

Customer Complaint Management

Scope

Applies to all QLeave employees (permanent, temporary and casual).

Purpose

To manage customer complaints using QLeave's complaints management system pursuant to s264 of the *Public Sector Act 2022* (PS Act) and the Queensland Public Service Customer Complaint Management Guideline.

Policy Statement

QLeave is committed to receiving all types of feedback from customers, including customer complaints. QLeave is dedicated to delivering customer service excellence and ensuring customer complaints are resolved effectively and in a timely way. QLeave values feedback from its customers as an opportunity to enhance our customer centric services and improve the way we deliver them.

Objectives

The objectives for this policy are:

- the customer complaint process is clear and readily accessible for all people who use the complaints management system regardless of their background or circumstances
- all parties involved in the customer complaint process are treated with courtesy and respect
- customer complaints are managed in an equitable, transparent, accountable, and responsive manner through QLeave's compliance with the relevant legislation, standards, and practices
- we identify and consider opportunities from customer complaints to improve the delivery of QLeave services by progressing and embedding a culture of continuous improvement.

Principles

The principles of this policy are informed by the Australian Standard Guidelines for complaint management in organisations (10002:2022) and the Queensland Public Sector's Queensland Public Service Customer Complaint Management Guideline.

Principles	This means we will...
Customer centric	• recognise and respect a person's right to provide feedback or complain about QLeave services, including if they wish to complain anonymously. • involve complainants in the process as far as practicable and appropriate. • ensure complainants are not adversely affected because of complaining. • ensure QLeave's actions and decisions consider, and are compatible with, the rights under the <i>Human Rights Act 2019</i> (HR Act) of parties to a complaint.

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Principles	This means we will...
	advise the complainant of the available internal or external review options.
Visible and accessible	- provide clear information on our website on how to make a customer complaint. - support anyone who requires assistance to make a complaint, including a person with a vulnerability that may impede them from expressing their concerns to QLeave. - accept customer complaints without charge. - recognise a complainant can request another person to represent them.
Responsive	- attempt informal and early resolution of a customer's concern, if possible. - assess the customer complaint (including human rights considerations) to determine how the matter(s) should be dealt with and by whom. - acknowledge and respond to customer complaints in a timely manner. - manage complainant expectations surrounding the customer complaint process, expected timeframes, their involvement, and possible outcomes.
Impartial and fair	- assess and investigate customer complaints and suitable resolution actions including clarify misunderstandings identify process or system changes if needed. - manage and decide each customer complaint in an impartial, unbiased, and equitable manner, in accordance with natural justice, procedural fairness and having perceived or actual conflicts of interests declared and managed. - treat customer complaints confidentially and manage personal information in accordance with the <i>Information Privacy Act 2009</i> (IP Act). - treat people with respect and manage unreasonable complainant conduct.
Employee empowered	- provide employees with information and training on complaint handling. - encourage employee feedback to identify improving complaint handling. - empower employees to resolve complaints effectively and efficiently. - ensure the work health and safety of employees who handle complaints.
Accountability and reporting	- publish roles and responsibilities that relate to complaint management. - manage documentation in accordance with the <i>Public Records Act 2023</i>. - internally record, monitor, and analyse customer complaint trends to continuously improve and inform delivery of QLeave services. - meet annual reporting obligations under the PS Act and the HR Act.

Responsibilities

Complainant

- Provide all relevant information regarding their customer complaint to QLeave, including details of the issue and what outcome they are seeking to resolve the matter.



- Engage with QLeave staff in a respectful and cooperative manner. QLeave reserves the right to take action where a person's behaviour may impact the wellbeing or safety of staff.
- Notify QLeave of any changes in circumstances e.g. the early resolution of the issues, that may affect the complaint including if they wish to withdraw the customer complaint.
- If requesting an internal review of the customer complaint outcome decision, submit the request within 20 business days of receiving the written notice of the outcome.

QLeave employees

- Ensure customer complaints are managed and resolved promptly at the first point of contact, if possible.
- Direct customers wishing to lodge a customer complaint to the 'Customer Complaints' page on QLeave's website or offer to lodge the customer complaint on their behalf, if appropriate.
- Ensure all customer complaints are registered in QLeave's Customer Complaints Register (the register) via the service desk portal.
- Ensure all related records including the customer complaint management checklist (see Appendix 1) and any human rights assessments made while investigating the customer complaint are securely maintained in QLeave's records management system.
- Escalate any customer feedback that may pose a potential risk or could contribute to improving the customer experience or service delivery at QLeave to the relevant business unit's manager.

Managers

- Ensure customer complaints referred to their teams for action are managed and resolved in a timely manner and in accordance with this policy and procedure.
- Complainants are kept informed by regular status updates on the progress and actions relating to their complaint.
- Provide regular status updates on the progress and actions taken to resolve the customer complaint to the Policy and Resolutions team (P&R team), as requested.
- Identify complaints that raise broader issues that may impact on QLeave's risk management framework and make recommendations to their line Director for potential improvements.
- Support and empower staff to resolve customer complaints through early resolution if possible and provide guidance to staff who may be the subject of a customer complaint.
- Ensure written responses and customer complaint outcome letters to complainants are approved in accordance with QLeave's Delegations and Authorisations Manual.

Policy and Resolutions team

- Coordinate and monitor QLeave's customer complaints added to the register for action to ensure:
 - complainants receive timely acknowledgement of receipt
 - customer complaints are actively managed, including completion of the complaint checklist (see Appendix1)
 - the matter is resolved by the relevant business unit within a timely manner.
- Provide advice, training, and guidance to QLeave staff and business units on effective complaints management consistent with this policy and procedure.
- Publish annual customer complaints data, including any human rights complaints, on QLeave's website and contribute to QLeave's annual report to meet statutory requirements.
- Provide internal reports on complaints as required to the Executive Leadership Team (ELT).



General Manager

- Approve QLeave's annual customer complaints report for publication on QLeave external website.
- Champion QLeave's commitment to respond and learn from customer complaints to improve service delivery and strengthen public trust.

Procedure

1. Customer complaints

A customer complaint is a complaint about a service or action by QLeave or its staff, by a person who is apparently directly affected by the service or action. A customer complaint can be made regarding a decision made, or a failure to make a decision.

Customer complaints provide an opportunity for QLeave to take action to improve the customer experience or to improve service delivery. Any customer or member of the public can lodge a customer complaint only if it is apparent that the person is directly affected by the service or action that was provided by QLeave or its staff.

QLeave's customer complaints handling involves using the complaints management system that includes all aspects of any policies, procedures, practices, staff responsibilities, systems and resources used to manage customer complaints as required by this policy and procedure.

Matters that are not considered a customer complaint include when the customer of QLeave is:

- requesting more information
- requesting a change in service or a new service
- suggesting improvements to QLeave services
- expressing a concern about QLeave but is not directly affected by a decision or an action
- providing information (for example, reporting an incident).

The following matters are not a customer complaint and are managed under a separate process:

- request an internal review of a decision, determination, direction or notice made under the legislation that QLeave administers which requires the person to lodge an online Internal Review application form or to apply in writing for QLeave to give any further consideration
- individual employee grievance under *Directive 11/20 Individual employee grievances*
- privacy complaint under s166A of the IP Act which is referred to Legal Services
- corrupt conduct complaint under s36 of the *Crime and Corruption Act 2001*
- ministerial requests or related correspondence that is individually assessed and found not to be a customer complaint under s264(4) of the *Public Sector Act 2022*
- public interest disclosures under s12 or s13 of the *Public Interest Disclosure Act 2010*.

1.1 Customer complaints register

All matters assessed and accepted as a customer complaint as defined in s264(4) of the PS Act must be recorded in the register. The register captures key information including:

- the nature of the customer complaint
- date of receipt of the complaint and an acknowledgement sent by QLeave
- whether a human rights assessment has taken place and if there are any human rights impacts
- the time taken to resolve the customer complaint, and
- any or no further action that was taken because of the customer complaint.



Customer complaints data is reported to the ELT to support evidence-based decision-making such as QLeave's risk management, strategic and operational planning, and service delivery improvements.

2. Customer complaint handling

Customer complaints are generally managed by the relevant service delivery area that interacted with the complainant, and QLeave aims to resolve complaints promptly wherever possible.

In many cases, complaints can be resolved through early engagement, or by escalation of the matter to a supervisor where needed to decide and resolve the matter of concern. Most complaints made by a person are expected to reach an early resolution without the need for an investigation.

If a customer complaint cannot be resolved through early resolution and requires an investigation or further action, it must be recorded in the register and managed in line with this policy and procedure.

2.1 Receive and acknowledge receipt of a customer complaint

A complaint can be received in writing, online, over the phone, or in person. Where appropriate, encourage the person to submit a customer complaint using the online form on QLeave's website.

If a QLeave employee receives a complaint that cannot be resolved through early resolution (such as immediate action or escalation), the customer complaint must then be recorded in the register.

The P&R team is responsible for coordinating and allocating complaints received by QLeave to the most relevant business unit for action and resolution.

If the matter does not meet the definition of a customer complaint, the matter must still be actioned, either as standard correspondence or managed under another applicable policy and procedure.¹

The relevant business unit must acknowledge the customer complaint within three business days of receipt. Acknowledgement of the receipt of the customer complaint may be provided verbally or in writing and may match the same format the customer complaint was received by QLeave.

Where a verbal acknowledgement is provided, a record of this action must be made in the register.

2.2 Communicate, assess and resolve

Once a customer complaint has been acknowledged to the complainant, the employee responsible for managing the matter must seek to understand the issue(s) raised in the customer complaint and work towards a timely, fair and effective resolution of the matters raised by the complainant.

2.2.1 Assessment process

The complaint must be assessed to determine the most suitable resolution pathway, that includes:

- identifying the core issue(s) of the customer complaint
- determining relevant laws, regulations, benchmarks, standards or criteria to assess the complaint against (for example legislation, QLeave policies, or procedures)
- obtaining relevant information/documents, including from the complainant or QLeave systems.

The complainant must be contacted if further clarification is needed regarding the issue(s) raised or the outcome sought to resolve the customer complaint.

The complainant must be:

- provided with information about the customer complaints management process, including estimated timeframes to help manage the complainant's reasonable expectations
- advised of responsibilities they have to take part in the complaint management process

¹ For example, a policy and procedure for the matters outlined at heading **1 Customer complaint** that are not a customer complaint.



- informed of anticipated delays due to the complexity of an investigation or another reason.

All assessment actions must be recorded in the register and QLeave's records management system.

2.2.2 Unreasonable complainant conduct, frivolous or vexatious customer complaint

If a complainant uses unreasonable conduct, is frivolous or vexatious, the employee assessing the complaint must advise the complainant the customer complaint will not be actioned and provide the written reasons.

Review rights must be provided to the complainant if they are dissatisfied and want to pursue an internal or external review of QLeave's refusal based on the unreasonable complainant conduct.

The QLeave employee must ensure a written refusal response to the complainant on the customer complaint, and linked records are stored in the register and QLeave's records management system.

2.2.3 Timeframes and communication within the complainant

Under s6.18 of the Queensland Public Service Customer Complaint Management Guideline, a customer complaint should be responded to within 30-business days of receipt by QLeave.

The early resolution of a complaint is strongly encouraged to resolve matters in a timely manner.

If a customer complaint is complex and cannot be resolved within the 30-business day timeframe:

- the employee managing the complaint **must** keep the complainant informed of any changed or continued delays in resolving the customer complaint and the reason(s) for the delay
- status updates may be provided to the complainant, preferably on at least a fortnightly basis
- all correspondence and a summary of any telephone conversations between QLeave and the complainant must be recorded and saved in QLeave's records management system.

2.2.4 Procedural fairness and natural justice

Procedural fairness and natural justice must be applied when making decisions about a customer complaint, and any person who is the subject of the customer complaint, including all the following:

- providing the complainant with a fair opportunity to be heard prior to making the decision
- considering all relevant and available evidence and disregarding any irrelevant matters
- always disclosing a personal interest, avoiding actual or perceived conflicts of interest
- clearly setting out the findings on material questions and the reasons for making the decision.

2.2.5 Resolution options

A customer complaint may be resolved by:

- explaining to the complainant the QLeave decision or action, including the rationale
- providing information about the complainants' right to seek review of a decision, if it is applicable
- acknowledging and closing the customer complaint if it is determined QLeave's actions and decisions align with the relevant legislation, QLeave policies and/or procedures
- upholding the customer complaint and taking corrective action, such as:
 - setting aside a decision and substituting a new QLeave decision
 - issuing an apology
 - updating the QLeave website or public-facing materials, or
 - providing a service previously withheld.
- referring the matter for business system or process improvements, where required.



2.2.6 Human Rights Assessments

The QLeave business unit and the employee handling the customer complaint must conduct a human rights assessment to assess whether any human rights are limited under Part 2 of the HR Act by considering:

- are any human rights engaged or limited by the decision or action complained about?
- if so, did the decision or action limit those human rights?
- if yes, was the limitation lawful, justified, and reasonable in the circumstances?

The employee managing the customer complaint must make a record of the human rights assessment and decision-making process and save the assessment to QLeave's records management system.

The P&R team must review the human rights assessment throughout the complaint lifecycle until closed or resolved and make necessary adjustments to the complaints register as required.

2.3 Outcome of a customer complaint

QLeave staff responsible for handling the customer complaint must provide the complainant with a written notice of the outcome upon the completion of the assessment and resolution process pursuant to s264(2)(c) of the PS Act.

The written notice of the customer complaint outcome must include:

- a clear explanation of the final decision or customer complaint outcome
- the actions or recommendations QLeave will take because of the customer complaint
- a clear outline of the complainant's rights of review, including:
 - internal review procedure
 - external review² options
- the timeframe to request an internal review (within 20-business days from the date of written notice of the outcome of the customer complaint).

QLeave staff handling the customer complaint must ensure all information exchanged with the complainant is accurately recorded and retained in QLeave's records management system including:

- copies of any written communication or summaries of verbal discussions, and
- outcome response and any associated documents communicated to the complainant.

2.4 Closure of a customer complaint

When closing a customer complaint in the register, the P&R team must record the outcome, noting:

- when the complainant was advised by written notice of the customer complaint outcome
- whether any further action is required or to be undertaken by QLeave
- whether a human rights assessment was undertaken by the business unit managing the complaint, and whether the complaint impacted the complainant's human rights (for reporting purposes under s97(2)(b) the HR Act)
- any information needed for annual reporting under s264(3) of the PS Act

² Where potential information privacy and human rights issues arise during review of the customer complaint, complainants must be advised that an external review in relation to these issues may be available to them prior to completion of an internal review process.



- if the customer complaint results in recommended business improvement or further activities, the relevant manager of a business unit is responsible for:
 - implementing and monitoring the recommended actions, or
 - referring the matter to a relevant manager or business unit for follow-up action.

3. Internal review of a customer complaint outcome

If the complainant is dissatisfied with the outcome of their customer complaint and/or the way the complaint was handled by QLeave, they may request an internal review of the complaint outcome.

A request for an internal review must be submitted in writing to QLeave within 20-business days of receiving the customer complaint outcome. A request received that is outside this timeframe may still be considered on a discretionary basis by QLeave when there are reasonable grounds or exceptional circumstances e.g. illness, natural disaster, or factors that prevented a person making a timely request.

The person must state why they request an internal review and what outcome(s) they are seeking.

The internal review is a merits-based review of:

- the original complaint and how it was handled by QLeave, and
- the decision provided by QLeave in the written notice or the outcome reached.

The internal review must be conducted by a QLeave employee, employed at the same or a higher level than the original decision maker, and independent from the original decision-making process.

The P&R team coordinates allocating the internal review of a customer complaint, by consulting with and seeking endorsement from relevant Director(s) to appoint a suitable internal review officer.

The internal review officer must analyse the customer complaint to determine if use of the complaints management system and/or the outcome was fair and reasonable by considering and assessing:

- information provided by the complainant with the request for internal review
- material considered as part of managing the customer complaint
- if QLeave's Customer Complaint Management policy and procedure was followed
- whether human rights were engaged by the customer complaint, and if so, whether they were properly considered during the management of the complaint
- information provided by relevant parties e.g. the original decision maker or complainant.

The internal review officer must consider whether any human rights are engaged or limited by the internal review process.

Subject to the complexity of the internal review requirements, the internal review officer must aim to resolve the internal review within 20 business days of receiving the request for internal review.

The internal review officer must keep the complainant informed of any changes or emergent issues that will impact the resolution of the internal review, including any need to extend the final deadline.

Procedural fairness must be afforded to any person who is the subject of the internal review, and the complainant.

Based on the assessment undertaken of the internal review request, the internal review officer must identify suitable internal review outcomes.

Suitable outcomes for an internal review of a customer complaint may include, but are not limited to:

- finding the original decision was fair and reasonable in the circumstances, and the customer complaint does not merit further investigation, and affirm the original decision
- finding the original decision was unreasonable and must be set aside and be amended
- re-opening the original customer complaint for further action



- providing a clearer explanation of the original decision to the complainant
- amending a policy, procedure, or practice, or recommending such documents be amended
- offering an apology or some other suitable remedy; or
- providing further assistance to address a service delivery customer complaint.

The internal review officer must complete the internal review with a written response provided to the complainant, along with reasons for the decision. The external review rights must be provided to the person if they are dissatisfied and want an external review of QLeave's internal review response.

The internal review officer must keep the P&R team advised on the internal review including when the complainant was provided the written response. The P&R team will add all required details to the register.

4. External review

If a complainant remains dissatisfied with the QLeave internal review response, they may choose to exercise their external review rights and escalate their complaint to the most relevant integrity body.

Any QLeave employee assisting the complainant must provide the details of the relevant external integrity body with the jurisdiction to undertake the external review which may include:

- the Queensland Ombudsman, an **administrative action**, is defined in the *Ombudsman Act 2001* as any action about a matter of administration, and includes:
 - a decision and an act; and
 - a failure to make a decision or do an act, including a failure to provide a written statement of reasons for a decision; and
 - the formulation of a proposal or intention; and
 - the making of a recommendation, including a recommendation made to a Minister; and
 - an action taken because of a recommendation to a Minister.
- the Office of the Information Commissioner, a **privacy complaint**, as is in the IP Act:
 - (1) A **privacy complaint** by an individual about an act done or practice engaged in by a relevant entity in relation to the individual's personal information that may be a breach of the relevant entity's obligations to comply with –
 - (a) the information privacy principle(s) requirements; or
 - (b) for an agency – ch. 3A 'Mandatory notification of data breaches', pt 2 and 3.
- The Queensland Human Rights Commission, a **human rights complaint**, as is defined in the HR Act:
 - A **human rights complaint** is a complaint about an alleged contravention of s58(1) by a public entity in relation to an act or decision of the public entity.
 - s58(1) of the HR Act provides that it is unlawful for a public entity –
 - (a) to act or make a decision in a way that is not compatible with human rights; or
 - (b) in making a decision, to fail to give proper consideration to a human right relevant to the decision.

If an external review is initiated and accepted by an integrity body, QLeave may be required to provide more information to assist the external review. Actions taken on external reviews must be noted in the register and relevant documents retained in QLeave's records management system.

5. Annual customer complaints reporting

Under s264(3) of the PS Act, QLeave must publish its annual customer complaints data (financial year) on its website by 30 September after the end of the financial year.



In publishing its annual customer complaints data QLeave must include:

- the number of customer complaints including any human rights complaints received during the financial year;
- the number of those complaints resulting in further action; and
- the number of those complaints resulting in no further action.

The P&R team must provide a memorandum with the annual report to the General Manager for consideration, to obtain the approval prior to publishing the report on QLeave's external website.

6. Monitoring and review

QLeave's complaints management system for customer complaints will be reviewed annually to ensure it continues to comply with regulatory requirements and to meet the needs of the statutory body, its staff and customers. The review of the system may draw on a range of information sources, including:

- feedback from customers and QLeave staff
- the findings of internal or external audits, or evaluations
- any changes to relevant QLeave policies, legislation, regulation or organisation structure.

Legislation

- *Crime and Corruption Act 2001*
- *Human Rights Act 2019*
- *Information Privacy Act 2009*
- *Ombudsman Act 2001*
- *Public Interest Disclosure Act 2010*
- *Public Records Act 2023*
- *Public Sector Act 2022*
- *Victims' Commissioner and Sexual Violence Review Board Act 2024*
- *Work Health and Safety Act 2011*

Other related documents

- Complaint status and outcomes - what can you tell complainants? (Guideline issued by the Queensland Office of the Information Commissioner)
- Guidelines for complaint management in organisations – Australian standard (AS 10002:2022)
- How to deal with unreasonable client behaviour policy and procedure – PPO-0029
- Queensland Public Service Customer Complaint Management Framework
- Queensland Public Service Customer Complaint Management Guideline

Definitions

Term	Definition
Complainant	Means a person or their representative, or a representative of an organisation (including clients, consumers, service users, and customers) making a customer complaint.



Term	Definition
Complaints management system	Means all aspects of the policies, procedures, practices, staff, systems, and resources used for managing customer complaints.
Corrupt conduct	Means corrupt conduct as defined in the <i>Crime and Corruption Act 2001</i>: (1) Corrupt conduct means conduct of a person, regardless of whether the person holds or held an appointment, that— (a) adversely affects, or could adversely affect, directly or indirectly, the performance of functions or the exercise of powers of— (i) a unit of public administration; or (ii) a person holding an appointment; and (b) results, or could result, directly or indirectly, in the performance of functions or the exercise of powers mentioned in paragraph (a) in a way that— (i) is not honest or is not impartial; or (ii) involves a breach of the trust placed in a person holding an appointment, either knowingly or recklessly; or (iii) involves a misuse of information or material acquired in or in connection with the performance of functions or the exercise of powers of a person holding an appointment; and (c) would, if proved, be— (i) a criminal offence; or (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment. (2) Corrupt conduct also means conduct of a person, regardless of whether the person holds or held an appointment, that— (a) impairs, or could impair, public confidence in public administration; and (b) involves, or could involve, any of the following— (i) collusive tendering; (ii) fraud relating to an application for a licence, permit or other authority under an Act with a purpose or object of any of the following (however described)— (A) protecting health or safety of persons; (B) protecting the environment; (C) protecting or managing the use of the State's natural, cultural, mining or energy resources;



Term	Definition
	(iii) dishonestly obtaining, or helping someone to dishonestly obtain, a benefit from the payment or application of public funds or the disposition of State assets; (iv) evading a State tax, levy or duty or otherwise fraudulently causing a loss of State revenue; (v) fraudulently obtaining or retaining an appointment; and (c) would, if proved, be— (i) a criminal offence; or (ii) a disciplinary breach providing reasonable grounds for terminating the person's services, if the person is or were the holder of an appointment.
Customer Complaint	Means a complaint about a service or action of QLeave, or its staff, by a person who is apparently directly affected by the service or action. Examples include a customer complaint about: • a decision made, or a failure to make a decision, by a public sector employee of the public sector entity • an act or failure to act of the public sector entity • the formulation of a proposal or intention by the public sector entity; • the making of a recommendation by the public sector entity • the customer service provided by a public sector employee of the public sector entity.
Customer	Means a person, organisation or their representative that uses QLeave's services or may have obligations to QLeave. A customer includes members of the public, workers, employers, levy payers, supplier or contractor that participated in a QLeave procurement process. For example, a person that was not successful in a QLeave procurement process and who wants to raise issues regarding allegations of QLeave's possible non-compliance with the Queensland Procurement Policy.
Customer Complaints Register	Means the platform used to capture customer complaint information and data, including complainant details, timeframes, and outcomes.
External review	Means a review of a QLeave decision by an integrity body with the jurisdiction e.g. Queensland Ombudsman, Office of the Information Commissioner, Queensland Human Rights Commission. An external review by a relevant integrity body will look for evidence that QLeave's decision-making was unlawful, unreasonable or wrong. An investigation may include talking to people who made the decision, looking at records about the decision and researching legislation and policies to ensure QLeave complied with all relevant requirements.
Feedback	Means opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly, or implicitly, to or about QLeave, its products, services, staff, or its handling of a customer complaint.

Term	Definition
	Feedback that is provided to QLeave is not a customer complaint.
Frivolous customer complaint	Means a complaint with no serious purpose or value which does not justify the use of expending QLeave resources needed to action it.
Further action	Means where, upon finalising a customer complaint, QLeave needs to take further action to resolve the complaint or deal with the concerns raised which then results in systemic or direct benefit. Systemic changes are typically at a system or whole of organisation level rather than an individual level. It addresses issues with policies, procedures or practices that will produce positive outcomes for future decisions or actions taken by QLeave. Direct benefit at an individual level produces a positive outcome for the complainant, such as QLeave issuing an apology. Examples of further action by QLeave may include: • a change in the original decision or action as a result of the complaint • staff education or training • improved business planning and processes • service delivery improvements • review or changes to a policy or procedure • administrative action to establish grounds for disciplinary action • compensation (including an ex-gratia payment to a person as a gesture of goodwill to resolve the dispute).
Human Rights complaint	A person may make a human rights complaint to the Queensland Human Rights Commission if QLeave has: • acted or made a decision in a way that is not compatible with human rights; or • failed to give proper consideration to a relevant human right when making a decision. A person may seek to make a human rights complaint to the Queensland Human Rights Commission only if – (a) the commissioner is satisfied the person has made a complaint to the public sector entity about the alleged contravention the subject of the complaint; and (b) at least 45 business days have elapsed since the complaint mentioned in paragraph (a) was made; and (c) the person has not received a response to the complaint or has received a response the person considers to be an inadequate response. The onus rests with QLeave to assess whether any human rights are impacted for every complaint received. A customer complaint can still be assessed as a human rights complaint irrespective of whether the complainant raises any potential human right impacts.

Term	Definition
Internal review of a complaint outcome	Means a review process conducted by an internal review officer that seeks to establish whether the customer complaint outcome was reasonable and correct, and that QLeave's complaints management system was followed. An internal review is an impartial review of a decision about a customer complaint by an employee who was not the original decision-maker. An internal review will consider whether the original decision-maker: • identified and addressed all the relevant issues, including potential breaches of the <i>Human Rights Act 2019</i> • sought and considered appropriate evidence • complied with legislative requirements and QLeave policies and procedures • made the correct decision • adequately explained the original decision • acted consistently with their obligations under the <i>Human Rights Act 2019</i> An internal review is not a re-investigation of a customer complaint (although this is an outcome that may be recommended by an internal reviewer).
Internal review officer	Means a QLeave employee who conducts an internal review. The internal review officer for a customer complaint must be: • independent from the original customer complaint; and • in a position equal to, or higher than, the original decision-maker, or nominated by such a person. An internal review may involve more than one internal review officer.
No further action	Means where, upon finalising a customer complaint, QLeave does not need to take further action to resolve the issues raised in the complaint. No further action may include: • complaints that undergo an internal review process that uphold and affirm the original outcome. • complaints that are resolved where QLeave issues an apology or an explanation to the person to resolve the matter.
Privacy complaint	A privacy complaint is a complaint by an individual about an act done or practice engaged in by QLeave in relation to the individual's personal information that may be a breach of QLeave's obligation to comply with – (a) the privacy principle requirements; or (b) for an agency – chapter 3A, part 2 or 3. An individual may not make a privacy complaint to the Office of the Information Commissioner unless – (a) the individual has first made a privacy complaint to the relevant entity under s166A of the IP Act; and



Term	Definition
	(b) either – (i) the individual does not consider the relevant entity's response to the complaint to be adequate; or (ii) the response period for the complaint has ended and the individual has not received a response to the complaint. The onus rests with QLeave to assess whether any information privacy principles are impacted for every complaint received. A customer complaint can still be assessed as an information privacy complaint irrespective of whether the complainant raises any potential information privacy issues.
Procedural fairness	Means to provide a person who might be adversely affected by an administrative decision with a fair hearing before the decision is made. In effect, procedural fairness requires that the decision-maker give the person: • reasonable notice that an adverse decision may be made • notice of the specific, critical issue or issues on which the decision is likely to turn • information about any adverse, relevant or credible evidence that has been obtained from other persons • a fair opportunity to be heard to directly address those critical issues Procedural fairness requires the decision-maker to genuinely consider the person's submissions with an open mind and without prejudgement or any form of bias before making the decision.
Resolution	Means a customer complaint is resolved when the issue or matter raised by the complainant is dealt with by QLeave in line with its complaints management system. The resolution of a customer complaint may not be to the satisfaction of a complainant.
Unreasonable complainant conduct	Means any unreasonable behaviour by a complainant which, because of its nature or frequency, raises substantial health, safety, resource, or equity issues for QLeave employees or any other person involved in the customer complaint process. Examples of unreasonable complainant conduct include: • the use of abusive, indecent, obscene, or offensive language, whether verbal or written • unnecessarily lengthy or excessive correspondence • a customer exhibiting rudeness, anger, aggression and/or a refusal or unwillingness to cooperate • expectation of unrealistic and unachievable outcomes • refusal to accept decisions and resubmitting the same issues • threats of harm to staff, workers, themselves, or others.

Term	Definition
	To take action on unreasonable conduct refer to the How to deal with unreasonable client behaviour policy and procedure – PPO-0029.
Vexatious customer complaint	Means a complaint without a reasonable or sound basis in fact, has little chance of succeeding, and is instead designed to harass, annoy, or creates an unreasonable resource burden on QLeave.
Vulnerabilities	Means complainants with potential vulnerabilities are customers who are believed to be at more risk of detriment due to their personal circumstances for a range of reasons, including but not limited to: • age • mental or physical health conditions • disability or impairment • financial circumstance • rural or remote living conditions • difficulties accessing digital services.

Content Owner

For further information, please contact:

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Version Control

Version	Effective Date	Comments
1	15 June 2020	Document approved.
2	31 January 2024	Document updated to align to Controlled Documents Framework (CDF) and Queensland public service framework and guideline.
3	26/09/2025	Document updated through scheduled review process



Appendix 1



**PORTABLE
LONG SERVICE
LEAVE**

Customer Complaints Management Checklist

This checklist is used to assist business units and the Policy and Resolutions Team in managing customer complaints submitted to QLeave under [section 264](#) of the *Public Sector Act 2022*. All parties must complete the applicable sections of this checklist for reporting and recordkeeping purposes to comply with the *Public Sector Act 2022*, *Human Rights Act 2019*, *Information Privacy Act 2009* and the *Public Records Act 2023*.

General Customer Complaint Information (to be completed by Policy and Resolution Team)			
Complainant Name			
Complaint ID No.			
CM File No.			
Allocated Business Unit			
Legislation Customer Complaint Relates to:	☐ <i>Building and Construction Industry (Portable Long Service Leave) Act 1991</i> ☐ <i>Community Services Industry (Portable Long Service Leave) Act 2020</i> ☐ <i>Contract Cleaning Industry (Portable Long Service Leave) Act 2005</i>		
Complaint Sub-Category (select all that apply)	☐ Worker Claim ☐ Employer Claim ☐ Response delays	☐ Processing delays ☐ Staff behaviour ☐ Call wait times	☐ Other (specify):
Section 1 (to be completed by Policy and Resolution Team)			ACTION COMPLETED
Customer complaint receipted and added to Customer Complaints Register			☐
Customer complaint allocated to the business unit in Customer Complaints Register Date allocated: XX/XX/202X			☐
Section 2 (to be completed by business unit managing customer complaint)			ACTION COMPLETED
Business unit accepts to process and provide a response to the customer complaint Date accepted: XX/XX/202X			☐
Business unit to contact complainant and provide acknowledgment of receipt of the customer complaint by sending a letter within three (3) business days of receipt. Date acknowledgement letter provided to complainant: XX/XX/202X			☐
Business unit conducts human rights assessment and copy of assessment saved to applicable CM File No.			☐
Issue/s raised by the complainant were identified, understood, investigated and resolved. Identified issue/s are:			☐

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(List issues if applicable)	
Has the complainant raised concerns, or have issues been identified by QLeave, that relate to an individuals' personal information? Refer to the information privacy principles in the Information Privacy Policy and Procedure (List issues if applicable)	☐
Outcome decision letter outlining how each identified issue was responded to and resolved by the business unit was drafted and response issued to complainant? Date outcome decision letter was issued: XX/XX/202X Copy of the letter and accompanying email to Complainant saved to CM File No.(?) Date outcome letter and accompanying email saved to CM: XX/XX/202X	☐
Any further action required by QLeave as a result of the customer complaint? (e.g. change to policy, process, system or otherwise) (List further actions if applicable and which business unit is responsible)	☐
Note if the customer complaint resulted in no further action	☐
Has the outcome letter provided advice on the relevant internal or external review rights, timeframes and contact details? e.g., administrative action – Queensland Ombudsman	☐
Policy and Resolutions Team was advised the customer complaint matter is resolved?	☐
Copy of this completed checklist saved to applicable CM File No.?	☐
Section 3 (to be completed by Policy and Resolution Team)	ACTION COMPLETED
Customer complaint resolved and closed in the Customer Complaints Register. Date customer complaint closed: XX/XX/202X	☐
Record in the Customer Complaint Register if complaint resulted in no further action	☐
Record in the Customer Complaint Register if complaint resulted in further action	☐
Internal review Section 4 (to be completed by Policy and Resolution Team)	Date Review Sought
Request for internal review must be receipted Date request for internal review was receipted: XX/XX/202X	☐
Internal review added to Complaint ID No with suffix IR in Customer Complaints Register	☐
Customer complaint allocated to the business unit in Customer Complaints Register Date allocated: XX/XX/202X	☐

Section 5 (to be completed by business area managing the internal review)	
Business unit accepts to respond and provide the response to the internal review Date accepted: XX/XX/202X	☐
Was the request made within 20 business days of receipt of the outcome decision letter?	☐
Is the internal review allocated to a more senior officer to the original decision maker?	☐
Is the Internal review officer independent from the original decision-making process?	☐
Has the internal review officer no direct or perceived conflict of interest in the matter?	☐
Record the details of the Complainant's reasons for seeking an internal review and to which business unit or position the internal review was allocated	☐ Date: DD/MM/YY
Does the internal review officer have discretion to set aside the outcome decision of the customer complaint and apply relevant remedies to resolve any matters in dispute?	☐
Internal review decision letter outlining how each ground for review was responded to and resolved by the business unit and was drafted, signed and issued to complainant? Date internal review decision letter issued: XX/XX/202X Copy of internal review decision letter and email to complainant saved to CM File No.(?) Date internal review decision letter and email saved to CM: XX/XX/202X	☐
Has the decision on internal review provided advice on relevant external review rights, timeframes and contact details? e.g., administrative action – Queensland Ombudsman; human rights – Queensland Human Rights Commission; privacy – Office of the Information Commissioner; discrimination – Queensland Human Rights Commission	☐
External Review	Date QLeave Notified
Section 6 (to be completed by Policy and Resolutions team)	
External review must be receipted Date external review was receipted: XX/XX/202X	☐
External review added to Complaint ID No with suffix ER in Customer Complaints Register	☐
Record details of external review and the integrity body e.g., Queensland Ombudsman; Queensland Human Rights Commission; Office of the Information Commissioner etc	☐
External review allocated to the Legal Services in the Customer Complaints Register Date allocated: XX/XX/202X	☐