

## Senate Standing Committee on Economics

### INQUIRY INTO NATIONAL CONSUMER CREDIT PROTECTION AMENDMENT (SMALL AMOUNT CREDIT CONTRACT AND CONSUMER LEASE REFORMS) BILL 2019 (NO. 2)

#### ANSWER TO QUESTION ON NOTICE

#### Services Australia

**Topic:** Certification Measures

**Question reference number:** IQ20-000002

**Member:** Jenny McAllister

**Type of question:** Written

**Date set by the committee for the return of answer:** 16 April 2020

**Number of pages:** 1

**Question:**

- a) What measures does Services Australia have in place to determine whether registered providers are providing “high cost but low value goods or services” or goods that “expose Customers to unacceptable risks of financial stress or exploitation”?
- b) Please table any internal departmental documentation which describes these measures.

**Answer:**

- a) Where Services Australia (the Agency) investigates complaints, third party tip-offs, or other information that may indicate that a business is offering goods, services or payment arrangements that are excluded from Centrepay, the Agency undertakes compliance activity, which involves:
  - **Ongoing eligibility** – a comprehensive check against the business’s obligations under the Centrepay Policy and Terms and regulatory frameworks.
  - **Consent** – seeking evidence that customer consent has been obtained and retained by the business.
  - **Receipts** – checks to ensure the full deduction amount has been applied to the customer’s account by the business. Also check the business has not passed on the Centrepay transaction fee to the customer.
  - **Trading Information** – ensuring the business still has the required licensing and accreditations; checking there have been no changes in the ownership arrangements and no changes to the provision of the contracted goods or services.
  - **Random check of customer deduction history** – this is to ensure businesses aren’t restarting customer deductions once they have been ceased by the customer.
- b) The Agency is not able to provide the Centrepay Assurance Framework as it would place the integrity of the Centrepay compliance program at risk. Services Australia follows the processes set out in this framework to identify potential fraud and to inform any actions the Agency may take. Access to this document is restricted to staff undertaking Centrepay compliance activities.

**Senate Standing Committee on Economics**

**INQUIRY INTO NATIONAL CONSUMER CREDIT PROTECTION  
AMENDMENT (SMALL AMOUNT CREDIT CONTRACT AND CONSUMER  
LEASE REFORMS) BILL 2019 (NO. 2)**

**ANSWER TO QUESTION ON NOTICE**

Services Australia

**Topic:** Monitoring

**Question reference number:** IQ20-000003

**Member:** Jenny McAllister

**Type of question:** Written

**Date set by the committee for the return of answer:** 16 April 2020

**Number of pages:** 1

**Question:**

Do the measures requested in (IQ20-000002) involve monitoring or random sampling?

**Answer:**

The measures include both targeted and random assurance reviews of Centrepay businesses.

## Senate Standing Committee on Economics

### INQUIRY INTO NATIONAL CONSUMER CREDIT PROTECTION AMENDMENT (SMALL AMOUNT CREDIT CONTRACT AND CONSUMER LEASE REFORMS) BILL 2019 (NO. 2)

#### ANSWER TO QUESTION ON NOTICE

##### Services Australia

**Topic:** Provider Complaints Process

**Question reference number:** IQ20-000004

**Member:** Jenny McAllister

**Type of question:** Written

**Date set by the committee for the return of answer:** 16 April 2020

**Number of pages:** 19

**Question:**

- a) Can people make a complaint about a registered provider that is in breach of Centrepay Policy and Terms?
- b) How would this be done?
- c) Please table any internal departmental documentation which describes complaint handling.

**Answer:**

- a) Yes.
- b) Individuals and organisations can submit a complaint with the agency relating to the Centrepay programme via the following channels:
  - o Online
    - Individuals can lodge a complaint via their registered MyGov account or submit feedback anonymously.
    - Organisations can lodge a complaint via the Business feedback and complaints section on the Services Australia website.
  - o Phone
    - Individuals and businesses can lodge a complaint with a Services Australia Service Officer over the phone on a dedicated complaint, suggestion or compliment line – 1800 132 468.
  - o Face to Face
    - Individuals and businesses can lodge a complaint in person with Services Australia at any of our face-to-face sites.
  - o Letter
    - Individuals and businesses can submit a complaint in writing to Services Australia; free postage applies if sent from within Australia.
- c) A copy of Services Australia's 'managing customer complaints and feedback' process is attached (refer to Attachment A).



# Australian Government

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## Services Australia

## Managing customer complaints and feedback 104-02000000

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### Background

This document outlines the complaints and feedback management process in Services Australia, including processes for compliments and suggestions. The document contains the Customer Complaints and Feedback Policy, Customer Complaints and Feedback Management Guidelines and complaint escalation reasons.

### On this Page:

#### Services Australia complaints and feedback

The agency receives and manages customer complaints and feedback consistently across each service delivery brand. The management process is governed by the Customer Complaints and Feedback Policy and the Customer Complaint and Feedback Management Guidelines. This information is on the [Process](#) page and clearly outlines the agency's approach to complaints and feedback.

#### Types of customer feedback

Feedback is a term used to reflect a complaint, compliment or suggestion.

**Complaint** - expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

**Compliment** - an expression of praise for a staff member, product or service provided by the agency. It is important to record and share compliments, recognising the high quality service we provide.

**Suggestion** - a proposal to consider improvement or change to a product or service, typically as a result of observation or experience.

#### Characteristics of a complaint

A complaint is made if:

- a person expresses dissatisfaction in relation to a product or service, and
- a response or resolution is explicitly or implicitly expected or legally required

A customer can complain about a service, process or decision of the agency over the phone, in writing, in person or via myGov.

A complaint can be made by:

- a customer - payer, payee, non-parent carer or employer
- a legal and/or authorised representative of a customer
- a member of the public
- individuals who are not customers of the agency, or
- an external stakeholder, for example a Member of Parliament or the Commonwealth Ombudsman, on behalf of a customer

The staff member taking the complaint is responsible for:

- confirming with the customer whether they are making a general enquiry or a complaint
- managing the customer's general enquiry by providing general information if possible

In this document:

- 'customer' refers to customers of the agency who lodge a complaint
- 'non-customer complaints' are made by individuals who are not customers of the agency

A complaint is not a review of the technical correctness of a decision. Customers need to pursue their review rights through the relevant channels such as agency appeal or objection processes, Administrative Appeals Tribunal (AAT).

## Principles of complaints and feedback management

**First contact resolution** means that the staff member who first receives a complaint takes ownership of that complaint and will investigate and attempt to finalise it. First contact resolution applies to all complaints including written complaints and complaints received online.

First contact resolution is about resolving the customer complaint or issue at the point of entry, addressing all out-standing issues and applying a collaborative approach with specialist areas when needed.

**Start-to-finish management by a complaints owner.** A staff member retains ownership of a complaint until it is finalised to agency satisfaction or is escalated to Level 2. If consultation with specialists is required, the staff member managing the complaint retains ownership of the complaint while consulting with relevant business owners and stakeholders to resolve issues.

It is important that customers know who in the agency is managing their complaint and who will respond to them.

Ownership is also about providing:

- acknowledgement of the customer's complaint
- details of the staff member managing the complaint
- a date the customer can expect to hear back from the staff member if their complaint issues cannot be addressed straight away

**A defined escalation process for priority or complex complaints.** Complaints that cannot be resolved at Level 1, or that meet one of the [complaint escalation reasons](#), are escalated to Level 2.

The Level 2 Team has expertise in dealing with complex and urgent customer complaints. When a complaint is escalated, the Level 2 Complaints Officer takes ownership and manages the complaint from start-to-finish.

**A business owner for all feedback policy, practice and key performance measures.** The Multicultural and Tailored Services Branch is responsible for the agency complaints and feedback management policy and procedures.

**A focus on business feedback and systemic issues resolution as an outcome of complaints.** Complaint information can provide a picture of weaknesses in policies, service or program delivery. Complaints can also point to a systemic administrative problem that could be repeated.

When complaints or feedback are recorded, regular reports are provided to business areas to enable trends and systemic issues to be identified and addressed.

## Complaints and feedback management process

The agency has 2 levels of complaint management. Customers are advised:

- which level their complaint is being investigated at (Level 1 or Level 2)
- the expected timeframe to finalise the matter, and
- subsequent escalation options should they remain dissatisfied with the outcome

### Level 1 complaint

This is the response to customers managed at first point of contact and includes complaints received:

- on the agency's Feedback and Complaints line
- via a general business queue
- in a service centre
- on an outbound call
- in writing including online

The Service Officer who receives the complaint takes ownership of the complaint and attempts to resolve it for the customer. This may require seeking support from a Service Support Officer (SSO), Technical Peer Support Officer, Team Leader or Manager.

For information about how to manage a Level 1 complaint, see [Level 1 complaints and feedback](#).

### Level 2 complaint

A complaint that cannot be resolved at Level 1 or meets a [complaint escalation reason](#) is managed as a Level 2 complaint.

For information about how to escalate a complaint to Level 2, see [Level 1 complaints and feedback \(CLK\)\(MED\)](#) or [Level 1 complaints - Child Support](#).

For information about how to manage a Level 2 complaint, see [Level 2 complaints](#).

The [Resources](#) page contains scenarios that show the differences and key indicators for feedback compared to appeals and general enquiries.

For more information, see [About Review of decision and appeals](#), [Reviewing Child Support decisions](#) or [Request for review of legislative debt decisions \(Medicare\)](#).

## Apologies

When a person feels wronged by the actions of a government agency, often what they want most is an acknowledgement and an apology. The value of a well-placed, sincere and timely apology should not be underestimated. It can take the heat out of a difficult conflict and lead to its early resolution. If there is an ongoing relationship with the agency, an apology can restore the person's trust in the agency. A willingness to apologise for an error also demonstrates an agency's openness to learning from its mistakes.

An apology for the way a customer feels or their perceived experience can support the resolution of a behavioural complaint. Acknowledging or validating someone's feelings or point of view without necessarily agreeing with their perspective can help build rapport and demonstrate empathy and care.

An effective apology will:

- admit the problem, to help the person feel heard and understood
- acknowledge that the agency was responsible, if that is the case
- explain to the person how the problem came about
- assure the person that the problem will not happen again, for example by explaining what processes the agency or service delivery brand (Centrelink, Child Support or Medicare) has put in place
- recognise that a person's real grievance may have an emotive element and be different from how their complaint was expressed

The Commonwealth Ombudsman publications, Better practice guide to complaint handling, and Better practice guide to managing unreasonable complainant conduct, both provide more information on how to deliver a meaningful and effective apology. The [Resources](#) page has links to both publications.

## Recording complaints, compliments and suggestions

Complaints, compliments and suggestions are recorded in:

- the Customer Feedback Tool, or
- Cuba

The **Customer Feedback Tool** is used by staff to report all Centrelink and Medicare complaints, compliments and suggestions.

For information about how to record complaints, compliments and suggestions in the Customer Feedback Tool, see [Recording customer complaints and feedback in the Customer Feedback Tool](#).

**Cuba** is used by staff to record Child Support complaints and compliments.

For information about how to record complaints and compliments in Cuba, see [Recording Child Support complaints and compliments in Cuba](#).

The [Resources](#) page contains information for all staff including information specific to complaints management in Centrelink and Medicare and Child Support. Links include Security incident reporting, intranet links and external websites such as the Office of the Australian Information Commissioner.

## Contents

[Level 1 complaints and feedback](#)

[Level 2 complaints](#)

[Complaints handling \(CS\)](#)

[Complaints about staff behaviour \(CLK\)\(MED\)](#)

[Recording customer complaints and feedback in the Customer Feedback Tool](#)

[Recording Child Support complaints and compliments in Cuba](#)

## Process

This page contains the Customer Complaints and Feedback Policy for Services Australia, the Customer Complaint and Feedback Management Guidelines, definitions used in the Policy and Guidelines and the complaint escalation reasons used to assess a complaint for its priority or complexity.

### On this Page:

## Services Australia Customer Complaints and Feedback Policy

Table 1

Section	Policy
<b>Our commitment</b>	<p>The agency is committed to delivering high quality services to our customers, and using complaints, compliments, and suggestions to improve service delivery.</p> <p>This policy describes the agency's approach for managing complaints, compliments and suggestions.</p>
<b>Key features</b>	<ul style="list-style-type: none"><li>• The agency uses a two level complaints and feedback management process</li><li>• Relatively simple complaints and all compliments and suggestions are expected to be finalised at Level 1, with more complex and sensitive matters escalated and finalised at Level 2 by specialist complaints staff</li><li>• Staff receiving a complaint should attempt to manage and resolve a complaint at the first point of contact. If the complaint cannot be immediately finalised, staff will retain ownership of the complaint while they seek the information, assistance or support they require to finalise it. The staff member is expected to manage and resolve the complaint from start-to-finish, unless the complaint is too complex, or one of the <a href="#">complaint escalation reasons</a> are met</li><li>• If a complaint is too complex to finalise, it should be escalated to Level 2 specialist complaints staff who will then manage the complaint from start-to-finish</li><li>• Staff will escalate complaints according to the <a href="#">complaint escalation reasons</a> which are regularly reviewed. An escalation can occur on first review of a complaint, or when the first outcome does not finalise the complaint</li><li>• Staff must acknowledge complaints and regularly update customers on the progress of their complaint until it is finalised</li><li>• Complaints made in person or over the phone should be acknowledged as they are received. Written complaints should be acknowledged within five working days</li><li>• The agency aims to finalise and respond to complaints within 10 working days. More complex complaints that require significant investigation may take longer to finalise</li><li>• If a complaint will take longer to respond customers should be updated about the progress of their complaint at least every five working days after acknowledgement of their complaint</li><li>• Centrelink and Medicare staff must record all information about complaints and feedback in the <a href="#">agency's central database for customer</a></li></ul>



	<p><a href="#">feedback</a>. Cuba is used by Child Support staff to record complaints and compliments. See <a href="#">Recording Child Support complaints and compliments in Cuba</a></p> <ul style="list-style-type: none"> <li>• If a customer is not satisfied with the response to their complaint, staff should advise them of their further escalation options both internal and external to the agency</li> <li>• Feedback will be provided to staff and business areas where there is an identified need to improve the service provided to customers</li> <li>• Compliments will be shared with staff to recognise the value of good service</li> <li>• Regular complaints reports will be made available to business areas to enable trends and systemic issues to be identified and addressed. Reports will also be tabled at Executive meetings to ensure accountability for complaints and issues impacting service delivery</li> </ul>
<p><b>Guiding principles</b></p>	<p>The agency subscribes to the fundamental principles of complaint handling as outlined in the Commonwealth Ombudsman's Better practice guide to complaint handling:</p> <ul style="list-style-type: none"> <li>• <a href="#">fairness</a></li> <li>• <a href="#">accessibility</a></li> <li>• <a href="#">responsiveness</a></li> <li>• <a href="#">efficiency</a></li> <li>• <a href="#">integration</a>, and</li> <li>• <a href="#">first contact resolution</a></li> </ul>
<p><b>Fairness</b></p>	<ul style="list-style-type: none"> <li>• The agency welcomes complaints, compliments and suggestions</li> <li>• All complaints will be treated on their merits and investigated impartially and thoroughly</li> <li>• Complainants will not be victimised or suffer negative consequences as a result of their complaint</li> <li>• Complaints will be managed transparently, and complainants kept informed about the progress and result of investigations</li> <li>• A complainant's privacy will be respected, and staff will investigate complaints discreetly in accordance with Information Access Policy</li> <li>• Written complaints that contain obscene or offensive content may be returned to the complainant to remove offending content and resubmit. If a complainant refuses to remove <a href="#">offensive or obscene content</a> from a complaint the agency may refuse to accept it and consider alternative servicing options</li> <li>• Complaints received via the phone or in person where the customer's behaviour is unacceptable or hostile, that creates an intimidating, frightening or offensive situation in the workplace should be managed in accordance with the agency's Customer aggression guidelines. See the <a href="#">Resources</a> page for a link to the Customer aggression guidelines homepage</li> <li>• The agency will ask customers to be respectful and courteous to staff and explain that this assists us to meet our service commitments. See the <a href="#">Resources</a> page for a link to Our service commitments</li> </ul>
<p><b>Accessibility</b></p>	<ul style="list-style-type: none"> <li>• The agency will make it easy to lodge complaints and provide compliments or suggestions</li> <li>• The agency will accept complaints and feedback via a range of channels</li> </ul>

	<ul style="list-style-type: none"> <li>• When appropriate and available, customers and complainants will be communicated with about their complaint or feedback over the phone</li> </ul>
<b>Responsiveness</b>	<ul style="list-style-type: none"> <li>• The agency will be responsive to complainants who have special needs and offer measures to assist them in making a complaint or providing feedback</li> <li>• The agency will ensure that staff are alert to the needs of vulnerable complainants and have support to manage complaints in a manner that is considerate of those needs</li> <li>• The agency will act professionally at all times</li> <li>• The agency will balance the needs of staff with the needs of complainants. Alternative servicing options may be implemented for customers that continue to behave in an unreasonable manner or inappropriately towards staff</li> <li>• The agency will actively monitor social media channels to alert us to customer complaints and suggestions. We will use this feedback to provide the agency with early intelligence about service delivery or policy issues and escalate accordingly</li> </ul>
<b>Efficiency</b>	<ul style="list-style-type: none"> <li>• The agency will apply a two level approach to complaint management to ensure its response is proportionate and appropriate</li> <li>• The agency will attempt to finalise complaints as quickly as possible at the first point of contact. The priority and complexity of a complaint will determine whether it is escalated to specialist complaints handling staff</li> <li>• The agency will not respond to repeated contact from complainants about the same issue, where the previous complaint was comprehensively investigated and responded to</li> <li>• Complainants are able to raise their issues and/or concerns in other forums, such as with the Ombudsman, their Member of Parliament or with the Minister's Office, if they remain dissatisfied with the agency's response</li> <li>• Complaints and feedback information and responses to customers will be subject to a Quality Assurance process in accordance with the agency's Quality Framework. See the <a href="#">Resources</a> page for a link to the Quality Framework and Resources homepage</li> </ul>
<b>Integration</b>	<ul style="list-style-type: none"> <li>• The agency will access its collective skills, knowledge and experience to finalise complaints and provide complainants with an explanation of what has occurred</li> <li>• The agency will collaborate across divisions and teams to resolve complaints for the benefit of the customer</li> <li>• When required and agreed to by the complainant, the agency will collaborate with other Australian Government agencies to resolve complaints without the complainant needing to contact both organisations</li> <li>• The agency will use complaints, suggestions and compliments to improve service delivery. This includes the provision of feedback to the business or programme and to service delivery staff</li> <li>• The agency will report volumes, reasons, and strategies used to address root causes of complaints in its annual report</li> <li>• Responsibility for complaints and feedback management policy and procedure will be centralised within the Multicultural and Tailored Services Branch</li> </ul>

<b>First Contact Resolution</b>	Complaints will be investigated and finalised end to end from the first point of contact where possible. Ownership of the complaint remains until it is either finalised to the agency's satisfaction or it is escalated to a specialist Complaints Officer.
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## Services Australia Customer Complaint and Feedback Management Guidelines

Category title	Description
<b>Overview</b>	<p>These guidelines provide support for the application of the Customer Complaint and Feedback Policy and detail the major aspects of receiving, assessing, managing and finalising complaints and feedback.</p> <p>Complaints and feedback are everyone's responsibility, and everyone within the agency is authorised to finalise them. Any staff member receiving a complaint should try to finalise it at the first point of contact. If the complaint cannot be immediately finalised, staff should retain ownership of the complaint until it is either finalised or further escalated to Level 2. This includes if assistance is required from senior staff or Subject Matter Experts (SMEs).</p> <p>Complaints, compliments and suggestions lodged via the agency's official complaints and feedback channels will be received by staff with a skill-set in complaints and feedback handling in each of the service delivery brands.</p> <p>The agency's Multicultural and Tailored Services Branch is responsible for all policy and procedures related to customer complaints and feedback, and the management of all Level 2 complaints.</p> <p>Complaints alleging unauthorised access and/or disclosure of information or internal fraud will be referred to the Internal Fraud Control and Investigations Branch. See the <a href="#">Resources</a> page for a link to the Reporting suspected incidents of fraud or unauthorised access homepage. Complaints alleging customer fraud will be referred to the Serious Non-Compliance Branch. The allegations will then be managed under the fraud investigation procedures for these Branches.</p> <p>Where a complaint is considered urgent or high profile it may need to be escalated to the Secretary, Executive and Minister's Office. This escalation will occur within the Level 2 Complaints Team in accordance with the agency's Escalation Coordination Policy. See the <a href="#">Resources</a> page for a link to the Escalation Coordination Team homepage for information about the policy.</p>
<b>Receiving a complaint, compliment or suggestion</b>	<ul style="list-style-type: none"> <li>• Using the definitions contained within this policy, staff are expected to determine whether the customer is making a complaint or general enquiry, or providing a compliment or suggestion</li> <li>• In making a determination, staff should also consider the following criteria to assess whether a customer is making a complaint or a general enquiry: <ul style="list-style-type: none"> <li>○ The manner in which the customer communicates or expresses the issue/s,</li> <li>○ The urgency of the issue/s raised,</li> <li>○ The potential or actual impact of the identified issue/s on the customer, and</li> <li>○ Prior or ongoing attempts at resolution through regular business processes</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Customers are entitled to make complaints or provide feedback anonymously. Staff will not record identifying details of customers who wish to remain anonymous. Where possible staff will confirm with the customer if and how they want to be advised of the complaint outcome. Customers who lodge anonymous complaints will be advised that it may be difficult to conduct a full investigation without knowing the identity of a complainant</li> <li>• Staff will be alert and flexible to the needs of vulnerable customers. This includes allowing authorised third parties to make complaints and act on behalf of others</li> <li>• All compliments and suggestions provided to the agency via phone or in person should be acknowledged by the staff member who receives them and the customer informed their feedback will be shared with the relevant staff and business owners. Compliments and suggestions provided online are acknowledged at the time of lodgement. Compliments and suggestions provided online or in writing from customers will be shared with relevant staff and business owners</li> <li>• When a complainant expresses intent to go approach the media about their complaint, staff must alert the agency's media section. If the customer advises they have been to the media the case should be escalated to specialist complaints staff</li> <li>• Customers who provide complaints and suggestions via the agency's social media channels will be responded to and encouraged to provide details so we can provide a tailored response to finalise their complaint. In the absence of personal details, a social media complainant will be provided with a general response</li> <li>• If a complaint is provided to the agency via phone or in person, staff are expected to acknowledge receipt of the complaint during the initial contact and attempt to finalise it</li> <li>• If a complaint is received via a written or an online channel, including social media, where automatic acknowledgement is not available, the staff member who receives the complaint must contact the customer to acknowledge receipt of the complaint within five working days and attempt to finalise it</li> <li>• During any initial contact with a customer, including when the customer first provides their complaint or feedback, staff are expected to manage the customer's expectations. This includes providing details about the complaints and feedback management process, timeframes for investigating a complaint, asking about the remedy the customer is seeking and advising what can and cannot be done</li> <li>• Staff should take the time to record all complaints and feedback as a method of highlighting weakness and improving service to customers. All customer complaints and feedback must be recorded in the agency's central database for customer feedback</li> </ul>
<p><b>Complaint assessment</b></p>	<ul style="list-style-type: none"> <li>• Staff should take a holistic approach to complaint assessment and consider the complainant's issues as well as any other relevant concerns the staff member identifies. This includes any issues that have not been identified by the customer but could impact on or contribute to their dissatisfaction</li> <li>• Staff will assess complaints for priority or complexity by referring to the <a href="#">complaint escalation reasons</a>, and then decide whether the complaint can be finalised at first contact or if it needs to be escalated to a specialist Complaints Officer (for contact details, see Warm transfer customers to Level 2 - Escalated Complaints and Feedback team in <a href="#">Complaints</a>). Staff should also assess if complaint issues require investigation after the first</li> </ul>

	<p>contact, and manage the customer's expectations regarding what will happen and when</p> <ul style="list-style-type: none"> <li>• Any complaints originating from the Commonwealth Ombudsman, the Minister, Members of Parliament, directed to the agency's Executive branch, should be escalated for management by specialist complaints staff</li> <li>• If a complaint is about the age, sex, religion, race, sexual orientation, gender identity, intersex status, marital or any other personal characteristic (perceived or known) of agency staff, staff must treat it with sensitivity and with regard to anti-discrimination principles</li> <li>• Complaints about the actions, management, or conduct of a staff member handling a complaint must be escalated for independent investigation. If the complaint is about a staff member the complaint should be escalated to the staff member's manager or a specialist complaints staff member</li> </ul>
<b>Planning</b>	<ul style="list-style-type: none"> <li>• When a complaint cannot be finalised at the first point of contact, staff should document what needs to be done to finalise the complaint. This includes, but is not limited to, the issue to be investigated, any steps involved, whether more information is required, the remedy the customer is seeking, and any special considerations</li> <li>• Staff must document all details of their plans for investigation on the complaint record in the agency's central customer feedback database including any commitments provided to customers</li> <li>• Staff should update their plans when an investigation progresses and new information becomes available</li> </ul>
<b>Investigation</b>	<ul style="list-style-type: none"> <li>• Staff must treat a complaint on its merits and undertake an investigation proportionate to the assessment of the complaint and the severity of the issues presented</li> <li>• Staff should use all resources available to them in an attempt to finalise a customer's complaint. This includes reference material and assistance from Subject Matter Experts (SMEs) and/or a Team Leader</li> <li>• During an investigation, staff should contact a complainant to update them about the progress and status of their complaint, where additional information is required, or when adverse or conflicting information is presented</li> <li>• Staff must document all details of their investigation and any related decisions on the complaint record in the agency's central customer feedback database</li> </ul>
<b>Response</b>	<ul style="list-style-type: none"> <li>• Staff should inform complainants of any findings in relation to the issues raised in a complaint and advise when a complaint is finalised. This advice should be provided in accordance with agency guidelines on disclosure of information. See the <a href="#">Resources</a> page for a link to details on disclosure of information on the Your right to privacy website page</li> <li>• Staff should tailor responses to meet the needs of individual complainants, and offer a remedy to complaint issues that is appropriate in the circumstances</li> <li>• In instances where a mistake is made, or service standards are not met, staff should offer an apology</li> <li>• Staff should clearly explain any remedies provided or offered to the customer, including information or an apology. If no remedy is appropriate or available, the staff member will explain this to the customer</li> </ul>

	<ul style="list-style-type: none"> <li>• If a customer remains dissatisfied with the response or the remedy provided or offered to finalise their complaint, staff should advise them of their further escalation options within the agency and external such as the Commonwealth Ombudsman. For contact details, see Warm transfer customers to Level 2 - Escalated Complaints and Feedback team in <a href="#">Complaints</a></li> <li>• Complaints about the actions, management, or conduct of a staff member handling a complaint should be escalated to specialist complaints staff or the staff member's manager if the initial response does not resolve the complaint. Customers should be informed that we cannot advise them of the outcome of these investigations but that we value feedback provided by customers</li> </ul>
<p><b>Business improvement</b></p>	<ul style="list-style-type: none"> <li>• Staff should proactively identify systemic issues and complaint trends impacting on the service the agency provides to customers. Staff are expected to report systemic issues at the earliest opportunity</li> <li>• Staff will record information about complaints and feedback in a centralised database for customer feedback. Reports from this database will be provided to business owners to enable them to identify complaint trends, consider suggestions, and review all compliments</li> <li>• When there is evidence that a service or policy affecting a customer could be improved as the result of a complaint, the person managing the complaint should provide constructive and respectful feedback about the issues identified to increase individual and organisational capability and improve customer service</li> </ul>
<p><b>Responsibility</b></p>	<p><b>All staff responsibility</b></p> <ul style="list-style-type: none"> <li>• Staff are expected to adhere to this policy and follow any procedural and process instructions related to complaints and feedback management</li> <li>• Staff are expected to explain to customers how they can make a complaint or provide feedback, acknowledge and record all complaints and feedback when they are received, and ensure that responses are provided in a timely manner</li> <li>• Staff are responsible for attempting to finalise complaints and feedback at the first point of contact. This includes seeking technical and/or leadership assistance where necessary, being aware of guidelines for escalating more complex or sensitive issues, acknowledging and responding to complaints and feedback and apologising when appropriate to complainants</li> <li>• Staff are expected to provide relevant and timely business feedback about behavioural complaints, systemic issues and opportunities to improve service to customers</li> <li>• Staff will treat complaints about the behaviour of other staff or contractors in the strictest of confidence</li> </ul> <p><b>Management responsibility</b></p> <ul style="list-style-type: none"> <li>• Managers are expected to promote a positive and transparent complaint and feedback culture, actively discussing complaint reports with individual staff and in the team environment and support staff to prioritise complaint resolution</li> </ul>

	<ul style="list-style-type: none"> <li>Managers are responsible for evaluating business feedback about behavioural complaints and working with staff to develop their skills in service delivery</li> <li>Managers are expected to be actively involved in the ongoing review and evaluation of the complaint management process, applying their knowledge, skills and experience to enhance service delivery by escalating potential systemic issues and opportunities for improvement</li> </ul> <p><b>Executive responsibility</b></p> <ul style="list-style-type: none"> <li>The Executive will make complaint handling a priority, and be accountable under the Quality Framework for promoting and maintaining a customer centric focus in an environment of continuous improvement</li> <li>The Executive will lead by example, collaborate on and be responsible for systemic issues, drive improvement initiatives, apologise when appropriate, encourage innovation and the discussion of ideas, and provide clarity around business ownership of products and services</li> <li>The Executive will ensure that processes for management of external complaints and Executive correspondence are observed, and ensure that responses are provided in a timely manner</li> </ul> <p><b>Customer and complainant responsibility</b></p> <ul style="list-style-type: none"> <li>Complainants are expected to use respectful and courteous language, free from abusive, offensive and threatening comments in the complaints or feedback they provide</li> <li>Customers and complainants are expected to provide the agency with all relevant information about their feedback or complaint to assist with resolution of their issues</li> </ul>
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## Definitions of terms used in the Customer Complaints and Feedback Policy

Term	Description
<b>Acknowledge</b>	Informing a customer that the agency has received their complaint, compliment or suggestion and what the next steps are in the complaints and feedback management process.
<b>Behavioural complaint</b>	A complaint about the manner in which an individual staff member interacted with a customer or complainant.
<b>Channel</b>	The avenue through which the agency receives or responds to a complaint.
<b>Complainant</b>	The person or organisation that has lodged the complaint or provided feedback.
<b>Complaint</b>	An expression of dissatisfaction in relation to a product or service, where a response or resolution is explicitly or implicitly expected or legally required.
<b>Complexity</b>	An evaluation of a complainant's circumstances and/or the issues complained about that will determine whether the complaint is managed at Level 1 or Level 2.
<b>Compliment</b>	An expression of praise for a staff member, product or service provided by the agency.

<b>Agency's satisfaction</b>	An investigation has been completed, the customer has been informed of the result, an appropriate remedy has been provided and the customer has had an opportunity to respond.
<b>Dissatisfaction</b>	The customer's expectations are not met and they use normal business channels to request more information, provide information, or request for a change to a decision.
<b>Feedback</b>	A complaint, compliment or suggestion regarding the agency's policies, procedures, products, service delivery or systems.
<b>Feedback to the business</b>	Information provided back to the business in circumstances where an opportunity to improve service to customers is identified.
<b>First contact resolution</b>	The staff member who first takes ownership of the complaint will investigate and attempt to finalise the complainant's issues.
<b>Finalised</b>	A complaint has been investigated, responded to and resolved to the agency's satisfaction.
<b>Findings</b>	The factual end product of the investigation as communicated to the complainant.
<b>General enquiry</b>	Contact from a customer not intended as feedback or a complaint to the agency.
<b>Level 1 complaint</b>	A complaint that does not meet the escalation threshold and that can be finalised at first contact.
<b>Level 2 complaint</b>	A complaint that meets the priority and complexity threshold articulated in the escalation reasons for management by specialist staff.
<b>Ownership</b>	The person who receives a complaint or feedback has a responsibility to manage the complaint, compliment or suggestion from end to end until it is finalised. Ownership of a complaint should only transfer upon escalation.
<b>Remedy</b>	The result or response sought by the complainant and/or provided by the agency.
<b>Sensitivity</b>	A special circumstance and/or issue complained about that will determine whether the complaint is managed at Level 1 or Level 2.
<b>Service delivery</b>	The process by which a customer or complainant receives or accesses the agency's services.
<b>Start-to-finish</b>	The process by which a Level 1 or Level 2 officer who receives a complaint takes ownership of it, manages it and investigates it until it is finalised to the agency's satisfaction.
<b>Suggestion</b>	A proposal to consider improvement or change to a product or service, typically as a result of observation or experience.
<b>Systemic issues</b>	A problem or error that has the ability to reoccur and impact business if it is not addressed. They have the potential to affect a customer base, business area, product or service, or the agency as a whole.
<b>Timely</b>	Action has been taken within the agency's specified timeframes for complaints and feedback.
<b>Unreasonable complainant behaviour</b>	Includes unreasonable persistent contact, demands or arguments that may be in the form of complaints to or about the agency, or more general correspondence or interactions. Actions are generally deliberate, and individuals may be uncooperative and/or aggressive when communicating their issues with the agency.



## Complaint escalation reasons used to assess a complaint for its priority and complexity

Escalation reason	Description
1	<p><b>Ombudsman complaint</b></p> <p>The complaint originates through contact from the Commonwealth Ombudsman, including both warm-transferred complaints and investigations pursuant to section 8 of the Ombudsman Act 1976.</p>
2	<p><b>Member of Parliament/Ministerial and Executive correspondence</b></p> <p>The complaint is received into the agency by way of a Member of Parliament (MP), the Minister, or via the agency's Executive branch, either verbally or in writing.</p>
3	<p><b>Complaint is fundamentally sensitive</b></p> <p>The complaint involves an urgent or high profile issue that could adversely affect the reputation of the agency or where the agency's actions may have or could harm a vulnerable customer.</p> <p>Complaints of this kind will require detailed investigation, intensive management and unique responses.</p> <p>Examples include but are not limited to:</p> <ul style="list-style-type: none"> <li>• allegations that the agency's actions have caused harm to a person, or a person to harm themselves or another person</li> <li>• a complaint from a customer who is in the process of taking legal action against the agency</li> <li>• a complaint about service received from or actions taken by the agency following a bereavement</li> <li>• a complaint from a customer with a terminal illness</li> <li>• a complaint about a decision with impacts on a vulnerable customer</li> <li>• a complaints about the recording of gender identity or a transgender, intersex or non-binary issue</li> <li>• a complaint from a customer receiving Farm Household Allowance</li> </ul> <p>The Level 2 Complaints Team will manage these complaints and escalate in accordance with the agency's Escalation Coordination Policy. See the <a href="#">Resources</a> page for a link to the Escalation Coordination Team homepage for information about the policy.</p>
4	<p><b>Potential serious breach of APS Code of Conduct or allegations of fraud, unauthorised access or disclosure of information</b></p> <p>The complaint includes allegations of a breach of the APS Code of Conduct, including threats of retribution, discrimination or other serious staff misconduct.</p> <p>The complaint may also include allegations of staff accessing or disclosing information without authority, committing fraud and/or allegations of fraud being committed by a customer.</p> <p>Complaints of this type are likely to require impartial investigation by qualified staff and may take an extended period of time. The Level 2 Complaints Team will escalate these complaints in</p>

	accordance with the agency's code of conduct investigation procedures. See the <a href="#">Resources</a> page for a link to the Conduct and Behaviour policy homepage for more information.
5	<p><b>Complex, cross programme or multiple issues</b></p> <p>The complaint includes multiple, less routine issues, that require investigation and liaison beyond merely seeking technical support or guidance from a Team Leader.</p> <p>The complaint may involve several of the agency's service brands or programmes or another agency, and achieving an outcome will require investigation and liaison within and between service brands. It includes complaints with cross agency issues.</p>
6	<p><b>Evidence of media involvement</b></p> <p>The complainant has told us that they have been in contact with a media outlet about their complaint, or the media outlet contacts the agency directly about a customer complaint. The agency has established protocols for managing media escalations and enquiries, requiring significant co-ordination and intensive management. See the <a href="#">Resources</a> page for a link to the Media protocols homepage.</p>
7	<p><b>Persistent unreasonable complainant behaviour</b></p> <p>The complainant displays behaviour that requires more intensive management in order to progress and resolve the complaint. <a href="#">Unreasonable complainant behaviour</a> includes:</p> <ul style="list-style-type: none"> <li>• unreasonable persistence</li> <li>• unreasonable demands</li> <li>• unreasonable lack of cooperation</li> <li>• unreasonable arguments</li> <li>• unreasonable behaviour</li> </ul> <p>Consider this complaint escalation as an option after the application of the Customer aggression guidelines and referrals to social workers for vulnerable customers have been made. Talk to a Manager or Team Leader about any incidents of customer aggression and for advice about reporting and support. See the <a href="#">Resources</a> page for a link to the Customer aggression guidelines homepage.</p>
8	<p><b>Refusal to accept first contact outcome</b></p> <p>The Level 1 complaint owner has investigated the complaint and is satisfied that they have provided an appropriate outcome, however the complainant continues to disagree with the outcome and requests that their complaint be escalated.</p>

## References

Links to the Federal Register of Legislation site point to a 'Series' page which lists all available historical versions. Navigate to the appropriate legislative reference(s) listed below by selecting the 'Latest' compilation at the top of the list.

[Age Discrimination Act 2004](#)

[Australian Human Rights Commission Act 1986](#)

[Disability Discrimination Act 1992](#)

[Privacy Act 1988](#)

[Ombudsman Act 1976](#)

[Racial Discrimination Act 1975](#)

[Sex Discrimination Act 1984](#)

## Resources

This page contains resources to help staff in Services Australia manage customer complaints, compliments and suggestions. Links on this page may be unavailable to external audiences.

### On this Page:

## Differences between a complaint and an appeal or objection

This table shows contains scenarios that show the differences between a complaint and an appeal/objection and key indicators to look for.

<b>Scenario</b>	<b>Complaint or appeal/objection?</b>	<b>Indicators keywords or factors</b>
A customer disagrees with a decision and requests that the decision be reviewed.	Appeal/objection	disagree, decision, review, appeal, objection
A customer is dissatisfied with the decision making process and the length of time taken to make a decision.  The customer understands/agrees with the decision, but is dissatisfied with the outcome and or process including service provided by staff or delays in appeal.	Complaint	understands/agrees (decision), dissatisfied, outcome, process, rude, delayed, etc.
A customer is dissatisfied with a decision, and believes we have made a mistake.  The customer does not understand how the decision was made, feels that nothing has been explained, the service provided was rude and judgemental and that not all information was fully considered. The customer disagrees with the decision.	Both appeal/objection and complaint.	dissatisfied, decision, mistake, information not considered, disagrees
A customer has an appeal/objection in progress and is dissatisfied with the length of time it is taking to complete	Complaint	appeal/objection in progress, dissatisfied, length of time taken, up

the review. The customer is also upset about the content of a letter received, the review, and the manner of the staff member when contacted to discuss the letter.		
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## Security incident reporting

[Security incident reporting](#)

## Intranet links

[Tell us what you think](#)

[Customer complaints and feedback management](#)

[Customer aggression guidelines homepage](#)

[Media protocols](#)

## Services Australia Website

[Our service commitments](#)

[Your right to privacy](#)

## Contact details

[Complaints](#)

## External websites

[Commonwealth Ombudsman - Better practice guide to complaint handling](#)

[Commonwealth Ombudsman - Better practice guide to managing unreasonable complainant conduct](#)

[Ombudsman New South Wales - Apologies - A practical guide](#)

## Training & Support

This page contains training information. Links on this page may be unavailable to external audiences.

### Training packages

Add the course number to the **Search** field in the [Learning Portal](#) (LMS) in ESSentials:

- **DHS00095** - Complaints and Feedback

## **Virtual training packages**

Virtual classroom training for staff in service delivery areas on how to manage complaints and feedback and use the Customer Feedback Tool.

[Complaints and Feedback training](#)

## Senate Standing Committee on Economics

### INQUIRY INTO NATIONAL CONSUMER CREDIT PROTECTION AMENDMENT (SMALL AMOUNT CREDIT CONTRACT AND CONSUMER LEASE REFORMS) BILL 2019 (NO. 2)

#### ANSWER TO QUESTION ON NOTICE

#### Services Australia

**Topic:** Centrepay Investigations

**Question reference number:** IQ20-000006

**Member:** Jenny McAllister

**Type of question:** Written

**Date set by the committee for the return of answer:** 25 March 2020

**Number of pages:** 1

**Question:**

- a) How many investigations into breaches of Centrepay Policy and Terms occurred in 2018-19, and 2019-2020 to date?
- b) What were the outcomes of each investigation?
- c) Can you identify an example where a provider was found to be in breach of the criteria in Centrepay Policy and Terms listed above?

**Answer:**

- a) In the 2018-19 financial year, 179 compliance audits into potential breaches were completed.

In the 2019-20 financial year up until 31 December 2019, 236 compliance audits into potential breaches have been completed.

- b)

	2018-19	2019-20 (to 31 December 2019)
Compliant	49	39
Non-compliant	130	197

Business obligations are contained in the Centrepay Policy and Terms. Non-compliance can be found for varying reasons. Corrective action may include:

- Education and Support
  - Suspension
  - New terms or additional conditions on their approval
  - Withdrawal of their approval, or
  - Referral to regulators or law enforcement agencies
- c) An example of where the Agency has rejected Centrepay business applications include businesses undertaking door-to-door sales in remote Indigenous communities.