

Complaints, Compliments and Feedback Management Policy

Who needs to comply with this policy

This policy and the related procedure apply to all Attorney-General's Department (AGD) employees and contractors, staff seconded from other agencies and members of boards and committees administered by AGD. Public sector staff in AGD-related statutory offices are also required to apply this policy and the related procedure.

What is covered by this policy

This policy relates to customer complaints, compliments and feedback made directly to AGD about behaviour, communication, service delivery and service quality. It also extends to complaints, compliments and feedback in relation to AGD policy content and policy application.

This policy does not apply to a complaint about the exercise of a statutory discretion or a decision made by SACAT/SAET during the course of proceedings.

This policy does not apply to complaints resulting from a procurement process. For details on how to deal with a supplier complaint, refer to the AGD Procurement Framework.

Definitions

Complaint: An expression of dissatisfaction related to our products, services, staff or the handling of a complaint, **where a response or resolution is explicitly or implicitly expected or legally required.**

For example: I left a message for an officer to return my call regarding an issue with services provided. It has been one week, and no one has returned my call. I wish to register a complaint.

Compliment: Positive feedback about our products, services, staff or the handling of a complaint. It can recognise a skill, behaviour or activity of the organisation as a whole, an organisation's business unit, or individual staff member.

For example: Excellent and genuine customer service. Keep up the great work.

Feedback: Any opinion, comment, suggestion or expression of interest or concern, made about our products, services, staff or the handling of a complaint, **where there is no explicitly or implicitly expected or legally required response or resolution.**

For example: I spoke with an officer in the department on Friday who was very helpful and knowledgeable and was able to answer my enquiry.

For the purpose of this policy, a '**customer**' is the recipient of a service, contact or product from us, and is either:

- An individual member of the public; or
- A business or government agency or representative.

A complaint can be submitted for a customer by a third party.

What is the AGD position

AGD encourages complaints, compliments and feedback. Complaints are an opportunity to resolve an issue with our products or services and to learn and improve from it. Compliments help us to recognise what is working well. AGD will enable, respond to and be accountable for complaints, compliments or feedback, based on the following principles.

Principles and minimum standards

We are committed to the following principles and *minimum standards*:

- **Visibility** – We will provide information about the ‘how and where’ to submit a complaint, compliment or provide customer feedback. This will include external review mechanisms, such as the Ombudsman.
- **Customer focused** – A customer-focused approach will be adopted and the rights of customers to disagree with us will be supported by promoting an open, responsive, and non-confrontational process. Staff will be suitably trained.
- **Objectivity and fairness** – We will respond to all customer contact in an equitable, objective, and unbiased manner with a view to resolution where applicable.
- **Accessibility** – Customers can easily submit complaints, compliments, suggestions, and feedback through a variety of methods, which offer flexibility and convenience at no cost. Persons with language barriers, persons from indigenous and culturally and linguistically diverse backgrounds and persons with hearing or speech impediments will also be accommodated through assistive technology/services. Disadvantaged and vulnerable people will also have access to complaint mechanisms.
- **Responsiveness** – Customers submitting written contact will receive timely acknowledgement of its receipt. Recording of written complaints is a minimum requirement. Business units may also have systems for logging complaints received by phone or in person. AGD aims to provide a response/resolution to a complaint within 21 working days.
- **Ensure no detriment** – We will not discriminate against a customer or treat them adversely because of particular feedback provided which may challenge us to review existing processes.
- **Accountability** – We will undertake regular monitoring of written customer contact and ensure business unit heads and senior executives are made aware of written customer contact, including volumes, the nature of contact, categories, and trends.
- **Confidentiality** – Personally identifiable customer information will be available where necessary, but only for the purposes of addressing the feedback. Our customer’s information will be actively protected from disclosure, unless consent to disclosure is expressly provided or where disclosure is required by law.
- **Continuous Improvement** – We will analyse written customer contact and where appropriate, implement changes to help us grow and improve our standard of customer service and overall performance.
- **Consistency** – We will share information to ensure consistency and better practices.

Vexatious, malicious or fraudulent complaints

We may elect not to review or provide a response to complaints which are considered to be vexatious, malicious or fraudulent, however they will be recorded. A complaint may fall into this category if it appears, on reasonable assessment, to be baseless, without merit or intended to cause harassment, or is provided anonymously. Staff should consult a senior level officer or manager if they believe the complaint to be vexatious, malicious or fraudulent.

Annual Reporting

AGD is required to report the number and type of complaints and the outcomes/improvements made as a result of complaints in the annual report, per [DPC Circular 013 Annual Reporting Requirements](#).

Internal Reporting

Business units will provide information on contacts that fall within this policy scope for quarterly reports to the AGD Chief Executive, covering:

- The number of complaints, compliments and feedback received. Note that a single complaint may have numerous contacts associated with it, however a specific matter raised by a complainant will only be counted for reporting as one complaint. When a report is received and allocated to a business unit, reported volumes will be adjusted so that events are not double counted. Nil reports are not required
- Issues arising from complaints and feedback, for example complaint trends, risks, systemic issues, and improvements made as a result of contact
- Category of the complaint or feedback (see the minimum categories provided within the Complaints, Compliments and Feedback Management procedure)
- Status of matter (open, under investigation, not in scope, closed)
- Length of process, from initial contact to closure.

What are AGD and my responsibilities

The **Chief Executive** is responsible for the operation of this policy.

All staff are responsible for:

- Implementing the principles and standards set out in this policy, the related procedure and any supplementary business unit guidance
- Understanding the ethical issues that might arise as part of their role, including conflict of interest, procedural fairness, confidentiality and privacy
- Reporting as a public officer to OPI/ICAC on conduct that they reasonably suspect may be considered to amount to corruption, misconduct or maladministration in public administration.

Business unit heads are responsible for:

- Implementing processes that ensure compliance with this policy. It is not necessary for a business unit to have its own customised policy and procedure, but it may elect to do so, provided it is consistent with the principles and minimum standards of this policy and related procedure
- Ensuring that employees understand their obligations under this policy and are supported to comply with those obligations (including, where appropriate, tools and training to manage complaints, compliments and feedback)

- Collecting and recording data on complaints, compliments and feedback to assist in the identification of systemic and recurring matters and/or potential improvements to service delivery and customer relations
- Providing information for quarterly reports and the annual report.
- Assessing the risk of matters lodged with them by referring to AGDs Risk Assessment Matrix and reporting extreme and high-risk matters to the relevant executive(s) and AGD Chief Executive.
- Ensuring that all documentation regarding complaint, compliment and feedback management is retained in accordance with the [State Records Act 1997](#). Refer to *Part 5 – Care and management of official records, section 13 – Maintenance of official records* which stipulates:
Subject to this Act, every agency must ensure that the official records in its custody are maintained in good order and condition¹.
 The original complaint email/correspondence should be attached in the central register. All related letters and attachments should be filed and available on request
- Ensuring that review and follow up of actions are assigned to a senior level officer or manager.

Statutory officers: This policy is not intended to override any statutory obligation or process that is applicable to the responsibilities of a statutory officer. In the event that a statutory officer determines that it is not appropriate to apply any aspect of this policy and the related procedure, the officer will advise the AGD Chief Executive in writing.

Framework

This policy is part of the Complaints, Compliments and Feedback Management Framework, which includes:

- [DPC Circular 013: Annual Reporting Requirements](#)
- [DPC Circular 039: Complaint Management in the South Australian Public Sector](#)
- Australian/New Zealand Standard: Guidelines for complaint management in organisations (AS/NZS 10002:2014)
- [Independent Commissioner Against Corruption Directions and Guidelines for Public Officers](#)
- [State Government Information Privacy Principles](#)
- [State Records Act 1997](#)
- AGD Complaints, Compliments and Feedback Management Procedure
- Complaints, Compliments and Feedback Management Guide
- AGD Risk Assessment Matrix.

| Date approved | Approved by | Date for review | Responsible Unit | Version |
|----------------|--|-----------------|----------------------------------|---------|
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¹ State Records Act 1997