



Client Complaints Management Policy

1. Introduction

Queensland Independent Schools Block Grant Authority (QIS BGA) recognises the importance of complaints management as part of quality client service. Complaints are inevitable, and QIS BGA seeks to be accountable for actions and decisions made. Clients and stakeholders have the right to complain and seek remedy for actions and decisions that adversely affect them.

Complaints are a valuable source of feedback and are an important tool for business improvement and staff development. Diligent and prompt attention to complaints increases client satisfaction and improves performance.

2. Purpose

The purpose of this policy is to:

- provide staff with information about the client complaint handling process
- inform stakeholders of the client complaint handling processes
- provide an avenue for client communication and feedback
- recognise, promote and protect the client's rights, including the right to comment and provide feedback on service
- provide an efficient, fair and accessible framework for resolving client complaints and monitoring feedback to improve service delivery.

3. Definitions

- Complaint-** is any expression of dissatisfaction or concern made by, or on behalf of, an individual client including government agencies, duly authorised representatives of schools or a member of the public, that relates to QIS BGAs services or the performance, behaviour and conduct of staff, or the complaints handling process.
- Complaints management system** is the corporate policy, procedure, personnel and technology used by QIS BGA in receiving, recording, responding to and reporting about complaints.
- Formal complaint** is one that is not able to be resolved at the first point of contact and where the client conveys that they are seeking further action to be taken. The complaint is submitted in writing to the General Manager or Board Chair either directly from the client, or documented by another on behalf of the client, so that all aspects of the complaint can be accurately understood and investigated.
- Informal complaint** is a complaint of a less serious nature, which can be acknowledged verbally and resolved without the need for a formal investigation.





4. Relevant Documentation and Legislation

- (a) *Privacy Act 1988* (Cth)
- (b) *Competition and Consumer Act 2010* (Cth)
- (c) *Capital Grants Program (CGP) for non-government schools, Program Guidelines*
- (d) *State Capital Assistance Scheme Guidelines*
- (e) *External Infrastructure Subsidy Scheme Guidelines*
- (f) *QIS BGA Staff Handbook*
- (g) *QIS BGA APP Privacy Policy*, October 2018
- (h) *QIS BGA Internal Privacy Policy*, October 2018
- (i) *QIS BGA Data Breach Response Plan*, October 2018

5. Scope

All written complaints and serious or unresolved telephone complaints must be recorded to the *Complaints Register* and managed in accordance with QIS BGAs complaints management procedure. Non-serious verbal complaints should be resolved at the frontline and recorded to the register, in accordance with the principles in this policy.

Where written and/or formal complaints are in relation to grant based decisions made by the QIS BGA Capital Advisory Committees or Board of Directors, the current Program Guidelines or Operations Manual will shape any actions employed in response to the complaint, under the process of appeal.

NB- *any complaints made in relation to allocation of capital grants to schools will be addressed under the relevant capital grant Program Guidelines.*

6. Procedure

6.1 THE PRINCIPLE OF NATURAL JUSTICE

- (a) The principle of natural justice demands that the handling of complaints be based upon an assumption of innocence unless and until evidence shows otherwise. The review of the complaint made will then form the basis of appropriate action by QIS BGA, to respond to both the individual and organisational matters addressed in the findings.
- (b) QIS BGA supports and promotes a positive and constructive approach to client complaint management and acknowledges its value as a business practice. QIS BGA is receptive to client complaints and encourages feedback, both positive and negative. QIS BGA also promotes a 'complaint friendly' culture that respects people's right to complain about any aspect of QIS BGAs operations.

6.2 REPORTING REQUIREMENTS

- (a) All complaints made, whether they be formal or informal, must be entered to the *Complaints Register*.



- (b) The complaints management system will be used to identify systemic and recurring problems, guide complaint reduction strategies and improve service delivery.
- (c) The General Manager will report, at least, quarterly to the Board regarding complaints received and the subsequent resolution and outcomes.
- (d) If the General Manager and staff cannot resolve a complaint or the complaint refers to the General Manager, the Board Chair will assume the responsibilities of presiding and officiating over the investigation with the focus to resolve the complaint.

6.2 COMPLAINTS MANAGEMENT SYSTEM

(a) Frontline complaints handling

- (i) QIS BGA staff are empowered to resolve less serious complaints at the outset.

(b) Internal complaints resolution

- (i) In the first instance, written complaints, serious or unresolved telephone complaints and complaints referred by external agencies must be progressed to the General Manager for internal resolution (refer Appendix A). Where a complaint involves the General Manager, such complaints will be reported to the Board Chair.
- (ii) The General Manager will review complaints and deem the nature of the complaint. The General Manager may investigate and review written responses for consistency and completeness and ensure quality of the data recorded. The General Manager may determine that the complaint is serious enough to be addressed in counsel with the Board Chair. In this situation, or if a complaint is in relation to the General Manager, the Chair will determine whether to refer a complaint to the Board.

6.3 TRANSPARENCY AND ACCESS

- (a) The BGA will ensure adequate resources, including staff, are available to assist complainants and to manage complaints.
- (b) Reasonable assistance will be available to complainants with special needs including complainants who are unable to lodge a complaint in writing or people requiring interpreter service assistance.

6.4 RESPONSIVENESS

- (a) Receipt of a complaint will be acknowledged to the complainant as soon as possible.
- (b) Complaints will be dealt with within reasonable timeframes.
- (c) All parties to a complaint will receive regular progress reports/updates throughout the process.

6.5 OBJECTIVITY

- (a) Complaints will be investigated without prejudice to any other right a complainant might have.
- (b) Each complaint will be addressed in an equitable, objective and unbiased manner.
- (c) Complaints will be managed in a fair and consistent way.



6.6 CONFIDENTIALITY

- (a) Complaints will be dealt with confidentially and complainants respectfully treated, in accordance with the Australian Privacy Principles contained in the Commonwealth *Privacy Act 1988*, which underpins QIS BGAs *APP Privacy Policy*.
- (b) Personal information collected as part of the complaints process will be managed in accordance with QIS BGA's *APP Privacy Policy*.
- (c) Complainants will not suffer any reprisal from QIS BGA or its officers for making a complaint.

6.7 INVESTIGATION OF COMPLAINTS

- (a) Every reasonable effort will be made to investigate all the relevant circumstances and information surrounding a complaint.

6.8 FEEDBACK

- (a) All parties to a complaint will receive information that clearly explains how and why a decision was made (refer Appendix A).
- (b) The complainant will be informed of any further review mechanism that is available should he/she be dissatisfied with action taken by QIS BGA in relation to their complaint.
- (c) Complainants will be advised of outcomes as soon as possible after a decision is made. They will be given reasonable feedback including adequate and well-articulated reasons for the complaint outcome. They will also be advised of external review options or statutory appeal options (where applicable).

6.9 MONITORING EFFECTIVENESS/CONTINUOUS IMPROVEMENT

- (a) Complaint data held in the *QIS BGA Complaints Register* will be analysed to identify systemic issues that need to be addressed in order to improve performance.
- (b) Where potential system improvements are identified, such feedback shall be communicated by the General Manager to the Board for consideration and implementation.

6.10 REMEDIES

- (a) When a complaint is justified, the BGA will take appropriate remedies that are fair and reasonable to both the complainant and any BGA personnel involved. The BGA will always endeavour to be consistent and, where possible, resolve complaints quickly and without embarrassment and conflict.

7. Responsibilities

- (a) All staff:
 - (i) are responsible for receiving client complaints and feedback
 - (ii) are to give priority to assist in the resolution of client complaints. They will resolve minor verbal (informal) complaints where appropriate or refer more serious written (formal) complaints directly to the General Manager. Where the position of General Manager is the basis of the complaint, the Board Chair will receive the complaint



(iii) shall record the details of minor verbal complaints received and resolved in the *QIS BGA Complaints Register* and advise the General Manager or, as per clause 8.1.2, the Board Chair.

(b) The General Manager will:

- (i) ensure that the *Client Complaints Management Policy* is implemented
- (ii) will ensure staff understand the nature of informal and formal complaints and how to effectively manage any referrals and responses
- (iii) will manage the documentation of all complaints received, through the *QIS BGA Complaints Register* and how they were resolved, including any changes that may be required to delivery of service
- (iv) review and investigate all unresolved complaints
- (v) will take overall responsibility for any complaints and have them addressed.

QIS BGA DOCUMENT CONTROL DETAILS		
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Appendix A

INFORMAL AND FORMAL CLIENT COMPLAINT MANAGEMENT

