

# External Service-Related Complaints Policy

## 1. Purpose

This policy establishes how the department manages complaints efficiently and effectively, allowing us to continually improve the quality of the service we provide and ensures we meet our regulatory obligations as a NSW Government department. We know how important it is that complaints are treated seriously and have a timely resolution. The department is committed to handling complaints fairly, efficiently, and effectively. We recognise that complaints and handling them effectively can improve the way we do business and build stronger relationships with our customers.

This policy should be read in conjunction with the Unreasonable Complainant Conduct Procedure and the Complaint intranet page.

## 2. Scope

- 2.1 This policy applies to all employees, consultants and contractors within the department. It also extends to employees, consultants and contractors from any departmental entities that employ individuals in or through the department.
- 2.2 Matters relating to the following are not covered by this policy and should be addressed under separate arrangements by the business area concerned:
  - 2.2.1. Decisions subject to other review processes or outside the control of the department.
  - 2.2.2. Costs of services provided by the department.
  - 2.2.3. Misconduct or other workplace issues.
  - 2.2.4. Public interest disclosures by employees.
  - 2.2.5. Compliance enquiries or complaints.
  - 2.2.6. General feedback.
  - 2.2.7. Requests for information and/or service.

## 3. Policy statement

The department is committed to providing high quality service to our customers and stakeholders who access or are impacted by our programs, systems and services. We are also committed to the NSW public sector's complaint-handling principles of respectful treatment, information and accessibility, good communication, taking ownership, timeliness, and transparency.

- 3.1 Acknowledge complaints within 3 working days where immediate resolution is not possible.
- 3.2 Frontline employees must resolve complaints promptly and respectfully wherever possible.
- 3.3 Where practicable, complainants will be notified of next steps.
- 3.4 Resolve complaints within one month, where possible.
- 3.5 If a complaint cannot be resolved within one month, provide customers with regular updates on its progress and the expected resolution date.
- 3.6 Contents of complaints lodged without contact information (anonymous), will be assessed and addressed only where there is sufficient information.
- 3.7 Record, track and undertake analysis to identify opportunities to improve our programs and services.

### Unreasonable Complainant Conduct

- 3.8 The department must treat all complaints with respect and ensure accessibility and responsiveness.
- 3.9 The Ethics Team will make determinations of unreasonable complainant conduct matters under the Unreasonable Complainant Conduct Procedure to ensure fair evaluation and support for our employees.

## 4. Compliance

If you fail to comply with this policy, corrective action may be taken in accordance with the Code of Ethics and Conduct. All employees, and others covered by the code, are expected to adhere to the ethical and behaviour standards it outlines.

## 5. Related documents

**Table 1.** Related documents

| Document Type      | Document Name                                                                                                                                                  |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Procedures         | Unreasonable Complainant Conduct Procedure                                                                                                                     |
| Guidelines         | Standards Australia's Guidelines for complaint management in organisations (AS 10002:2022)<br><u>NSW Ombudsman – Effective Complaint Management Guidelines</u> |
| Intranet Resources | <u>3-Level Model of Complaint Management</u> – Complaints page                                                                                                 |

## 6. Review process

Governance and Legal Division – Ethics Branch will review this policy no later than 2 years from the date the document is approved. The document may be reviewed earlier in response to post-implementation feedback, changes to legislation, or as necessary.

## Policy metadata

**Table 2.** Policy metadata

| Category                     | Description                                |
|------------------------------|--------------------------------------------|
| Status                       | Draft                                      |
| Date of approval             | 25 March 2025                              |
| Approver                     | Chief Operating Officer                    |
| Group                        | Corporate Services                         |
| Division                     | Governance and Legal                       |
| Policy Owner                 | General Counsel                            |
| Branch                       | Ethics Branch                              |
| Document location            | DCCEEW Intranet                            |
| Next review date             | Two years from approval March 2027         |
| Associated procedure/s       | Unreasonable Complainant Conduct Procedure |
| Any additional applicability | N/A                                        |
| Superseded document          | N/A                                        |
| Further information          | ethics-dcceeew@environment.nsw.gov.au      |
| Document reference           | DOC25/176424                               |

## Version control

**Table 3.** Version control

| Version | Date issued   | Change                                          |
|---------|---------------|-------------------------------------------------|
| 0.1     | February 2025 | First adoption of an External Complaints Policy |

## Appendices

### Appendix 1 – Definitions

**Table 4.** Definitions

| Term                                      | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Service-related complaint</b>          | Expression of dissatisfaction made to or about the department our services, our employees or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>3-Level Model Complaint Management</b> | <ul style="list-style-type: none"><li>• First-Level: Frontline complaint handling - Early resolution where complaints are managed by frontline staff. The goal is to resolve issues quickly and informally, ideally within 30 days.</li><li>• Second-Level: Internal Assessment, Investigation, or Review – A more detailed investigation and response are required, potentially involving support from Senior Management and/or the Ethics Team.</li><li>• Third-Level: External assessment, investigation, or review – This is a final level, involves an independent review conducted in conjunction with the Ethics Team.</li></ul> |

### Appendix 2 – Roles and responsibilities

| Role                          | Responsibility                                                                                                                                                                                                                                                                                                      |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Secretary</b>              | <ul style="list-style-type: none"><li>• Promote and enable a culture that values feedback, responds to complaints and uses these experiences to improve service delivery.</li><li>• Ensure the external service-related complaint policy, supported by guidelines, are established within the department.</li></ul> |
| <b>DCCEEW Leadership Team</b> | <ul style="list-style-type: none"><li>• Support the Secretary in promoting and enabling a culture that values feedback, responds to complaints and uses these experiences to improve service delivery.</li></ul>                                                                                                    |

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| <b>People Leaders</b>                                            | <ul style="list-style-type: none"> <li>• Ensure complaints are effectively managed and responded to in accordance with the department's external service-related complaints policy.</li> <li>• Encourage all employees to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li> <li>• Ensure their employees are trained in a range of skills such as empathy, problem solving, listening and common sense which enables them to effectively respond and address complaints.</li> <li>• Review reports on complaints and identify opportunities for improvements in service delivery outcomes.</li> <li>• Show commitment and support for managing unreasonable conduct.</li> </ul> |
| <b>Employees whose duties include the handling of complaints</b> | <ul style="list-style-type: none"> <li>• Respond to complaints in a timely fashion and treat all people with respect.</li> <li>• Ensure complaints are effectively managed and responded to in accordance with the department's external service-related complaints policy.</li> <li>• Provide feedback on issues arising from complaints and identify opportunities for improvements in service delivery outcomes.</li> <li>• Remain calm, listen carefully, and demonstrate empathy when receiving complaints.</li> </ul>                                                                                                                                                                                                              |
| <b>All employees</b>                                             | <ul style="list-style-type: none"> <li>• Understand and comply with the department's external service-related complaints policy.</li> <li>• Help people to make a complaint if needed and treat people with respect.</li> <li>• Remain calm, listen carefully, and demonstrate empathy when receiving complaints.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Director Audit &amp; Ethics</b>                               | <ul style="list-style-type: none"> <li>• Support the management and improvement of the external service-related complaint policy and related guidelines.</li> <li>• Promote awareness of the external service-related complaints policy and guidelines.</li> <li>• Work with business areas to identify opportunities for improvements in service delivery outcomes.</li> </ul>                                                                                                                                                                                                                                                                                                                                                          |

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| <b>Departmental Complaints Teams</b> | <ul style="list-style-type: none"> <li>• Coordinate the receipt and tracking of the department's responses to Business Unit specific complaints in compliance with this Policy.</li> <li>• Provide regular monthly reports to the Ethics team areas on complaints volume and trends.</li> <li>• Provide feedback to business areas on issues arising from complaints and opportunities for improvements in service delivery outcomes.</li> <li>• Implement internal escalation procedures for unresolved complaints.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Ethics Team</b>                   | <ul style="list-style-type: none"> <li>• Establish and maintain the department's external service-related complaint policy and related guidelines.</li> <li>• Coordinate the receipt and tracking of the department's responses for externally referred complaints from other Agencies (i.e. NSW Ombudsman's Office, Ministerial Complaints)</li> <li>• Train and assist business areas to resolve complaints promptly and in accordance with NSW Ombudsman requirements and department's external service-related complaint policy and its guidelines.</li> <li>• Provide regular quarterly reports to the ELT and ARC areas on complaints volume and trends.</li> <li>• Provide feedback to business areas on issues arising from complaints and opportunities for improvements in service delivery outcomes.</li> <li>• Implement internal escalation procedures for unresolved complaints.</li> </ul> |