

CUSTOMER FEEDBACK AND COMPLAINTS POLICY

Department of Human Services (DHS)

Summary

Providing guidance and best practice management in the effective and timely response to customer feedback and complaints.

Table 1: Document Details

Policy Number	23BDHS/1625
Applies to	All DHS staff
Issued by	Office of the Chief Executive and Governance
Delegated Authority	Chair, Client Services and Partnerships Committee
Policy Custodian	Director, Office of the Chief Executive and Governance
Content author	Manager, Government Business Office of the Chief Executive and Governance
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Governance Committee	Client Services and Partnerships Committee
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Confidentiality	OFFICIAL

Table 2 – Revision Record

Date	Version	Revision description
02/08/2012	1	Implementation
12/05/2016	2	General update
07/08/2018	3	Update to current branding and correct template only
01/05/2019	4	Significant update to context, policy detail and roles and responsibilities to ensure compliance with PC039
17/11/2023	5	Three-year review and update (including Gov Safety and reporting requirements)

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1. Policy Title

Customer Feedback and Complaints Policy

2. Purpose

This Policy supports DHS to:

- manage customer feedback and complaints in a fair, and consistent manner
- comply with State Government policy and national standards
- be responsive to the needs of our customers and clients.

3. Context

Effective complaints management in government is an integral part of performance management and customer satisfaction. Customer complaints and feedback provide a mechanism for DHS to improve services by listening to the voice of the customer.

A well-managed, inclusive, and transparent complaints handling model can build trust between the public sector and the community. The Policy should help identify and mitigate gaps in services and risks.

DHS introduced an integrated Complaints Management System (CMS) in 2007, including corporate policy and procedures.

In 2014, the South Australian Ombudsman conducted an audit of complaint-handling practices across the South Australian government. This led to the development of [Premier and Cabinet Circular *Complaint Management in the South Australian Public Sector \(PC039\)*](#), issued in July 2015 and updated in November 2018, which requires agencies to establish and maintain an effective complaint management system that conforms to principles in the Australian/New Zealand Standard: AS/NZ 10002:2014 *Guidelines for Complaint Management in Organisations*. In October 2018, the South Australian Ombudsman released an *Audit Survey Report* assessing the complaints management systems of state agencies and making recommendations for improvement.

These audits were reflected in the update of the DHS Customer Feedback and Complaints Policy in 2019.

4. Scope

DHS strives to ensure everyone in our community feels respected, represented and seen and steadfast. We are steadfast in our commitment to enabling positive and enduring outcomes for Aboriginal people, people with disability and/or neurodivergence, young people, older people, culturally and linguistically diverse people, LGBTIQ+ and gender diverse people.

The Customer Feedback and Complaints Policy applies to all DHS staff and divisions.

Included:

This policy applies to customer feedback received by DHS, including, suggestions, compliments, and complaints.

Excluded:

This policy does not apply to

- A request for or follow up of services (eg, screening)
- Complaints that are the subject of a formal investigation, an administrative appeal, or other form of legal redress.
- Complaints concerned with workforce conduct (the Grievance Resolution Procedure outlines the process for DHS staff to raise issues in the workplace).
- Critical client incidents.

5. Policy Detail

DHS will maintain an effective customer feedback and complaint management system (CMS) to support management of feedback and complaints.

DHS values feedback and complaints and is open and responsive. We use feedback to support continuous improvement.

DHS will handle complaints professionally and efficiently. Divisional procedures developed under this policy should be customer-centered and should not include procedures that cause further harm or distress to individuals. Divisions should ensure that procedural fairness is awarded to complainants, and that complaints can be received and addressed anonymously.

Each business unit, with direct customer service responsibilities, must have a clearly defined complaint handling procedure that conforms to this policy and state

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government requirements¹. The procedure must assist employees in transferring or escalating complaints in a timely and sensitive manner. The procedure must be inclusive and accessible. Consideration should be made to ensure the person tasked with managing the complaint is not directly named by the complainant.

DHS will make information available to people on where they can seek advocacy support that may assist them in raising and resolving their feedback and/or complaints. An advocate may be an eligible support person, a lawyer, a doctor, a professional visitor, an independent advocacy service, or the SA Ombudsman.

All complaints should be taken seriously. When complaints are received, they should be assessed, and the business unit should confirm with the complainant whether the issues raised are within our area of responsibility. If the complaint does not relate to that division, information should be provided to the complainant on where to best direct their query to.

DHS will ensure complaints are reported to external authorities as required by legislation or relevant policy.

As required by the *Independent Commission Against Corruption Act 2012*, any complaints or feedback that potentially relate to issues of serious corruption, will be immediately reported to the Office for Public Integrity.

People should not be adversely affected because they have made a complaint.

Business units should consider the most appropriate point of contact for the person making the complaint within DHS and advise the complainant.

DHS will be particularly alert to complaints that indicate potential risk to customers, gaps in service delivery, or misconduct, and will take appropriate action.

DHS should ensure there are avenues for review and escalation of complaints internally.

If the matter is not able to be resolved internally, complainants should be provided with information about avenues for seeking resolution and/or external appeal.

DHS will maintain communication with complainants throughout the process, including:

- prompt acknowledgement
- information about expected timeframes
- details of action taken and the reasons for those decisions

¹ Premier and Cabinet Circular *Complaint Management in the South Australian Public Sector* (PC039), page 4.

- outcomes and;
- avenues of review or appeal of decisions.

DHS will use the customer's preferred communication method to acknowledge the complaint. Regular and responsive communication can reduce complaint escalation.

DHS internal investigation into a complaint will be outcome focused. We will involve the customer in the resolution of a complaint where possible.

Where the complainant and the customer are not the same person, communications will be to both, to the extent that privacy laws and confidentiality obligations permit.

DHS uses [GovSAfety](#), an integrated system, to record, document, and manage complaints and feedback.²

DHS will collect, monitor, and evaluate our performance, and look for opportunities to improve, as outlined below.

5.1 Roles and Responsibilities

This policy requires that business units with direct customer service responsibilities have complaint handling procedures and processes that conform to this policy and [DPC Circular 039](#).

The following governance arrangements support this policy.

The **Chief Executive** is responsible for:

- ensuring DHS maintains an effective Complaints Management System
- promoting a culture that values complaints, takes them seriously and responds appropriately
- supporting the use of complaints data to inform service improvements leading to better customer service overall

The **Executive Leadership Team** is responsible for:

- providing leadership and oversight to the CMS within their Division

² Prior to 16 May 2022, DHS staff used [MySAFETY](#). to report an incident, complaint or feedback. All reports made after 16 May 2022 are lodged in [GovSAfety](#). MySAFETY remained available until 31 May 2022, for the completion of existing reports only. It was then archived, but available to authorised users for historical reporting purposes.

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- ensuring processes are in place and that all customer feedback and complaints are recorded, responded to and managed appropriately, consistent with this Policy
- ensuring escalation and internal review processes are in place within their Division
- ensuring urgent and serious matters are identified and actioned promptly and appropriately, including reporting or referral as required (to the Chief Executive, the Incident Management Unit, or to external authorities)
- identifying opportunities and systemic issues and implementing remedial actions and improvements
- ensuring complaints about the Senior Authorising Officer of the Restricted Practices Unit are directed to the Deputy Chief Executive responsible for the Restrictive Practices Authorisation scheme.

The **Director, Office of the Chief Executive and Governance**, is responsible for:

- providing central support and coordination for the department's CMS, including corporate policy, and review
- feedback or complaints received via DHS Enquiries (post, online or phone) are monitored by the Office of the Chief Executive (OCE)
- maintenance of a centralised complaints register, and [reporting template](#)
- handling complaints received by the Chief Executive and Ministers' Offices
- ensuring this policy is accessible to the public on the DHS website.

Directors, managers, supervisors, and senior staff are responsible for:

- ensuring the [Closing the Gap Framework Policy](#) and the [Diversity and Inclusion Strategy](#) are considered in the development of CMS procedures
- ensuring complaints received by the division are appropriately recorded in GovSafety
- clearly communicating to their staff responsibilities and requirements, including policy and procedures, related to complaints and feedback
- providing training and support to staff to respond to complaints and feedback
- providing oversight to the operations of the CMS in their business unit
- ensuring information about how to complain or provide feedback is clearly communicated to customers, and support is provided to those who need it

- ensuring their business unit report 6 monthly to OCE via the centralised complaints register, and template (covering January to June and July to December)

All staff are responsible for:

ensuring they are familiar with this Policy, the mandated incident reporting and feedback system (GovSAfety) and any procedures, guidelines and processes, and act accordingly.

5.2 Complaints and Feedback received by OCE

The OCE receives complaints and feedback regarding DHS through the online form, directly to the DHS Enquiries inbox, by phone, and by mail. When received OCE will forward the feedback to the appropriate division's inbox or contact, where it will be assessed as to lodgment on Gov SAfety or other action in accordance with the division's complaints procedure.

5.3 Unreasonable complainant behaviour

Unreasonable conduct is "any behaviour by a person which because of its nature or frequency, raises substantial health, safety, resource or equity issues for the people involved in the complaint process".³ Escalation processes for unreasonable complainant behaviour should be included in business units' CMS procedures, Responses to the customer in this situation should remain professional and consistent.

5.4 Customer Privacy

Privacy considerations should remain at the forefront of all feedback and complaint processes. Any disclosures made in the CMS process should adhere to public expectations and to the Premier and Cabinet Circular 12 – Information Privacy Principles Instruction.

Responses to complaints or feedback that lead to concerns for a person's health or welfare should follow the Information Sharing Guidelines.

5.5 Recording of Complaints

All complaints and feedback should be recorded by the business unit in line with its complaints and feedback procedure.

³ NSW Ombudsman 2021, [Managing unreasonable conduct by a complainant](#)

OCE will record complaints and feedback received through the Office of the CE and Ministers' Offices for the department to assist with reporting to ELT and for annual report processes.

A [template](#) has been developed by OCE which is provided to business units to report to OCE. This [template](#) records the minimum reporting requirements. Business units are not limited to the minimum requirements when recording feedback and complaints within their own recording systems (ie. Gov SAfety).

5.6 Reporting

Divisions are required to report to the OCE 6 monthly via the complaints [template](#) provided. OCE will maintain a centralised complaints register for reporting purposes, as outlined below.

Divisions should identify the types of complaints received to be able to monitor where there may be trends (eg. program or service quality, wait time, perceived unfair discrimination or racism, online experience such as accessing information or navigation ease).

The DHS Client Services and Partnership Committee currently oversee a proactive and systemic approach to client and customer feedback and complaints resolution.

An annual report on complaints data, feedback and service improvements will be provided to the Client Services and Partnership Committee.

The report can include:

- The number and type of complaints received;
- The outcome of complaints, including matters resolved at first point of contact;
- Any systemic issues identified;
- Whether any experiences of racism or discrimination are reported;
- Any service improvements made resulting from customer complaints or feedback;
- The number of requests received for internal and/or external review.

This information will support DHS in its commitment to continuous improvement in customer service and overall business operations.

Complaints data is also included in the DHS Annual Report.

5.7 Timeframe

We will ensure that complaints are acknowledged within five (5) business days;

We will aim to finalise complaints within 30 business days;

Where a complaint is not resolved within 30 business days, we will explain the reason for the delay to the complainant and negotiate an interim response with an indicative timeframe as to when a full response can be expected, to the extent that privacy laws and confidentiality obligations permit.

6. Risk

Risks of non-compliance include:

- customer and community dissatisfaction and harm
- gaps in services
- litigation
- loss of reputation and staff confidence
- financial loss.

7. Definitions

Advocate: Someone who may support a client/customer to make a complaint, or make the complaint on behalf of a client. An advocate may be an eligible support person, a lawyer, a doctor, a professional visitor, an independent advocacy service, or the Health and Community Services Complaints Commissioner.

Client/Customer: Someone who has received one or more of DHS services or programs.

Complaint: An expression of dissatisfaction made to or about an agency related to its products, services, employees, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Complaint Management System: Includes policies, procedures, practices, employees, hardware and software used by an agency for the management of complaints and feedback.

Feedback: An opinion, comment or expression of interest or concern, made directly or indirectly, explicitly or implicitly to or about the agency, about its products, services, employees or the handling of a complaint. A response is not explicitly or implicitly expected or legally required. Feedback can be either positive or negative.

Gov Safety: The current SA Government-wide Work Health and Safety system used to lodge hazard, incident and injury records, including feedback and complaints.

Procedure: Instructions that set out how policies will be implemented and by whom.

* The terms customer and client are used interchangeably depending on the requirements of the business unit.

8. Reference Documents

8.1 Directive documents

[Australian/New Zealand Standard: Guidelines for complaint management in organisations](#)
(AS/NZ Standard AS/NZS 10002:2022)

Health and Community Services Complaints Act 2004

Independent Commission Against Corruption Act 2012

Ombudsman Act 1972

[Premier and Cabinet Circular – PC 039 - Complaint Management in the South Australian Public Sector](#)

8.2 Supporting documents

[DHS Feedback and complaints webpage](#)

[SA Government online complaints and feedback form](#)

[DHS Customer Feedback and Complaints Reporting Template](#)

8.3 Related documents and resources

[Audit Survey Report: Assessment of state agencies' complaints managements systems – Ombudsman SA \(June 2018\)](#)

[Code of Ethics | Office of the Commissioner for Public Sector Employment](#)

[Managing unreasonable conduct by a complainant – A manual for frontline staff, supervisors and senior managers – A joint project of the Australasian Parliamentary Ombudsman \(2021\)](#)

9. Closing the Gap

Under the National Agreement on Closing the Gap, specifically Priority Reform Three: Transforming Government Organisations, DHS is committed to systemic and structural transformation to improve accountability, and to respond to the needs of Aboriginal peoples. In the future, DHS will be expected to report on actions to implement the transformation elements under Priority Reform Three which include identifying and eliminating racism and embedding and practicing meaningful cultural safety. These outcomes will be measured by the proportion of Aboriginal people reporting experiences of racism, and the proportion of Aboriginal people who identify as feeling culturally safe in dealing with DHS.

It is noted that additional considerations may be required to support and respond to feedback and complaints from Aboriginal clients. These specific factors may include, for example, the provision of information to family, next-of-kin and community, seeking specific cultural advice, and developing specific resources.

Each business unit handling complaints and feedback is required to have up to date information on culturally safe and inclusive practices and support services. As stated above, Directors, managers, supervisors, and senior staff are accountable for monitoring the provision of up to date information. Divisional and business unit CMS procedures must address responding to complaints and feedback from Aboriginal peoples.

The [Closing the Gap Framework Policy](#) provides guidance for developing strategies that positively impact Aboriginal people.

10. Policy Approval

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<p>Comments:</p>	<p>APPROVED</p> <p> -----</p> <p>Joe Young Chair, Assurance Committee</p> <p>23 / 11 / 2023</p>