

Effective Complaints Management

EFFECTIVE COMPLAINTS MANAGEMENT SELF AUDIT CHECKLIST

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The Queensland Ombudsman's Office developed the *Effective Complaints Management Self Audit Checklist* as an auditing tool for agencies to use to assess their own complaints management policy and practices. The checklist is comprehensive, covering all facets of good complaints management. It is based on the *Effective Complaints Management Fact Sheets*, the Australian Standard AS 4629-1995 and the International Standard ISO 10018.

The Queensland Ombudsman has kindly given permission to the Ombudsman for the Northern Territory to adapt and use this document.

Effective Complaints Management Self Audit Checklist

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Critical element 1 – Setting the scene

- Do you know how your complaints management system compares to best practice?
- Can you be sure that complaints are handled consistently and fairly across your organisation?
- Do you use customer feedback to improve the quality of your service?
- Would you like to identify what needs to be improved in your complaints management system?

Developed by the Queensland Ombudsman's Office, this Self Audit Checklist will help you gauge your agency's performance against best practice standards. You will be able to evaluate the strengths and weaknesses of your existing complaints management arrangements and identify areas for improvement.

Participant instructions

The checklist is a self-assessment/diagnostic tool that is drawn from the essential elements identified in the *Effective Complaints Management Fact Sheets* series. Each critical element included in the checklist corresponds to the same numbered and titled Fact Sheet. If you need further information on any particular element refer back to the relevant Fact Sheet.

Who should complete the checklist?

Depending on the size and structure of your organisation, this checklist may be able to be completed by one person or may require a team effort. Ideally, a senior member of the customer service team should be involved. Some questions may need to be referred to other teams or management. Forming a team that represents the breadth and depth of the customer service function within your organisation will provide the best results.

Completing the checklist

The checklist consists of six columns that will enable you to complete a thorough assessment of your current complaints management system and help you to devise action points to improve your system. The following list explains each column:

1. **Critical elements and Sub-elements**

There are 13 critical elements. Each critical element is divided into a series of sub-elements. The sub-elements reflect the essential factors for effective complaints management as discussed in the *Effective Complaints Management Fact Sheets* series.

2. **Indicators**

The indicators are the policies, procedures and practices that would be expected in an organisation that is achieving the intent of the sub-element. As you work through the checklist it may seem that some indicators are repeated a number of times. While the indicators seem similar, the context provided by the critical elements and sub-elements is different. You should ensure that your response addresses the requirements of the critical elements and sub-elements.

3. Assessment

Use the following three-point scale to assess each indicator:

1. Not addressed
2. Partially implemented or addressed
3. Fully addressed
- N/A Not applicable

For some indicators a simple yes or no may be sufficient.

4. What supports your assessment?

If you have specified that a particular indicator is fully or partially addressed (assessment rating of 3 or 2), record the details of the policies, procedures or practices you have relied upon to make your assessment in this column.

5. Recommended actions for improvement

In this column detail the strategies or actions your organisation needs to implement in order to fully satisfy the requirements of those indicators you have identified as only partially addressed or not addressed at all.

6. Action plan

In this column you should endeavour to combine your recommended actions for improvement for the sub-element into an action plan. Your action plan should address the process, responsible officers, reporting requirements and timeframes.

Putting it all together

Once completed, the checklist will provide a series of action plans that address the weaknesses or deficiencies you have identified in your complaints management system.

If you have identified the need for your organisation to develop a complaints management policy and/or procedures, the brochure *Developing Effective Complaints Management Policy and Procedures* provides a development framework.

Access to the complaints management policy and/or procedures of nine Queensland public sector agencies is also available through our website. These policies and procedures have been developed in consultation with our Office and meet the requirements of the Australian complaint-handling standard.

Critical element 2 — Commitment

Sub-element	Indicators	Assess- ment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
2.1 Senior management demonstrates commitment to customer service by assigning priority to an effective complaints management system that reflects the needs, expectations and rights of customers	2.1.1 You have a written policy and procedures to support your complaints management process				
	2.1.2 Your policy is published and staff are informed about it				
	2.1.3 Your customers can readily access your complaints policy (e.g. on your website)				
	2.1.4 Senior management discusses the system's purpose and objectives with staff				
	2.1.5 Customer complaints are promoted by senior management as an opportunity to improve agency performance				
	2.1.6 Complaints management guidelines align with organisational standards, such as Customer Service Standards and Code of Conduct				
	2.1.7 The complaints manager or coordinator reports to senior management				

Critical element 2 — Commitment

Sub-element	Indicators	Assess- ment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
2.2 Senior management assigns authority to complaints staff	2.2.1 Complaints staff have authority to take action to remedy complaints and to make or recommend changes to procedures				
	2.2.2 Complaints staff have ready access to senior management for decisions outside their authority				
	2.2.3 Complaints review officers can apply or vary the application of agency policy or decline to apply policy if the circumstances of the case justify it				
2.3 Senior management receives regular reports on the complaints management system and monitors its progress against measurable objectives	2.3.1 Senior management receives regular reports about the effectiveness of the system against measurable objectives				
	2.3.2 Senior management regularly reviews the complaints system's effectiveness				
	2.3.3 Details of reviews and actions taken to improve services are published to staff and the public				

Critical element 2 — Commitment

Sub-element	Indicators	Assess- ment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
	2.3.4 Senior management receives regular reports on trends and emerging systemic issues and takes action to address concerns				
2.4 Management allocates sufficient resources for complaints management	2.4.1 The system is properly resourced including human and technological resources				
	2.4.2 Resources are allocated to promote adequate access to the system				

Critical element 3 — Complaints model

Sub-element	Indicator	Assessment 3,2,1,N/A	What supports your assessment?	Recommended action for improvement	Action plan
3.1 Agency has a staged way of receiving, recording, processing, responding to and reporting on complaints	3.1.1 You have procedures for the complaints process that outline the stages, timelines and primary areas of responsibility for managing complaints				
	3.1.2 Your complaints system has an assessment process to elevate complaints to a higher level if required				
	3.1.3 Your system is structured to allow a fair and detailed consideration of complaints, provides for internal review and advises of options for external review if the customer remains dissatisfied				
	3.1.4 Complaints information is systematically recorded and monitored for consistency, e.g.: <ul style="list-style-type: none"> • who referred complaint • complaints type • work unit/region where complaint arose • timeframe for deciding complaint • outcome 				

Critical element 3 — Complaints model

Sub-element	Indicator	Assessment 3,2,1,N/A	What supports your assessment?	Recommended action for improvement	Action plan
	3.1.5 Results of complaints reviews are entered into a central database and monitored for consistency of outcome				
	3.1.6 System-wide complaints information is regularly analysed and reported to senior management, complaint managers and complaints staff				
3.2 Clear lines of authority and guidelines are developed for complaints review officers (i.e. senior officer or designated complaints officer who reviews or investigates complaints that remain unresolved following initial agency response)	3.2.1 You have guidelines for complaints review officers that outline their authority and process to be followed				
	3.2.2 Complaints reviewing officers have authority to confirm or change a decision of an original decision-maker or frontline complaints staff				
3.3 Statutory responsibilities for reviewing actions or decisions are clarified	3.3.1 Your complaints policy outlines any statutory responsibilities for reviewing certain categories of decisions				

Critical element 4 — Communication

Sub-element	Indicator	Assessment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
4.1 Communication practices help provide better customer service	4.1.1 You publicise your complaints handling points of contact through a range of points, such as your website and at customer service centres				
	4.1.2 You offer customers a toll-free number that connects directly to your complaints section/s				
	4.1.3 Your complaints areas have a facility for customers to leave a message about their complaints when officers are busy or the office is unattended				
	4.1.4 Information on how to make a complaint is easy to understand				
	4.1.5 Arrangements are in place to assist customers with special needs, such as sight or hearing impaired people, those with a reading or mental disability or language difficulty				

Critical element 4 — Communication

Sub-element	Indicator	Assessment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
	4.1.6 Complaints staff receive cross-cultural training and have access to translation and interpreter services				
	4.1.7 Information is provided to complainants about complaints stages, either verbally or in writing				
	4.1.8 Your customers are informed of their right to internal and external reviews				
	4.1.9 You advise customers about improvements to be made as a result of their complaints on a complaint-by-complaint basis and through your Annual Report				
4.2 Agency establishes target times for stages of the complaints handling process and lets customers know what they can expect	4.2.1 Your staff advise customers, either verbally or in writing, of the anticipated times for stages of the complaints process				
	4.2.2 You have letter templates to guide your staff when communicating decisions				
	4.2.3 Complaints staff are empowered to tailor letter templates to enable the individual circumstances of each case to be addressed				

Critical element 4 — Communication

Sub-element	Indicator	Assessment 3,2,1,N/A	What supports your assessment?	Recommended actions for improvement	Action plan
4.3 The agency assists complaints staff to become better communicators	4.3.1 Training is provided in areas such as interviewing skills, dealing with difficult people, dispute resolution, writing in plain English and customer relations				
	4.3.2 Complaints staff are encouraged to speak to concerned customers rather than only responding in writing				
	4.3.3 Your customers service standards include relevant communication standards, such as means, style and times for responding				

Critical element 5 — Visibility and access

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
5.1 The agency ensures its customers know where and how to make a complaint	5.1.1 Information about where and how to make a complaint is available at customer service contact points and publicised in a variety of media			
	5.1.2 Complaints telephone numbers, such as hotlines or toll-free services, are publicised			
	5.1.3 Your website has a designated complaints section with a link from the home page			
	5.1.4 You publicise information in languages other than English about where and how to make complaints			
	5.1.5 You liaise with special needs groups in the community to inform them of arrangements to accommodate their needs			
5.2 The agency provides information to staff to assist customers in making a complaint	5.2.1 Your frontline staff are able to assist customers with details on how to lodge a complaint			
	5.2.2 Information about how members of the public can make complaints is available to all staff, e.g. on your intranet			

Critical element 6 — Responsiveness and fairness

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
6.1 Agency responds quickly and courteously to customer complaints	6.1.1 You have written guidelines that establish realistic target timelines for handling complaints that cover both verbal and written agency responses			
	6.1.2 You monitor the progress of complaints and advise complainants of reasons for deviation from target timelines			
	6.1.3 Your target timelines are met in most cases			
	6.1.4 Complainants are advised how their matters will be dealt with and receive ongoing feedback throughout the process			
	6.1.5 Complaints telephone lines are answered promptly and inquiries and questions dealt with reasonably speedily			
	6.1.6 You have a bring-up system to help meet target timelines for complaints			

Critical element 6 — Responsiveness and fairness

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
6.2 Complaints are treated impartially and fairly for the complainant and the original decision-maker	6.2.1 Complaints reviewers have not had significant involvement in an issue under complaints review or have a personal interest in the outcome			
	6.2.2 The principles of natural justice are followed (people likely to be adversely affected by a decision or action are given reasonable opportunity to comment on information or material and the decision-maker acts in an impartial and unbiased manner)			
	6.2.3 The original decision-maker is informed about the complaint if the complainant proceeds directly to a higher level of review			
	6.2.4 Responses to complainants following investigation or internal review of their complaints include reasons for decisions			
	6.2.5 The original decision-maker is advised of the outcome of the review and given reasons for any decision that rescinded or varied the original decision			

Critical element 6 — Responsiveness and fairness

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
6.3 Customers and staff have a right to expect appropriate confidentiality	6.3.1 Complaints information, including the identity of complainants, is treated confidentially wherever possible or necessary			
	6.3.2 Procedures are in place to manage whistleblower complaints in accordance with the <i>Whistleblowers Protection Act 1994</i>			

Critical element 7 — Resources

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points:
7.1 Complaints staff are appropriately selected and trained	7.1.1 The selection process for complaints staff emphasises the need for good interpersonal and conflict resolution skills			
	7.1.2 You have an overall complaints coordinator or manager who ensures consistency, timeliness and quality in how complaints are dealt with and data collected			
	7.1.3 You regularly seek feedback from staff involved in complaints handling on the effectiveness of the current procedures			
	7.1.4 You provide appropriate training to ensure complaints staff are equipped to effectively and consistently deal with complaints according to your policy and procedures			

Critical element 7 — Resources

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points:
7.2 Effective complaints management systems are supported by adequate information technology and modern communication equipment	7.2.1 Your complaints management system allows you to record, monitor and respond to complaints in a timely way			
	7.2.2 You classify complaints in a way that is relevant to your agency's business			
	7.2.3 You have the ability to record complaints information electronically on a central database			
	7.2.4 Alternatively, you have an effective paper-based system			
	7.2.5 Your system registers and classifies complaints and provides reports and trend analysis			
	7.2.6 Your system has a tracking mechanism to allow the complaints coordinator to monitor the progress of matters handled by other staff			
	7.2.7 Complaints staff have communications equipment to suit their needs, such as hands-free telephone arrangement and answering machine			

Critical element 8 — Personnel and training

Sub-element	Indicator	Assessment 3,2,1 N/A	Assessment demonstrated by	Action points
8.1 Agencies provide training in complaints management processes and encourage a positive attitude towards complaints	8.1.1 Your agency provides training to staff involved in handling complaints that is specifically tailored to their level of authority and duties			
	8.1.2 Your training provider works through your agency's complaints policy and guidelines to ensure staff fully understand procedures and roles			
	8.1.3 Your training program focuses on time management, dispute resolution, analytical thinking, customer relations, handling difficult people, writing in plain English and stress management			
	8.1.4 Essential information about your complaints management system is included in your induction program			
8.2 Complaints reviewers are senior to and independent of primary decision-makers	8.2.1 You have specifically designated officers (complaints reviewers) to review decisions that are not resolved to the complainant's satisfaction in the first instance or are not appropriate to be handled through the frontline process			
	8.2.2 Complaints review is conducted by or at the direction of an officer who is generally senior to the original decision-maker			

Critical element 9 — Assessment and investigation

Sub-element	Indicator	Assessment 3,2,1,0, N/A	Assessment demonstrated by	Action points
9.1 Each complaint and allegation must be assessed to determine its nature, how it should be dealt with and who should deal with it	9.1.1 Your agency has guidelines for the assessment of complaints that identify classes of complaints and how they should be dealt with, e.g.: <ul style="list-style-type: none"> complaints about standards of service or an incorrect decision complaints about inappropriate conduct of an officer that may lead to disciplinary action 			
	9.1.2 Complaints alleging official misconduct or work-related criminal conduct by staff are referred to the Chief Executive Officer or delegate (e.g. Crime and Misconduct Commission liaison officer) or direct to the Crime and Misconduct Commission			
	9.1.3 Complaints are generally dealt with by an officer who is senior to the original decision-maker and who was not involved in making the original decision			
	9.1.4 Your assessment considers a range of factors, such as the complaint's seriousness, and whether it involves an issue of public interest (see other criteria in Fact Sheet 9)			

Critical element 9 — Assessment and investigation

Sub-element	Indicator	Assessment 3,2,1,0, N/A	Assessment demonstrated by	Action points
9.2 The investigations process is supported by guidelines	9.2.1 Your agency has guidelines for investigative officers that clearly explain their role			
	9.2.2 The guidelines for investigative officers detail how to conduct interviews, inspect sites and documents and observe natural justice principles			
	9.2.3 The guidelines provide that decisions on review are made according to the weight of evidence on the balance of probabilities			
	9.2.4 The guidelines require investigators to check agency claims about relevant issues			
	9.2.5 The guidelines recommend the type of detail to be included in investigative reports, such as a summary of the investigation and results, factors that contributed to the complaint arising and recommendations to remedy the complaint or prevent similar complaints occurring			

Critical element 10 — Remedies

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
10.1 The complaints handling process needs to have the capacity to determine and implement remedies	10.1.1 Your complaints management guidelines outline the range of remedies available according to such factors as relevant legislation, the type of complaint received and the degree of detriment experienced by the complainant			
	10.1.2 Mediation or other informal dispute resolution processes are used where appropriate to reach an agreement between your agency and the complainant			
	10.1.3 Complainants are consulted about their expectations and any remedy they are seeking			
	10.1.4 Remedies offered by your agency are fair and reasonable for the complainant and agency			
	10.1.5 Remedies offered for complaints of a similar nature are consistent			
	10.1.6 In cases where a remedy is provided to a complainant affected by maladministration, steps are taken to provide a remedy to others also affected, even if they have not made a complaint			

Critical element 10 — Remedies

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
	10.1.7 Remedies are implemented as soon as possible			
	10.1.8 Your agency takes steps to prevent complaints arising of a similar nature by making relevant changes to policies and procedures			
10.2 Appropriate authority to determine remedies	10.2.1 Your policy and procedures outline officers who are authorised to determine remedies of certain types and up to an authorised limit			
	10.2.2 Staff who handle complaints have direct access to your Chief Executive Officer or Senior Manager for approval of remedies that exceed the limits authorised in your guidelines for those staff			

Critical element 11 — Business improvement

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
11.1 Effective complaints management systems collect specific data and identify recurring or system-wide problems	11.1.1 You have a system to collect agency-wide complaints data (including divisional and regional complaints data)			
	11.1.2 The complaints data is collected in sufficient detail to facilitate comparisons with previous periods and identify system-wide or recurring complaints			
	11.1.3 Your complaints manager or coordinator compiles reports for senior management based on the analysis of the data, which include recommendations for: <ul style="list-style-type: none"> complaint reduction strategies improvements to business processes 			
11.2 Complaints information is used to improve business practices and increase organisational effectiveness	11.2.1 Complaints reports and recommendations are considered on a regular basis by senior management			
	11.2.2 Senior management uses the complaints report information and recommendations to target problem areas and improve policy and procedures as necessary			

Critical element 11 — Business improvement

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
	11.2.3 Senior management reports on how business improvements have been made as a result of complaints information in your agency's annual report or other widely-accessible publication			
	11.2.4 Information about your agency's complaints management system is included in internal publications to raise awareness of roles in the complaints handling process and how complaints contribute to service improvement			

Critical element 12 — Reviewing internal systems

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
12.1 Regular review of the complaints management system ensures it is operating efficiently and effectively and is responsive to changing circumstances and needs	12.1.1 Your agency conducts regular reviews, or has a schedule of forthcoming reviews, to determine how its complaints management system is working			
	12.1.2 Your review process includes an audit of either a sample of complaints files or files covering a specific period to identify problems in the complaints system and confirm the accuracy of reports on the system provided to senior management			
	12.1.3 Your review evaluates complaints policy, procedure and guidelines [see Fact Sheet 12 (1 a–g)]			
	12.1.4 Your review evaluates the adequacy of the system [see Fact Sheet 12 (2 a–h)]			
	12.1.5 Your review seeks the view of staff, customers and complainants [see Fact Sheet 12 (3 a–i)]			
	12.1.6 A timetable is developed for implementation of recommendations developed from your system review			

Critical element 12 — Reviewing internal systems

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
	12.1.7 You report the results of your review to staff and customers to demonstrate your commitment to continuous improvement			
12.2 Safeguards can be built in to ensure quality in your complaints management system	12.2.1 Your agency has a suitably independent and qualified person or committee to monitor the effectiveness of your system and recommend changes to it			
	12.2.2 Your agency monitors complaints staff to ensure they are efficient and effective in gathering and analysing complaints information and identifying defective administration			
	12.2.3 Your agency monitors complaints outcomes to ensure they are fair and in the best interests of complainants and your agency			

Critical element 13 — External review

Sub-element	Indicator	Assessment 3,2,1,N/A	Assessment demonstrated by	Action points
13.1 Agencies should take steps to inform complainants of their right to external review	13.1.1 Your complaints staff understand avenues available for external review			
	13.1.2 Complaints staff are instructed to advise complainants of those avenues where appropriate			
	13.1.3 Your agency publishes information advising complainants about their right to seek external review (e.g. on website)			