

**Review of the  
Child Support Agency's  
Complaint Service**

Report under section 35A of the *Ombudsman Act 1976*

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July 2001

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# 1. Executive Summary

## ***Purpose of the Review***

My office has adopted a policy of 'decline and refer' for agencies that have a viable internal complaints service, on the basis that it is desirable for agencies to deal with complaints about their actions and service, in the first instance. This means that we must have confidence that agencies deal with complaints appropriately. This review was initiated by my office to assess the effectiveness of the internal complaints system of the Child Support Agency (CSA), and was focussed narrowly on how the CSA Complaints Service handled complaints referred by my office.

## ***Methodology***

This review was conducted in two parts. The first part addressed clients' awareness of the Complaints Service and the strategies used by the CSA to promote it. The second part, conducted as a joint project with the CSA, assessed through case reviews the effectiveness of the Complaints Service in dealing with complainants referred to it by my office, as an alternative to investigation by my office.

## **Client awareness of the Complaints Service**

In early 1997 my office undertook a brief survey of complainants to ascertain their level of awareness of the CSA's Complaints Service. The survey was repeated during two further fortnights in 2000 as part of this review. During the survey periods, Investigation Officers asked each person they spoke to who had a current complaint about the CSA whether they were aware that the CSA had a Complaints Service.

A brief analysis was also undertaken of the information available to the CSA clients and the public about the Complaints Service — including the CSA's brochures and other publications, letters sent to clients, and the CSA's website — to ascertain what information was provided about the Complaints Service and how accessible it was.

## **Case reviews**

The project tracked a number of complainants to my office through their dealings with the CSA Complaints Service to assess the effectiveness of complaint handling. This included several complainants who complained about the Complaints Service itself.

This aspect of the project was undertaken as a document review, through examination of records in my office's Complaint Management System (CMS) and the CSA's computer system and Complaints Service's complaints database.

Throughout this report, the main group of complaints (complaints from clients about the CSA which my office declined to investigate and advised the person to use the Complaints Service) are referred to as **Group A** or CSA

complaints. The second group, where the complaint was about the Complaints Service itself, are identified as **Group B** or Complaints Service complaints.

### ***Conclusions about client awareness***

Very similar results were obtained from the Client Awareness Surveys in both 1997 and 2000. In 1997, 32% of the 193 respondents were aware of the Complaints Service and 68% said they were not. There were 146 respondents in the four week period of the second survey in 2000, and of these 34% were aware that the CSA had a Complaints Service and 66% were not.

This second survey also identified whether the respondents were payers or payees.

Just over half the respondents were payers with just less than half being payees. Of the payers, 39% were aware of the Complaints Service compared to 28% of payees.

The review of the CSA's publications and other written material showed that while the CSA does not routinely include reference to the Complaints Service in its letters to clients, most publications do provide details about it. The CSA's website <[www.csa.gov.au](http://www.csa.gov.au)> does not have a readily identifiable section about client rights, or an equivalent, which leads a user directly to information about the Complaints Service.

This brief analysis suggests that additional methods of informing clients about the Complaints Service may be required to improve client awareness. Possible strategies to enhance awareness are detailed in our recommendations.

### ***Conclusions from the case review process***

The review group assessed 52 complaints individually, awarding a score against a set of criteria in four broad categories. Complaint handling in 43 cases was assessed as 'excellent', with 23 scoring a perfect score of 42. Four cases were rated 'satisfactory' while five were rated as 'needing improvement'.

Of the 42 Group A complaints, 36 recorded a score of 'excellent' with 20 rating a perfect score. Three cases were 'satisfactory' and three were rated as 'needing improvement'. For Group B, seven of the 10 complaints were rated 'excellent' with three perfect scores. One was considered 'satisfactory' and two as 'needing improvement'.

In a clear majority of cases, the Complaints Service effectively and efficiently resolved the complaints originally brought to my office. It is therefore reasonable for my office (in the absence of any special factors) to continue to decline to investigate complaints where the complainant has not been to the Complaints Service and to refer them there instead, with an invitation to return to my office if the Complaints Service is unable to resolve the problem.

Generally the ratings for Group A and Group B complaints were similar, although it must be kept in mind that the sample for Group B was too small to draw firm conclusions.

### ***Areas of strength***

The areas of strength identified (that is, areas where a score of excellent was consistently achieved) were:

- Non-judgemental documenting of the matter (this was the only criterion where every complaint was rated as 'excellent');
- Identification and documenting of issues on the CSA computer system;
- Appropriate investigative action;
- Appropriate negotiation with the Team Leader.

### ***Areas needing improvement***

The areas identified as needing improvement (that is, where lowest scores were recorded) were:

- Internal recording procedures;
- Timeliness, the need to keep clients informed of progress, and associated system documentation.

### ***Some other specific results***

- 79% of complaints were rated 'excellent' and a further 12% were rated 'satisfactory' against the criterion about being a 'good example of investigation and resolution'.
- 100% of Group A cases from NSW/ACT and Queensland were rated 'excellent' compared to 85% from South Australia/Northern Territory, 70% from Victoria/Tasmania and 50% from Western Australia. Although the cases reviewed covered all CSA regions the sample per region is too small to draw firm conclusions about regional performance.
- 58% of the complaints reviewed were from payees, although 80% of complaints in Group B (five of the seven cases) were from payers.
- Overall, there was very little difference in the results for payers and payees. 77% of payers' complaints were rated as 'excellent' compared to 86% for payees. For Group A, 85% of both payer and payee complaints were rated 'excellent'. For Group B payee complaints, only 20% achieved an 'excellent' rating, compared to 62% for payers.
- There was very little delay between the time my staff spoke to complainants and advised them to call the Complaints Service, and when the person did so. Nearly 70% of Group A complainants contacted the Complaints Service on the same day that they spoke to my office. A further 24% contacted the Complaints Service on the following working day.
- This review did not assess what proportion of complainants who are referred by my office to the Complaints Service do follow that advice. My office's Client Satisfaction survey conducted in 2000 (using 1999 data) found that 92% of those CSA complainants who were referred back to the Agency reported doing so; however, the survey did not specify the

Complaints Service. Further research would be needed to establish whether there is a significant number who do not contact the Complaints Service. There may be a need for referral protocols with the CSA, to ensure that complainants with problems do pursue their complaints where my office declines to investigate.

- In Group B, the review determined that there was no justifiable reason for the complaint about the Complaints Service in 72% of the cases; the major problems identified with the complaint handling in these matters were timeliness in following up matters and not keeping the client advised of the progress of their complaint.

### ***Factors contributing to the outcome***

While the review was not aiming to identify what specific features of the Complaints Service contribute to the high ratings, certain characteristics of its structure and management emerge as relevant. These include the commitment from management to an effective complaints handling process; the centralised management of the Complaints Service which has developed a professional, experienced and well-respected team with clear roles and responsibilities identified for the Complaints Officers; a strong reporting regime which leads to the 'learnings' from complaints being used to improve service; and the strong role of training both for and by Complaints Officers.

### ***Conclusion***

This review has concluded that the CSA's Complaints Service functions at a high standard and provides a sound basis for my office to continue to decline to investigate matters that the person has not attempted to resolve through the Complaints Service. However the review has also highlighted a number of areas for the CSA that would benefit from further attention. The recommendations set out below are designed to address these areas.

### ***Recommendations***

**Recommendation 1: That as part of ongoing monitoring and review of its communications strategy, the CSA should incorporate strategies that improve the awareness of the Complaints Service among CSA clients.**

**Consideration should be given to the feasibility and appropriateness of:**

- **Reviewing the design of the CSA website to provide more direct access to information about the Complaints Service.**
- **Including a copy of the Complaints Service brochure with each assessment notice.**
- **Incorporating information about the Complaints Service into all correspondence.**
- **Incorporate into regular client satisfaction surveys, questions about clients' awareness of the Complaints Service.**
- **Providing further training, including the issuing of practice directions, to ensure that all inquiry staff advise callers about the Complaints Service as part of regular contact, and particularly whenever an issue of concern or complaint is raised.**

- Ensuring information about the Complaints Service is included on the CSA's Interactive Voice Response system on its general enquiry line (131 272).

**Recommendation 2:** That the Complaints Service ensure that its ongoing training and quality assurance programs address the issues identified by the review where improvement was warranted. Specifically, these include:

- Communication with clients, with particular emphasis given to the importance of keeping clients informed of the progress and outcome of complaints;
- Timeliness of completing investigations;
- Recording of investigative action, remedies and follow-up action on the CSA system and the Complaints Service database.
- Development of a system for the Complaint Team management to monitor complaints so that incomplete or less than satisfactory complaint handling can be addressed and followed up.

## **CSA Response**

CSA has responded very positively to this review. Included below are CSA's comments in response to my recommendations.

### ***Recommendation One - raising client awareness***

*CSA is in the process of redesigning a new page on our website specifically dealing with client complaints. This will be integrated and accessible from other key pages. In this way information about the Complaints Service will be more overt and accessible to clients using our website.*

*CSA is currently reviewing information included with assessment notices. We will ensure that information about the Complaints Service is considered as part of this review. At present, Complaints Service information is contained in the Child Support Handbook which is distributed with each new assessment notice.*

*All client correspondence currently provides an avenue for clients to raise a complaint by referring them to their client service officer. This effectively gives them access to step 1 of our complaints process. This provides clients with adequate information about their options for raising concerns without subverting the 3 step process.*

*In the next financial year, CSA will examine a new client research model to improve the quality of the feedback we are receiving from our clients. The new model will consider a number of 'point of service' items of which Complaints may be included.*

*Since the completion of your review, CSA has implemented a number of strategies to provide client service officers with increased skills and knowledge about client complaints. This includes an ongoing program of information sessions run by complaints officers, a complaints module delivered by complaints officers included in all Entry Level Programs for staff, and enhanced feedback of learnings and emerging issues through a range of Agency-wide communication channels.*

*As you are aware, the basis of the 3 step complaint process relies on appropriate actioning of client concerns at the first point of contact. This ensures that clients get relevant information at the most appropriate point of their contact with the CSA. Including information about the Complaints Service on the Interactive Voice Response system may inadvertently encourage clients to contact the complaints line directly, thereby skipping the first 2 steps of the process. This may impact in two ways. Firstly, there are resource implications for CSA to manage an increased number of step 3 complaints, and secondly, in terms of client service, clients may be inconvenienced by being referred back to step 1 of the process by a complaints officer.*

*I have complete confidence in the skills and abilities of the client service officers on the general inquiry line to identify and escalate complaints appropriately. They are supported in developing these skills and making decisions via internal client service training, a coaching system, and feedback provided by the Complaints Service.*

### ***Recommendation 2 - ongoing training and quality assurance programs***

*Since the completion of your review, some of the initiatives outlined above have been implemented to enhance the ongoing training and quality assurance programs associated with the complaints service.*

*In addition, we are considering other options and models for ongoing improvement, including the findings from your report. Your report will be included as an agenda item at the next complaints conference. ... This will provide an opportunity to reinforce your findings and to workshop a number of the issues you have raised. These issues will include communication with clients about the progress and outcome of their complaint, timeliness, recording of investigative action, and ongoing quality assurance and feedback of complaint handling. Also, the impending introduction of a new IT system for CSA will improve the management and monitoring system for the Complaints team.*

I consider the above a reasonable response to my recommendations.



## **2. Purpose of the review**

My office has adopted a policy of 'decline and refer' for agencies that have a viable internal complaints service, on the basis that it is desirable for agencies to deal with complaints about their actions and service, in the first instance.

My office therefore needs to be assured of the effectiveness of the CSA's Complaints Service so that when my officers exercise discretion not to investigate and refer complainants to the Complaints Service, I can be satisfied that they will receive a reasonable and appropriate service.

My office must also be satisfied that complainants do accept the advice to pursue this avenue of redress and that there are no agency service factors that may dissuade complainants from pursuing their concerns.

The review was designed to assess the effectiveness of the internal complaints system of the CSA in dealing with matters that my office has declined to investigate, including the level of client awareness of the Complaints Service.

Although the CSA has a three-step complaints process (where complaints are initially dealt with by enquiry officers, then Team Leaders, and then Complaints Officers, as necessary) the case review element of the review focussed only on matters dealt with by the Complaints Service as Step 3 complaints. The focus of the process was deliberately narrow with the aim of assessing how effectively the Complaints Service handled only those complaints that had had been referred by my office, and not how it conducted all its business.

### 3. Background to the review

Towards the end of 1997, my office began planning a major project to review the effectiveness of the internal complaints mechanisms of the three largest complaint generating agencies — Centrelink, the Australian Taxation Office (ATO) and the CSA. All of these agencies had recently established internal complaint procedures. The CSA's Complaints Service was established in July 1996, and the ATO's Problem Resolution Service (PRS) and Centrelink's Customer Relations Unit (CRU) were established in mid-1997. A similar structure was proposed for the review for each of these agencies, commencing with the review of the ATO's PRS.

In May 1997 the CSA had completed Phase One of an internal evaluation of its Complaints Service. My office was represented on the evaluation Steering Committee. In April 1998 the Australian National Audit Office (ANAO) released a report of its enquiry into the Management of Selected Functions of the Child Support Agency, which included a brief review of the CSA's Complaints Service, and made some recommendations for its improvement (see section 4.6). The implementation of the recommendations from both these reviews coincided with significant reorganisation across the CSA, from July 1998 onwards. These resulted in considerable structural and organisational change in the Complaints Service.

I wrote to the CSA in late 1998 advising that I would be undertaking a review of the CSA Complaints Service, with the aim of assessing the Service against good practice criteria, as well as examining my office's referral procedures and examining selected case studies. Work commenced on gathering background information about the Complaints Service during 1999, but the review was temporarily suspended pending the completion of the CSA's reorganisation. However, reviewing agency internal complaint handling processes continued to be a priority for my office. I noted in the 1999–2000 Annual Report:

*We need to have confidence that agencies deal with complaints appropriately, as we decline to investigate many complaints we receive on the basis that it is best for the agency to deal with the matter itself, at least in the first instance.*

*As a consequence, we examine the complaint handling processes of particular agencies from time to time to ensure that they have effective arrangements in place.<sup>1</sup>*

In late 1999, the changes were considered to be sufficiently bedded down for a review by my office to be appropriate. Because of the internal evaluation in 1997 and the ANAO's review in 1998, and the 'learnings' from the review of the ATO's PRS, it was determined that a simpler, more focused review should be undertaken. It was decided that the review should primarily assess the

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<sup>1</sup> Commonwealth Ombudsman, *Annual Report 1999-2000*, Canberra, 2000. p 1.

effectiveness of the handling of complaints by the Complaints Service where my office had declined to investigate on the basis they could be managed by the Complaints Service. The focus would be on case reviews, rather than a general assessment of the Service against good practice criteria.

The format of this review project was developed in the second half of 2000. My office held discussions with the CSA about the alternative approach in mid-2000, and the CSA indicated that it was also very keen to take an active part in any review or evaluation of the Complaints Service.

It was agreed that my office and the CSA should undertake the review cooperatively. It was recognised that each agency would have particular interests and areas of focus, so the review process was structured to collect and analyse information to serve a variety of purposes. My interest was primarily to be satisfied that referral to the Complaints Service is an appropriate basis for exercising discretion not to investigate. For the CSA, the review process provided an opportunity for the introduction of an ongoing Quality Assurance process.

## **4. Background to Complaints Service**

### **4.1 Introduction of Complaints Service**

The CSA Complaints Service was developed as a result of recommendations from the Joint Select Committee on Certain Family Law Issues report on the Child Support Scheme in November 1994.<sup>2</sup> Among the 163 recommendations in this Report were:

- That the CSA develops in consultation with its clients, a code of conduct and service standards for its staff and ensures that all clients are aware of conduct and service standards that have been set (Recommendation 20).
- That the CSA introduces administrative procedures to ensure that clients not receiving service to these standards have redress to higher levels of management and informs all clients of the process and procedures required to pursue complaints about conduct and service delivery (Recommendation 21).
- That the CSA develop administrative mechanisms to monitor client complaints and solve the deficiencies in conduct and service delivery (Recommendation 23).

The CSA Complaints Service commenced operation on 1 July 1996, as part of the Child Support Clients' Charter. Its aims were expressed as:

1. To turn dissatisfied clients into satisfied clients.
2. To improve the quality of the Child Support Agency's operation.

### **4.2 The Three-Step complaints process**

The Complaints System was designed as a three-step process that involved Case Officers, Team Leaders and Complaints Officers. Step 1 complaints are those dealt with by Enquiry Officers or Case Officers. Where the matter cannot be resolved at this level it is then referred on to a Manager or Team Leader who will deal with it as a Step 2 complaint. The CSA believed that the majority of complaints would be dealt with at these two levels. A separate complaints phone line — 132919 — was established for clients who were unable to have their problems resolved at the first steps, which was to be staffed by designated Complaints Officers. Although it was agreed that 'the complaints process is not just about those complaints that get to Step 3' a key component of the new Complaints Service was the introduction of Complaints Officers.<sup>3</sup>

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<sup>2</sup> The Parliament of the Commonwealth of Australia Joint Select Committee on Certain Family Law Issues: *The Operation and Effectiveness of the Child Support Scheme*, AGPS, November 1994.

<sup>3</sup> From *Child Support Agency Complaints Handbook*, quoted in *Post Implementation Review of the CSA Complaints Service – Phase One*, May 1997.

### **4.3 Structure of the Complaints Service**

Initially, there was a Complaints Officer in each of the CSA's 24 branches, and a National Complaints Coordinator, located in Brisbane. The National Coordinator did not have direct management responsibility for the Complaints Officers, who were managed at each site and were part of a support services team. In August 1997, the National Complaints Coordinator position was moved to Canberra and located within the Ministerial and Client Services, although management responsibility for Complaints Officers was retained in each site. In July 1998, as part of a major reform program across the CSA to tailor services to meet client needs at particular stages, and in response to Phase One of the Evaluation of the Complaints Service, the Complaints Service was placed under the national management of the Director of Ministerial and Client Services.

### **4.4 Current status of the Complaints Service**

Following the reorganisation in July 1998, Complaints Officer positions in each region had a distinct role with clearly articulated and documented expectations. Prior to this, the Complaints Officer positions were often combined with other roles (such as Technical Advisor and Ministerial and Ombudsman Liaison Officer). When the Complaints Service came under national management, various initiatives were introduced to improve effectiveness and timeliness, and response to systemic issues identified through the Complaints Service.

By late 2000, there were 20.5 Complaints Officers across five Regions, with 6.5 officers located in NSW/ACT, five in each of Queensland and Victoria/Tasmania and two in each of Western Australia and South Australia/Northern Territory. They report directly to the Director, Ministerial Liaison Unit, and work closely with the Regional Client Matters teams that comprise Ministerial and Ombudsman Liaison Officers, Client Relations Officers and Compensation Officers. While the addition of the 0.5 is recent, staffing levels have otherwise been reasonably constant over the years and are likely to remain so.

The Complaints Service is in the process of developing a national telephone system, with the first phase testing a link between Brisbane and Adelaide. The link allows staff to take their own region's calls with the overflow going to available officers in the other region. Where no-one is available there is a message advising that and offering voicemail, or a wait option for up to five minutes. If the testing stage is satisfactory it is expected that other offices will progressively be brought onto the national loop. Apart from this development there are no other plans to review the organisational arrangements of the Complaints Service.

### **4.5 Internal CSA evaluation of the Complaints Service**

As part of the introduction of the Complaints Service it was agreed that there would be a short-term post-implementation review. It was determined that the review would be in two phases to reflect the two separate aims of the Complaints Service. Phase One would focus on the degree to which the implementation of the Complaints Service had improved the quality of the

CSA's operation, while Phase Two would focus on the degree to which the implementation of the Complaints Service had been effective in turning dissatisfied clients into satisfied ones. The report on Phase One of the Review was completed in May 1997.

This review made a number of findings and recommendations about the Complaints Service. The recommendations in respect of Step 1 and Step 2 complaints focused mainly on improved training and education for CSA staff. For Step 3 complaints the review recommended an increase in resourcing and national coordination of the Complaints Service and that promotion of the Complaints Service be enhanced.

Phase Two of the review, which was to test client satisfaction with the Complaints Service, was not undertaken. As there appeared to be very little public differentiation between the three steps of the complaints process the CSA determined a survey would be unlikely to accurately obtain clients' perceptions of the Complaints Service alone.

The joint project that led to this report, involving the tracking of clients through their dealings with the Complaints Service, was seen by the CSA to be, in part, an alternative process to Phase Two of the evaluation. However it was not the object of the review to determine whether a dissatisfied client has become a satisfied one, but rather to assess how effectively the Complaints Service deals with matters referred to it by my office.

#### **4.6 ANAO review of CSA Complaints Service**

In April 1998 the Australian National Audit Office (ANAO) published the results of a performance audit it had undertaken of the CSA.<sup>4</sup> One short chapter of this report addressed the complaints handling function. Part of this concentrated on the findings and recommendations of the CSA Phase One review. The other significant area addressed by the ANAO report was the recording of complaints and monitoring of complaint issues.

The ANAO made two recommendations about the CSA's complaint service function. One was that the CSA identify ways of enhancing client awareness of its complaints service. The other was that the CSA incorporate into its new computer system the facility to record all complaints and analyse the information recorded. The CSA agreed with both the ANAO's recommendations as both were already incorporated into future planning.

The CSA advises that it has implemented the ANAO recommendations to enhance client awareness (these are discussed further in section 6.3.1). The facility to record all complaints (for Steps 1, 2 and 3) will be a feature of the CSA's redeveloped computer system. However, at this stage, no implementation date has been set.

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<sup>4</sup> ANAO, *Management of Selected Functions of the Child Support Agency*, Audit Report no. 39, tabled 6 April 1998, Canberra

## **5. Methodology**

This review was conducted in two parts. The first part addressed client awareness of the Complaints Service and the strategies used by the CSA to promote it. The second part assessed, through case reviews, the effectiveness of the Complaints Service in dealing with complainants referred to it by my office.

### **5.1 Client Awareness of Complaints Service**

#### **5.1.1 Client awareness survey**

In early 1997, when the CSA Complaints Service was relatively new, my office undertook a brief survey of complainants to ascertain their level of awareness of the CSA's Complaints Service. During the month of March 1997, all investigation officers asked each person they spoke to who had a complaint about the CSA whether they were aware of that the CSA had a Complaints Service.

The survey was repeated in the last week of May and the first week of June 2000, and for a further two week period in August 2000. All callers to my office complaining about the CSA were asked if they were aware that the CSA had a special Complaints Service phone number staffed by Complaints Officers, and the responses recorded. In this survey, investigation officers also recorded whether the caller was a payer or a payee.

#### **5.1.2 Review of CSA public information about the Complaints Service**

A brief analysis was undertaken of the information available to the CSA clients and the public about the Complaints Service. We reviewed the CSA's brochures and other publications, the letters sent to clients, and the CSA's website to ascertain what information was provided about the Complaints Service and how accessible it was.

## **5.2 Case Reviews**

### **5.2.1 Approach**

As the aim of this review was to assess the effectiveness of the Complaints Service for the purposes of providing reassurance that my office's 'decline and refer' policy is appropriate, it was decided to conduct case reviews, tracking a series of complainants referred by my office through their dealings with the Complaints Service. This approach was considered to be preferable to review of a random sample of complaints handled by the Complaints Service.

It was also concluded that it would not be particularly helpful to survey complainants, as the review was to be based on objective observations of the complaints-handling process, rather than on the complainants' more subjective view of the assistance they received. Further, complainants may be

unable to distinguish between the assistance they received from the CSA generally and the Complaints Service specifically.

It was also decided to review the Complaints Service handling of matters where complainants had made a complaint to my office about the Complaints Service itself.

This case review component of the project was undertaken as a document review, through examination of records in my office's Complaint Management System (CMS) and the CSA's computer system and Complaints Service's complaints database.

### **5.2.2 Review Group**

As the review was a joint exercise with the CSA, a small group was formed to conduct the review, consisting of specialist staff from both offices. These were a Principal Investigation Officer and Senior Investigation Officer from my Sydney office, with assistance from an Investigation Officer from my Brisbane office. The CSA was represented by the Director of the Ministerial Liaison Unit, the Complaints Team Leader and a project officer from the Complaints Team. Although the review was planned and executed jointly, my office maintained overall direction and responsibility for the development and conduct of the review. The review process was greatly enhanced by the seniority of CSA officers involved and their willing cooperation and enthusiasm for the project.

### **5.2.3 Terminology**

Throughout this report, the main group of complaints, comprising complaints from clients about the CSA, where my office declined to investigate and advised the person to use the Complaints Service, are referred to as Group A or CSA complaints. The second group, where the complaint was about the Complaints Service, are identified as Group B or Complaints Service complaints.

This report refers to 49 cases or complainants and 52 complaints or complaints-handling processes, as being the subject of this review. This draws a distinction between people who complained whose cases we reviewed and their complaints, which were handled by different Complaints Officers.

### **5.2.4 Sample**

The cases to be reviewed were drawn from a pool identified by a search of my office's Complaints Management System (CMS), using these parameters:

#### **Group A:**

- Complaint about the CSA closed 1/1/00 – 30/3/00;
- Discretion not to investigate was exercised for reason A1: 'advised to pursue with agency complained of';
- Complaint summary text indicated that the complainant was advised to contact the Complaints Service.



### **Group B**

- Complaint about the CSA closed 1/1/00 – 30/3/00;
- ‘Complaint service’ selected as an issue.

A total of 142 complaints were identified, with 128 of these being Group A complaints and 14 Group B. The number of actual complainants was fewer than 142 as some people had complained more than once in the quarter. More detail about how the sample was selected is at Appendix B.

The CSA identified and provided documentation for 52 cases. This represented 55 of the 142 complaints referred from my office, as one complainant had made three separate complaints, and another had made two.

From this group, ultimately, complaints from 49 clients (42 Group A and 7 Group B) were reviewed. On closer inspection of the 52 cases it was clear that some matters had been raised with CSA enquiry officers and not with the Complaints Service (as Step 3 complaints) and so were not dealt with by Complaints Officers. These were excluded, as the purpose of this review was to assess the effectiveness of matters referred to, and handled by, the Complaints Service, and not the general CSA enquiry officers or other officers. A review of the CSA’s overall approach to complaints-handling (including Step 1 and 2 complaints) may need to be undertaken, either internally by the CSA or by my office, at another stage.

An explanation of the CSA’s three-step process of handling complaints can be found at paragraph 4.2.

The final group for review consisted of 49 cases or complainants and 52 complaints or complaints-handling processes. In two cases, both in Group B, there was more than one Complaints Officer involved.<sup>5</sup>

### **5.2.5 Process**

Once the cases for review were selected, the CSA printed all the relevant system documents, which were generally from the date the complaint was made to the Complaints Service until the matter was resolved. A printout of the data held in the Complaints Service’s database was also included. A full CMS closure printout was also available.

The review group met to examine all the relevant documentation for each case against criteria set out in a checklist, developed as part of the pilot (see section 5.2.6). This included assigning to the handling of the case a mark (out of a maximum of 42), which would put it in one of three categories:

- excellent = >35;
- satisfactory = 28 – 35; or
- needs improvement = <28.

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<sup>5</sup> One Group B case was handled by two different Complaints Officers and another by three.

This examination was undertaken as a cooperative process by the review group so that a consensus position was reached. This incorporated discussion and debate on each case that went beyond just scoring against the checklist, and focused on the overall quality of the complaints handling.

Although the process was undertaken cooperatively, my office had final responsibility for the assessments. During the pilot particular effort was put into ensuring that the checklist and scoring provided as rigorous an assessment as possible. My office's participants were mindful of the potential for the CSA to influence the process so as to present the Complaints Service in a positive light. However the commitment of the CSA participants to a thorough review and improvement process meant that this did not become an issue.

A checklist was developed to ensure that each case was assessed against a range of criteria in four categories. These were:

- appropriate identification and documenting of issues;
- investigation action and documentation;
- identification, implementation and recording of appropriate remedies; and
- an 'overall' category that included issues such as timeliness and the quality of recording.

Other relevant details were also recorded, including whether the complainant was a payee or payer, which region the case was from, which Complaints Officer dealt with it, and the dates of contact with my office and the Complaints Service.

A copy of the checklist is at Appendix A.

### **5.2.6 Pilot**

A pilot was conducted prior to the full case review being undertaken to ensure that a suitable sample could be identified and to develop and test the checklist. The trial used cases based on complaints closed in April 2000, identified in the manner outlined above.

A trial checklist was prepared in advance of the review team meeting. This was trialed on 10 of the 42 cases identified. The checklist was modified during the pilot to ensure that it covered all relevant matters and that ambiguities were removed. It was during the pilot phase that the scoring system was developed and checked.

The pilot showed that sufficient cases for review could be identified by my office and located by the CSA. It also provided guidance on the period for which systems documents were required in order to properly track a complaint to its conclusion. The pilot also confirmed that a team approach to the examination of cases, using set criteria, was an effective way to proceed.

## 6. Conclusions about client awareness

### 6.1 Conclusions from the Ombudsman Client Awareness Surveys

Very similar results were obtained from the Client Awareness Surveys in both 1997 and 2000. The conclusions are set out in Table 1, and in Chart 1.

In 1997, 193 complainants were surveyed. Of these:

- 62 (32%) said they were aware of the Complaints Service; and
- 131 (68%) said they were not.

That is, two out of every three people complaining to my office in 1997 about the CSA was not aware of the Complaints Service.

There were 146 respondents surveyed in the four weeks of the second survey in 2000. Of these:

- 49 (34%) were aware that the CSA had a Complaints Service; and
- 97 (66%) were not aware of it.

This second survey also identified whether the complainants surveyed were payers or payees.

- Just over half the respondents were payers (75);
- Just less than half were payees (71);
- 39% of payers were aware of the Complaints Service (29 respondents);
- 28% of payees were aware of it (20 respondents).

**Table 1: Awareness of the CSA Complaints Service by complainants to the Ombudsman's Office in 1997 and 2000.**

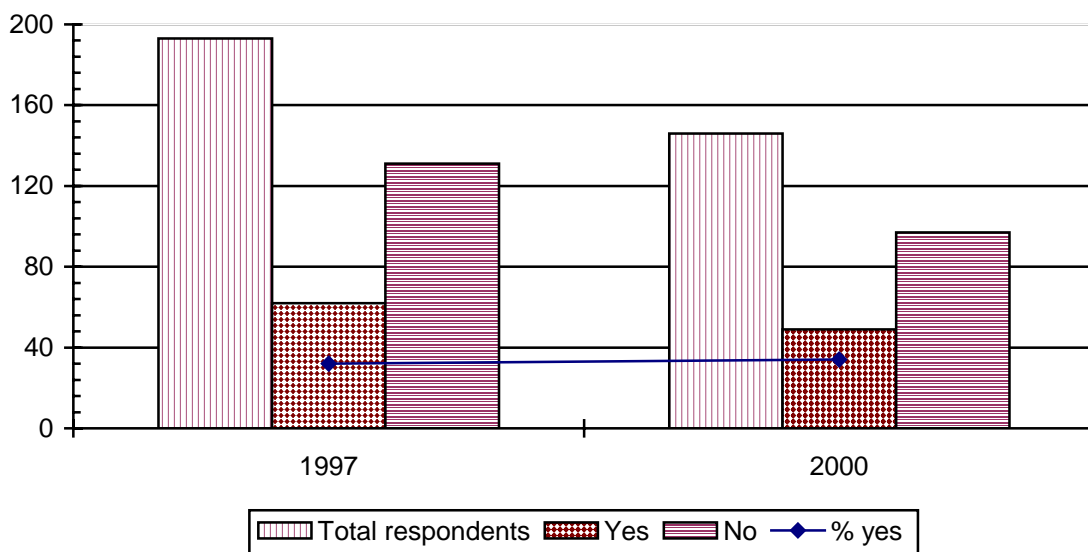
Date	Respondents											
	Yes				No				Total			
	%		Number		%		Number		Number			
1997	32%		62		68%		131		193			
2000	34%		49		66%		97		146			
	Payee		Payer		Payee		Payer		Payee		Payer	
	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.
1997 <sup>6</sup>	–	–	–	–	–	–	–	–	–	–	–	–
2000	28%	20	39%	29	72%	51	61%	46	49%	71	51%	75

Although it is perhaps not surprising that only one third of complainants were aware of the Complaints Service in 1997, as it was less than a year old at that

<sup>6</sup> In the 1997 survey, investigation officers were not asked to record whether the complainant was a payee or a payer. However, this was noted in 51 cases. A markedly different pattern to the 2000 survey was suggested by this sub-sample, with 65% being payees and only 35% payers. Only 18% of the payees were aware of the Complaints Service compared to 50% of the payers.

time, it is disappointing that the results from the 2000 survey show barely any increase in awareness. It is not clear why payers appear to have better knowledge of the Complaints Service than payees. However it may be that payers have more interaction with the CSA; or are more inclined to pursue their concerns about the CSA, and be aware of the avenues to do this. In the 1999–2000 financial year more payers than payees complained to my office about the CSA. Of the 2,228 complaints about the CSA, 1,156 were from payers and 957 were from payees. Not all complaints are made by a payer or payee.<sup>7</sup> Complaints from payers represent 52% of all complaints and 55% of payer/payees complaints. Complaints from payees make up 43% of all complaints and 45% of the payer/payee complaints.

**Chart 1: Awareness of the CSA Complaints Service by complainants to the Ombudsman’s Office in 1997 and 2000.**



## 6.2 Conclusions from the review of CSA information

### 6.2.1 Publications and other written material

The review of the CSA’s publications and other written material showed that the CSA does not routinely include reference to the Complaints Service in all letters to clients, however most publications do provide details of it. For example, the Client Charter explains the Complaints Service and provides the telephone number. Under the heading ‘We take complaints seriously’ it states:

*We are genuine in making our service commitments, but recognise that we do not always get it right. Please*

- *contact us if you have a complaint*

<sup>7</sup> In 1999-2000 there were 115 complaints that were not made by or on behalf of a payer or payee. Complaints may also be made by people other than payers or payees, such as employers involved in the child support scheme.

- *speak to the staff member you've been dealing with, or their manager who will try to solve the problem*
- *if you are still not satisfied, call (for the cost of a local call) the Complaints Service on 132 919*
- *you may wish to contact the Commonwealth Ombudsman if you are not satisfied with our complaints service.*

The Client Charter also includes the Complaints Service telephone and Freefax numbers in the section 'How to contact us'. The Child Support Assessment Handbook contains a similar statement, under the heading 'Client Charter'. Both of these publications are provided to all new CSA clients, and the Client Charter was forwarded to all current CSA clients at the time of its release in 1996.

### **6.2.2 CSA's website**

The CSA's website <[www.csa.gov.au](http://www.csa.gov.au)> does not have a separate section which focuses on client rights or an equivalent, which might directly lead a user to information about the Complaints Service. Clicking on the link 'parents' on the home page does provide a further option 'Client Charter', which provides information about the Complaints Service as described above. However there is nothing that would suggest to someone unhappy with the CSA service, who was trying to find out what means of redress there might be, that this would be the path to take. The link 'publications' on the home page takes a user to a list of CSA publications including the Child Support Handbook and a brochure *We take your complaints seriously* (which provides the same information as the Client Charter quoted above). The 'contact us' link also provides the telephone and Freefax numbers for the Complaints Service.

While the information about the Complaints Service is on the website, it requires some navigation to locate it. It is likely that a user who is aware of the Complaints Service (and reasonably familiar with how to navigate around a website) would be able to locate information about it. However a person logging on to the CSA website with a general query — about what options are available to them if they are unhappy with a decision or service — may not readily find the information they need.

### **6.2.3 Information through the Enquiry Line**

Depending on the region, CSA clients calling the CSA's general enquiry line may either be connected directly to an officer, or may be presented with an automated list of options. The Complaints Service is not an option on the automated lists. While callers are on hold, they listen to music rather than to messages about the CSA's services, such as information about the Complaints Service.

These are deliberate choices by the CSA, because it wants to encourage clients with a complaint to go through Step 1 (an enquiry officer) and Step 2 (a Team Leader) before contacting a Complaints Officer. While this approach is understandable, its effectiveness relies on enquiry officers recognising

matters of complaint that should be escalated to the next step. It also makes the enquiry officer responsible for deciding that the client has a 'complaint' that has not been resolved through the normal channels, rather than allowing the client to decide if the matter should be pursued at a higher level. Providing direct information or options about the Complaints Service on an Interactive Voice Response system would not necessarily subvert the three-step process, if appropriate information were provided about when a client should contact the Complaints Service (that is, only after having raised the concern with an enquiry officer and/or Team Leader.)

### **6.3 Strategies to enhance awareness**

#### **6.3.1 Strategies identified in the ANAO report**

The ANAO report also pointed to lack of client awareness of the Complaints Service as a significant concern. It reported that client surveys commissioned by the CSA also indicate that about 60% of clients were not aware of the existence of the Complaints Service.<sup>8</sup> The ANAO report (in 1998) noted that at the time, the CSA was proposing the development of a communications strategy. The ANAO suggested that this would provide an opportunity to examine how client knowledge of the Complaints Service could be enhanced, and recommended that this form part of the strategy. The ANAO suggested that there could be benefit in making reference to the Complaints Service on all forms, letters and publications.

The CSA has implemented various strategies to enhance client awareness of the Complaints Service, including:

- Sending all clients a copy of the Child Support Handbook with their assessment letters, which includes information about the Complaints Service.
- Providing new clients with an information kit that includes the Charter brochure, which outlines the Complaints Service.
- Complaints officers attending community information sessions and lobby group meetings to promote the Complaints Service.
- The Complaints Service brochure being provided to electorate offices of Members of Parliament, Centrelink and community service providers (including Migrant Resource Centres, adult migrant education centres and Aboriginal legal and health services).
- Complaints Officers presenting a training session for all new CSA staff as part of their induction as well as providing training to existing staff.
- Providing information and 'learnings' about complaints to managers and staff on a regular basis as an internal means to enhance client awareness of the Complaints Service.
- As an external measure, key messages about the Complaints Service are also included in information sessions to Members of Parliament, community groups and clients.

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<sup>8</sup> ANAO, *Management of Selected Functions of the Child Support Agency, Audit Report no. 39*, tabled 6 April 1998, Canberra

While these strategies are important and useful, the later survey undertaken by my office in 2000 showed client awareness of the Complaints Service has not substantially increased over the years, with almost two out of every three clients with a complaint still unaware of it.

### **6.3.2 Further strategies**

Although the scope of my office's surveys was limited, the results do suggest that some other methods of informing clients about the Complaints Service are necessary. For example, a direct link on the homepage such as 'your rights' or 'if you are unhappy with a decision or service' which leads directly to information about the Complaints Service, objection rights and other forms of review and redress would be more user-friendly. Alternatively the CSA could consider including information about the Complaints Service on all correspondence, and more regularly forwarding Complaints Service brochures to clients.

**Recommendation 1: That as part of ongoing monitoring and review of its communications strategy, the CSA should incorporate strategies that improve the awareness of Complaints Service among CSA clients.**

**Consideration should be given to the feasibility and appropriateness of:**

- **Reviewing the design of the CSA website to provide more direct access to information about the Complaints Service.**
- **Including a copy of the Complaints Service brochure with each assessment (and re-assessment) notice.**
- **Incorporating information about the Complaints Service into all correspondence.**
- **Incorporate into regular client satisfaction surveys, questions about clients' awareness of the Complaints Service.**
- **Providing regular ongoing training, including the issuing of practice directions, to ensure that all inquiry staff advises callers about the Complaints Service as part of regular contact, and particularly whenever an issue of concern or complaint is raised.**
- **Ensuring information about the Complaints Service is included on the CSA's Interactive Voice Response system on its general enquiry line (131 272).**

## 7. Conclusions from the case review process

### 7.1 Conclusions from the cases reviewed

#### 7.1.1 General conclusions

Each of the 52 complaint handling processes that arose from the 49 cases reviewed was assessed separately by the review group. As part of the assessment, a score was awarded against a set of criteria, in four broad categories (issues, investigation, remedies and 'overall'), where 3 represented 'excellent', 2 'satisfactory' and 1 'needs improvement'. The maximum possible score was 42. The criteria against which the cases were assessed, and a copy of the checklist used to undertake the assessment, are at Appendix A.

Of the 52 complaints assessed 43 fell into the 'excellent' category, with 23 scoring a perfect score of 42. Four cases were rated 'satisfactory' while five were rated as 'needing improvement'. The lowest score recorded for any complaint was 20 (a Group A complaint).

Of the 42 Group A complaints about the CSA, 36 recorded a score of 'excellent' with 20 rating a perfect score. Three cases were 'satisfactory' and three were rated as 'needing improvement'.

For the complaints about the Complaints Service in Group B, seven of the 10 complaints were rated 'excellent' with three perfect scores. One was considered 'satisfactory' and two 'needing improvement'.

The table below provides the full scores for each area. A more detailed discussion of the results from each category is provided below.

**Table 2: Ratings, against the areas assessed, for Group A, Group B and all complaints.**

Area*\Score	Group A (42 complaints)			Group B (10 complaints)			Total (52 complaints)		
	1	2	3	1	2	3	1	2	3
Issues									
A	1	0	41	0	1	9	1	1	50
B	8	1	33	4	0	6	12	1	39
Investigation									
C	3	1	38	2	0	8	5	1	46
D	3	0	39	1	0	9	4	0	48
E	1	3	38	1	2	7	2	5	45
Remedy									
F	4	3	35	1	1	8	5	4	43
G	4	4	34	3	0	7	7	4	41
H	2	7	33	1	1	8	3	8	41
I	3	4	35	0	1	9	3	5	44
J	9	4	29	4	1	5	13	5	34



Overall									
K	0	0	42	0	0	10	0	0	52
L	6	1	35	3	2	5	9	3	40
M	4	4	34	2	1	7	6	5	41
N	0	21	21	0	6	4	0	27	25

\* Key: areas assessed

Issues

A = Were all the issues identified and documented on the CSA system?

B = Were all the issues appropriately recorded on the complaints database?

Investigation

C = Was there appropriate investigative action?

D = Was there appropriate negotiation with the Team Leader?

E = Was the investigation documented on the CSA system?

Remedy

F = Was there a quality decision made?

G = Were appropriate remedies identified and implemented?

H = Was the client advised of the remedy?

I = Was the remedy documented on the CSA system?

J = Was the remedy recorded on the complaints database?

Overall

K = Was the document on the CSA system non-judgemental with just the facts recorded?

L = Was the complaint dealt with in a timely fashion?

M = Was this a good example of investigation and resolution?

N = Was this a good example of quality recording?

In a clear majority of cases in our sample, the Complaints Service effectively and efficiently resolved the complaints originally brought to my office. These case reviews show that overall the CSA's Complaints Service is sound. It is therefore reasonable for my office to continue to decline to investigate complaints where the complainant has not been to Complaints Service and to refer them there instead, with an invitation to return to my office if the Complaints Service is unable to resolve the problem.

**7.1.2. Results from the 'Issues' category**

Cases in this category were assessed against two criteria: whether the *key issues* of the complaint *were appropriately identified and documented* on the CSA computer system; and *whether the issues were properly recorded* on the Complaints Service's database. There were consistently very high ratings for the first criterion with all but two of the complaints rated as 'excellent' (one in Group A rated as 'needs improvement' and one in Group B as 'satisfactory').

Although the majority were also rated as 'excellent' against the second criterion (39 of the 52 complaints) the ratings against this criterion suggest that internal recording is an area that could improve. A total of 12 complaints were rated as 'needing improvement' in this area.

### **7.1.3 Results from the ‘Investigation’ category**

There were three criteria applied under this category: whether there was *appropriate investigative action*, *appropriate negotiation with the Team Leader*, and whether the *investigation was documented on the CSA system*. Generally the results from this category were of a very high standard for all criteria. Of the 52 complaints, 45 were scored ‘excellent’ against all three of these criteria — 38 of the 42 Group A complaints and seven of the 10 Group B complaints about the Complaints Service.

For three of the Group A complaints and another two from Group B the *investigative action* was rated as ‘needs improvement’. *Negotiation with the Team Leader* was also seen as ‘needing improvement’ for three Group A complaints and one from Group B. The *documentation of the investigation* was ‘excellent’ or ‘satisfactory’ for all but two of the complaints.

### **7.1.4 Results from the ‘Remedy’ category**

Five criteria were applied in the ‘Remedy’ category. Three were about the *quality of the decision made*, whether *appropriate remedies were identified and implemented*, and whether *the client was advised of the remedy*. The other two related to recording issues — whether the remedy was *documented on the CSA system* and *properly recorded on the Complaints Service database*.

The results were generally of a high standard, although ratings for *recording the remedy on the Complaints database* indicated again that this is the area most clearly requiring improvement. Thirteen of the 52 complaints were rated as ‘needing improvement’ against this criterion. However for the criteria relating to *documentation on the CSA system* 44 complaints were scored as ‘excellent’ and a further five were rated as ‘satisfactory’.

From my office’s perspective, recording on the CSA system, which is accessed by all CSA officers and provides the fullest record of a client’s dealings with the CSA, is more important in terms of the quality of service provided to clients. From a client service perspective the scores against this criterion were consistently of a high quality.

A rating of ‘excellent’ for all five criteria was recorded for 27 of the 52 complaints (23 from Group A but only four of the 10 Group B complaints).

### **7.1.5 Results from the ‘Overall’ category**

The ‘Overall’ category assessed complaints against four criteria. The first two were whether the recording of the complaint was done in a *non-judgemental* way, and whether the complaint was dealt with in a *timely fashion*. The other two criteria required assessors to make an overview assessment: whether the complaint was a *good example of investigation and resolution*, and whether it was a *good example of quality recording*.

The criterion about *non-judgemental recording* was the only one against which every complaint was rated as 'excellent'. The ratings for *timeliness* were less impressive: 40 of the 52 complaints were rated as 'excellent', three as 'satisfactory', with nine (six from Group A and three from Group B) being assessed as 'needing improvement'. Of the Group B complaints about the Complaints Service itself, only half (5) of the complaints were rated as 'excellent' with a further two as 'satisfactory'. Timeliness was often one of the elements of complaints about the Complaints Service. This is an area that needs some attention.

The results of the two other criteria in the 'Overall' category are interesting because of the overview they provide. Against the criterion about being a *good example of investigation and resolution*, 41 of the 52 complaints were rated as excellent, which comprised 34 of the 42 Group A complaints (81%) and seven of the 10 Group B complaints. Of the Group A complaints, four were rated as 'satisfactory' and four as 'needing improvement'. For Group B, there were two 'needing improvement' and one 'satisfactory'.

The final question considered was whether it was a *good example of quality recording*. The results from this were markedly different from all other areas, as this was the only area where complaints rated 'excellent' were not in the majority. Of the 52 complaints reviewed, only 25 were considered 'excellent'. However none was rated as 'needing improvement' with the remaining 27 complaints all ranked as 'satisfactory'. The pattern was similar for both Group A and Group B complaints. In Group A one half (21) were rated 'excellent' and the other half 'satisfactory', while for Group B, six were 'satisfactory' and four were 'excellent'.

Most of the problems with recording relate to lack of appropriate entries on the complaints database, rather than on the CSA system. As noted above, in the 'Remedy' category, substantially different scores were recorded against the criteria about whether the remedy was *documented on the CSA system* and whether the remedy was *recorded on the complaints database*. In the first, 44 of the 52 were ranked 'excellent' with only three complaints 'needing improvement'. However in the second, 13 complaints were rated as 'needing improvement', five were 'satisfactory' and only 34 were considered 'excellent'.

While problems with recording on the complaints database is clearly a concern for the CSA, as this has implications for its monitoring and management of complaints, they are less significant for my office assessment of the effectiveness of the Complaints Service. For my office the more important issue would be any failure or deficiency in appropriate documenting of contact, concerns, actions and remedies on the CSA system.

#### **7.1.6 Results of comparison by CSA region**

The 49 cases (and 52 complaints) reviewed covered all CSA regions and included at least one complaint handled by each Complaints Officer. Most of the cases reviewed came from Victoria/Tasmania (13 cases giving rise to 15 complaints), NSW/ACT (13 cases and 14 complaints) and Queensland (13 cases). There were six complaints from South Australia/Northern Territory

and four from Western Australia. As the sample per region is quite small no firm conclusions can reasonably be drawn about regional performance of the Complaints Service. However the comparative outcomes across the regions are interesting.

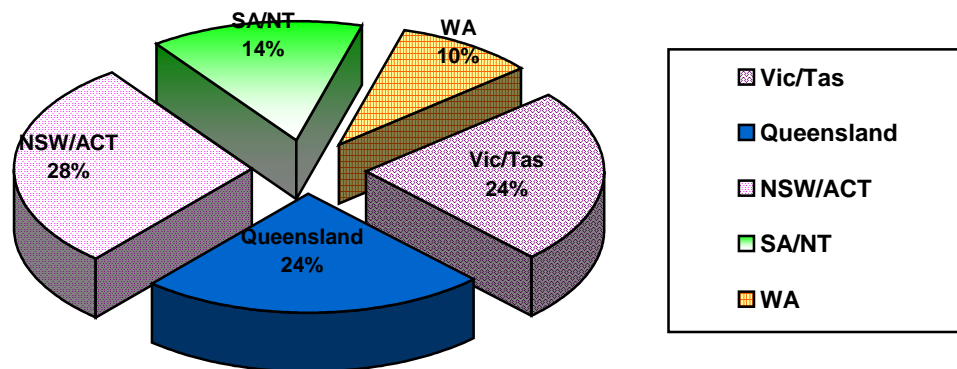
Of the Group A complaints, the majority again came from the CSA’s NSW/ACT, Victoria/Tasmania and Queensland regions with the breakdown as follows (see Chart 2):

- NSW/ACT (12)
- Victoria/Tasmania (10 complaints)
- Queensland (10)
- South Australia/Northern Territory (6)
- Western Australia (4)

NSW/ACT is a larger region than Victoria/Tasmania or Queensland, but the similarly high numbers from these regions in this review probably reflects the greater propensity of my offices in Queensland and Tasmanian to refer to the Complaints Service, rather than a difference in the complaints handled by each region.

Among the Group A complaints, all of the 12 reviewed from NSW/ACT and the ten from Queensland, all were rated ‘excellent’, while of the 10 complaints from Victoria/Tasmania, seven were rated ‘excellent’, one ‘satisfactory’ and two as ‘needing improvement’. Five of the six complaints from South Australia/Northern Territory were rated ‘excellent’ (with one ‘satisfactory’), as were two of the four from Western Australia, which also had one each rated ‘satisfactory’ and ‘needing improvement’.

**Chart 2: Group A cases reviewed by CSA region.**



The Group B complaints came from only three regions – Victoria/Tasmania (five complaints from three complainants), NSW/ACT (two complaints from one complainant) and Queensland (three separate complaints). This is more likely to reflect the number of complaints from these regions and the greater propensity for my officers in these regions to refer callers back to the

Complaints Service in the first instance, than any greater problems with the Complaints Officers in these regions.

Three of the Victoria/Tasmania Group B complaints were rated 'excellent', one 'satisfactory' and one as 'needs improvement'. In NSW/ACT, the first complaint-handling process was rated as 'needing improvement' but the follow-up process was rated 'excellent'. In Queensland, the handling of all three complaints was rated 'excellent'. The results of the regional breakdown are in Table 3 below.

**Table 3: Ratings of complaint-handling processes for Group A and Group B complaints by CSA region.**

	NSW/ACT	Vic/Tas	Qld	SA/NT	WA
<b>Group A</b>					
Excellent	12	7	10	5	2
Satisfactory	–	1	–	1	1
Needs improvement	–	2	–	–	1
<b>Group B</b>					
Excellent	1	3	3	–	–
Satisfactory	–	1	–	–	–
Needs improvement	1	1	–	–	–

If these results could be construed as showing lower than average performance in one region over another, then this may be a significant issue for CSA management. However, from my office's point of view, the results do not show that the Complaints Service in any particular region is performing at level where we could not be comfortably satisfied that complainants should be referred to the Complaints Service in the first instance.

There appears to be a correlation between my offices with a high 'decline and refer' rate and some high performing CSA regions, but not for others. For example, my Queensland office has a reasonably high 'decline and refer' rate and the Complaints Service in Queensland was consistently rated as 'excellent'. On the other hand, the complainants to my Hobart and Melbourne offices generally come from the CSA's Victoria/Tasmania region, yet these offices have very different 'decline and refer' rates. However, as has been noted earlier, my Hobart office is staffed by a single person. It may be that this is the cause of the higher 'decline and refer' rate in comparison to Melbourne, rather than any particular perception of the Complaints Service in the Victoria/Tasmania region.

While this review did not seek to establish the reasons for these variations, it would be useful to try and do so. It would be important to establish whether there is any correlation between 'decline and refer' rates and perceptions among my officers about the Complaints Service performance in different regions. It may be that variances are a result of different internal practices at the local office level rather than CSA regional differences. This would be a useful issue for my office to pursue as part of any follow-up to this project.

### **7.1.7 Results of comparison of complaints from payers and payees**

Of the 52 complaint handling processes reviewed, 30 were from payees. Eight of the 10 complaints about the Complaints Service considered in Group B (five of the seven cases) were from payers. Of the 42 Group A cases reviewed, 14 were payers (34%) and 28 were payees (66%). This represents a higher proportion of payees than was in the original pool of potential cases for review identified by my office. It is not clear why this disproportion occurred in the final sample. The three complaints omitted from the original sample identified by the CSA (because they did not meet the criterion as Step 3 complaints) were from payers. All but two of the seven Group B cases were from payers, which is a similar proportion to the original pool of 14 potential cases identified by my office where there were four payees and 10 payers.

Although the proportion of payees in our project sample was greater than the proportion of payees identified by my office, it is not possible to draw any firm conclusions about whether payees are more likely than payers to act on our advice to contact the Complaints Service. The CSA was unable to show whether fewer of the payers we had referred to the Complaints Service had made contact, as we had not asked it to locate all of the 142 potential cases for review we had identified. Further checking of cases ceased once an adequate sample was identified. Although data was not kept on this issue, anecdotal information from the CSA is that there were very few cases where we had referred either payers or payees to the Complaints Service (where the CSA could identify the client from the information available) where there was no further contact.<sup>9</sup> However, the contact in some cases was with the general enquiry line rather than with the Complaints Service.

Generally there appears to be no discernible difference in the quality of the complaints handling for payers or payees, particularly in the Group A complaints.

Overall only 77% of payers' complaints were rated as 'excellent' (17 of the 22 complaints) while for payees, 86% were (26 of 30). The difference arises in the Group B complaints that were about the Complaints Service. Not only is this group dominated by payers, but also the review ratings for payers were less satisfactory. In the Group A complaints 86% of the complaints from both payers (12 of 14) and payees (24 of 28) were rated excellent, while the other two of the payers' complaints were considered 'satisfactory'. One complaint from a payee was rated as 'satisfactory' and three were 'needing improvement'.

The only two of the 10 Group B complaints from payees were rated as 'excellent', compared to five of the eight complaints from payers. Of the other three payer complaints, one was rated 'satisfactory' and two were rated as 'needing improvement'. However both of those rated as 'needing improvement' were cases involving two (or more) Complaints Officers, and ultimately, there was a good outcome with the final Complaints Officer's

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<sup>9</sup> The CSA was not able to identify all the clients on the list provided by my office, as the personal details were not always complete or accurate.

handling of each matter rating 'excellent'. This might suggest that payers are more inclined to pursue complaints where there has not been a satisfactory outcome, or that the service payers received is less adequate than that received by payees. However, the sample is really too small to reliably draw such inferences.

### **7.1.8 Complaints made by the client's representative**

Of the 142 complaints identified by my office as part of the potential cases to be reviewed, 16 had been made by someone other than the payer or payee. An effort was made to include a number of these in the sample to ensure that advice about Complaints Service to a third party was getting to the payer or payee. However only one of the 49 cases ultimately reviewed was made by a representative, although this one case was the subject of three complaints to my office — one by the payer himself and one each from his wife and his mother.<sup>10</sup> This was included as one of the Group B complaints where the Complaints Service was one of the issues being complained about. These complaints are set out in case study 1 below.

#### **Case study 1: Peter (payer)**

*The issues:*

Peter rang my office to complain about the amount of an assessment and the delays in issuing an assessment. He had lodged an objection and was advised to wait for the outcome of that and to contact the Complaints Service about the service standards matter. A short time later his wife rang to complain that the matters weren't resolved, and was advised to contact the Complaints Officer. Some time later Peter's mother rang to complain that her son was being harassed by the CSA and that Peter's wife had been insulted by a Complaints Officer. She was advised that her son should complain to the Complaints Service in the first instance, and that her daughter-in-law should write to the Manager of the CSA.

*The investigation:*

It appears that Peter himself did not initially contact the Complaints Service and when his wife did the Complaints Officer she spoke to was only able to discuss her concerns in general terms as the CSA had no written authorisation from Peter that his wife could make enquiries on his behalf. The Complaints Officer provided Peter's wife with a great deal of information about the change of assessment (COA) process and said she would research further her concerns about the information which must be provided on a COA application, particularly about her personal details. The Complaints Officer sought advice from the COA Team Leader and the legal section, to clarify what information Peter must provide about his wife. She informed Peter's wife that he would not be required to provide her date of birth, and discussed a range of other issues, reiterating that she could talk to her about the specifics of the case when she had received the authorisation for her to be Peter's representative. The Complaints Officer also gave her a detailed explanation of the complaints process, and at her request, located a counselling service for her. Peter later contacted the CSA saying they were harassing him, but did not pursue the matter with the Complaints Service. It is not clear how Peter's mother's complaint about the treatment of her daughter-in-law by the Complaints Officer arose. She did not pursue this matter with the CSA.

*The outcome:*

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<sup>10</sup> Another complaint by a representative had been included in the 52 initially located by the CSA but was not finally reviewed as it was determined not to properly meet the criterion as a Step 3 complaint.

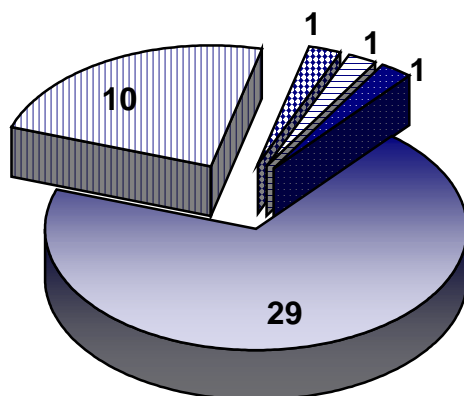
The review of the Complaints Service handling of this matter found that there was no justifiable basis to the complaint about the Complaints Service. Indeed, the assessment of the Complaints Officer's handling of the matter resulted in a perfect score of 42.

Although this one example of a complaint from a representative resulted in a satisfactory outcome, we are not able to draw any conclusions about whether advice given to a representative — that the matter should be taken to the Complaints Service — would be acted on due to insufficient sample size. This may be an area for my office to pursue further.

### 7.1.9 Time lapse from referral to Complaints Service and contact

In all the cases reviewed there was very little delay between the time my officers spoke to complainants and advised them to call the Complaints Service, and when the person did so. For 29 of the 42 Group A complaints, the person contacted the Complaints Service on the same day that they spoke to my office. A further 10 contacted the Complaints Service on the following working day. In the remaining three cases, one called three days later, one six days later, while another waited 11 days before contacting the Complaints Service. These results are set out in Chart 3 below.

**Chart 3: Time between contact with Ombudsman's Office and contact with the CSA Complaints Service for Group A complaints (working days).**



■ same day □ next day ▨ 3 days delay ▩ 6 days delay ■ 11 days delay

### 7.1.10 Whether clients take advice to contact Complaints Service

The data shows that those people who take my officers' advice to contact the Complaints Service, generally do it promptly. This review did not assess what proportion of complainants do follow that advice. The methodology was not designed to address this issue. My office's Client Satisfaction Survey<sup>11</sup> conducted in June 2000 (using 1999 complaint data) found that 92% of CSA complainants who were referred back to the Agency reported doing so; however, the survey did not specify the Complaints Service.

<sup>11</sup> A C Nielsen, *Commonwealth Ombudsman. Final Report: Client Satisfaction Survey June 2000.*



The CSA did not follow up all the 142 complainants identified by my office who were advised in the March quarter to contact the Complaints Service, as the project required the CSA to locate only sufficient cases for an adequate review to be undertaken. However the CSA has informed us that in most cases where it was unable to locate a case it appeared to be because our records contained incomplete or incorrect information about the client, rather than that the client had not contacted the Complaints Service. Notwithstanding this advice, on the results from this review, we are not able to satisfy ourselves that all callers whose complaints are declined and referred to the Complaints Service will actually do so. This would be an important issue for my office to explore as part of any follow up research.

If further research shows that there is a group that does not take our advice to pursue their complaint with the Complaints Service, my office would need to assess whether this is a problem. It may be that the office needs to develop referral protocols with the CSA, to ensure that complainants are not dissuaded from pursuing their complaint if my office declines to investigate it. This may include an arrangement whereby the Investigation Officer arranges with the Complaints Service to contact the complainant in certain circumstances, rather than relying on the complainant to take action him or herself.

Where possible my office should decline to investigate complaints where the matter has not been raised with the Complaints Service, but Investigation Officers are required to make a reasoned judgement in the individual circumstances of each case, taking account of complainants' ability to advocate for themselves, the previous attempts they had made to resolve the matter, and any other sensitivities or barriers that may inhibit complainants' ability or likelihood of pursuing the matter with the Complaints Service.

#### **7.1.11 Complaints about Complaints Service – Group B**

Generally the ratings for Group A and Group B complaints were similar, although it must be kept in mind that the sample for Group B (10 complaints from seven complainants) is too small to draw firm conclusions. Overall, 83% of complaints were rated as 'excellent'. For Group A complaints this rose to 86%, while for Group B complaints it was 70%. For all complaints only 10% were rated as 'needs improvement' but for Group B, 20% received this rating compared to 7% for Group A.

One of the most significant differences between the groups was in the area of *timeliness*. Only 50% of the complaints were rated as 'excellent' for Group B, whereas for Group A over 80% were. *Appropriate identification and implementation of remedies* was another area where there was a difference between the handling of Group A and Group B complaints. For three of the ten complaints in Group B (30%) this was rated as 'needs improvement' compared to only four of the 42 Group A complaints (about 10%). This was clearly one of the issues that gave rise to the complaints to my office about the Complaints Service.

Of the seven Group B cases, the review concluded that there was no justifiable reason for the complaint about the Complaints Service in five cases. For most of these cases, the Complaints Service was dealing with the matter in a reasonable timeframe at the time that the complaint was made, and eventually arrived at a satisfactory outcome.

In two cases, there was justification for the complaint to my office about the Complaints Service. These were investigated by my officers and CSA officers. The major problems identified with the complaint handling in these matters were *timeliness* in following up matters and *not keeping the client advised* of the progress of their complaint. In both cases the intervention of a second (and in one case third) Complaints Officer or Ministerial and Ombudsman Liaison Officer was required before the matter was adequately resolved.

In one case, the matter had not been followed up by the Complaints Officer as agreed for a reason outside the individual Complaints Officer's control, due to her unplanned absence on sick leave. While the responsibility for ensuring that an officer's caseload is taken over in such situations lies with the Complaints Service management, there will always be unexpected circumstances where the system fails. However this matter was handled by two other officers before a satisfactory outcome was achieved. This indicates some problems with follow-up and management.

Case study 2 provides the background to this matter.

### **Case study 2: Michael (payer)**

#### *The issues:*

Michael contacted the Complaints Service to get an explanation for why garnishee action was taken in 1992 to collect child support from his wages. He wanted the name of the officer who had authorised the garnishee so he could consider taking legal action against the person.

#### *The investigation:*

The Complaints Officer documented the detailed explanation she gave to Michael about how in 1992 garnishee action was the normal procedure but the policies had now changed and payers are now contacted to discuss payment arrangements before direct deductions are arranged. Michael insisted he wanted a written explanation. However before the end of the day this Complaints Officer left work on emergency sick leave. No follow up arrangements were put in place. When no letter was forthcoming, the payer rang the Complaints Service again two weeks later and spoke to a second Complaints Officer. This Complaints Officer asked Michael to write in with his complaint, and took no action. The payer then rang my office very annoyed at getting what he saw as a 'run-around' with no-one prepared to give him the explanation in writing that he wanted.

#### *The outcome:*

Following a phone call from my office, the Regional Ministerial and Ombudsman Liaison Officer agreed to respond to Michael in writing as he requested and a letter was sent to Michael within 28 days explaining the policy and legislative framework in relation to salary deductions in 1992 and subsequent procedural changes.

The second Group B complaint where the complaint was justified, was handled by two officers before there was a satisfactory outcome. Eventually the matter was very well handled and a very good result for the complainant

was reached (and a rating of 'excellent'). Although the first Complaints Officer identified and documented the payer's concerns he failed to take appropriate investigative action. After the person complained to my office, a very thorough investigation was undertaken, which was very well-documented on the CSA system. This produced the outcome the complainant was seeking which was appropriate in the circumstances.

Case study 3 outlines this complaint.

### **Case study 3: Antony (payer)**

*The issues:*

After contacting my office, Antony, a payer, rang the Complaints Service to complain that despite his notifying the CSA on a number of occasions of his relevant dependants they were not included in previous assessments and were only added to his assessment from the date of the last notification.

*The investigation:*

The Complaints Officer told him that unless the regional office was able to confirm that he had notified them by fax in 1997 as he stated then the decision to add his relevant dependants only from the date of the most recent notification would stand. The Complaints Officer undertook to discuss the matter with the office concerned. There is no documentation on the CSA system to suggest that he did. Antony contacted my office about a week later to say that he felt he was being put off by the Complaints Service and was not being kept informed of what action they were taking.

*The outcome:*

Following contact from my office another officer investigated Antony's complaint. Although he was unable to locate Antony's fax from 1997, he determined that there was sufficient other information recorded on the system to corroborate Antony's claim that he had advised the CSA on a number of occasions about his relevant dependants. He recommended that Antony's assessment be backdated, which would have the effect of reducing his arrears to less than \$100, which could be deducted from his tax refund and the balance returned to him.

## **7.2 Areas of strength and areas needing improvement**

The areas of strength identified in the Complaints Service handling of complaints (that is, areas where a score of 'excellent' was consistently achieved) included the identification and documenting of issues on the CSA computer system and the non-judgemental documenting of the matter. This latter area was the only one where a score of 3 ('excellent') was recorded for every complaint. There were also very high levels of 'excellent' ratings for appropriate investigative action (46 of the 52 complaints) and appropriate negotiation with the Team Leader (48 of the 52).

The following case study sets out an excellent example of complaint handling, where the Complaints Officer identified a range of issues and pursued them all.

Although the outcome was partly detrimental to the complainant (in that it reduced the arrears owing) the Complaints Officer made every effort to ensure that the payee understood how her account had been adjusted, was

satisfied that her new assessment was correct, received all the information she requested, and was informed of all her options for seeking a further change to the assessment and compensation. The Complaints Officer readily agreed to an interview as requested and made sure the complainant was kept informed of progress, through detailed letters and telephone conversations.

The complainant was initially reluctant to contact the Complaints Service when my officer advised her to, but agreed to on the understanding that she could come back to my office if she felt her concerns had not been adequately addressed. She did not contact my office again.

#### **Case study 4: Rita (payee)**

*The issues:*

Rita contacted my office to complain about the CSA agreeing to the assessment being reduced on a number of occasions on the basis of the payer providing what she says were unsubstantiated decreases in his estimate of his income and increases in his expenses. She told the Investigation Officer that she had lodged objections but that these had been ignored. Rita had not contacted the Complaints Service about her concerns and was initially reluctant to pursue these matters herself, however the Investigation Officer declined to investigate until she had done so, telling her that she could come back to my office if her complaints were not adequately addressed.

Rita called the Complaints Service that day and asked to have an interview with a Complaints Officer and to complain about the handling of her case. She raised some different issues with the Complaints Officer than she did with my office – specifically about the CSA's lack of collection action although she also complained of the CSA accepting the payer's estimate and wiping out the arrears owed to her, and the current rate of assessment. The Complaints Officer listed five separate issues in a detailed system document.

*The investigation:*

The Complaints Officer undertook to obtain all copies of assessment letters since start date of case as requested but explained that some may take up to 10 working days. In her file record, she noted that the request for information kept expanding and that she may need to refer the payee to the FOI provisions. She then checked the records and noted a discrepancy in the current assessment that used a higher rate than that set by the change of assessment. She also found that the payee had lodged two 'End' forms but that only the second one was acted on. This had discharged any debt, but arrears arising from a later reconciliation for this period had not been discharged. The Complaints Officer confirmed with a Technical Advisor that these arrears should be discharged although the reconciliation was completed later than the End form, as it stated that the liability should end when neither party owed the other.

*The outcome:*

The Complaints Officer wrote to Rita advising that the arrears created by the reconciliation cannot be recovered and that the current assessment has been corrected in line with the change of assessment. She included a copy of the End form as well as providing details of the assessments, a summary of the account and a list of payments disbursed. She apologised for the delays in correctly implementing the changes and also set out the steps the CSA had taken to collect the arrears. She confirmed that Rita had an appointment to meet with her in a few days time. The Complaints Officer also explained to Rita that at the time the payer lodged his estimate the CSA had no discretion to reject it even if it appeared unreasonably low, although the law has since changed. She advised her that she could lodge a change of assessment herself if she believed the assessment was wrong. In a follow-up phone call Rita complained about the arrears being reduced and said she only ended the case because the CSA had made mistakes in administering the case. The Complaints Officer advised her that she could apply for compensation if she believed the CSA had caused her a loss. The

Complaints Officer arranged to send Rita all the assessment letters before her interview and ensured that the Case Officer would contact the payer to make payment arrangements.

Two of the three areas where there was room for improvement (that is those with the lowest scores) were more related to the CSA's internal recording procedures, rather than issues that would impinge on effective complaints handling service, from an individual client perspective. These were ensuring complaints were recorded on the complaints database and recording all follow-up dates and all action taken on the systems documents.

The third area where there was room for improvement was in dealing with the complaint in a timely fashion and, particularly, the need for clients to be informed of progress and for that process to be clearly documented on the system. This is a more significant issue from my office perspective as issues of timeliness and not receiving advice about the progress of the complaint were key issues in the Group B complaints, where the complaint was about the Complaints Service itself.

The following case study is an example of complaints handling that is less than satisfactory. The Complaints Officer began the investigation in an appropriate way, but when his initial approach to obtaining information was unsuccessful he did not consider alternatives or pursue the matter further. He did not negotiate directly with the Team Leader or pursue the complainant's concern about the failure to collect her child support. He did not advise the complainant that he would not be taking further action or why.

#### **Case study 5: Carmel (payee)**

*The issues:*

Carmel contacted my office in Hobart to complain that although she had arrears of about \$14,000 the CSA was not doing enough to collect the maintenance owing. She was advised to take her concerns to the Complaints Service. She rang the Complaints Service the next day and told the Complaints Officer she spoke to that she had a court order issued in Western Australia in March 1999. She wanted the CSA to collect the child support owing to her. She provided information about the payer's employment status and that he was currently in the middle of a property settlement with his second partner. The Complaints Officer told Carmel that he would need a copy of the Court Order and she agreed to fax it to him when she could.

*The investigation:*

The Complaints Officer (in Melbourne) contacted a Complaints Officer in Townsville where the case was managed. The Townsville Officer left a message for the Team Leader to contact her or the Complaints Officer in Melbourne. She noted that she was trying to establish who had responsibility for this case, as the listed case officer was temporarily undertaking a different role. She subsequently recorded on the system that there was not a copy of the Court Order on file.

*The outcome:*

Ten days later Carmel rang the Complaints Officer in Melbourne to advise that she was unable to obtain a copy of the Court Order from her solicitor, as she has not paid her account. He recorded this, but took no further action and provided Carmel with no advice about how her complaint might be pursued. He did not consider other ways a copy of the Court Order might be obtained or check the status of her account or check what collection action had or might be taken.

Despite some individual cases being handled in a less than satisfactory way, it is important to note that overall the case reviews did not reveal any areas of significant weakness. *Recording issues on complaints database* rated as 'needing improvement' in only 12 of the 52 complaints, and was rated 'excellent' in 39. Similarly, *recording remedy on complaints database* was rated as 'needs improvement' in 13 complaints of the 52 complaints, with another five being 'satisfactory' and 34 'excellent'. Even in the area of *timeliness*, which is potentially an area of concern, 40 of the 52 complaints were rated as 'excellent' and three as 'satisfactory' with only nine rated as 'needs improvement'.

**Recommendation 2: That the Complaints Service ensure that its ongoing training and quality assurance programs address the issues identified by the review where improvement was warranted. Specifically, these include:**

- **Communication with clients, with particular emphasis given to the importance of keeping clients informed of the progress and outcome of complaints;**
- **Timeliness of completing investigations;**
- **Recording of investigative action, remedies and follow-up action on the CSA system and the Complaints Service database.**
- **Development of a system for the Complaint Team management to monitor complaints so that incomplete or less than satisfactory complaint handling can be addressed and followed up.**

## 8. Factors contributing to the high ratings for the CSA's Complaints Service

Notwithstanding the recommendations in this report for improvements in the CSA's complaint handling, the outcome clearly indicates that the CSA's Complaints Service is effective and responsive.

This review was deliberately limited in its scope and did not seek to identify what specific features of the Complaints Service contributed to this outcome. However, much of it can be attributed to certain characteristics of its structure and management, which accord with the essential elements for effective complaints handling identified by Standards Australia.<sup>12</sup>

There is a strong commitment from senior management within the CSA to have effective structures to resolve complaints and also to learn from the information that complaints provide the agency. This is evidenced by the management structure in place since the reorganisation in July 1998, which saw the Complaints Service being centrally managed, with the overall responsibility for the Complaints Team residing with one of the senior executive team in Canberra.

As the Department of Family and Community Services (DFaCS) reported in its Annual Report for 1999-2000:

*The Child Support Agency takes a holistic approach to the coordination and management of feedback and complaints by integrating national management of the Complaints Service, ministerial correspondence, complaints made through the Commonwealth Ombudsman and Office of the Federal Privacy Commissioner, requests for compensation, and the media. This approach facilitates analyses of feedback and provides information about trends in the full range of complaints that come to the Child Support Agency. This provides the Child Support Agency with valuable information for the review and development of practices and procedures and for continuous improvement to client service.<sup>13</sup>*

The restructure also developed clear roles and responsibilities for Complaints Officers. This ensured that the critical nature of their complaints handling role was clearly understood and they were not subsumed into other duties, which blurred their role or took away from its importance. Complaints Officers are at a relatively senior level (usually ASO 6), which helps to ensure respect for

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<sup>12</sup> Standards Australia, *Complaints Handling AS 4269-1995*, Homebush, 1995. The essential elements include: commitment at all levels of the organisation; fairness to the person making the complaint; adequate resources for the staffing, training and support; visibility of the complaints system; access for those with special needs to the complaints process; assistance for lodging complaints; responsiveness; appropriate remedies; using complaint information to address systemic issues; and accountability for complaint handling across the organisation.

<sup>13</sup> Department of Family and Community Services, *Annual Report 1999-2000*, Canberra, October 2000. The CSA is located within DfaCS, which also has portfolio policy formulation and advising responsibilities for the CSA.

their position and expertise within the Agency. It also constitutes recognition of the importance of their role of complaints handling for the organisation.

The Complaints Team has also instituted a thorough system of training both for its own staff, and also for other CSA staff, with the Complaints Officers taking a key role in induction and ongoing training programs. Complaints Officers present a complaint handling training session *Complaints: An Opportunity* as part of the entry level training program. This aims to help staff understand why people complain and provides a model for handling complaints and explains the role of all staff in resolving complaints. This is one aspect of the Complaints Team taking a role influencing service improvement throughout the Agency. Complaints Officers also attend a quarterly national conference to develop and enhance their own skills and understanding.

The Complaints Team also passes on the 'learnings' from its complaints handling through its reporting regime. The Complaints Team produces quarterly reports on complaints received. As well as presenting statistical data, these reports also identify trends in complaint issues and provide a breakdown of data for each of the CSA's Streams, so that the information can be used by Stream Managers to understand the underlying cause of complaints and address service issues. It makes substantial use of case studies, as the feedback from the Streams indicate that these have proved to be very useful in adopting the learnings from complaints.

Individual Complaints Officers are also assigned regional and portfolio responsibilities, whereby they are responsible for the analysis and feedback of complaints information to their portfolio area. The Complaints Team reports that stakeholders have begun to ask their assigned Complaints Officer for updated information as part of managing their business.<sup>14</sup>

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<sup>14</sup> CSA Complaints Service, *CSA Complaints Report, June 2000*.



## **9. Conclusion**

This review has concluded that the CSA's Complaints Service functions at a high standard and provides a sound basis for my office to continue to decline to investigate matters that have not been dealt with by the Complaints Service. However the review has also highlighted some areas that warrant further attention. This report makes recommendations designed to improve these areas.

The recommendations target promotion of the Complaints Service to enhance clients' awareness and aspects of Complaints Officers' handling of cases — in particular, issues of timeliness, communication with clients, and recording.

R N McLeod  
Commonwealth Ombudsman  
July 2001

## **\*Criteria used in Case Reviews to assess complaint handling**

Under the 'Issues' category there were two areas assessed (to a maximum of 6 points):

- Were all the issues identified and documented on the CSA system;
- Were all the issues appropriately recorded on the complaints database.

Under the 'Investigation' category there were three areas (maximum 9 points):

- Was there appropriate investigative action;
- Was there appropriate negotiation with the Team Leader;
- Was the investigation documented on the CSA system.

Under the 'Remedy' category five areas were assessed (maximum 15 points):

- Was there a quality decision made;
- Were appropriate remedies identified and implemented;
- Was the client advised of the remedy;
- Was the remedy documented on the CSA system;
- Was the remedy recorded on the complaints database.

Under the final 'Overall' category, four issues were considered (maximum 12 points):

- Was the document on the CSA system non-judgemental with just the facts recorded;
- Was the complaint dealt with in a timely fashion;
- Was this a good example of investigation and resolution;
- Was this a good example of quality recording.

## \*Copy of Checklist

### CSA Complaints Service Quality Assurance Program

#### Contact

Client name and case number	
Type of client	Payer/Payee
What was the date the client was referred from the ombudsman	
When did the client speak to a complaints officer/CSA	
Who was the complaints officer	

Scoring:            *Needs improvement – 1*      *Satisfactory – 2*      *Excellent – 3*

#### Issues

Were all issues identified and documented on the CSA system	
Were the issues appropriately recorded on the complaints database	
Total Issues Category (out of 6)	

#### Investigation

Was there appropriate investigation action	
Was there appropriate negotiation with the T/L	
Was the investigation documented on the CSA system	
Total Investigation Category (out of 9)	

#### Remedy

Was there a quality decision made	
Were appropriate remedies identified and implemented	
Was the client advised of the remedy	
Was the remedy documented on the CSA system	
Was the remedy recorded on the complaints database	
Total Remedy Category (out of 15)	

#### Overall

Was the document on the CSA system non judgemental with just the facts recorded	
Was the complaint dealt with in a timely fashion	
Was this a good example of investigation and resolution	
Was this a good example of quality recording	
Total Overall Category (out of 12)	

Overall score (out of 42)	
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<28 needs improvement      28-35 satisfactory      >35 excellent

Comments

QA completed by/date:

### **\*Detail on selection of the case review sample**

There were 142 cases identified as meeting the criteria (as discussed in Section 5.2.4 on page 14) with 128 of these being Group A complaints and 14 Group B.

In 91 of the 142 cases identified discretion was exercised in a simple straightforward way and the complainant immediately referred to the Complaints Service. For a further 37 complaints, the complainant had either already been in contact with the Complaints Service or they were given other advice and information as well as being referred to the Complaints Service.

Of the 142 complaints identified in both Group A and Group B, 68 were from or on behalf of payers (65 of whom were male and 3 female) and 74 were from or on behalf of payees (all but one of whom were female). In 16 cases, the complaint was made by another party, most usually a partner or mother.

A sample of Group A cases to be reviewed was then drawn from the Group A pool by the CSA on the basis of:

- The CSA being able to identify the complainant
- The matter was dealt with by the Complaints Service.
- The selected cases provided a reasonably proportional representation across CSA regions and from my offices, and of complaints from payers and payees.

All the 14 complaints identified in Group B were referred to the CSA as possible cases for review for location of documentation.

The CSA was asked to give priority to identifying the cases for:

- The 14 cases where the Complaints Service was the subject of the complaint (Group B complaints).
- The 91 cases where the complaint was simply declined and referred straight to the Complaints Service (that is, not those where other advice or information was provided or where previous contact with the Complaints Service was noted).
- Complaints made by a representative.
- Cases that would provide a balanced representation from each office or region, both Ombudsman and CSA (noting the disproportionate referrals from our Brisbane and Hobart offices).

Of the sample initially identified by the CSA, 23 complaints (42%) were from the payer (all male) and 32 (58%) from the payee (all but one female). In 32 cases, the matter had been simply declined by my office and the complainant referred straight to the Complaints Service, with no other advice or contact. In three cases, the complaint was made by a representative of the client. Nine were about the Complaints Service (and two of these had made earlier complaints to my office but were referred to the Complaints Service, one twice).