Improvement of Services and Processes***

Once complaints are resolved, the relevant business unit will identify any underlying causes and implement changes and strategies to systems, processes and services to reduce the risk of re-occurrence and better meet the expectations of our customers.

### ***Reporting***

In accordance with the Premier's Circular *PC013 – Annual Reporting Requirements*, South Australian government agencies are expected to report annually on complaint data and to address system improvements planned for the next financial year.

Complaints will be referenced in the DIS Annual Report and will include as a minimum:

- Number of complaints received,
- Category of complaints received, using the Across Government Complaints Categories (listed in accompanying procedures), and
- Examples of service improvements made as a result.

Additionally, feedback, complaints and compliments data will be reviewed and analysed periodically to:

- Identify systemic issues to be addressed to improve performance,
- Identify trends and frequency of repeat complaints,
- Determine resolution of outcomes of complaints,
- Determine improvements to remedy issues, and
- Identify areas of best practice and promote learning.

This policy also establishes a protocol for monitoring trends in numbers and types of feedback, complaints and compliments to be reported quarterly to senior executive.

## **Compliance**

The Code of Ethics for the South Australian Public Sector requires all public sector employees to uphold the values of the Public Sector.

Deliberate breach or circumvention of the principles of the policy or any documents referenced in this document, may lead to the appropriate disciplinary action in accordance with the *Public Sector Act (2009)*.



## Supporting Documents

- DIS Complaint Management Procedure
- [AS/NZS 10002:2014 – Guidelines for complaint management in organisations](#) ('the Australian standard')
- [Ombudsman SA, Complaint Management Framework \(March 2016\)](#)
- [Commonwealth Ombudsman – Better Practice Guide to complaint handling](#)
- [Premier's Circular PC013 – Annual Reporting Requirements](#)
- [Premier's Circular PC039 – Complaint Management in the South Australian Public Sector](#)
- [State Records Act 1997](#)
- [Information Sharing Guideline \(ISG\) 2008](#)
- [Code of Ethics for South Australian Public Sector](#)
- DIS Complaint Management Procedure



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## DOCUMENT CONTROL

**Title: Complaints Management Policy**  
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Approved by: Executive Director,  
Performance and Business Operations

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Policy Owner: Director, Client Services

Contact person: Manager,  
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**Government  
of South Australia**

Department for  
Innovation and Skills