

# Client Complaints Management Policy and Procedures

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<b>Maintained by</b>	Compliance and Assurance Branch
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## Document control

Version	Approved by	Approval date	Revisions
<b>v.1</b>	State Librarian and Chief Executive Officer	February 2017	Created
<b>v.2</b>	State Librarian and Chief Executive Officer	February 2020	<p>Reformatted to fit 2019 policy template.</p> <p>Revisions to incorporate human rights' considerations into the policy and explicit references to human rights with reference to the Queensland Government Guide developed for that purpose.</p> <p>Review of other content and policy statements with amendments including:</p> <ul style="list-style-type: none"> <li>• incorporation of elements from procedure's document to provide a single less confusing and comprehensive Policy and Procedures document</li> <li>• addition of detailed 'Responsibilities (3)</li> <li>• addition of a section outlining State Library approach to complaint management from Procedures (9).</li> <li>• reorganisation / reordering of content to add greater clarity including better</li> </ul>

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			consolidation of information about communications to clients <ul style="list-style-type: none"> <li>rewording of content to reflect the simpler expression currently used in Queensland Ombudsman support material</li> </ul>
<b>v.3</b>	State Librarian and Chief Executive Officer	June 2023	
<b>v.4</b>	State Librarian and Chief Executive Officer	April 2025	Changes made to reflect the change in position for the Complaints Manager
<b>v. 5</b>	State Librarian and Chief Executive Officer	September 2025	Inclusion of process in relation to complaints referencing a breach of Human Rights

## 1. Authority

State Librarian and Chief Executive Officer.

## 2. Responsibilities

The State Librarian and Chief Executive Officer is responsible for State Library of Queensland's Client Complaints' Management System. Roles and responsibilities regarding the management of complaints are assigned with reference to *AS 10002:2022 Guidelines for complaints management in organisations*.

Information and Client Services team manage client feedback which includes complaints. Complaints are initially recorded in the State Library's Complaint Management System (Tellus feedback system) and triaged to the appropriate team for investigation and providing a response. Information and Client Services team review the response and send to the complainant.

If a client is dissatisfied with the initial outcome, the complaint is escalated to the Complaints Manager for review. The Complaints Manager reviews the complaint outcome to ensure they have been handled fairly and appropriately, considering the investigation process, relevant circumstances, legislation, and internal policies.

## 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

This policy and associated 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 *Human Rights Act 2019*.

## 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.

State Library is not authorised to receive or address complaints concerning other public libraries.

## 6. Definitions

Word	Definition
Complaint	An expression of dissatisfaction made, by a person who is 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	<p>The Manager, Compliance and Assurance performs the role of State Library's Complaints Manager for complaint outcomes where the client has requested an internal review.</p> <p>The role is responsible for reviewing complaint outcomes to ensure they have been handled fairly and appropriately, considering the investigation process, relevant circumstances, legislation, and internal policies.</p>
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:
<b>Ensure the complaints process is easy and accessible for clients</b>	<ul style="list-style-type: none"> <li>• provide clear information about how to make a complaint and how complaints are managed</li> <li>• publish the <i>Client Complaints Management Policy and Procedures</i> on the State Library website</li> <li>• provide reasonable assistance to clients in making complaints and providing feedback.</li> </ul>
<b>Be responsive and accountable</b>	<ul style="list-style-type: none"> <li>• record, track, acknowledge and process complaints in a timely manner.</li> <li>• actively communicate progress to the complainant about the process, timeframes and possible outcomes of the complaint and any other necessary information.</li> <li>• ensure that communication provided at all stages of the management of the complaint is clear, detailed and meaningful.</li> <li>• advise complainants, as soon as practicable, where State Library is unable to deal with either part or all of their complaint.</li> <li>• advise clients of their internal and external review options</li> <li>• report our actions and decisions relating to complaints as required internally and externally.</li> </ul>
<b>Consideration of complaints</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• take all reasonable steps to ensure that a complainant is not adversely affected.</li> <li>• protect the rights of complainants and State Library officers where they are the subject of a complaint.</li> <li>• not investigate a complaint found to be abusive, trivial, or vexatious.</li> </ul>
<b>Confidentiality</b>	<ul style="list-style-type: none"> <li>• deal with complaints confidentially to the extent possible and in accordance with the <i>Information Privacy Act 2009 (Qld)</i>.</li> </ul>
<b>Continuous improvement</b>	<ul style="list-style-type: none"> <li>• use feedback and complaints as a tool for continuous improvement.</li> <li>• provide feedback and complaints related reports to areas to the State Library to inform continuous improvement including an annual report to State Library Executive Leadership Team</li> <li>• ensure adequate <i>Client Complaints Management Policy and</i></li> </ul>

	<b>State Library will:</b>
	<i>Procedures</i> training is provided annually to staff involved in the management of complaints.
<b>Reporting</b>	<ul style="list-style-type: none"> <li>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>.</li> </ul>

## 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 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

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

### 8.1 Complaints regarding collections

State Library upholds the principles of intellectual freedom and equitable access to information, as outlined in our [Intellectual Freedom Policy](#). Our collections reflect a broad spectrum of perspectives and ideas, supporting the diverse needs of our community.

If a complaint is received requesting changes to the availability, access or catalogue descriptions of physical or online content in the library's collections it will be assessed according to the [Reconsideration of Library Collections Policy](#).

## 9. Complaint management

### 9.1 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:

- 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 to staff (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.

## 9.2 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 28 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.

If a complaint relates specifically to a potential breach of Human rights, or references the *Human Rights Act 2019*, it will be referred immediately to the relevant Executive Director and the State Librarian and CEO for their review and formal response.

## 9.3 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 to the State Librarian and CEO for assessment. If the Executive Director or State Librarian and CEO 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.

## 9.4 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 the State Library's Complaint Manager. On receipt, the Complaints Manager 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.

If the Complaints Manager was involved in the initial outcome, an internal review will be conducted by an officer other than the officer who handled the original complaint and will be overseen by a State Library Executive Director or by the State Librarian and CEO

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.

## 9.5 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*).

If a complaint about State Library is escalated to the Queensland Human Rights Commission or the Australian Human Rights Commission, it will be managed by the relevant Executive Director and the State Librarian and CEO.. This ensures that any complaints about possible breaches of human rights are reviewed by senior leadership and responded to promptly, in line with our legal responsibilities and internal policies.

## **9.6 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.

## **11. Human rights**

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)*.

## **12. Risk management and mitigation**



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

## 13. References

This policy is supported by

### Queensland Government

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

### State Library of Queensland

- [Responsible Client Conduct Policy](#)
- [Reconsideration of Library Collections Policy](#)

### Other

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

## 14. Approval

09/09 /2025

State Librarian and CEO

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