



Client Complaints Management Policy and Procedures

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Maintained by:	Content and Client Services
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1 Authority

State Librarian and Chief Executive Officer.

2 Responsibilities

In line with section 6.4 of the *AS 10002:2022 Guidelines for complaints management in organisations* and section 264 of the *Public Sector Act 2022*, the State Librarian and Chief Executive Officer is responsible for State Library of Queensland's Client Complaints' Management System. In addition, the Senior Management Team, the Client Complaints Manager, people leaders and all staff have responsibilities with regard to handling complaints. Roles and responsibilities regarding the management of complaints are assigned with reference to *AS 10002:2022 Guidelines for complaints management in organisations*.

The Coordinator, Library and Client Services performs the role of State Library's Complaints Manager for complaints and feedback received from clients. The Client Complaints Manager is responsible for managing complaints received in relation to all client-facing activities. If the Client Complaints Manager identifies that a complaint is best handled by a team or branch with expertise relevant to the complaint, they will liaise with the relevant team to reach an outcome. If a client complaint is in relation to an employee, the Client Complaints Manager will liaise with the Director, People and Culture on how best to manage the complaint.

3 Policy Statement

State Library welcomes feedback and complaints to assist with continual improvement of service delivery. State Library is committed to ensuring that anyone using the library's services can make a complaint and will have that complaint addressed within a reasonable timeframe and in a fair, accountable and transparent way.

4 Purpose

The Policy and Procedures describe the principles and processes that will be used by State Library in managing client complaints in line with section 264 of the *Public Sector Act 2022* and *AS 10002-2022 Guidelines for complaints management in organisations*, and with reference to the

5 Scope

This policy and associated procedures apply to client complaints received in relation to State Library services and staff.

The Client Complaints Management Policy does not replace or interfere with legislation or policy dealing with complaints about privacy, right to information, official misconduct or maladministration, criminal conduct or illegality, or matters specifically dealt with through other legislative and/or appeal processes.

6 Definitions

WORD	DEFINITION
Complaint	An expression of dissatisfaction made, by a person who is apparently directly affected, to or about the State Library relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
Complaint Management System (CMS)	All aspects of the policies, procedures, practices, staff, hardware, and software used by State Library for the management of complaints.
Complainant	The person, organisation or its representative making a complaint.
Complaints Manager	The Coordinator, Library and Client Services performs the role of State Library's Complaints Manager for complaints and feedback received from clients. This role is responsible for managing client complaints received in relation to all client-facing activities of State Library.
Client	The organisation or person that receives a product or service.
Feedback	An opinion, comment, suggestion, compliment or expression of interest or concern about State Library related to its products, services or the actions of State Library's staff.

7 Principles for managing complaints

When applying this policy, the State Library will act and make decisions in a way that is compatible with human rights and give proper consideration to all human rights relevant to a decision as required by the *Human Rights Act 2019*.

	State Library will:
Ensure the complaints process is easy and accessible for clients	<ul style="list-style-type: none">• provide clear information about how to make a complaint and how complaints are managed• publish the Client Complaints Management Policy and Procedures on the State Library website• provide reasonable assistance to clients in making complaints and providing feedback.
Be responsive and accountable	<ul style="list-style-type: none">• record, track, acknowledge and process complaints in a timely manner• actively communicate progress to the complainant about the process, timeframes and possible outcomes of the

	State Library will:
	<p>complaint and any other necessary information</p> <ul style="list-style-type: none"> • ensure that communication provided at all stages of the management of the complaint is clear, detailed and meaningful • advise complainants, as soon as practicable, where State Library is unable to deal with either part or all of their complaint. • advise clients of their internal and external review options • report our actions and decisions relating to complaints as required internally and externally.
Consideration of complaints	<ul style="list-style-type: none"> • manage complaints impartially and deal with them fairly, respectfully, consistently and in accordance with the principles of natural justice and without actual or perceived conflicting interests. • take all reasonable steps to ensure that a complainant is not adversely affected
	<ul style="list-style-type: none"> • protect the rights of complainants and State Library officers where they are the subject of a complaint • not investigate a complaint found to be abusive, trivial, or vexatious.
Confidentiality	<ul style="list-style-type: none"> • deal with complaints confidentially to the extent possible and in accordance with the <i>Information Privacy Act 2009</i> and the <i>Right to Information Act 2009</i>.
Continuous improvement	<ul style="list-style-type: none"> • use feedback and complaints as a tool for continuous improvement • provide feedback and complaints related reports to areas of the State Library to inform continuous improvement including two reports annually to State Library Executive Management Team • ensure adequate Client Complaints Management Policy and Procedures training is provided annually to staff involved in the management of complaints.
Reporting	<ul style="list-style-type: none"> • ensure the State Library's client complaints' data is published to the Queensland Government's Open Data portal annually in accordance with the s 264 of the <i>Public Sector Act 2022</i>.

8 How to make a complaint

If required, State Library will offer practical assistance and support to people who may experience difficulty and who wish to make a complaint. Complaints may be made verbally, in writing and online. Complainants are encouraged to submit their complaint online. Complaints may also be made as follows:

- online via the Tell-Us web form found at: <http://www.slq.qld.gov.au/about-us/contact-us>
- in person via staff members at service points
- by phone by calling 3840 7666 (Mon to Thurs, 10am-8pm, Fri to Sun 10am-5pm) and advising that you wish to make a complaint
- in writing to State Library of Queensland Complaints, PO BOX 3488, South Brisbane, QLD, 4101
- via State Library's official social media channels

Clients wishing to make a complaint in person are advised that due to the nature or complexity of the complaint, an outcome may not be immediately available and may require follow up by the appropriate staff member or people leader.

Recording of complaints

Records of all complaints received are recorded in accordance with State Library's Client Complaints' Management System. Correspondence and other details surrounding complaints will also be recorded. At a minimum, the record of the complaint will identify the following:

- a) The complainant's identity and contact information (where provided)*
- b) Issues raised by complainant
- c) The outcome sought by the complainant
- d) Any other information needed to properly respond to the complaint
- e) Any support requirements needed by the complainant.

Complaints made anonymously will be recorded and assessed as per this Policy and Procedure.

Some complaints may be made directly staff where it may not be practicable for them to record the complaint at the time (e.g. front-of-house staff). In these instances, the complaint need not be recorded if:

- a) The complaint is appropriately addressed through immediate discussion, or
- b) Staff provide the client with appropriate details for making a complaint to the organisation.

Assessment and resolution

State Library will acknowledge receipt of all client complaints within 3 working days of their receipt. State Library will then aim to respond to any complaint within 7 working days

State Library aims to finalise the outcome of complaints as quickly as possible, and will use mediation, negotiation and informal resolution where appropriate.

State Library will seek early resolution to complaints at the first point of contact where possible.

If a complaint cannot be managed at first contact or is more serious or complex, the complaint will go through a process of internal assessment and resolution.

State Library will handle all complaints fairly and with due regard to the rights of staff and clients. Principles of natural justice and consideration of human rights apply to the management of complaints.

Unreasonable complainant conduct

There may be instances when a complainant's conduct may be considered unreasonable. These might include:

- Unreasonable lack of cooperation e.g., providing disorganised, excessive, or irrelevant information, or unwillingness to consider other viewpoints
- Unreasonable arguments e.g., unreasonable arguments such as holding theories unsupported by evidence or illogical interpretation of facts or laws
- Unreasonable behaviour e.g., aggression, threats, behaviour that infringes upon the safety and security of others. This may be experienced face-to-face or over other communication channels such as email and telephone (refer to Responsible Client Conduct Policy)
- Unreasonable persistence e.g., refusal to accept a final decision and persisting with issues despite advice and all avenues of review have been exhausted

- Unreasonable demands e.g., seeking resolution of issues beyond the scope of the original complaint or insisting on outcomes that are unattainable.

If a complaint is lodged that may be considered vexatious, trivial or unreasonable, the complaint will be referred to an Executive Director or State Librarian for assessment. If the Executive Director or State Librarian considers the complaint to be vexatious, trivial or unreasonable, no further action is required, and the complainant is advised that no further action will take place.

Internal review

If a complainant is dissatisfied with the outcome of their complaint or the way in which the complaint was managed, they may seek an internal review by a senior State Library officer. On receipt, the State Library will conduct an internal review of the processes taken to arrive at the original outcome and to determine if further information regarding the decision or any suitable alternative outcomes can be provided.

An internal review will be conducted by an officer other than the officer who handled the original complaint and will be overseen by an Executive Director or by the State Librarian and Chief Executive Officer.

As with communication to the complainant regarding assessment and resolution, advice to the complainant regarding the progress or outcome of the review should be meaningful and detailed. It will include detail of any actions taken, outcomes, the reasons for decisions made, any remedy or resolution offered and information concerning any other remedies that may be available to the complainant.

External review

If the complainant is dissatisfied with the internal review process, they may seek an external review by an independent external review body. External review bodies available include the:

- [Office of the Queensland Ombudsman](#)
- [Office of the Information Commissioner Queensland](#) (for complaints about breaches of privacy).
- [Queensland Human Rights Commission](#). (for complaints about a breach of human rights under the Human Rights Act 2019).

Remedies

With reference to AS 10002:2022, possible remedies for the resolution of complaints may include:

- communication with the complainant
- rectification for detriment to the complainant
- mitigation to reduce the adverse consequences for the complainant
- satisfaction of reasonable concerns raised by the complainant
- compensation for detriment sustained.

10 Communication to complainant

Feedback related to a complaint may be requested via any of the methods listed in section 8. How to make a complaint.

Complainants will be advised regarding the progress or outcome of the complaint. Contact

with complainants will be meaningful and detailed. Communication will include detail of any actions taken, reasons for decisions made, any remedy or resolution offered and information concerning any other remedies that may be available to the complainant.

Complaints made anonymously, and where no contact details have been provided, will not be advised of the outcome of the complaints. However, complaint details, including the outcome will be recorded according to the Client Complaints Management System.

Referral

State Library may receive complaints that fall outside its jurisdiction. In that case, the complainant will be made aware of the fact that the complaint is not within State Library's jurisdiction and may be assisted to identify the relevant agency or body. The complainant may also receive reasonable assistance to identify the procedure for making a complaint to the agency or body. Where a complaint is made involving an event or service to which State Library has a partnership agreement, the Complaints Manager will consult with relevant Executive Director regarding appropriate referral.

11 Essential considerations

State Library will properly consider human rights when making decisions in relation to complaints and will act in ways that are compatible with human rights as required by the *Human Rights Act 2019*.

Risk management and mitigation

Risk	Description of risk	Mitigation management
Risk 1	Failure to adequately respond to client feedback and complaints results in diminished services and reputational damage	Standards for responding to complaints are maintained, as outlined in Policy and Procedures. Client Complaints Management Policy and Procedures is provided annually to staff involved in the management of complaints. Continuous improvement processes include reports to relevant areas of the State Library on feedback and complaints received and the response. The Executive Management Team receives biannual reports to ensure informed oversight of complaint and feedback management.

12 References

The policy is supported by:

Queensland Government

- [Public Sector Act 2022](#)
- [Information Privacy Act 2009](#)
- [Right to Information Act 2009](#)
- [Human Rights Act 2019](#)
- [Queensland Ombudsman - Public administration resources](#)

State Library of Queensland

- [Responsible Client Conduct Policy](#)

Other

- [AS 10002-2022 Guidelines for complaints management in organizations](#)
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13 Approval

Approved by State librarian and Chief Executive Officer 6 July 2023.

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