2009-10 Survey of Complaint Handling Practices in the Western Australian State and Local Government Sectors

Ombudsman Western Australia
Serving Parliament – Serving Western Australians

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Foreword

As Western Australian Ombudsman, my principal function is to investigate and resolve complaints about public administration. I recognise that government organisations also deal with a variety of complaints, including complaints that are referred back to them by my office. In November 2009, I requested all organisations within my jurisdiction to participate in a survey of complaint handling. This was the third such survey conducted by my office, the last being in 2001.

The analysis of the responses to the survey is set out in this comprehensive report: *2009-10 Survey of Complaint Handling Practices in the Western Australian State and Local Government Sectors* (**the Report**).

In brief, I am very pleased to observe that state and local government organisations:

- take complaint handling seriously;
- largely have appropriate practices in place to handle complaints; and
- are generally doing a good job of handling complaints.

The Report also sets out potential opportunities for improvement to complaint handling practices.

My office currently undertakes a number of activities to assist agencies with their complaint handling. Following the opportunities for improvement identified through the survey, where appropriate, we will assist agencies to further improve their complaint handling.

Chris Field
OMBUDSMAN

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1 Executive summary

In November 2009, the Ombudsman's office surveyed all organisations within its jurisdiction to examine complaint handling by Western Australian state and local government organisations. This was the third such survey conducted by our office, the last being in 2001. The 2009-10 survey was structured according to a series of complaint handling principles, against which participants were asked to assess themselves. These principles are based on, and consistent with, the *Public Sector Commissioner's Circular 2009 - 27 on Complaints Management* and the Australian Standard (AS ISO 10002-2006: *Customer Satisfaction - Guidelines for Complaints Handling in Organisations*). Survey responses confirmed that the vast majority of respondents consider these principles to be relevant to their organisation.

The principles for complaint handling can be broken into three stages:

Of the 308 state government agencies and local governments surveyed, a high response rate of 72 per cent was achieved. This consisted of responses from 84 per cent of state government agencies (covering 99% of Full Time Equivalents [**FTE**]) and 59 per cent of local governments (covering 81% of FTE).

1.1 Key messages

- Western Australian state and local government organisations:
    - o take complaint handling seriously;
    - o largely have appropriate practices in place to handle complaints; and
    - o are generally doing a good job of handling complaints.

- Opportunities for the improvement of complaint handling practices have been identified.

- The findings of the survey support the view that effective and efficient implementation of the complaint handling principles can be achieved through a 'fit for purpose' complaint handling system. This is a system that varies to fit an organisation's circumstances and is proportionate to the number and type of complaints it receives.

1.2 Key findings

The key findings arising from the survey are summarised below. They are based on organisations' own responses about their complaint handling practices, provided through the survey. More detail about the findings of the survey is also provided on the following pages.

- 78 per cent of respondents reported receiving complaints in 2008-09, while 22 per cent of respondents reported receiving 0 complaints in the same period. More specifically:
    - o 31 per cent of respondents reported receiving 1-10 complaints;
    - o 30 per cent reported receiving 11-100 complaints;
    - o 14 per cent reported receiving 101-1000 complaints; and
    - o 3 per cent reported receiving more than 1000 complaints.

Enabling complaints

- Basic arrangements that enable people to make complaints were commonplace with 70 per cent of respondents reporting they prominently display contact details for making complaints and accept complaints by letter, email and telephone. However, almost one-third of respondents reported that they did not have all of these basic arrangements. There is also limited tailoring of complaint handling processes to suit customer demographics. These two areas present opportunities for improvement, so that the basic arrangements for visible and accessible complaints channels become universal.

Responding to complaints

- Once complaints have been made survey respondents - particularly larger organisations that received the most complaints - generally reported arrangements to ensure that complaints are dealt with in a prompt, objective and confidential manner. However, the survey results point to some opportunities for improvement, specifically, setting timelines for handling complaints and meeting them, the management of unreasonable complainants and connecting complaints processes to legislated whistleblower and anti-corruption processes.

- Effectively responding to complaints also involves providing appropriate remedies when complaints are sustained and avenues for review and/or appeal. Four out of five respondents reported providing some form of remedy when complaints were sustained and advising complainants about their right to seek external review and/or appeal. While these results are positive, they also represent opportunities for improvement.

Accountability and learning

- Most respondents reported having arrangements to ensure that they are recording and analysing complaints. A number of organisations, however, did not report having mechanisms to use the lessons learnt from a complaint to assist organisational development. This represents an opportunity for improvement.

- Larger organisations and those reporting higher numbers of complaints were more likely to report that they had put into action all of the complaint handling principles covered by the survey. State government departments, which are subject to the *Public Sector Commissioner's Circular 2009 - 27 on Complaints Management,* more frequently reported having a comprehensive complaint handling system which put all of the principles into action.

2 Survey purpose and methodology

2.1 Survey purpose and design

The Ombudsman is an independent officer, directly responsible to Parliament, and his principal functions are:

- To investigate and resolve complaints about public administration; and

- Learning from those complaints, to improve the standard of public administration over time.

As part of investigating complaints, the Ombudsman's office refers complainants back to organisations, in order to give the organisation an opportunity to resolve complaints themselves before the office commences an investigation. Accordingly, the Ombudsman's office has an interest in complaint handling by organisations within its jurisdiction.

In addition, in February 2010, the Ombudsman's office became responsible for the Western Australian government complaints management policy, as outlined in the *Public Sector Commissioner's Circular 2009-27 on Complaints Management*, as well as this policy's ongoing maintenance and development.

To provide the Ombudsman's office with confidence that complaints are being dealt with effectively, and to gain an overview of complaint handling in the organisations that fall within the Ombudsman's jurisdiction, in November 2009 the office conducted a survey across state government agencies and local governments regarding their complaint handling processes. The office conducted similar surveys in 1999 and 2001.

The 2009 survey questionnaire covered all aspects of complaint handling, organised according to 10 principles for good practice. These principles form the three stages of complaint handling:

- **Enabling Complaints** – arrangements that enable people to make complaints to organisations

- **Responding to Complaints** – ensuring that complaints are dealt with in a prompt, objective and confidential manner

- **Accountability and Learning** – using complaints to demonstrate accountability and stimulate organisational improvement.

The good practice principles for complaint handling were drawn from the Ombudsman's office's guidelines for *Effective Handling of Complaints Made to your Organisation – an Overview* (**the Guidelines**), and are consistent with the Public Sector Commissioner's circular on complaints management and the Australian Standard on complaints handling *AS ISO 10002-2006: Customer satisfaction – Guidelines for complaints handling in organisations* (**the Australian Standard).** The principles of good practice complaint handling are set out in Figure 1.

Figure 1: Good Practice Principles for Complaint Handling

Step 1:
Enabling
Complaints

Step 2:
Responding
to
Complaints

Step 3:
Accountability
and
Learning

Customer focus
Visibility
Accessibility
Responsiveness
Objectivity & fairness
Confidentiality
Remedy
Review
Accountability
Continuous improvement

1. **Customer focus** – the organisation is committed to effective complaints handling and values feedback through complaints

2. **Visibility** – information about how and where to complain is well publicised to customers, staff and other interested parties

3. **Accessibility** – the process for making a complaint and investigating it is easy for complainants to access and understand

4. **Responsiveness** – complaints are acknowledged promptly, addressed according to urgency, and the complainant is kept informed throughout the process

5. **Objectivity and fairness** – complaints are dealt with in an equitable, objective and unbiased manner. This will help ensure that the complaint handling process is fair and reasonable. Unreasonable complainants are not allowed to become a burden

6. **Confidentiality** – personal information related to complaints is kept confidential

7. **Remedy** – if a complaint is upheld, the organisation provides a remedy

8. **Review** – there are opportunities for internal and external review and/or appeal about the organisation's response to the complaint, and complainants are informed about these avenues

9. **Accountability** – accountabilities for complaint handling are clearly established, and complaints and responses to them are monitored and reported to management and other stakeholders

10. **Continuous Improvement** – complaints are a source of improvement for organisations

'Fit for purpose' complaint handling systems

The findings of the survey support the view that effective and efficient implementation of the complaint handling principles can be achieved through a 'fit for purpose' complaint handling system. This is a system that varies to fit an organisation's circumstances and is proportionate to the number and type of complaints it receives.

Decisions about building a 'fit for purpose' system could incorporate the following considerations:

- The number and demographics of the organisation's customers, and how they generally communicate with the organisation;

- The nature and breadth of the organisation's interactions with the public;

- The level of complaints that is considered reasonable for the organisation (by examining trends in its level of complaints over time and industry benchmarks);

- The organisation's risk management strategy – does this specify that monitoring complaints are an important way of mitigating any risks?

- The value the organisation derives, or wishes to derive, from complaints to improve its operations over time, as well as other information needs of management; and

- The cost of operating a complaint handling system.

2.2 Response rates and understanding the survey results

A total of 308 organisations were invited to participate in the survey - all State Government agencies (167) and Local Governments (141) in the Ombudsman's office's jurisdiction. At that time, 18 State Government agencies advised that another agency was responsible for handling complaints about them. This was confirmed with the relevant organisation, leaving a possible total of 290 respondents. The survey was conducted between 3 November and 30 November 2009.

The survey achieved an overall response rate of 72 per cent. This consisted of responses from 125 (84%) State Government agencies and 83 (59%) Local Governments, totaling 208 responses, out of the possible total of 290 responses.

The completed State Government surveys accounted for 99 per cent of State Government FTE. The Local Governments that completed the survey account for 81 per cent of Local Government FTE.

Survey respondents included all State Government agencies that were major sources of allegations to the Ombudsman's office in 2008-09. 72 per cent of Local Governments that were the subject of one or more allegations to the office in 2008-09 also responded.

When analysing the results of the survey, in order to better understand how responses varied by the nature of the organisation surveyed, the Ombudsman's office divided respondents into categories based on their size, type and the number of complaints they reported receiving in 2008-09. The categories used are set out in Tables 1 to 3. Where appropriate, the office also analysed the responses using other variables. These are discussed at the relevant points in the report.

Table 1: Categories for analysis, by organisation size

Organisation size by FTE	Number of respondents
Micro - Less than 10 FTE	16 (8%)
Small - 10 to 99 FTE	96 (46%)
Medium - 100 to 249 FTE	45 (22%)
Large - 250 or more FTE	51 (24%)
Total	**208 (100%)**

Table 2: Categories for analysis, by organisation type

Organisation type	Number of respondents
Boards	17 (8%)
Corporations	11 (5%)
Departments	33 (16%)
Local Governments	83 (40%)
Statutory Authorities	64 (31%)
Total	**208 (100%)**

Table 3: Categories for analysis, by number of complaints agencies reported they received in 2008-2009

Number of Complaints	Number of respondents
0 to 10	109 (52.5%)
11 to 50	39 (19%)
51 to 100	23 (11%)
101 or more	36 (17%)
Not provided	1 (0.5%)
Total	**208 (100%)**

For the purposes of analysis, Departments were defined as those agencies that operate under s.35 of the *Public Sector Management Act 1994*. Statutory Authorities were defined as those that are included in Schedule 1 of the *Financial Management Act 2006*. Departments and Statutory Authorities comprised the bulk of the responses from State Government agencies.

The Corporations category comprises the major utilities and port authorities. Respondents grouped in the Boards category were the professional accreditation or licensing bodies that draw on the technical and industry expertise of the board members in performing their functions. This is a small cohort of respondents.

Numbers in figures and tables may not sum to 100 per cent due to rounding. Percentage breakdowns by the number of complaints received are based on the 207 out of 208 respondents who provided the number of complaints received in 2008-09.

Not all organisations that were sent a survey responded. Making inferences about all 308 organisations within the Ombudsman's jurisdiction, including those that failed to respond to the survey, is therefore subject to a margin of error. Based on the response rate achieved, the indicative margin of error is +3.4 per cent.

Some examples of practices to implement complaints handling principles are provided as case studies throughout the report. These have been provided by survey respondents.

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3   Key facts and figures

Key findings

- 78 per cent of respondents reported receiving complaints in 2008-09, while 22 per cent of respondents reported receiving 0 complaints in the same period. More specifically:

  - 31 per cent of respondents reported receiving 1-10 complaints;
  - 30 per cent reported receiving 11-100 complaints;
  - 14 per cent reported receiving 101-1000 complaints; and
  - 3 per cent reported receiving more than 1000 complaints.

- Practices to implement all the complaints handling principles are considered relevant by respondents (including those that did not have them).

- Many important complaint handling practices are widespread.

3.1 Customers of government organisations

To provide context for their responses about complaint handling practices, respondents were asked to indicate how many customers they had in 2008-09. (The questionnaire recognised that the concept of 'customer' is not relevant to all organisations, and asked respondents to consider a wide definition of customer that included clients and consumers).

Respondents reported numbers of customers ranging from 12 to 6.5 million (the latter number is larger than the population of Western Australia as it includes international and interstate visitors).   Between 30 per cent and 42 per cent of Departments, Local Governments and Statutory Authorities reported having more than 20 000 customers (Figure 2). Eighty per cent of Corporations reported having less than 500 customers.

Figure 2: Number of reported customers, by organisation type
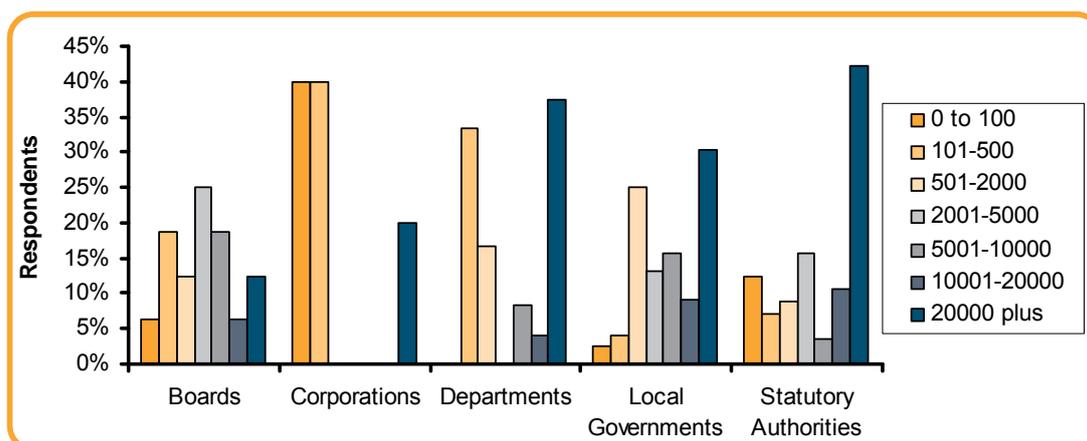
Respondents were asked to define their customers. Most organisations identified that they have a wide range of customers. Respondents as a whole most commonly identified their customer categories as "other government organisations," followed by "people to whom you provide licenses or who you register," "businesses that you regulate", "businesses that use your services", "residents," and "voluntary, not for profit and non-government organisations."

Local Governments most commonly identified ratepayers and residents as customers and also reported having the most diverse customer base.

Figure 3 shows the demographic information respondents provided about their customers. For example, of those respondents who knew their customers' demographics, 68 respondents identified that between 10 per cent and 50 per cent of their customers were people aged over 65 years. Fifty respondents identified that between 10 per cent and 50 per cent of their customers are children and young people. Respondents' estimates regarding the percentage of their customers belonging to the other three customer groups are set out in Figure 3 below.

Around one-third of respondents did not know the percentage of their customers who are children and young people, Aboriginal or Torres Strait Islander people, or people over 65. Approximately 50 per cent (94) of respondents did not know the percentage of their customers who were born overseas in a non-English speaking country, or who had a disability.

Figure 3: Customer demographics
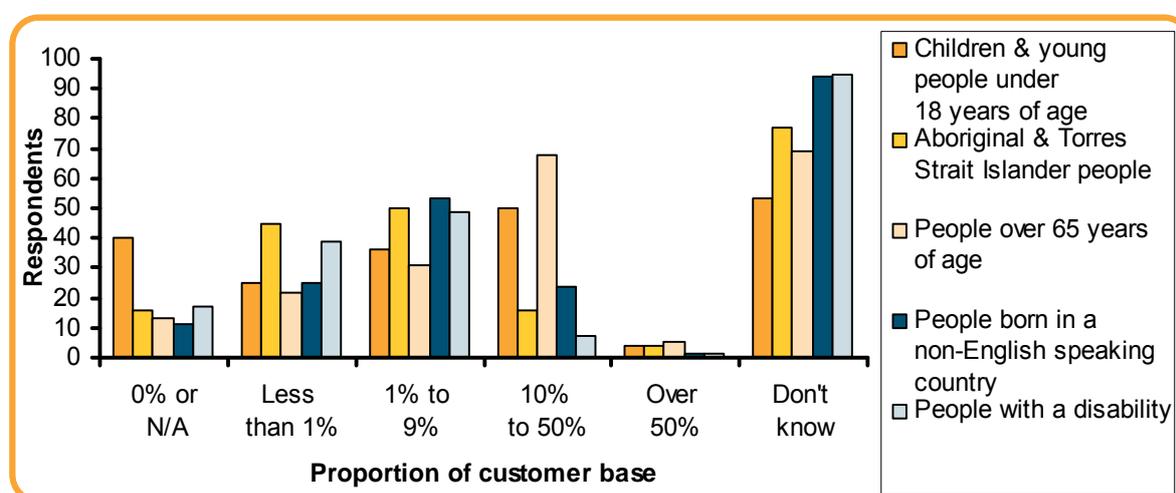
3.2 Complaints about government organisations

3.2.1 Definitions of complaint

Two-thirds of respondents (65% or 136 respondents) provided a definition of a complaint. The majority (73%) of these responses were based on the definition contained in the Australian Standard.[1] The definition of a complaint set out in the Australian Standard is *"an expression of dissatisfaction made to an organisation, related to its products, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected."*

3.2.2 Numbers of complaints

Figure 4 shows that 78 per cent of respondents reported receiving complaints in 2008-09. Just over 1 in 5 respondents (22% or 46 respondents) reported that they did not receive any complaints in 2008-09, and most of these (32 respondents) were micro or small

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[1]Standards Australia, 2006, *Australian Standard: Customer satisfaction - Guidelines for complaints handling in organisations* (AS ISO 10002-2006): Standards Australia, Sydney.

organisations; 31 per cent of respondents reported between 1 and 10 complaints; 30 per cent reported between 11 and 100 complaints; 14 per cent reported between 101 and 1 000 complaints; and a very small number (6 respondents or 3%) reported receiving more than 1 000 complaints.

**Figure 4 : Reported numbers of complaints in 2008-09, by complaint numbers**
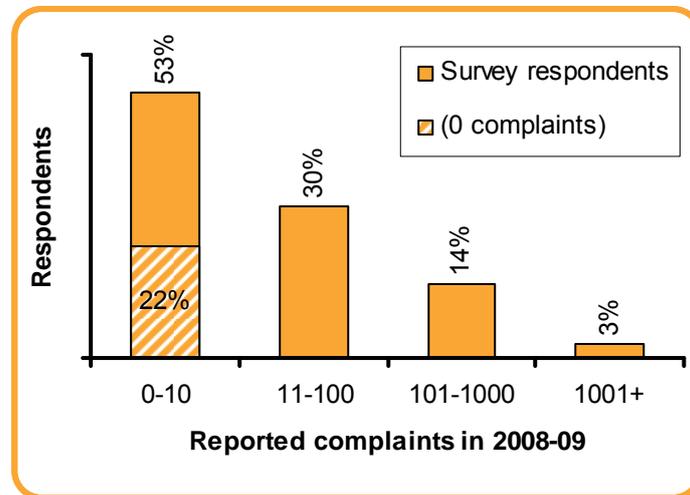
The number of complaints received generally increased with organisation size, with 46 per cent (24 of 51) of large organisations receiving over 100 complaints in 2008-09, compared with only 20 per cent (9 of 44) of medium organisations and 3 per cent (3 of 96) of small organisations (see Figure 5).

Figure 5: Reported complaints in 2008-09, by organisation size
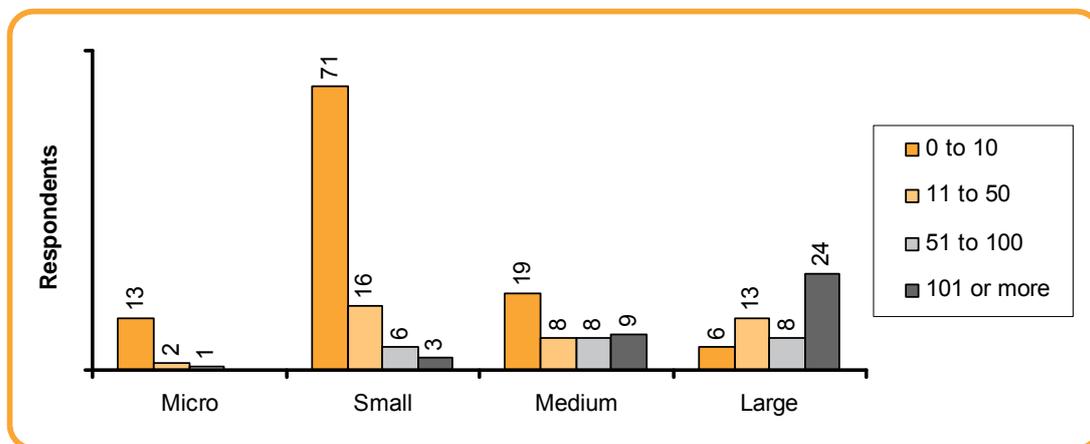
As Figure 6 shows, almost 90 per cent of Boards, 60 per cent of Corporations and 50 per cent of other organisation types received between 0 and 10 complaints in 2008-09. With the exception of Local Governments and Boards, around 25 per cent of each organisation type received more than 101 complaints.

Figure 6: Reported numbers of complaints in 2008-09, by organisation type
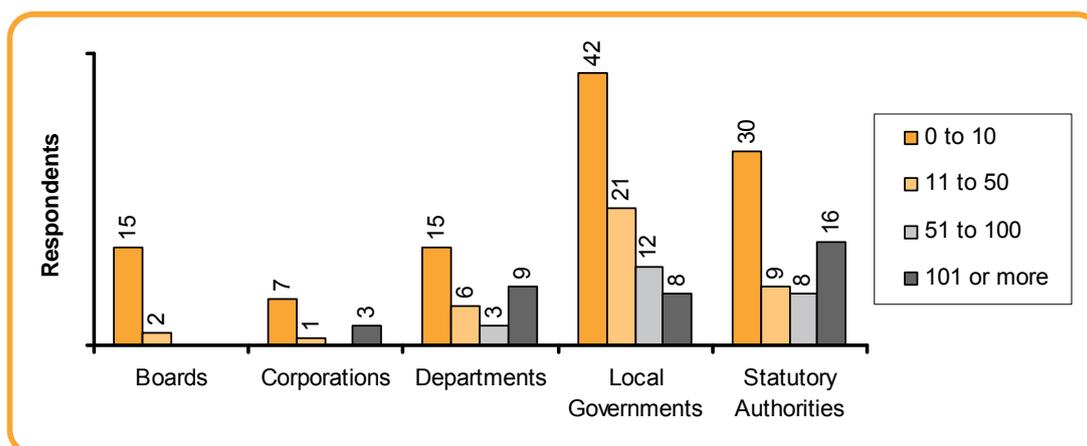
3.3 Local government complaints – Urban/Rural

It is not possible to split most organisation categories, other than Local Governments, on the basis of geographical location. For this reason, additional analysis has been conducted on the Local Governments category only to identify differences in the complaints received by urban (including regional centres) and rural (including remote locations) authorities.

The geographical distribution of complaints reported by Local Governments is summarised in Table 4. Urban Local Governments display a fairly even spread across all the complaint number categories, while most rural Local Governments reported receiving 10 complaints or less in 2008-09.

Table 4: Reported complaints in 2008-09 by Local Governments, by location[1]

Complaints range	No. Urban Respondents	No. Rural & Remote Respondents	All
0 to 10	9	32	41 (50%)
11 to 50	7	14	21 (26%)
51 to 100	9	3	12 (15%)
101 or more	6	2	8 (10%)
All	**31**	**51**	**82 (100%)**

[1] Breakdown based on the Australian Classification of Local Governments (ACLG). Urban includes regional centres. Offshore authorities excluded.

Urban Local Government respondents exhibited lower complaints per resident (Table 5). However it should be noted that the average complaint rates were influenced by a small number of respondents with relatively high complaint rates.

Table 5: Average complaints per 1 000 residents for Local Governments, by size and location

Size	Urban		Rural & remote		All	
	Complaint rate[1]	No. respond-ents	Complaint rate[1]	No. respond-ents	Complaint rate[1]	No. of responses
Small	4.0	3	11.4	46	11.0	49
Medium	1.6	12	10.1	4	3.7	16
Large	2.4	13	na	0	2.4	13
All	**2.2**	**28**	**11.3**	**50**	**8.0**	**78**

[1] Estimated from reported complaints in 2008-09 and ABS census data. Outliers excluded. **na** Not applicable.

3.4 Incidence of complaint handling practices

Respondents reported that many important complaint handling practices, which put the complaint handling principles into action, were widespread (Figure 7). Considering each complaint handling practice individually, the proportion of respondents that demonstrated each practice ranged from 99 per cent of respondents accepting complaints by letter, to fewer than 10 per cent of respondents having information in languages other than English.

Figure 7: Percentage of respondents with individual complaint handling practices
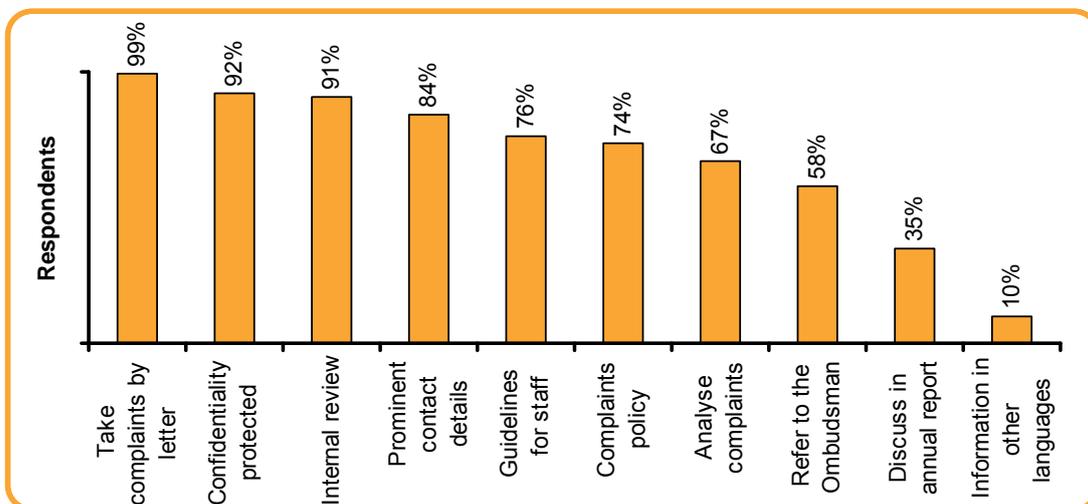
The larger the organisation (in terms of numbers of FTE), the more likely it was to report having each of the complaint handling practices canvassed in the survey questionnaire. Similarly, respondents were more likely to report having each of these practices in place if they received a larger number of complaints.

When comparing organisation types, Departments most frequently reported the highest levels of uptake of each of the individual practices covered in the survey. Conversely, Boards most often reported the lowest level of uptake for any given practice.

Practices to implement all the complaints handling principles are considered relevant by respondents (including those that did not have them). For many complaint handling

practices, respondents had the option of explicitly stating that the practice was not relevant to their organisation. In most cases, less than 10 per cent (and never more than 20%) of respondents selected the "not relevant" option. Generally, the organisations that selected "not relevant" were small organisations with low numbers of complaints.

Explanations provided by the 132 respondents that stated they base their complaint handling system on a standard indicated that over half of these were basing it on the Australian Standard.

The following chapters provide further details about the incidence of complaint handling practices, considered individually and on a systems basis.

4   Enabling complaints

Key findings

- Basic arrangements that enable people to make complaints were commonplace with 70 per cent of respondents reporting they prominently display contact details for making complaints and accept complaints by letter, email and telephone. However, almost one-third of respondents reported that they did not have all of these basic arrangements.

- There is also limited tailoring of processes to enable complaints to suit customer demographics.

- These two areas present opportunities for improvement, so that the basic arrangements for visible and accessible complaints channels become universal.

4.1 Customer focus

Principle: *The organisation is committed to effective complaint handling and values feedback through complaints.*

The Guidelines emphasise that organisations should be open to feedback, and committed to appropriate resolution of complaints. This commitment should be communicated to all staff, stakeholders and clients through documents such as a complaint handling policy, customer service charter or values statement.

4.1.1 Customer service charter and written complaint handling policy

- Nearly two-thirds (63%) of respondents to the survey reported that they have a customer service charter or equivalent. Of those who reported having a customer service charter, the vast majority (98%) stated that their charter indicates that their organisation is open to customer complaints and recognises that complaints are a useful form of customer feedback (94%).

- Almost three-quarters (74%) of respondents reported that they have a written complaint handling policy (Figure 8).

- Figure 8 shows that medium and large organisations were more likely than small or micro-sized organisations to report having a customer service charter and a written complaint handling policy.

- With respect to having a customer service charter, results for organisations are generally consistent across all organisation types. Other than Boards (47%), over 60 per cent of all respondents in each organisation type stated they possess such a charter.

- Of organsiational types, Departments were most likely (97%) to have a written policy on complaint handling, while around 60 per cent of Local Governments and Boards reported having such a policy.

Figure 8: Respondents that reported possessing a customer service charter and a written complaint handling policy, by organisation size
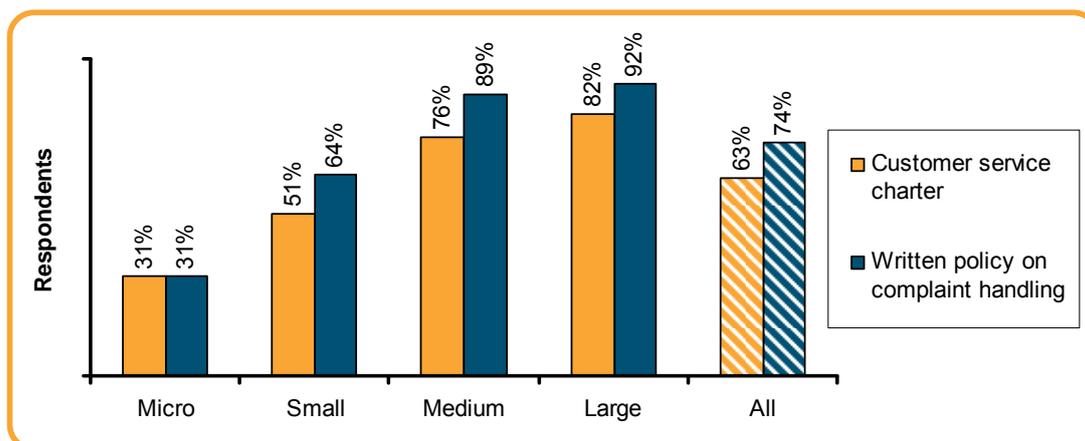
- The existence of a customer service charter and a written complaint handling policy are positively correlated with the number of complaints that an organisation received in 2008-09. Approximately 94 per cent of respondents who received 101 or more complaints had a customer service charter, and approximately 92 per cent had a written complaint handling policy. This compares with possession of a customer service charter by 50 per cent of respondents that received 0-10 complaints, and possession of a written policy on complaint handling by 67 per cent of respondents that received 0-10 complaints (see Figure 9).

Figure 9: Respondents that reported possessing a customer service charter and complaint handling policy, by number of complaints
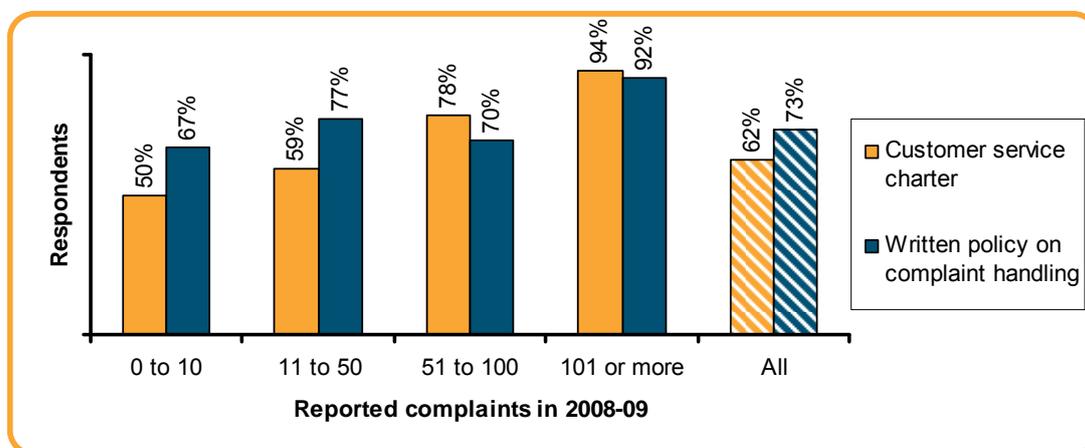
- Despite these findings, of the 109 respondents that received 0-10 complaints, only 11 (10%) believed a customer service charter was not relevant to their organisation and only 2 (2%) considered a complaint handling policy irrelevant.

4.1.2 Availability of complaint handling policy

- 123 organisations reported that they make their written complaint handling policy available, mainly via their website and at the front counter (some organisations made their policy available in more than 1 way). Access to the policies is shown in Table 6.

Table 6: Availability of complaint handling policy (multiple responses accepted)

Location of complaint handling policy	Number of respondents
Website	94 (45%)
Counter	47 (23%)
Brochure	39 (19%)
Form	33 (16%)
Other	*33 (16%)*
Not made available	30 (14%)
No policy	*55 (26%)*

- Of the 30 respondents that had a written complaint handling policy but did not make it publicly available, 11 were large and 10 had over 101 complaints in 2008-09.

4.1.3 Perceived value of feedback from complaints

- The overwhelming majority of respondents (88%) reported that feedback obtained through customer complaints is either valuable or extremely valuable to their organisation (93% among respondents who reported receiving complaints in 2008-09).

- 4 per cent of respondents thought feedback was neither valuable nor invaluable, with an additional 1 per cent indicating that feedback from customer complaints is not that valuable.

- 14 respondents (7%) believed this question was not applicable to their organisation, 13 of whom reported no complaints in 2008-09.

4.1.4 Case study

The Perth Zoo has provided the following case study.

Perth Zoo routinely collects written and verbal complaints and other feedback, using a variety of collection mechanisms. These include:

- Customer comment cards with both negative and positive comments.

- Verbal complaint forms - these include a statement concerning whether or not the visitor has been heard and had their feelings of dissatisfaction respected and are completed by Perth Zoo staff and volunteers. This form also includes an overview of the Perth Zoo's complaints process and the right of review to the Ombudsman.

- Written complaints made by email or letter.

This complaint information is documented and analysed to show what the complaint is about, what method of response is used and the action taken to address the issue. This information is provided to both the Perth Zoo Board and Chief Executive Officer

As part of responding to the complaint, the Visitor Services Coordinator distributes the complaints to the relevant operational area within the Perth Zoo. Operations managers then take action to address the complaint. The Perth Zoo customer is also informed of the action take to address their complaint.

The Perth Zoo uses relevant complaint information to continuously improve the way in which they conduct their operations. An example of this practice is the additional washing of the glass in animal viewing areas following a complaint on the difficulty of photographing animals.

4.1.5 Innovation

- The majority of respondents (82%) indicated that they demonstrate customer focus in additional ways to those tested through the survey. These ways are listed below.

○ Customer surveys	○ Advisory committees
○ Strategic plans that refer to customer service strategies	○ Codes of staff conduct
	○ Additional policies
○ Proactive communication with clients	○ Key performance indicators
○ Staff training and organisational culture initiatives	○ Community consultation
	○ Multiple modes of customer contact

4.2 Visibility

Principle: *Information about how and where to complain is well publicised to customers, staff and other interested parties.*

A critical part of complaint management is that information about how and where to complain should be highly visible, for example by prominently displaying the organisation's phone number or email address for making a complaint. In addition, information about the complaint process should be available in a variety of forms and languages appropriate to the organisation's customers.

4.2.1 Organisations that prominently display contact details

- Eighty four per cent of organisations reported that they have a prominently placed phone number and/or email address for making a complaint.

- Respondents reported most commonly displaying their phone number and/or email address for making a complaint on their websites (see Table 7).

- Nearly all respondents reported that their front line staff know the process for making a complaint (94%), and that their front line staff assist people who wish to make a complaint (89%).

- Other places respondents stated they displayed this information included survey forms, letterheads, local newspapers, public facilities, visitor information centres, handbooks, newsletters, fridge magnets, car registration stickers and complaint forms.

Table 7: Where respondents prominently display a phone number and/or email address for making a complaint (multiple responses accepted)

Where displayed	Number of respondents
Website	151 (73%)
Front counter	89 (43%)
Pamphlets	77 (37%)
White pages	61 (29%)
Signs	28 (13%)
Posters	24 (12%)
Other	*50 (24%)*
Not prominently displayed	*33 (16%)*

4.2.2 Organisations that do not prominently display contact details

- Figure 10 shows that almost 16 per cent (33) of respondents reported that their phone number and/or email address for making a complaint is not prominently displayed.

- Most (27) of the 33 respondents that reported their phone number or email address for making a complaint is not prominently displayed were micro or small in size (although 3 were large), and were predominantly Local Governments (14) and Statutory Authorities (13).

- None were organisations that reported having more than 101 complaints in 2008-09, although 10 had more than 10 complaints including 3 with more than 50.

Figure 10: Respondents that prominently display their phone number and/or email address for making a complaint, by organisation size
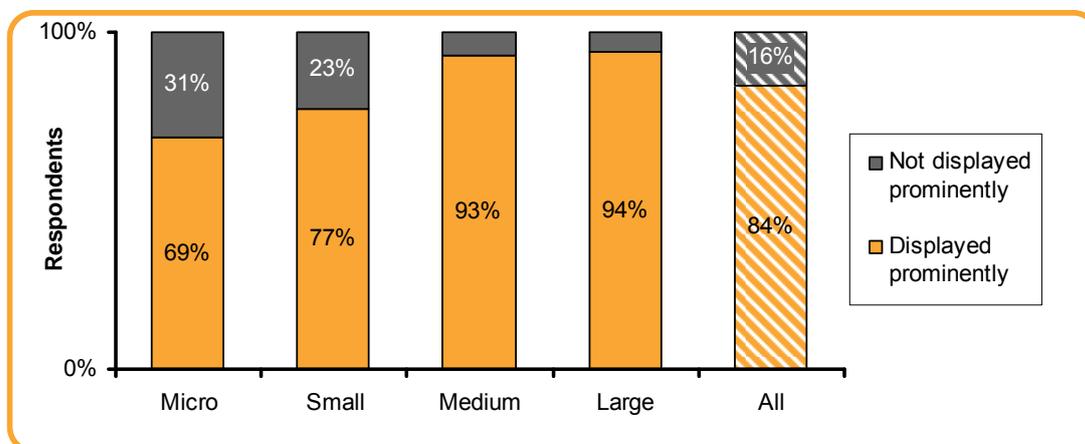
4.2.3 Innovation

Approximately one-third of respondents reported other methods of increasing the visibility of their complaint process. These included specific initiatives for particular groups, for example, a community consultation site directed at young people, client and/or customer surveys, annual reports, customer service plans, staff training initiatives and awareness campaigns.

4.3 Accessibility

Principle: *the process for making a complaint and investigating it is easy for all customers to access and understand.*

The Guidelines indicate that complaints should be accepted in a number of different ways including in person, over the phone, and in writing via email, fax and letter. In addition, complaint handling systems should be accessible to all customers, including people living in regional and remote areas, young people, people with disabilities, Indigenous Australians and people who were born overseas in a non-English speaking country. It is important that organisations understand their customer demographics to be able to ensure their customers can access the complaint handling process.

4.3.1 Complaints channels

- The majority of respondents accept complaints via multiple channels (Figure 11). Other methods reported included fax, feedback postcards and client surveys.

- Around 1 in 4 respondents (27% or 56 organisations) indicated that they currently have a toll free or local fee number that people can use to make complaints. For respondents with more than 101 complaints, the proportion of respondents who indicated they have a toll free or local fee number doubles to 1 in 2.

- Of these 56 organisations, 9 were Local Governments (equally split between metropolitan and regional authorities). Among organisation types, Departments were more likely to report that they have a toll free or local fee number.

- 70 per cent (146 of 208) of respondents reported that they have the facility for complainants to leave a message when officers are busy.

Figure 11: Methods by which organisations accept complaints (multiple responses accepted)

Respondents

Method	Percentage
Letter	99%
Email	96%
In person	90%
Telephone	85%
Hardcopy form	69%
Online form	47%
SMS	6%
Other	14%
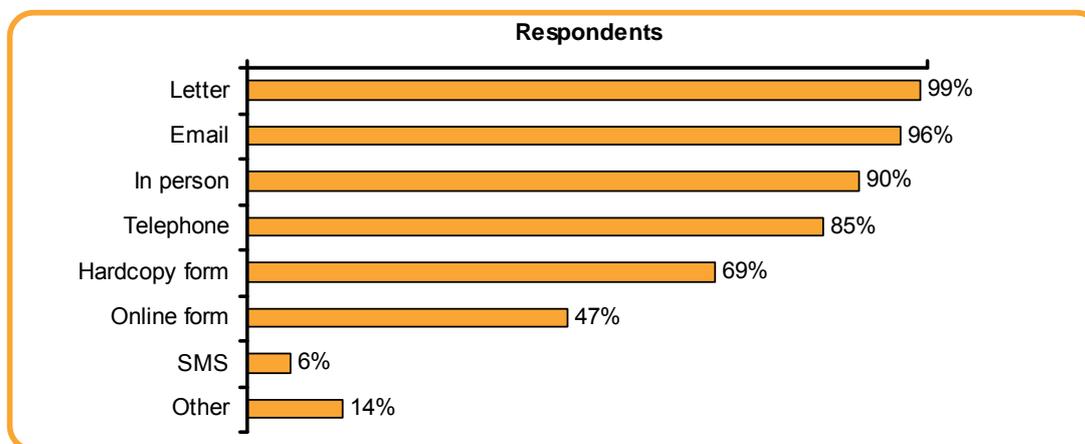
4.3.2 Understanding of customer demographics

- As discussed in section 3.1, organisations reported having customers from many different demographic groups, including children and young people, Aboriginal and Torres Strait Islander people, those over 65 years, people born overseas in a non-English speaking country and people with a disability. It also showed that between 30 per cent and 50 per cent of organisations did not know the percentage of customers from these different demographic groups.

4.3.3 Use of Translating and Interpreting Service National

- 49 per cent (97 of 197) of respondents that reported having customers born overseas in a non-English speaking country report arrangements to assist these customers.

- 39 per cent (77 of 197) report their staff have access to the Translating and Interpreting Service National (**TIS**). Twenty eight per cent (55 of 197, including 35 who also provide access to TIS) report other arrangements to assist these customers. The arrangements include organising assistance from staff who can speak languages other than English, access to alternative interpretation and translation services and specific support services and officers.

- Over 60 per cent of Departments reported that their staff have access to TIS, compared with less than 40 per cent for other categories of respondents (see Figure 12).

- A total of 15 respondents could recall actually using the service during the last year. The number of times they did so ranged from once to over 100 times.

- 15 respondents thought that access to TIS was not relevant. Reasons given for this perception included lack of demand, could potentially access if and when required, organisation perceived as too small to have this facility, and organisation not aware of the service.

Figure 12: Percentage of organisations whose staff have access to Translating and Interpreting Service National (TIS), by organisation type
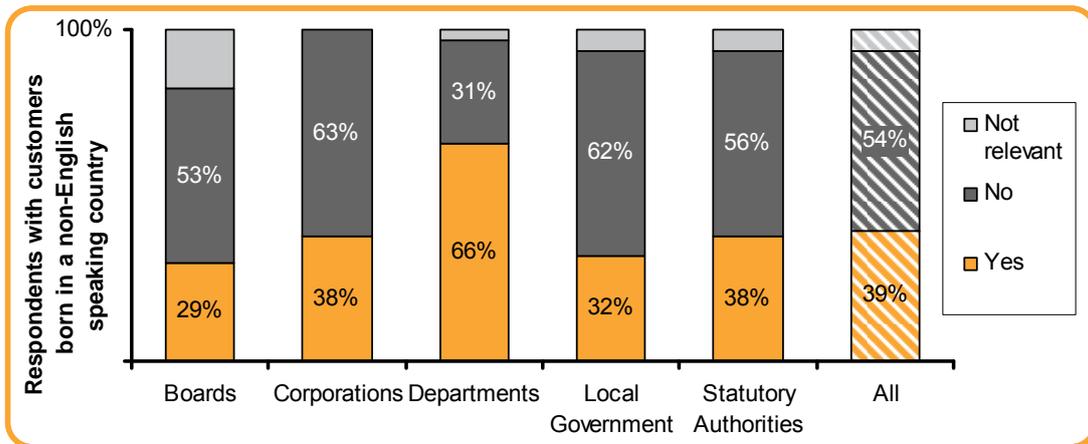
4.3.4 Providing information about making complaints in languages and formats suitable for different customer groups

- Respondents that reported they had customers who were born overseas in a non-English speaking country (197 respondents in total) were asked whether they provide information about how and where to complain in languages other than English. Fewer than 10 per cent of these respondents (19 of 197) provide complaint handling information in languages other than English. Of these 19 respondents, 11 answered "don't know" to the percentage of their customers born overseas in a non-English speaking country.

- Similarly, respondents who indicated they had children and young people as customers (a total of 168) were also asked about providing information on making a complaint in a format suitable for children and young people. 68 of the 168 (40%) respondents that identified having children and young people as customers indicated that they provide information in formats suitable for children and young people (see Figure 13). Measures taken include information written in plain English, individual assistance from staff, very clear procedural information and information in different formats such as flow charts.

Figure 13: Percentage of organisations that provide information suitable for people born overseas in a non-English speaking country and children and young people, by organisation size
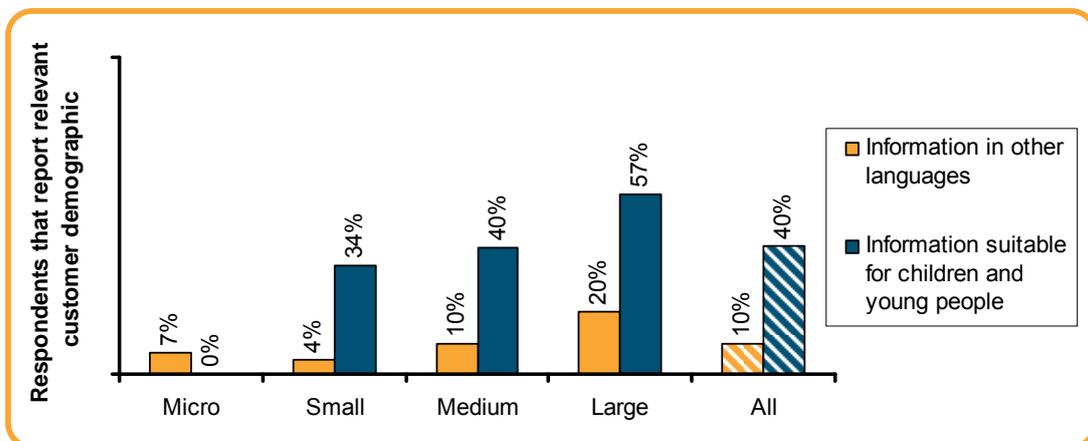
- Figure 14 shows that the proportion of an organisation's customers who were born in a non-English speaking country or who are children or young people appears to have little influence on whether or not the organisation provides information suitable for these groups. A similar proportion of organisations have suitable information, regardless of whether the organisation is able to estimate the percentage of its customers that fall within these groups or not.

Figure 14: Number of respondents that have customers who were born overseas in a non-English speaking country or are children and young people
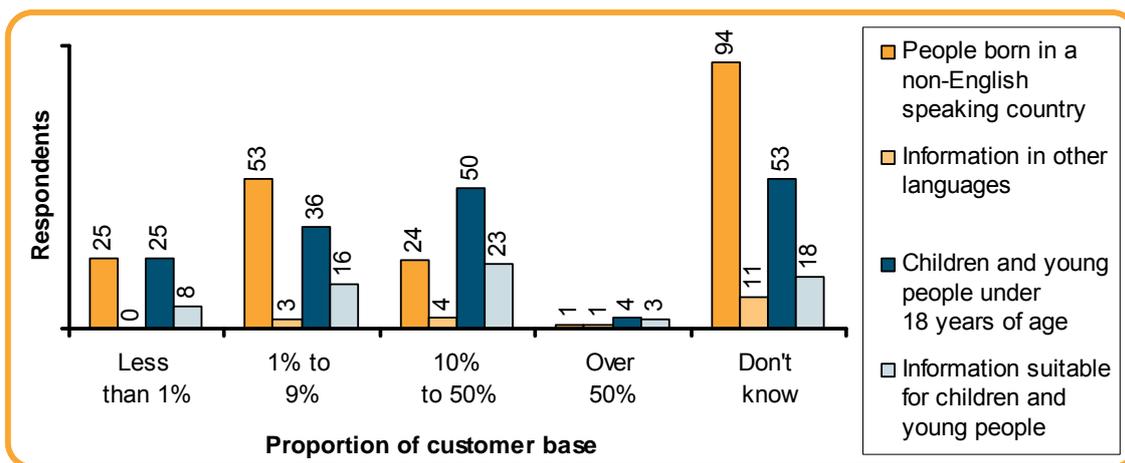
4.3.5 Other arrangements to assist children and young people make complaints

- Respondents that reported having children and young people as customers, and those that did not know (168 organisations or 81% of all respondents), were asked if they make special arrangements to assist them make complaints. 25 organisations (15%) reported doing so (Figure 15). These arrangements included information written in plain English, individual assistance from staff, very clear procedural information and information in different formats such as flow charts

- Among organisation types, Departments and Statutory Authorities were more likely to have special arrangements for assisting children and young people to make complaints.

Figure 15: Percentage of organisations that report special arrangements for children or young people to make complaints
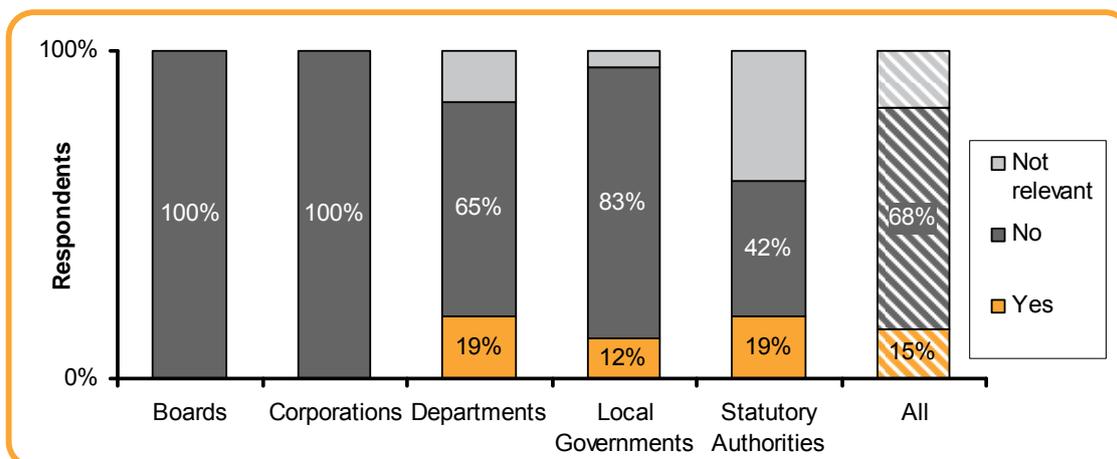
4.3.6 Accessibility to people with impaired hearing or sight

- Figure 16 shows that 63 per cent of large organisations reported providing their front line staff or complaint handling staff with access to the Text Telephones/Teletypewriters (**TTY**) and/or the National Relay Service (**NRS**). Departments were most likely to report that they have access to TTY and NRS.

- Overall, 28 per cent (58 of 208) of all respondents provide front line or complaint handling staff with access to these services.

- 8 (4%) respondents could recall actually using the services during the last year.

Figure 16: Front line staff with access to the Text Telephones/Teletypewriters and/or the National Relay Service, by organisation size
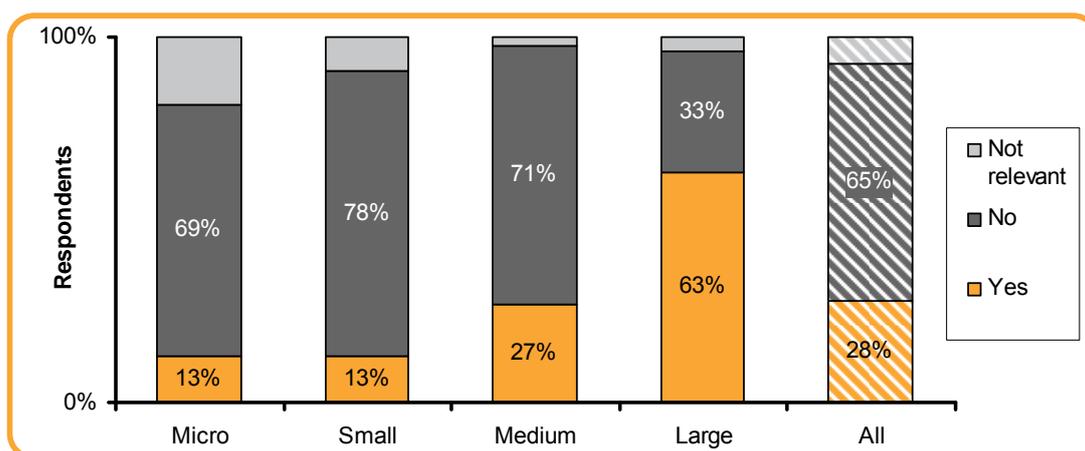
4.3.7 Innovation

- 25 per cent of respondents indicated that they had made additional arrangements to make it possible and/or easier for people to make a complaint. These included dedicated staff and support officers, customer surveys and community consultation, allowing complaints to be submitted anonymously, and 24 hour access to complaint channels.

- Over half of the organisations with more than 101 complaints in 2008-09 made additional accessibility arrangements.

- 19 per cent (16 of 83) of Local Governments and 23 per cent (15 of 64) of Statutory Authorities make additional arrangements. This is half that (45%) of Departments.

- 28 per cent (55 of 197) of respondents described other mechanisms for assisting people born overseas in a non-English speaking background country make a complaint, which included maintaining a register of staff with language skills, and translation services available on request (free of charge).

4.4 Visibility and accessibility considered in combination

4.4.1 Basic visibility and accessibility for making complaints

Visibility and accessibility are the foundations of an effective complaint handling system. This will ensure that low levels of complaints are a reflection of people's views about an organisation, not that it is difficult for people to make their views known.

- The majority of all organisations surveyed facilitate customers making complaints. Figure 17 shows that 70 per cent of all respondents reported all four basic visible and accessible complaint handling practices. These are: prominently displaying complaint contact details; taking complaints by letter, email, and telephone.

- However, 30 per cent of respondents reported that they did not have all these basic arrangements.

- 91 per cent of Departments and 97 per cent of organisations reporting more than 101 complaints in 2008-09 reported having all four visible and accessible ways of making complaints.

Figure 17: Percentage of organisations with visible and accessible ways of making complaints
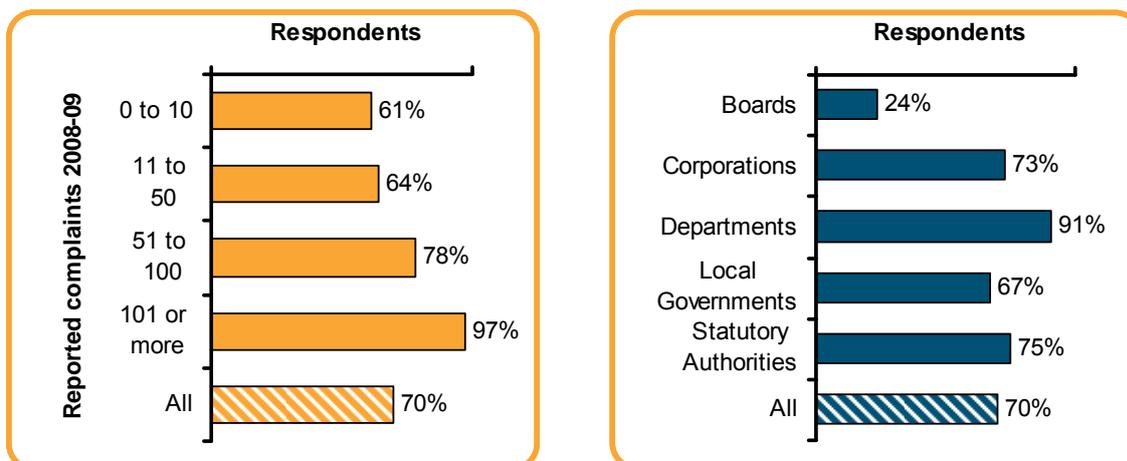
Respondents who reported receiving zero complaints in 2008-09 were more likely to report that they did not have one or more of the basic arrangements for enabling complaints in place (Figure 18).

- 31 per cent of respondents that do not have the basic practices reported zero complaints in 2008-09. Only 10 per cent reported 51 or more complaints.

- In contrast, only 19 per cent of respondents that have these practices reported receiving zero complaints, whereas 37 per cent reported 51 or more complaints.

Figure 18: Reported complaints for respondents with and without basic complaint enabling practices
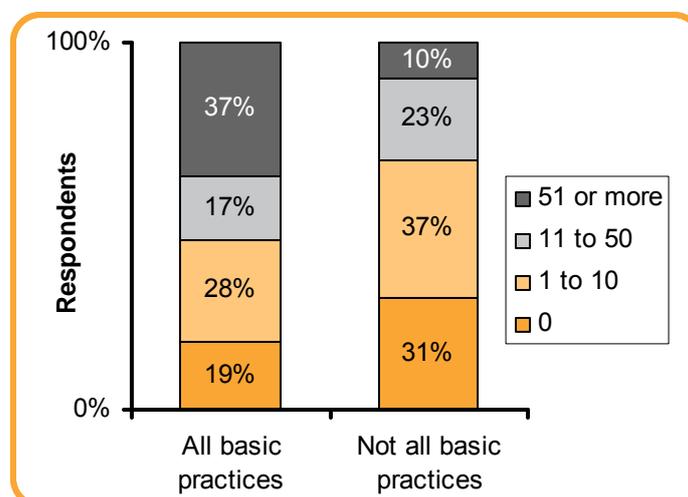
5   Responding to complaints

Key findings

- Once complaints have been made, survey respondents - particularly larger organisations that received the most complaints - generally reported arrangements to ensure that complaints are dealt with in a prompt, objective and confidential manner. However, the survey results point to some opportunities for improvement, specifically, setting timelines for handling complaints and meeting them, the management of unreasonable complainants and connecting complaints processes to legislated whistleblower and anti-corruption processes.

- Effectively responding to complaints also involves providing appropriate remedies when complaints are sustained and avenues for review and/or appeal. Four out of 5 respondents reported providing some form of remedy when complaints were sustained and advising complainants about their right to seek external review and/or appeal. While these results are positive, they also represent opportunities for improvement.

5.1 Responsiveness

Principle: *Complaints are acknowledged in a timely manner, addressed promptly and according to order of urgency, and the complainant is kept informed throughout the process.*

The Guidelines encourage responsiveness in handling complaints. Responsiveness is a natural extension of a customer focus and encourages complaints from customers who might otherwise be reluctant to complain. Organisational responsiveness is facilitated through clear guidance for staff on how to handle complaints and empowering them to do so, and by setting and monitoring timeframes for responding to complaints.

5.1.1 Written guidelines for handling complaints

- Around three-quarters of respondents (76%) reported they had written guidelines for staff, in the form or policies, procedures or manuals, setting out the procedures or steps for handling complaints. Three-quarters of those with guidelines (or 58% of all respondents) reported having a process to ensure they were applied (Figure 19).

- Respondents from larger organisations and those that receive higher numbers of complaints were more likely to have written complaint handling guidelines and processes for ensuring the procedures set out within them are implemented.

- Local Governments and Boards were less likely than other organisation types to have written complaint handling guidelines.

Figure 19: Respondents that reported written complaint handling guidelines and processes to ensure they are applied, by organisation size
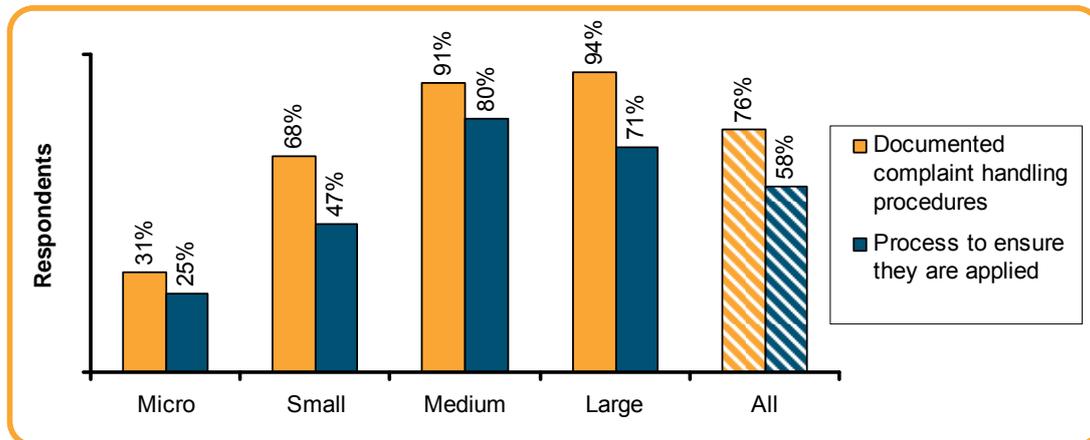
- A high proportion of complaint handling guidelines were reported to include basic processes for dealing with complaints and the complainant, such as who is responsible for handling complaints and that the complainant will be kept informed of progress.

- Most guidelines for staff on complaint handling, but not all, refer to the treatment of public interest disclosures and allegations of misconduct and corruption which are governed by specific legislation. 67 per cent of respondents' complaint handling guidelines contain guidance on identifying and referring public interest disclosures and 76 per cent provide guidance on identifying and referring complaints about misconduct or corrupt behaviour (Table 8). The pattern is similar across all organisation types.

Table 8: Features included in written complaint handling guidelines (multiple responses accepted)

Feature	Respondents
Who is responsible for handling complaints	95%
That the complaint will be acknowledged promptly	97%
How complaints will be prioritized for further action	66%
Assessing complaints to decide which ones can be resolved easily and which require investigation	70%
Identifying and referring public interest disclosures	67%
Identifying and referring complaints about misconduct or corrupt behaviour	76%
That the complainant be kept informed during the process	89%
That the complainant be informed of the outcome	97%

5.1.2 Empowering staff to resolve complaints early

- The majority of respondents (182 out of 208, or 88%) reported that they empower front line staff at the earliest point of contact to resolve less complex complaints. Only 14 respondents (7%) said they did not empower their staff, the remainder considered the question not relevant.

- 88 per cent (161 out of 182) of the respondents who said they empowered their front line staff to handle complaints considered that this approach significantly contributed to efficiency.

5.1.3 Case Study

The City of Melville (**the City**) has provided the following case study.

The City, a large metropolitan Local Government Authority, has developed a resource manual for its staff, *Delighting our Customers*. The manual details the City customer service standards, such as customer response timeframes. The City is also rolling out an associated customer service training program. The training gives staff tools and techniques to use in a variety of customer service scenarios and reinforces the organisation's customer service standards.

The resource manual and training also contain practical guidance for staff on implementing 'service recovery actions' in response to customer complaints, and how to identify when further authorization may be required. Service requests that cannot be addressed on the spot are entered into the City's Pathway information system, which tracks customer requests (including complaints) and follow up actions.

Three levels of customer service training are mandatory for all staff and upon completion each receives an 'empowerment warrant'. The empowerment warrant provides the Chief Executive Officer's endorsement for any actions that staff take, in accordance with procedures and training, that serve to 'delight' the City's customers.

### 5.1.4 Target timelines for resolving complaints

- Around two-thirds of respondents (133 of 208) indicated that they set target timelines for resolving complaints.

- Departments are more likely (82%) than other organisation types to set target timelines for the resolution of complaints. Local Governments (57%) are the least likely organisations to set target timelines.

- Target resolution timelines were also more common among larger organisations and those with high numbers of complaints (see Figure 20).

Figure 20: Percentage of respondents who reported target timelines for resolving complaints, by complaints received in 2008-09
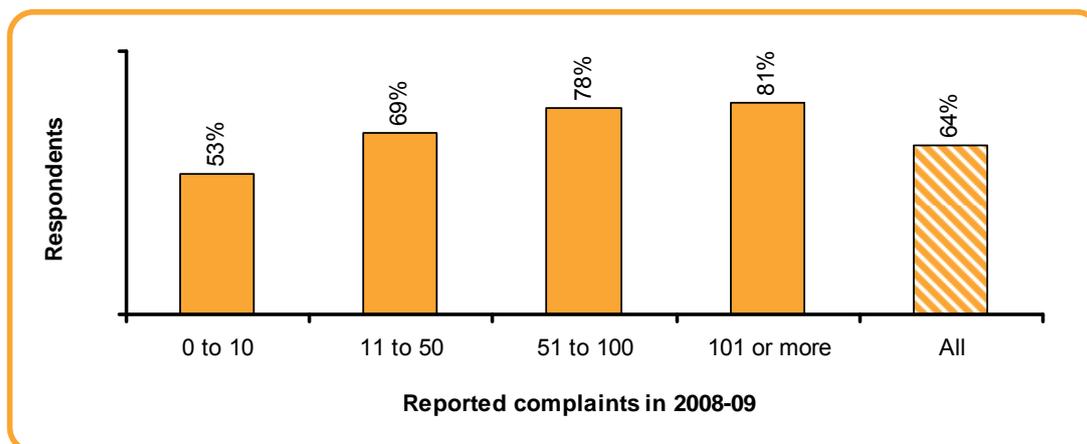
- Most (94%) organisations report that they seek to resolve complaints within a month (see Figure 21). No respondents reported target resolution timelines of more than 90 days.

- Over half the organisations with timelines of more than one month are micro-sized organisations.

Figure 21: Target timelines for resolving complaints, by timeframe
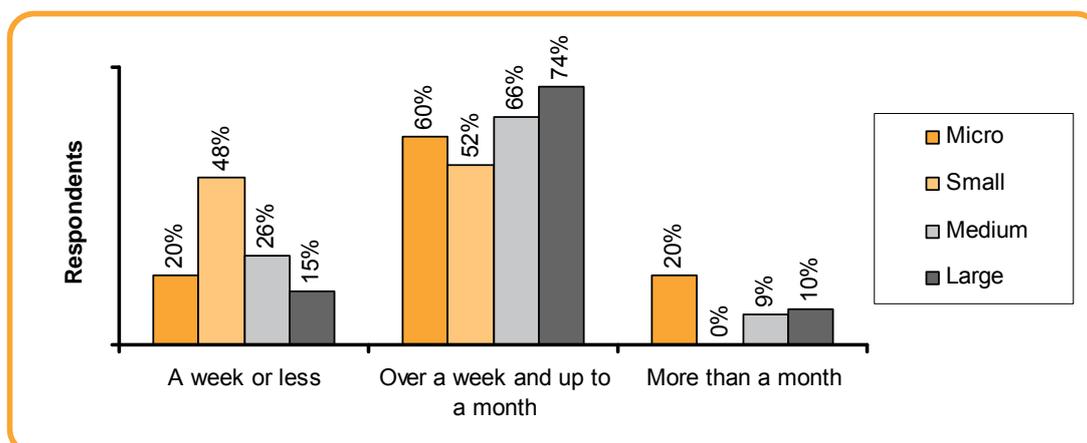
- Just over half (73) of the 133 organisations that set timelines report that they meet them over 75 per cent of the time. One in 4 respondents reported not knowing if they are resolving complaints within target timelines (Table 9).

Table 9: Complaints resolved within target timelines

Complaints resolved in target timelines	Number of respondents
None	4 (3%)
Less than 25%	1 (1%)
25% to 50%	10 (8%)
51 to 75%	13 (10%)
Over 75%	73 (55%)
Don't know	32 (24%)
All respondents with timelines	**133 (100%)**

5.1.5 Responsiveness to children and young people

- Figure 22 shows that overall, 14 per cent of respondents reported having special arrangements in place to respond to complaints by children and young people (excluding 40 respondents, or 19%, that do not have children as customers.)

- Around 1 in 4 (27%) Departments that reported having children and young people as customers, reported having special arrangements to respond to complaints from children and young people. Twenty eight per cent of large organisations reported having special arrangements for responding to complaints from children and young people.

Figure 22: Organisations with children and young people as customers, and that have special arrangements in place to respond to them, organisation type
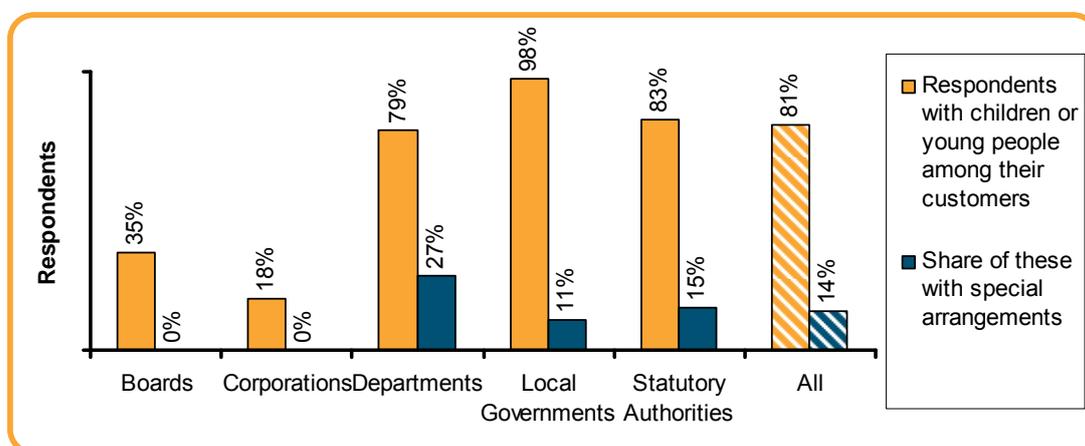
5.1.6 Innovation

- Respondents commented that other ways they ensure responsiveness to complainants included the integration of complaint response timelines into complaint registration systems, and regular reporting about complaints to management and at staff meetings.

5.2 Objectivity and fairness

Principle*: Complaints are dealt with in an equitable, objective and unbiased manner. This will help ensure that the complaint handling process is fair and reasonable.*

The Guidelines indicate that officers responsible for investigating complaints should be appropriately trained to investigate and deal with all complaints on their merits in an equitable, objective and unbiased manner. They must also ensure that any conflicts of interest are declared and that unreasonable complainants are managed effectively and with integrity.

5.2.1 Strategies for ensuring objectivity

- Two-thirds (62%) of respondents indicated that they had guidelines for complaint handling staff relating to managing conflicts of interest.

- Just over half of respondents (54%) indicated that investigations are reviewed by someone else within the organisation such as a senior staff member prior to finalisation.

- 34 per cent of respondents provide training for staff carrying out investigations, and a further 14 per cent indicated that this training is not relevant.

- Larger organisations are more likely to train staff in investigation techniques (49%) and have guidelines to avoid conflict of interest in complaint handling (76%). Similarly, the use of these strategies for ensuring objectivity increased with the number of complaints received by respondents.

- Departments had the strongest mix of these three strategies with 82 per cent having guidelines on handling conflicts of interest and 76 per cent indicating that investigations are reviewed (see Figure 23).

Figure 23: Strategies for ensuring objectivity in complaint handling, by organisation size
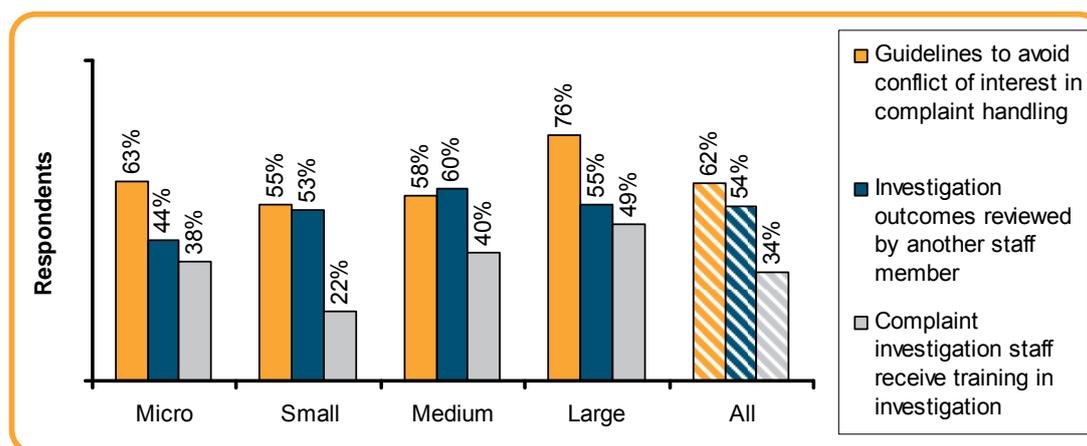
5.2.2 Managing unreasonable complainants

- 66 per cent of respondents reported that they provide advice to staff on managing unreasonable complainants. Nearly all of them (91%) consider this advice valuable.

- 83 per cent of respondents with more than 101 complaints in 2008-09 reported providing this type of advice.

5.2.3 Innovation

- One-third of respondents (33%) provided information on other methods by which objectivity is ensured. These included details on compliance with quality assurance standards, specific monitoring and auditing processes and references to internal and external review processes.

5.3 Confidentiality and privacy

Principle: *Information about complainants and their complaints is kept confidential.*

The Guidelines indicate that personal information of the complainant and any people who are the subject of a complaint should be protected from disclosure and only used for the purposes of addressing the complaint. Staff should be made aware of these confidentiality requirements.

- Confidentiality provisions are reported to be widely implemented, across all organisation sizes and types.

- Figure 24 shows that 92 per cent of respondents indicated that personal information about complaints is kept confidential.

- All but 1 of these respondents made staff aware of confidentiality requirements.

- 6 per cent of respondents reported that this practice was not relevant to them. Generally respondents reported that this was because they did not receive any complaints or personal information is not relevant to the complaint issue.

**Figure 24: Personal information about complainants
is kept confidential, by organisation size**
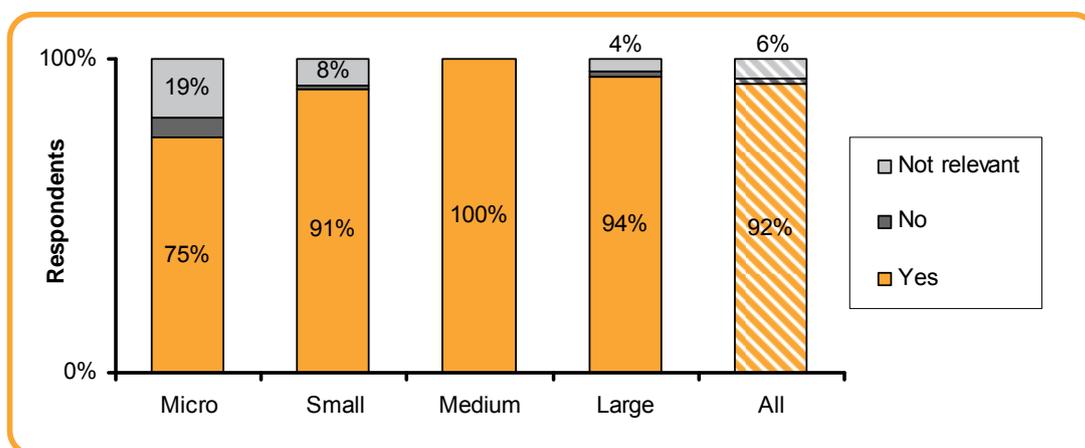
- Staff induction processes and internal polices are the most common ways of communicating these confidentiality requirements to staff (Figure 25).

Figure 25: Mechanisms used to communicate confidentiality requirements to staff
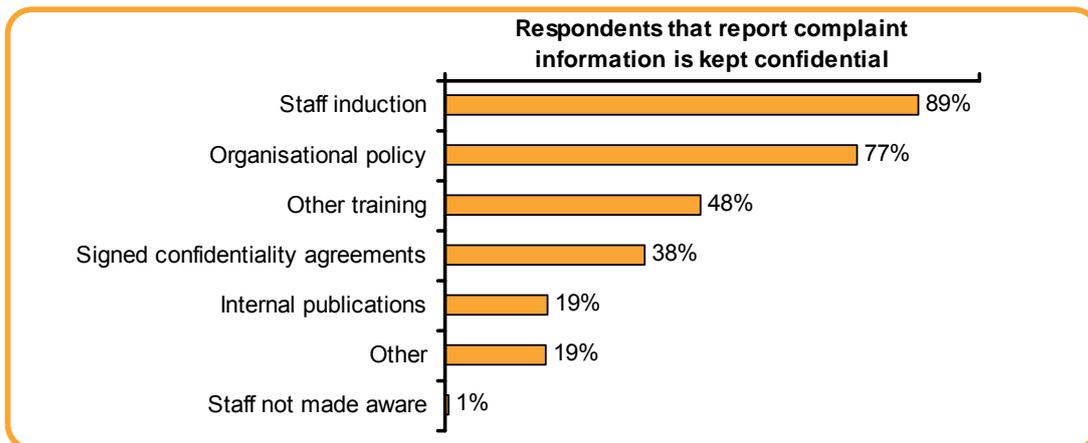

5.4 Remedy

Principle: *If a complaint is upheld, the organisation provides suitable redress.*

The Guidelines indicate appropriate remedies should be applied as part of the satisfactory resolution of a complaint. Remedies should be based upon suitable acknowledgement of any error and aim to restore the complainant to their original position. Reasoning behind redress decisions should be explained to the complainant.

5.4.1 Remedies provided

Survey respondents indicated that the application of remedies was commonplace (79%) in the process of resolving complaints (Figure 26). Only 5 (3%) respondents reported that no form of remedy was offered, although 18 per cent (38) of respondents considered remedies irrelevant to their business. Most of these latter respondents received less than 10 complaints in 2008-09, and were predominantly micro or small organisations.

Figure 26: Remedy provided by respondent, by organisation size
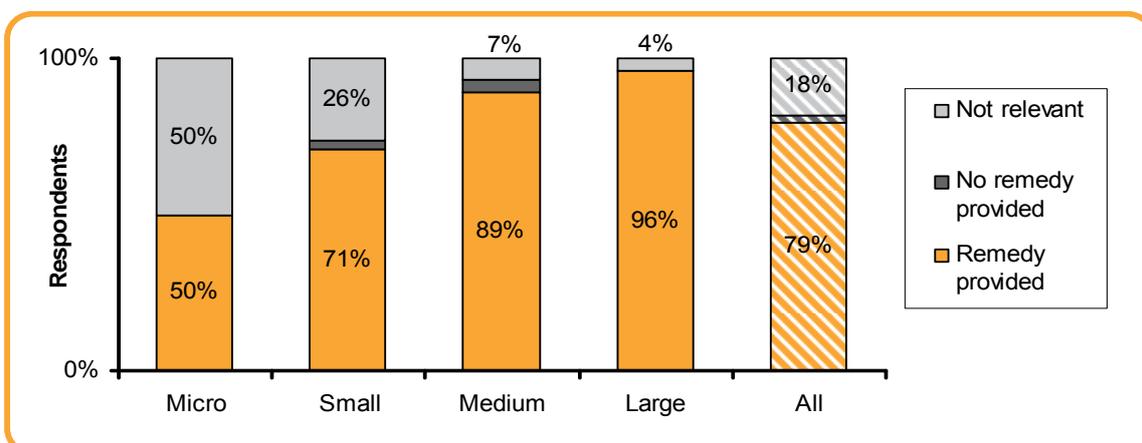
- 90 per cent of respondents that reported providing some form of remedy also indicated that the remedy aims to restore the complainant to their original position, to the degree possible. This figure was high across all organisation sizes (see Figure 27).

- 86 per cent of respondents gave reasons for providing or not providing remedies to complainants, although larger organisations tended to report doing this the most frequently.

Figure 27: Remedy provided when complaint upheld, by organisation size
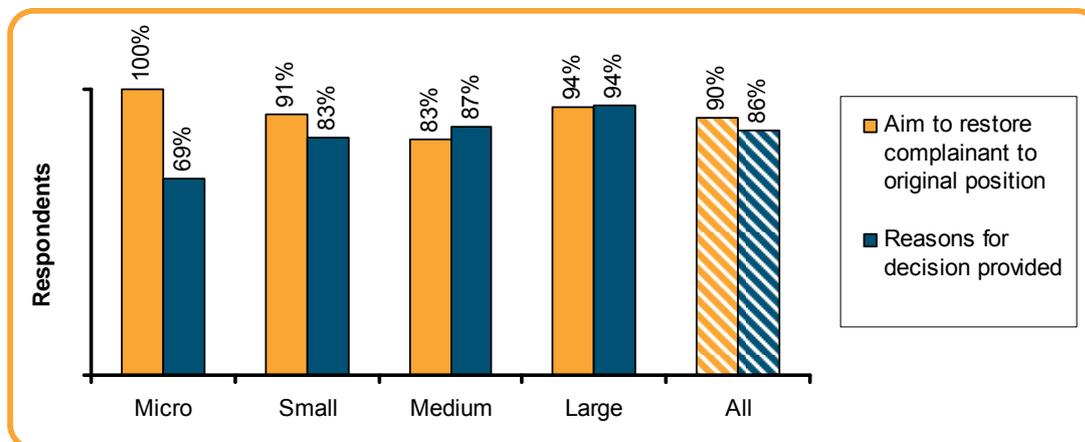
- 72 per cent of respondents considered guidance on the appropriate use of remedies would be useful.

5.5 Review

Principle: *There are opportunities for internal and external review and/or appeal of the organisation's response to the complaint, and complainants are informed about these avenues.*

To ensure objectivity, the Guidelines encourage an independent review of complaint investigation and resolution. Providing complainants with access to a review of the handling of their complaint provides assurance that the process is objective and that any potential for conflict of interest has been avoided or appropriately managed. Transparency about a complainant's recourse to review helps reinforce this objectivity.

The Ombudsman and other external statutory review processes are available for review of complaints about public sector organisations, supplementing internal review processes.

5.5.1 Review options for complainants

- The vast majority of organisations (98%) provided some form of review option for complainants. Only 4 respondents (slightly under 2%) indicated they did not undertake internal reviews nor did they refer complainants for external review.

- Around 9 per cent of respondents do not provide an internal review function for complaints (see Figure 28). Thirteen per cent of organisations indicated they did not refer complainants to external review options. A further 8 per cent indicated external reviews were not relevant.

Figure 28: Use of review options, by organisation size
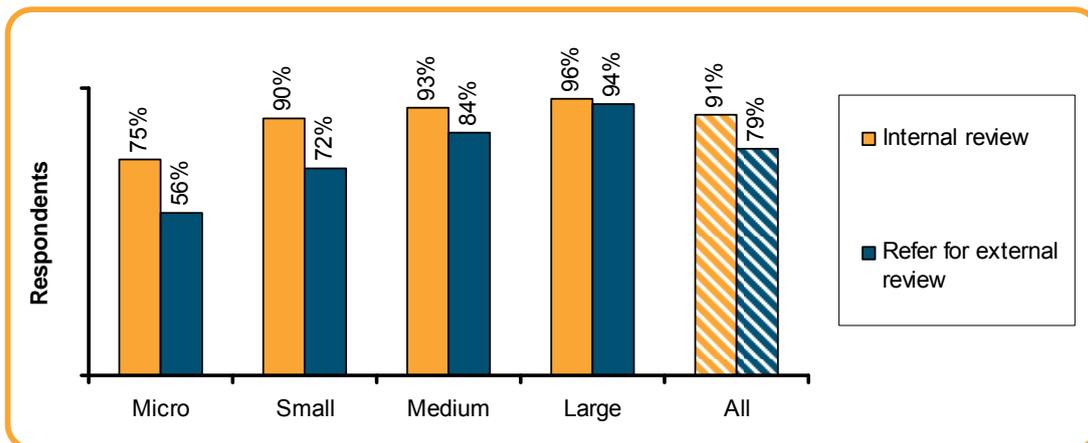
5.5.2 Provision of information on review options

- A majority of respondents indicated they provided information on internal review options (see Figure 29). This usually occurred in writing when the complainant was notified of the decision required (57% of respondents) and verbally by front line complaint handling staff (41% of respondents).

- Large and medium sized organisations reported providing information on methods of review in a variety of ways, including in writing, verbally, on their website and in pamphlets. Small and micro-sized organisations generally did not provide information on review options on their website or in pamphlets, but provided this information in writing and verbally. Micro-sized organisations rely on written correspondence to convey this information.

Figure 29: Methods of providing information to complainants on internal review
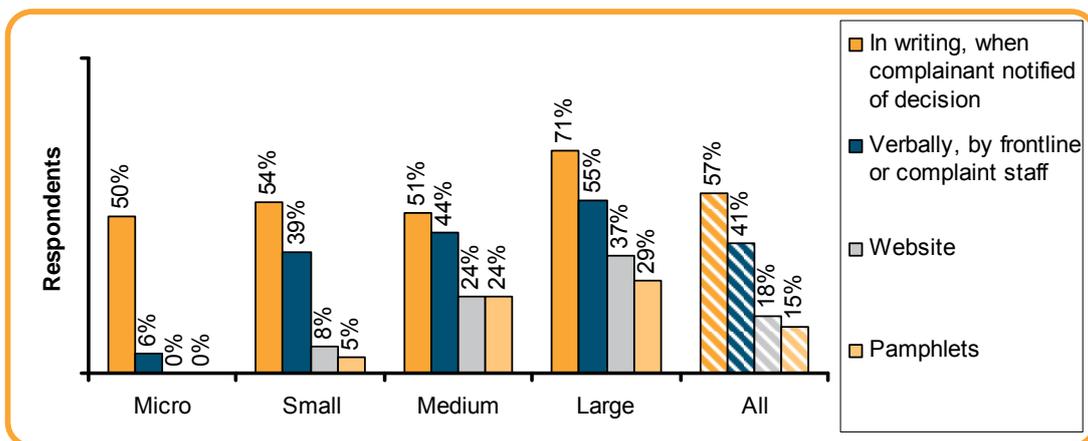
5.5.3 Referrals to external review options

- Table 10 shows that respondents indicated that they refer complainants to a variety of organisations including the Ombudsman, the Corruption and Crime Commission and the Department for Local Government.

- 58 per cent of respondents indicated they refer complainants to the Ombudsman for external review.

- Other places where complainants are referred for external review include the Equal Opportunity Commission, Information Commissioner and the Public Sector Commissioner.

- Respondents that were large organisations were more likely to report that they refer complainants to external bodies for review.

Table 10: Organisations to which complainants are referred for review

Referred organisation	Number of respondents
Ombudsman WA	120 (58%)
Corruption and Crime Commission	78 (38%)
Department for Local Government	71 (34%)
State Administrative Tribunal	71 (34%)
Office of Health Review	15 (7%)
Other	*56 (27%)*

- Figure 30 shows 82 per cent of Departments referred complainants to the Ombudsman for external review.

Figure 30: Respondents that refer complainants to the Ombudsman, by organisation type
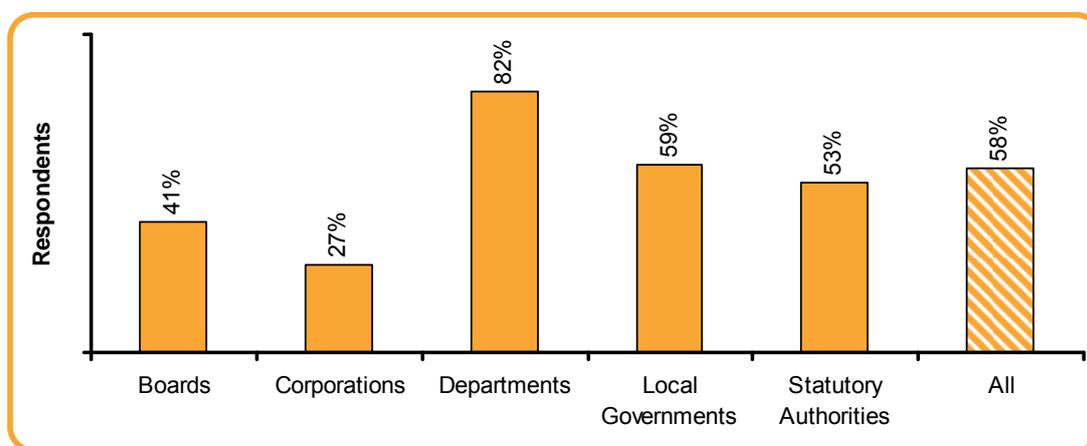
6 Accountability and learning

Key finding

- Most respondents reported having arrangements to ensure that they are recording and analysing complaints. A number of organisations, however, did not report having mechanisms to use the lessons learnt from a complaint to assist organisational development. This represents an opportunity for improvement.

6.1 Accountability

Principle: *Responsibilities for complaint handling are clearly established, and complaints, and responses to them, are monitored and reported to management and other stakeholders.*

Information on complaints needs to be collected and standardised to feed into organisations' reporting and planning processes. Standardised procedures facilitate the collection and collation of complaints information when complaints are handled in a decentralised system.

6.1.1 Complaint handling and monitoring

- Centralised complaint handling systems were more prevalent at either end of the organisation size spectrum, with medium-sized respondents being least likely to have a centralised system.

- Very few (3, or 6%) respondents that were large organisations reported having neither a centralised system nor standardised procedures.

- A similar pattern is evident when respondents are grouped according to number of complaints received.

- Figure 31 shows that Local Governments reported the least amount of organisations with centralised systems or standardised procedures in complaint handling. Nearly 30 per cent reported neither a centralised system nor standardised procedures.

Figure 31: Centralisation of complaint handling systems, by organisation type
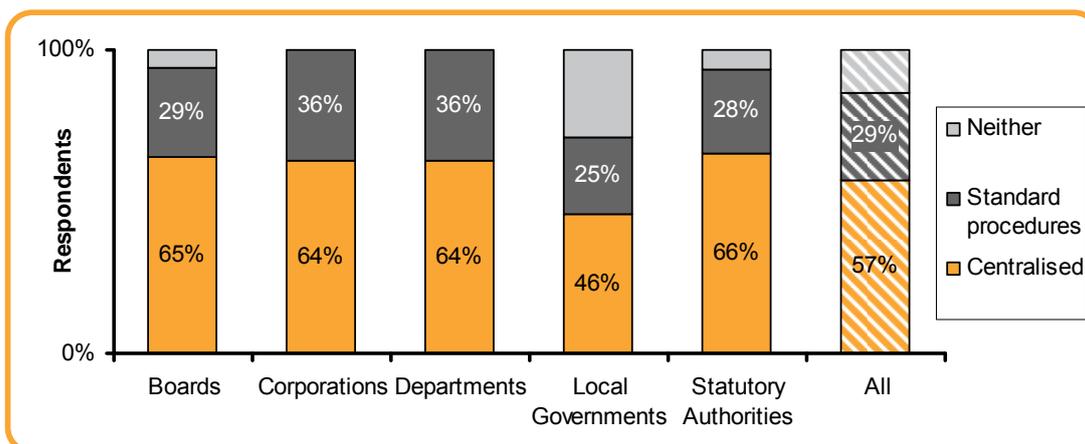
## 6.1.2 Features of complaints information systems

- Authorising specific staff to handle complaints and maintaining complaints information systems were commonplace practices among medium and large organisations (over 90%), but less commonplace among smaller organisations.

- Surveys of complainants and discussion of complaints in annual reports were less frequent (35% of respondents).

- Departments were more likely to report having accountability and monitoring practices than other organisation types (Figure 32).

Figure 32: Accountability features, by organisation type
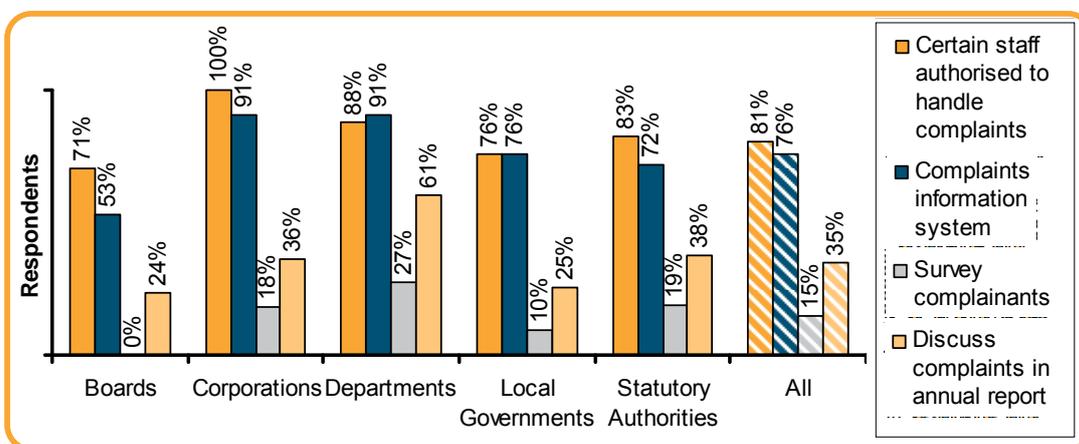
- Most (76%) respondents reported having a complaints information system in place, even when reported complaints are low (Figure 33). 90 per cent of respondents that reported more than 10 complaints in 2008-09 have a complaints information system in place.

Figure 33: Complaints information system, by reported complaints
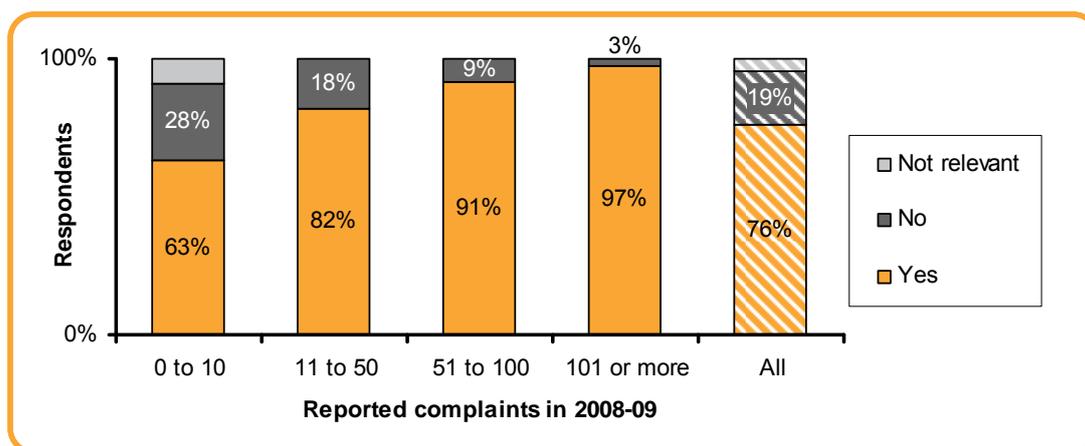
6.2 Continuous improvement

***Principle***: *Complaints are a source of improvement and innovation for organisations.*

Complaints are a source of innovation for developing and improving an organisation's business processes. Analysis of complaints can reveal systemic improvements and improving operations at the organisation level can improve the overall delivery of a public agency's objectives, as well as stem a source of dissatisfaction among customers and other stakeholders.

Complaint analysis and reporting of complaints to senior management are important elements of integrating complaints into organisational planning and continuous improvement processes.

6.2.1 Analysis of complaints

- Most respondents (67%) reported undertaking analysis of complaints. Types of analysis included identifying recurrent complaints, trends in complaints over time and looking at the underlying issues of complaints.

- Analysis is well-established (78%) among respondents who reported receiving more than 10 complaints (see Figure 34). (57 per cent of respondents that reported receiving less than 10 complaints in 2008-09 indicate they undertake some form of analysis.)

- It is less common for respondents to report mechanisms that ensure analysis of complaints leads to continuous improvement. Organisations of all sizes reported making reports to senior management on the analysis of complaints, although this is again more common among large organisations.

Figure 34: Reports to senior management on complaints, for organisations that reported more than 10 complaints in 2008-09, by organisation size[1]
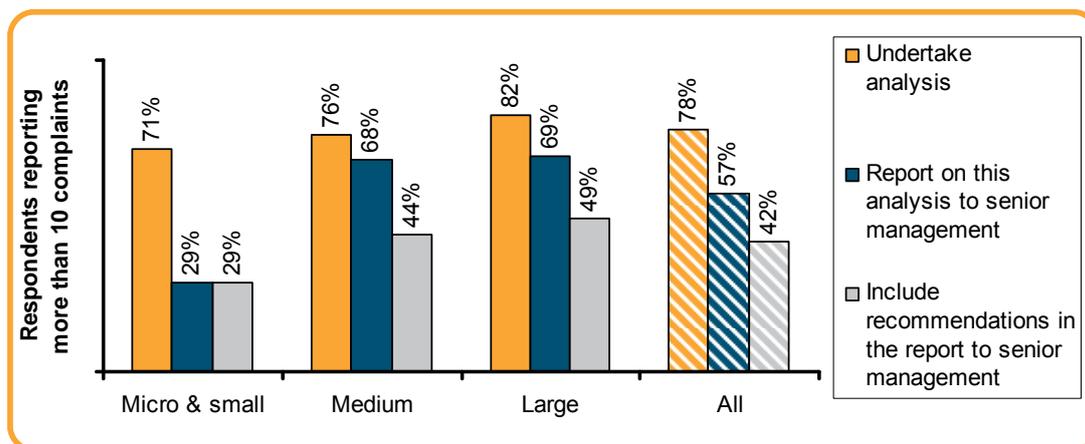
- Fewer respondents reported providing recommendations along with the analysis, and this practice was rare among Local Governments (Figure 35).

- Only very small numbers of respondents that were Boards and Corporations reported receiving more than 10 complaints in 2008-09. These categories are not shown in Figure 35, however the relevant respondents in them are included in 'All'.

Figure 35: Reports to senior management on complaints, for organisations that reported more than 10 complaints in 2008-09, by organisation type
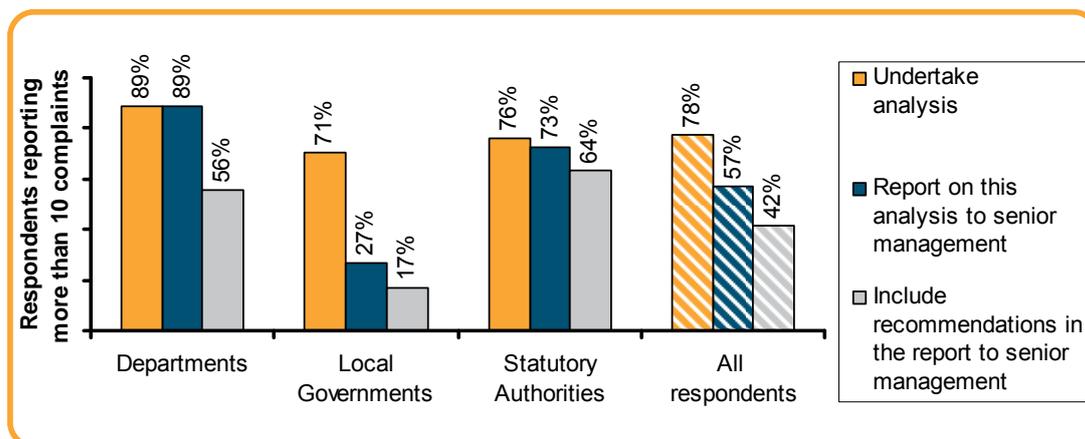
6.2.2 Case Study

Fremantle Ports has provided the following case study.

Fremantle Ports is a WA Government trading enterprise with a staff of more than 300 FTE. It is the strategic manager of the Port of Fremantle and operates port facilities in Fremantle and Kwinana. Complaints handling is integrated with its risk management, stakeholder management and strategic planning systems.

One of the performance indicators that Fremantle Ports reports in its annual report compares complaints in the current year with the average of the previous two years. This indicator is also reported on a year to date basis as part of Fremantle Ports' Corporate Scorecard, a monthly reporting process for the Executive and Board, with comments on significant issues and developments.

A key issue for the port is the expansion of trade activity in the North Quay and Rous Head areas, which has led to complaints at times about traffic congestion in the area. The Fremantle Ports' Logistics Branch is working with other Government agencies and with industry and has convened a road planning traffic management group to undertake monitoring in the area. Engagement with the issue has led to a fall in complaints about traffic in the North Quay and Rous Head area from 27 in 2006-07 to 4 in 2008-09.

Reduction in traffic management complaints in the North Quay and Rous Head area is related to this work to minimise congestion, for example the engagement of a road planning traffic management group to undertake on site monitoring of traffic in the area and other initiatives such as working with industry and other government agencies to achieve improved scheduling and increased two way loading of trucks. The work is ongoing.

6.2.3 Learning from complaints

- Most respondents considered complaints to be useful for the organisation's continuous improvement (see Figure 36). This attitude was more prevalent among respondents that were larger organisations and among those that reported receiving higher numbers of complaints.

Figure 36: Usefulness of complaints for continuous improvement, by organisation size
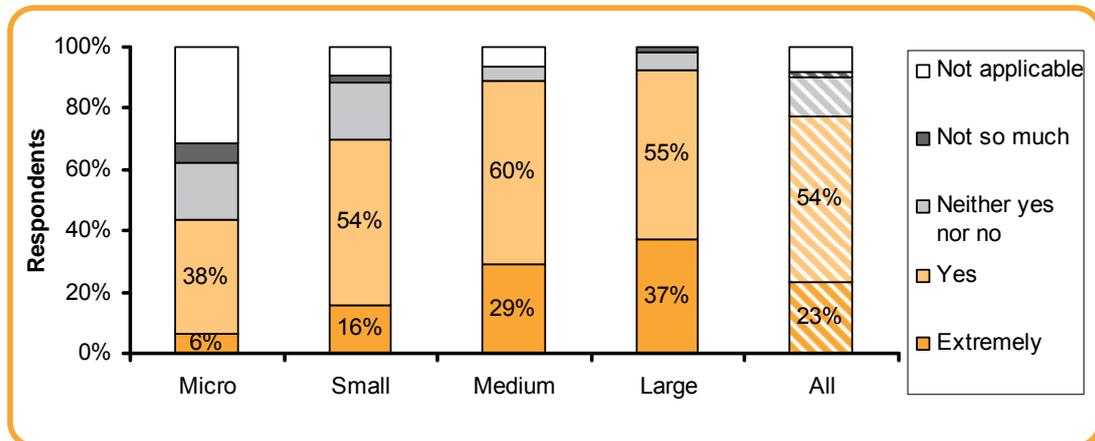
7 Complaint handling practices analysed as a system

Key findings

- Larger organisations and those reporting higher numbers of complaints were more likely to report that they had put into action all the complaint handling principles covered by the survey. State government departments, which are subject to the *Public Sector Commissioner's Circular 2009 - 27 on Complaints Management,* more frequently reported having a comprehensive complaint handling system which put all the principles into action.

## 7.1 Complaint handling practices analysed as a system

While individual complaint handling principles and practices are important, they also need to work together as a system. It was relatively uncommon for respondents to report a system of complaint handling practices that comprehensively supported the enabling of complaints through responding to complaints, to accountability and learning.

A selection of complaint handling practices are shown in Figure 37, with individual uptake of each practice as reported by survey respondents presented alongside cumulative uptake. The selection includes relatively common practices addressing all of the complaint handling principles. This figure is organised into the three stages of complaint handling discussed in Chapters four, five and six.

A conservative approach has been taken in this analysis where respondents who indicated a practice was not relevant to them, were not deemed to need the practice to have comprehensive system.

Using this framework, 60 per cent of respondents, (124 of 208) reported having systems that enable complaints. However, significantly less (40%) respondents reported complaint handling systems that not only enable complaints but also ensure responsiveness. Similarly, when including accountability and learning into the complaint handling system, the number of respondents whose system includes all three stages decreases to 25 per cent (51 respondents).

Figure 37: System of selected complaint handling practices, on an individual and cumulative basis
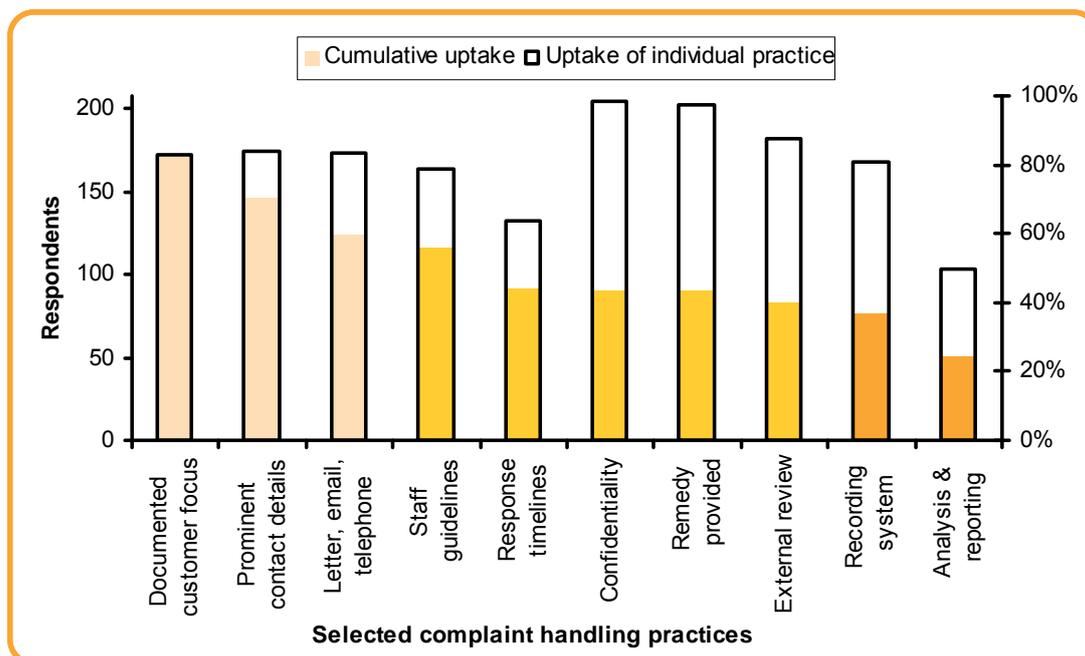
- Larger organisations and those with greater numbers of complaints were more likely to have incorporated all principles into a complaint handling system. Half of the 51 respondents that reported having all the selected practices were large organisations.

- 38 per cent of medium organisations reported having all the selected complaint handling practices. This compares to around 10 per cent for small and micro-sized organisations.

- State Government Departments, which are subject to the Public Sector Commissioner's circular on complaints handling, more frequently reported having a comprehensive complaint handling system, which put all the principles into action. Many Statutory Authorities also reported having this type of complaint handling system.

- Local Governments and Boards less frequently reported having all the principles that form a comprehensive complaint handling system.

- Respondents that make reference to the Australian Standard as the basis for their complaint handling system were four times more likely to have the comprehensive system than others.

7.1.1 Case Study

The Metropolitan Cemeteries Boards (**the Board**) has provided the following case study.

The Board is a medium sized (130 FTE) statutory authority that operates six cemeteries in the Perth metropolitan area. Complaints are received from cemetery visitors and funeral attendees.

The Board is committed to providing opportunities for community feedback and uses this feedback to improve its services to the community. The Board's Complaints Handling Guidelines were formalized in 2007, and systems to implement it were operating smoothly within 3 months. The following year the Board commissioned an external audit of its system. The audit was based upon the Australian Standard, Customer Satisfaction—Guidelines for complaints handling in organisations (ISO 10002:2004, MOD). Recommendations were graded according to risk and included improvements to public reporting, web access and the provision of information on review by the Ombudsman.

In 2009, the Board also initiated a training program for all Board staff in the organisation's new complaint handling processes. The training also ensures cemetery garden and office staff—usually the first point of contact for a complainant—are skilled in handling complaints. The Board considers improving the complaint handling skills of its frontline staff serves to avoid unnecessary escalation of complaints as well as minimise risks for the Board's standing in the community.