



# Complaint Handling Policy

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Please note that this document replaces the **Customer Feedback Policy (October 2017)**.

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# 1. Policy Statement

## 1.1 Objectives

This policy is intended to ensure we handle all customer complaints fairly, efficiently and effectively. The key objectives of our customer complaints management system is intended to:

- enable us to respond to issues raised by people providing complaints in a timely and cost-effective way
- boost public confidence in our administrative processes, and
- provide information that can be used by us to deliver quality improvements in our Schemes, services, staff and customer complaints handling.

## 1.2 Scope

This policy applies to all staff receiving or managing customer complaints from the public, made to or about us, regarding our Schemes, services, staff and complaints handling.

Customer requests, appeals, internal staff grievances and public interest disclosures are dealt with through separate mechanisms.

## 2. Policy Components

### Corporation Commitments

The Corporation expects staff at all levels to be committed to fair, effective efficient complaints handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
Director, Long Service Corporation	Promote a culture that values complaints and their effective resolution	<p>Report publicly on the Corporation's complaints handling.</p> <p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaints trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Recognise and reward good complaints handling by staff.</p> <p>Support recommendations for the Schemes, service, staff and complaints handling improvements arising from the analysis of complaint data.</p>
Executives and Managers	Establish and manage our complaints management system.	<p>Provide regular reports to the Director on issues arising from complaints handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed and implemented where appropriate.</p> <p>Recruit, train and empower staff to resolve complaints promptly and in accordance with the Corporation's policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve the Corporation's complaints management system.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</p> <p>Recognise and reward good complaints handling by staff.</p>

<p>Staff whose duties include complaints handling</p>	<p>Demonstrate exemplary complaints handling practices</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people to make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide comments to management on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the Corporation's complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
<p>All staff</p>	<p>Understand and comply with the Long Service Corporation's complaints handling practices.</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of the Corporation's complaints handling policies and procedures.</p> <p>Assist people who wish to provide complaints to access the Corporation's complaints process.</p> <p>Be alert to complaints and assist staff handling complaints to resolve matters promptly.</p> <p>Provide comments to management on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaints data as directed by management.</p>

## 3. Definitions

### Complaint

An expression of dissatisfaction made to or about us, our Schemes, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy includes:

- a complaint about conduct, service or product. This may relate to customer service, the quality of a service/product, a failure to provide information, the competence or conduct of staff, errors of judgment or misinterpretation of information, decisions being unfair, unreasonable or lacking in merit or poor administrative services
- an internal review of a complaint
- an internal review of how a complaint was handled
- an external review of a complaint or how the complaint was handled.

The following are not complaints under this Policy:

- staff grievances [see our grievance policy]
- public interest disclosures made by our staff [see our internal reporting policy]
- code of conduct complaints [see our Code of Conduct]
- responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- appeals to the Industry Committees
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'Feedback' below]
- customer service requests [see definition of 'Customer service request' below], and
- requests for information [see our access to information policy].

### Compliment

An expression of praise, commendation, or admiration made to or about us, our Schemes, services, or staff.

### Customer service request

The definition of a customer request includes:

- requests for approval
- requests for action
- routine enquiries about the Corporation's business
- requests for the provision of services and assistance
- reports of failure to comply with laws regulated by the Corporation
- requests for explanation of policies, procedures and decisions.

### Complaints management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

**Grievance**

A clear, formal written statement by an individual staff member about another staff member or a work-related problem

**Procedure**

A statement or instruction that sets out how our policies will be implemented and by whom.

**Public interest disclosure**

A report about wrongdoing made by a public official in New South Wales that meets the requirements of the *Public Interest Disclosures Act 1994*.

**Feedback**

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our Schemes, services or complaint handling where a response is not explicitly or implicitly expected or legally required.

## 4. Guiding principals

### 4.1 Guiding Steps



### 4.2 Facilitate Complaints

#### People focus

We are committed to seeking and receiving complaints. Any concerns raised in customer complaints will be dealt with in a reasonable time frame. The Corporation is committed to resolving complaints within 10 business days of receipt.

Customers will be:

- provided with information about our complaints handling process
- provided with multiple and accessible ways to provide complaints
- listened to, treated with respect by staff and actively involved in the complaints process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

#### No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

We will protect the identity of people lodging a complaint where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by the Corporation as permitted under the relevant privacy laws and any relevant confidentiality obligations.

#### Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

#### Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaints, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to provide complaints

with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

### **No charge**

There is no fee charged for lodging a complaint.

## **4.3 Respond to Complaints**

### **Early resolution**

Where possible, complaints will be resolved at first contact with the Corporation.

### **Responsiveness**

We will promptly acknowledge receipt of complaints. We are committed to managing people's expectations, and will inform people as soon as possible of the following:

- the complaints process
- the expected timeframes for our actions
- the progress of the complaint and reasons for any delay.

We will advise customers when their complaint is transferred to another person or team. We will also advise people as soon as possible when we are unable to meet our timeframes for responding to their complaint and the reason for our delay.

### **Objectivity and fairness**

We will address each complaint with integrity and in an equitable, objective and unbiased manner. We will ensure the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly.

### **Responding flexibly**

Our staff are empowered through appropriate training to resolve complaints promptly and with as little formality as possible.

### **Confidentiality**

We will protect the identity of people making complaints where this is practical and appropriate.

## 5. Complaint management system



### Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

The five key stages in our complaint management system are set out below.

### Receipt of complaints

We will record the complaint and supporting information. We will assign a unique identifier to the complaint. The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information, and
- any additional support the person making a complaint requires.

### Acknowledgment of complaints

We will acknowledge receipt of each complaint promptly, preferably within two working days. Consideration will be given to the most appropriate medium (eg. letter, phone call, email) for communicating with the person making a complaint.

### Assessment and addressing of complaints

We will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making the complaint, and where there is more than one issue raised, determine whether each issue needs to be addressed separately. When determining how a complaint will be managed, we will consider:

- how serious, complicated or urgent the complaint is
- whether the complaint raises concerns about people's health and safety
- how the person making the complaint is being affected
- the risks involved if resolution of the complaint is delayed, and
- whether a resolution requires the involvement of other organisations.

After assessing the complaint, we will consider how to manage it. Options to manage a complaint include:

- giving the person making a complaint information or an explanation
- gather information from the product, person or area that the complaint is about, or
- investigate the claims made in the complaint.

We will keep the person making a complaint up to date on our progress, particularly if there are any delays.

## Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making a complaint and advise:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to them.

## Closing the complaint

We will keep comprehensive records about:

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

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

## Three levels of complaint handling

We aim to resolve complaints at the first level, the frontline. Wherever possible, staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where it is not possible to resolve a complaint at the frontline, we may decide to escalate the complaint to a more senior officer within the Corporation for review.

Where a person making a complaint is dissatisfied with the outcome of the review, they may seek an external review of our decision (by the Ombudsman, for example).



## **5.1 Accountability and Learning**

### **Analysis and evaluation of complaints**

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports to the Corporation's Executive will contain information on:

- the number of complaints received
- the outcome of complaints
- issues arising from complaints
- systemic issues identified.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

### **Monitoring of the complaint management system**

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and other mechanisms available.

### **Continuous improvement**

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and data, and
- implement appropriate system changes arising out of our analysis of complaints data.

## 6. Document Control

### 6.1 Document Approval

Name & Position	Signature	Date
Kathy Skuta Director Long Service Corporation	Approved	02/12/2019

### 6.2 Document Version Control

Version	Status	Date	Prepared By	Comments
1.0	Draft	16/09/2019	Layla Helson	Draft Policy
1.1	Draft	18/09/2019	Layla Helson	Minor Changes
1.2	Draft	09/10/2019	Layla Helson	Minor amendments from feedback
1.3	Final	29/10/2019	Layla Helson	Minor amendments from Executive review

### 6.3 Review Date

This policy will be reviewed in June 2021

It may be reviewed earlier in response to post-implementation feedback from Business Units.