



Australian Government
Australian Customs Service

Customs House
5 Constitution Avenue
CANBERRA ACT 2601

25 September 2006

Professor John McMillan
Commonwealth Ombudsman
1 Farrell Place
CANBERRA ACT 2601
Attention: Ms Sue Prunster

**Complaint Handling In Australia's Airports
Customs Response to the Ombudsman's Draft Report**

Dear Professor McMillan

Thank you for your letter of 23 August 2006 to Mr Michael Carmody, Chief Executive Officer, Australian Customs inviting comments on the *Draft Report on the Ombudsman's own motion investigation – Complaint Handling in Australia's Airports, August 2006*. I am responding on the CEO's behalf.

The Report notes that research undertaken by the Ombudsman's Office during this Review suggests the number of complaints arising at airports was rising and that increased security measures (including check-in, screening and baggage handling) were a major contributor'. I note in this context that Customs is not responsible for aviation security per se and is not involved in the activities described.

Customs acknowledges the Commonwealth Ombudsman's role and expertise in complaints handling and the suggestion that the airport environment may be preventing complaints from being made is appropriate for discussion among Commonwealth agencies. Customs also agrees that consistency in the management of complaints across airport agencies should be an important objective for all agencies present in airports.

Customs investment in complaints management is considerable, and is reflected in the Report referring to Customs complaint handling mechanisms as “best practice”. This long-established complaints and compliments management system registers client complaints that are made about Customs operations at airports, shop fronts, shipping wharves and telephone call centres, the infrastructure used to support these such as computer centres, and the way Customs performs its role in revenue collection, border protection and enforcement of relevant Australian Government laws.

The following agency comments are provided in relation to the draft recommendations provided in the report.

Complaint Handling Standard

Report Recommendation 1 relates to agencies compliance with the current Australian Standard ISO 10002-2006 for complaint handling.

Report Recommendation 1

We recommend that all agencies review all aspects of their complaint handling mechanism against the recently published AS ISO 10002-2006.

Recommendation 1: Customs agrees with this recommendation and will implement an assessment of its complaint handling mechanism against AS ISO 10002-2006 at its next review, scheduled for 2007.

Joint Complaint Handling

Report Recommendations 2-6 relate to measures to be implemented if agreement is reached between agencies regarding the establishment of a joint agencies complaints management system.

Recommendation 2-6.

Customs is committed to addressing the issues highlighted in the Report recommendations 2-6 relating to establishment of a joint agencies complaints management system.

However, Customs does not agree that the need for such a system, based on the number of complaints received, has been sufficiently justified. The proposal to have a combined complaints management system specifically located at airports will significantly duplicate the current integrated Customs approach for dealing with clients.

Customs will however, refer recommendation 6 to the National Passenger Processing Committee (NPPC) for consideration and response. While the NPPC is chaired by the Australian Customs Service, it's membership also consists of the Australian Quarantine Inspection Service, the Attorney-Generals Department, the Department of Immigration and Multicultural Affairs, the Department of Industry, Tourism and Resources, the Australian Federal Police, and the Department of Health and Aging.

Individual Agencies

Report Recommendations 7-15 relate to measures to be implemented by individual agencies where agreement is not reached regarding the establishment of a joint complaints management system.

Report Recommendation 7

We recommend that agencies incorporate a picture of their uniforms in their service charters and complaints brochures and on the web pages and that complaints brochures be co-located at airports with those other agencies.

Recommendation 7: Customs agrees with this recommendation and will implement this at next printing.

Report Recommendation 8

We recommend agencies develop an agency-specific complaints poster featuring their uniform, which can be posted in airports.

Recommendation 8: Customs agrees with the recommendation to develop an agency-specific complaints poster. However this would be subject to signage and space availability in agreement with relevant airport owners.

Report Recommendation 9

We recommend that agencies demonstrate their commitment to good client service and continual improvement by including a clearly marked "complaint and compliments" or "feedback" link on their home page. This link should lead to a page containing or providing access to all complaint related information. Agencies can consider the ACS complaints and compliments web page as best practice.

Recommendation 9: Customs agrees and already complies with this recommendation.

Report Recommendation 10

We recommend that agencies include direct links to complaint pages of other agencies.

Recommendation 10: Customs agrees with this recommendation and will implement, subject to the approval of relevant agencies

Report Recommendation 11

We recommend that agencies ensure that their clients service charter or compliments brochure:

- *is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia.*
See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- *lists all formats in which a complaint may be made*
- *incorporates contact information for disabled clients*
- *incorporates the number for the telephone interpreter service*
- *is available in a range of formats.*

Recommendation 11: Customs agrees and already complies with this recommendation.

Report Recommendation 12

We recommend that agencies review complaint information on their websites for compliance with the W3 Web Content Accessibility Guidelines.

Recommendation 12: Customs agrees with this recommendation and will ensure on-line complaints site meets WC3 Web Content Accessibility Guidelines

Report Recommendation 13

We recommend that agencies provide information relevant to passenger rights and responsibilities when travelling to or from Australia in the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia, and that this information be available from the home page of each agency's website from an icon which would be recognisable to non-English speaking passengers.

Recommendation 13: Customs has a number of brochures which outline passenger requirements and responsibilities when entering Australia. The Customs "Know Before you Go" Brochure is widely available in brochure form, as well as on-line. The Customs Client Service Charter outlines a range of traveller expectations in relation to primary line processing, baggage examination, claiming a TRS refund, undergoing a personal search and service standards for communications with Customs.

Recognising the need for accessibility, Customs will consider translating the Know Before You Go Brochure into the ten most commonly spoken languages by international passengers visiting Australia.

Report Recommendation 14

We recommend that agencies institute a cross-agency referral process where agencies refer the complaint, rather than the complainant, to the appropriate agency. To this end, all feedback forms should include a statement that meets the requirements of Information Privacy Principle 11, making clear the agency's intention to forward complaints to the relevant department. Alternatively, a tick box at the bottom of a complaint form could be used by the complainant to indicate their permission for their complaint to be referred. Telephone complaint procedures should also be amended so that agency officers seek verbal permission from the complainant to refer their complaint.

Recommendation 14: Customs agrees to this recommendation in part. Customs will seek to implement a tick box in future communications, especially in brochure communications, and will consider seeking verbal consent for referral when dealing with verbal communications.

Customs does not support a referral process where the complaint, rather than the complainant, is referred to the appropriate agency. Customs preference remains that the complainant approach the relevant organisation.

Customs is concerned that any role which requires Customs to act as a complaints broker and collect data on behalf of other organisations, would place an onus on Customs to hold a level of expertise about other agencies functions in order to refer the complaint to the correct agency. Customs staff are not sufficiently trained to obtain relevant information, for example, in relation to a complex quarantine matter, that can be passed seamlessly to AQIS. This is equally relevant to other agencies attempting to clarify or collect data on a Customs matter.

Customs agrees to undertake a review of the requirements of Information Privacy Principle 11, with a view to confirming the referral of complaints to relevant Departments.

Report Recommendation 15

We recommend that agencies promulgate cross-agency complaint investigation guidelines, which encourage inter-agency consultation during the investigation phase of a complaint.

Recommendation 15: Customs believes that the current level of cross-agency consultation with Commonwealth agencies operating at international Airports is strong and does not require formal joint agency investigation guidelines. Customs will consult with relevant agencies during complaint investigations if required. Consultation with agencies will also take place where it is possible that issues raised by travellers may involve other agencies. It should be noted that Customs has to date, received very few complaints which involve more than one agency at the airport.

Thank you again for providing the draft report for Customs comment and we look forward to receiving the final report.

Yours sincerely

Jan Dorrington
National Manager
Passengers Branch



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September 2006

Professor John McMillan
Commonwealth Ombudsman
GPO Box 442
Canberra ACT 2601

Dear Professor McMillan

COMPLAINT HANDLING IN AUSTRALIAN AIRPORTS

Thank you for the opportunity to offer comment on your draft report on the complaint handling arrangements relevant to passengers at Australian airports and the recommendations for improvement. Unfortunately, it appears that the invitation to attend the workshop of 28 February 2006 was not extended to the AFP's Professional Standards Team (PRS) but I acknowledge that the AFP was represented through the Aviation function. As a result PRS was not involved in the discussion of the issues.

I have read the recommendations that have been identified and wish to make the following comment.

Recommendation 1

We **recommend** that all agencies review all aspects of their complaints handling mechanism against the recently published AS ISO 10002--2006.

The AFP presently manages complaints in accordance with the requirements of the *Complaints (Australian Federal Police) Act 1981*. In the very near future, the *Law Enforcement (AFP Professional Standards and Related Measures) Act 2006* will commence and complaints concerning AFP employees will be managed in accordance with Part V of the *Australian Federal Police Act 1979*. Accordingly, the AFP manages complaints in compliance with Commonwealth legislation. The Professional Standards area of the AFP will review the recently published AS ISO 10002--2006 to ensure that AFP complaint handling practices, not governed by legislation, comply with the standard.

Recommendation 2

We **recommend** that agencies develop a combined complaints management system with a physical presence in major international airports. These airports represent those most likely to have a multi-agency presence and have the highest passenger numbers.

As noted in Recommendation 1, the AFP response to complaint management is governed by specific legislation applicable to the AFP. The AFP does not consider it necessary, or appropriate, to participate in a combined complaints management system in major international airports. The AFP however, will ensure that it is represented on specific airport inter-agency forums where complaint trends can be identified and discussed with other agencies.

Recommendation 3

We recommend that agencies do more to make passengers aware of complaints handling mechanisms while they are in airports. To this end, we suggest that agencies consider an airport specific joint complaints brochure including pictures of the uniforms of each agency.

PRS are currently printing AFP specific brochures that include uniform identification. These brochures will be placed at all airports where there is an AFP presence. This information will also be available for the public to access on the AFP web site. At this point in time, we do not believe that a separate joint complaints brochure is necessary.

Recommendation 4

We **recommend** that this complaints brochure:

- is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia. See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- lists all formats in which a complaint may be made
- incorporates contact information for disabled clients
- incorporates the number for the telephone interpreter service
- is available in a range of formats.

The AFP public complaints brochure will be translated into 7 languages being those most widely used by the Australian population. These languages are:

1. Spanish
2. Arabic
3. Italian
4. Greek
5. Chinese
6. Vietnamese
7. Indian (Hindu)

In deciding on the appropriate languages, the AFP considered the Department of Immigration publication: "Language Services Guidelines for Commonwealth Agencies" which indicated that the most common household languages spoken within Australia other than English include; Italian, Greek, Arabic and Chinese.

Additionally, the AFP considered the Australian Bureau of Statistics data from the 2001 Census. This data represented the country of birth of Australian Citizens and shows a proportionally high number of Australian residents from Vietnam, India, the Peoples Republic of China, Lebanon, Germany, Greece and Italy.

Your report refers to a table of movements into Australia broken down by country of origin. The most common non-English languages identified by this report are included in those being translated by the AFP. These 7 languages represent the greatest proportion of languages spoken by travellers and Australian citizens.

This brochure will list all formats in which a complaint can be made. It will also incorporate the Telephone Interpreter Service (TIS) contact number.

The AFP is updating the AFP external website to improve accessibility and information regarding complaints. The public complaints brochure will also be available as a printable 'pdf' document (including the 7 language translations) via the external website.

Recommendation 5

We **recommend** that agencies develop a joint poster about the right to complain including pictures of the relevant uniforms.

The AFP will work with other agencies should this recommendation be supported. In addition, public complaints brochures will be available at all airports with an AFP presence. These brochures address the identification of AFP uniforms.

Recommendation 6

We recommend that the National Passenger Processing Committee be given the role of coordinating cross-agency complaints reporting among its member agencies. Systemic complaints affecting multiple agencies should be identified and resolved via this forum.

The AFP does not support the National Passenger Processing Committee being given the role of coordinating cross-agency complaints relating to conduct by AFP appointees. The AFP operates within Commonwealth Legislation in dealing with complaints about AFP appointees.

The AFP does endorse senior AFP representation on this committee and will contribute to the discussion of systemic complaints and the development of strategic solutions to overcome incidents involving multi-agency issues.

Recommendation 7

We **recommend** that agencies incorporate a picture of their uniforms in their service charters and complaints brochures and on their web pages, and that complaints brochures be co-located at airports with those of other agencies.

The AFP will release a new public complaints brochure which incorporates a picture of the shoulder emblem depicted on AFP uniformed officers shirts. The brochure also provides details on recognising an AFP officer and details the legislative requirement for AFP officers to provide identification material where requested.

The AFP public complaints brochure will be available at the airports where the AFP has a presence. These brochures will be readily accessible to members of the public and airport employees.

Recommendation 8

We **recommend** agencies develop an agency-specific complaints poster featuring their uniform, which can be posted in airports.

The AFP at this time will not be developing an agency specific poster, however the public complaints brochures will be prominently available at each airport.

Recommendation 9

We **recommend** that agencies demonstrate their commitment to good client service and continuous improvement by including a clearly marked "complaints and compliments" or "feedback" link on their home page. This link should lead to a page containing or providing access to all complaint related information. Agencies can consider the ACS complaints and compliments web page as best practice.

The AFP is currently developing an online complaints and feedback form to be released to the external AFP website during October 2006. The online form will be accessible on the same pages as other information relating to complaints.

Recommendation 10

We recommend that agencies include direct links to complaint pages of other agencies.

The AFP external website relates to the functions of the AFP and not other agencies. As a consequence, the AFP has developed links from its site to the key stakeholders being your office and ACLEI. The AFP is of the view that a link from your website to all agency websites would be a more efficient than requiring each agency to maintain duplicate links to other agencies.

Recommendation 11

We **recommend** that agencies ensure that their client service charter or complaints brochure:

- is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia. See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- lists all formats in which a complaint may be made
- for disabled clients
- incorporates the number for the telephone interpreter service
- is available in a range of formats.

As per the comment under recommendation 4, the AFP public complaints brochure will:

- be translated into the 7 most common languages within Australia;
- list all formats in which a complaint can be made;
- incorporate the TIS contact number; and
- be available in a range of formats (printed and electronic).

Recommendation 12

We **recommend** that agencies review complaint information on their websites for compliance with the WC3 Web Content Accessibility Guidelines.

The AFP complies with the requirements as determined by WC3 web content accessibility guidelines.

Recommendation 13

We **recommend** that agencies provide information relevant to passenger rights and responsibilities when traveling to or from Australia in the languages identified as the ten most commonly spoken languages by international passengers traveling to Australia, and that this information be available from the home page of each agency's website from an icon which would be recognisable to non-English speaking passengers.

The AFP will provide access to public complaint brochures which will be available in 7 languages other than English. Passenger rights in relation to the complaints framework and responsibilities of AFP appointees have been addressed in recommendation 4, regarding the public complaints brochure.

Recommendation 14

We **recommend** that agencies institute a cross-agency referral process where agencies refer the complaint, rather than the complainant, to the appropriate agency. To this end, all feedback forms should include a statement that meets the requirements of Information Privacy Principle 11, making clear the agency's intention to forward complaints to the relevant department. Alternatively, a tick box at the bottom of a complaint form could be used by the complainant to indicate their permission for their complaint to be referred. Telephone complaint procedures should also be amended so that agency officers seek verbal permission from the complainant to refer their complaint.

The AFP does not agree to all parts of this recommendation. The AFP position to this broad recommendation is that:

1. Where a complainant contacts the AFP and it is clear in the first instance that the complaint relates to another agency, then the AFP will refer the complainant to that agency;
2. Where the AFP has taken a complaint and it then becomes apparent that the complaint relates to another agency, the AFP will refer the complaint to that agency;
3. The AFP will ensure that the on-line complaints and feedback form complies with Information Privacy Principle 11; and

Recommendation 15

We **recommend** that agencies promulgate cross-agency complaint investigation guidelines, which encourage inter-agency consultation during the investigation phase of a complaint.

As covered under Recommendation 1, the AFP complaints processes are governed by specific legislation and as such are already in the public domain. AFP investigators will, to the extent available by law, work with other agency investigators on a case by case basis.

Yours sincerely

John Lawler
Performing the duties of Commissioner



Australian Government

Australian Quarantine and Inspection Service

Prof John McMillan
Commonwealth Ombudsman
GPO Box 442
CANBERRA ACT 2601

Dear Prof McMillan

COMPLAINT HANDLING IN AUSTRALIAN AIRPORTS

Thank you for your letter of 23 August 2006 to Ms Joanna Hewitt, Secretary of the Department of Agriculture, Fisheries and Forestry (DAFF) inviting comments on the *Draft Report on the Ombudsman's own motion investigation – Complaint Handling in Australia's Airports, August 2006*. The Secretary has asked me to respond on her behalf.

The Report notes that the research undertaken by the Ombudsman's Office while carrying out this review suggests that 'the number of complaints arising at airports was rising and that increased security measures (including check-in, screening and baggage handling) were a major contributor'. Although the Australian Quarantine and Inspection Service (AQIS) is a Commonwealth border agency that operates at the eight major Australian international airports (Sydney, Brisbane, Coolangatta, Cairns, Darwin, Perth, Adelaide and Melbourne), AQIS is not a security agency and screens incoming passengers only for quarantine risks. We understand that only a very small percentage of referrals to the Ombudsman relate to AQIS activities.

The following specific comments are provided for your consideration in the finalisation of the Report:

Complaint Handling Standard

Report Recommendation 1 relates to compliance by agencies with the current Australian Standard ISO 10002-2006 for complaint handling.

Report Recommendation 1

We recommend that all agencies review all aspects of their complaint handling mechanism against the recently published AS ISO 10002-2006.

AQIS Comment:

The AQIS Service Charter was reviewed in 2005/06 prior to the release of ISO10002-2006. The AQIS review followed the Client Service Charter Principles provided by the Department of Finance and Administration stating that 'agencies are required to have a strategy to manage and report on feedback and complaints and must: publish a summary, with reference to complaints data, and the department's general response to complaints, in the department's annual report'. The AQIS Service Charter satisfies these reporting requirements and provides an avenue for clients to make complaints and provide compliments from the printed copies of the Charter and through the AQIS internet site. AQIS is scheduled to review the AQIS Service Charter again within the next 2 years. This review will include an assessment against its compliance with AS ISO 10002-2006.

Joint Complaint Handling

Report Recommendations 2-6 relate to measures to be implemented if agreement is reached between agencies regarding the establishment of a joint agencies complaints management system.

AQIS Comment:

AQIS is committed to addressing the concerns highlighted in paragraphs 4.2-4.6 (Part 4 - Recommendations 2-6), however AQIS does not support a joint complaint handling system. The AQIS Service Charter, which incorporates the client feedback form, is a whole-of-agency mechanism for informing AQIS clients about service standards and for receiving feedback from our various client groups. The proposal to have a combined complaints management system specifically at airports would require duplication of the current AQIS approach.

Individual Agencies

Report Recommendations 7-15 relate to measures to be implemented by individual agencies where agreement is not reached regarding the establishment of a joint complaints management system.

Report Recommendation 7

We recommend that agencies incorporate a picture of their uniforms in their service charters and complaints brochures and on the web pages and that complaints brochures be co-located at airports with those other agencies.

AQIS Comment:

The AQIS Service Charter and AQIS Compliments and Complaints brochures are currently located throughout international airport terminals including inspection benches, in brochure holders next to baggage carousels and at AQIS specific and border agency shared shopfront locations. AQIS will continue to co-locate to the extent possible the AQIS Compliment and Complaints brochures with other border agencies within the airport environment.

As the AQIS Service Charter, Complaints and Compliments brochure and the AQIS webpage is utilised by all AQIS client service delivery areas (imports and export programs) it is not feasible to include all uniform combinations worn by AQIS officers. AQIS uniforms are easily identifiable with agency badging that clearly identifies the agency of the officers. AQIS will, in conjunction with other agencies, provide agency specific uniform posters linking them to Complaints and Compliments brochures at appropriate locations throughout international airports.

Report Recommendation 8

We recommend agencies develop an agency-specific complaints poster featuring their uniform, which can be posted in airports.

AQIS Comment:

While AQIS sees merit in this proposal, display of such posters would be subject to signage space availability at international airports.

Report Recommendation 9

We recommend that agencies demonstrate their commitment to good client service and continual improvement by including a clearly marked "complaint and compliments" or "feedback" link on their home page. This link should lead to a page containing or providing access to all complaint related information. Agencies can consider the ACS complaints and compliments web page as best practice.

AQIS Comment:

The current AQIS internet site includes a 'feedback' link on the homepage that links to the AQIS compliments and complaints form and appropriate contacts.

Report Recommendation 10

We recommend that agencies include direct links to complaint pages of other agencies.

AQIS Comment:

AQIS sees merit in this proposal and will move to implement it, noting that implementation would be subject to agreement from relevant agencies.

Report Recommendation 11

We recommend that agencies ensure that their clients service charter or compliments brochure:

- is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia.
See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- lists all formats in which a complaint may be made
- incorporates contact information for disabled clients
- incorporates the number for the telephone interpreter service
- is available in a range of formats.

AQIS Comment:

The latest version of the AQIS Service Charter and AQIS Compliments and Complaints brochure provides basic information in eight languages identified by AQIS as being those most commonly spoken by travellers from countries seeking AQIS services. AQIS will review the information provided on the Department of Immigration and Multicultural Affairs (DIMA) website and consider feasibility of aligning the current list of translated languages to the top ten listed by DIMA.

The AQIS Service Charter and internet site provides options for making a complaint or compliment by the following options:

- Speak to an AQIS officer;
- Contact the relevant AQIS Regional Manager, details are listed in the brochure and on the site;
- Complete an AQIS Compliments and Complaints brochure;
- Contact AQIS by either telephone, facsimile or email; or
- Contact Office of the Commonwealth Ombudsman with telephone and web address included.

The AQIS Service Charter does not specifically identify disabled clients, however the Charter states that when AQIS staff are attending to clients, they will be treated professionally, fairly, with integrity, respect and efficiency. DAFF (which includes AQIS) has a Disability Action Plan that articulates its commitment to improve accessibility for people with disabilities.

The revised 2006 AQIS Service Charter includes contact details for the telephone interpreter service and is presented in the eight key languages most commonly spoken by travellers from countries seeking AQIS services.

The AQIS Service Charter is available in hard copy at all AQIS offices and airports. Copies are also sent to clients through the AQIS Bulletin mailing list and available through Industry Consultative Committees. The Charter is also obtainable from the AQIS homepage.

Report Recommendation 12

We recommend that agencies review complaint information on their websites for compliance with the W3 Web Content Accessibility Guidelines.

AQIS Comment:

All AQIS content will be migrated to the new Departmental website in November/December 2006. The new site has been designed to meet WC3 Web Content Accessibility Guidelines.

Report Recommendation 13

We recommend that agencies provide information relevant to passenger rights and responsibilities when travelling to or from Australia in the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia, and that this information be available from the home page of each agency's website from an icon which would be recognisable to non-English speaking passengers.

AQIS Comment:

AQIS has translated the 'What can't I bring into Australia' brochure into 15 languages, which are those languages most commonly spoken by travellers from countries seeking AQIS services. This brochure outlines passengers responsibilities associated with the importation of quarantineable goods into Australia. The AQIS Service Charter outlines a range of passenger's rights when interacting with AQIS staff. These brochures are currently made available to international travellers at airports.

The AQIS website features a scrolling language bar on the AQIS homepage which links directly to translated information.

Report Recommendation 14

We recommend that agencies institute a cross-agency referral process where agencies refer the complaint, rather than the complainant, to the appropriate agency. To this end, all feedback forms should include a statement that meets the requirements of Information Privacy Principle 11, making clear the agency's intention to forward complaints to the relevant department. Alternatively, a tick box at the bottom of a complaint form could be used by the complainant to indicate their permission for their complaint to be referred. Telephone complaint procedures should also be amended so that agency officers seek verbal permission from the complainant to refer their complaint.

AQIS Comment:

As part of the next review of the current feedback arrangements, AQIS will undertake an assessment of compliance with the requirements of Information Privacy Principle 11, with a view to formalising the recommendation to include the confirmation of approval for referral of complaints to relevant Departments.

Report Recommendation 15

We recommend that agencies promulgate cross-agency complaint investigation guidelines, which encourage inter-agency consultation during the investigation phase of a complaint.

AQIS Comment:

AQIS officers are readily identifiable to the travelling public (through their uniform, in-flight video and airport signage). There are very few incidents where complaints against AQIS staff are referred to other agencies within the airport environment. AQIS currently liaises with the relevant agencies during complaint investigations to the extent necessary to satisfy investigation activities. Additionally, in situations where it is evident that issues raised by travellers could also relate to or have an impact on other agencies, consultation with those agencies is undertaken. AQIS believes that the current level of cross-agency consultation during these activities is appropriate.

In addition to the specific comments against the recommendations, AQIS also suggests the following editorial changes to the report:

- Pg 13 (3.1.3), change 'QUARANTINE' to 'quarantine'.
- Pg 14 (3.2.2), change 'QUARANTINE' to 'quarantine'.
- Pg 15 (3.2.4), change 'QUARANTINE' to 'quarantine'.

If you have any questions or require further information or clarification relating to the comments provided please contact Dr Andy Carroll, National Manager, Border on 6272 5499.

Thank you again for providing the draft report for comment. AQIS looks forward to receiving the final report.

Yours sincerely

Jenni Gordon
Executive Manager
Quarantine and Plant Programs

18 September 2006



Australian Government
Department of Health and Ageing

SECRETARY

Professor John McMillan
Commonwealth Ombudsman
GPO Box 442
CANBERRA ACT 2601

Dear Professor McMillan

Complaint Handling in Australian Airports

Thank you for your letter of September 2006 referring to the outcomes of the workshop held with stakeholders on 28 February 2006 and enclosing a copy of the workshop report.

While I do not see a direct role for the Department of Health and Ageing (DoHA) in a complaint handling mechanism per se, I do agree that the notion of improving coordination between the various agencies that operate at airports has the potential to impact positively on the experience of the travelling public.

I agree that the National Passenger Processing Committee (NPPC) is an appropriate forum for supporting a more coordinated government approach to complaints handling. I also note that the recommendations in the report consider how this would translate in an operational sense, which is important. As well as through participation on the NPPC, there are other ways in which DOHA can, and I believe does, influence this agenda in relation to international airports.

Under the Quarantine Act 1908, the Australian Quarantine and Inspection Service (AQIS) undertakes human quarantine activities at international airports on behalf of DoHA which provides policy oversight aimed at preventing the incursion into Australia of diseases of quarantineable and public health concern. Departmental officers liaise on a day to day basis with AQIS on aspects of human quarantine and have also established regular collaborative networks with other border agencies and the airline industry, particularly through pandemic planning. Safeguarding human health must always be a priority for DoHA when formulating policies that are operationalised by AQIS at international borders. However, I am also mindful that maintaining strong links with border agencies and DoHA's continued responsiveness on matters of human health policy advice will assist in passenger facilitation.

Thank you for the opportunity to comment on the report.

Yours sincerely,

Jane Halton
Secretary
1 October 2006



Australian Government

Department of Immigration and Multicultural Affairs

SECRETARY

24 September 2006
Prof. John McMillan
Commonwealth and Immigration Ombudsman
G P O Box 442
CANBERRA ACT 2601

Dear Prof. McMillan

Thank you for your letter of 23 August 2006 and the opportunity to comment on your draft report on the current complaint-handling arrangements available to passengers at Australian airports.

The Department of Immigration and Multicultural Affairs is committed to providing a service that is timely, open and accountable and responsive to clients' needs, and the feedback provided by clients is an important component in ensuring we are meeting our service standards. I appreciate the opportunity to comment on the draft report, and have attached some responses to the recommendations in Attachment A. In addition to the specific comments against the recommendations, we have indicated a number of suggestions as to possible changes to the body of the report, which are outlined in Attachments B.

In the interests of ensuring timely and well considered responses by us to your important work could I reinforce that the contact point within my department is the Ombudsman and HREOC section of the department. The email address for all communications with the department, including copies of correspondence to the departmental Executive, is hreoc.omb.@immi.gov.au.

I look forward to reading the published report in the near future.

Yours sincerely

(Andrew Metcalfe)

The following specific comments are provided for your consideration in the finalisation of the Report:

Recommendation 1

We **recommend** that all agencies review all aspects of their complaints handling mechanism against the recently published AS ISO 10002--2006.

DIMA Comment:

Agree - DIMA is currently reviewing all aspects of its complaints handling mechanism including compliance with AS ISO 10002 – 2006 and the Ombudsman Guide to Better Practice for Complaints Handling.

Recommendations 2 – 6: Across Agency Complaint Handling

Report recommendations 2-6 relate to measures to be implemented (if agreement is reached between agencies) regarding the establishment of a joint agencies complaints management system.

Recommendation 2

We **recommend** that agencies develop a combined complaints management system with a physical presence in major international airports. These airports represent those most likely to have a multi-agency presence and have the highest passenger numbers.

Recommendation 3

We recommend that agencies do more to make passengers aware of complaints handling mechanisms while they are in airports. To this end, we suggest that agencies consider an airport specific joint complaints brochure including pictures of the uniforms of each agency.

Recommendation 4

We **recommend** that this complaints brochure:

- is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia. See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- lists all formats in which a complaint may be made
- incorporates contact information for disabled clients
- incorporates the number for the telephone interpreter service
- is available in a range of formats.

Recommendation 5

We **recommend** that agencies develop a joint poster about the right to complain including pictures of the relevant uniforms.

Recommendation 6

We recommend that the National Passenger Processing Committee be given the role of coordinating cross-agency complaints reporting among its member agencies. Systemic complaints affecting multiple agencies should be identified and resolved via this forum.

DIMA Comment:

Taken for consideration. DIMA is committed to addressing the issues highlighted in paragraphs 4.2-4.6 relating to the establishment of a joint agencies complaints management system.

As part of the current review of complaint handling mechanisms, DIMA will investigate the viability of implementing these recommendations with other relevant agencies. We note however that other agencies have expressed concerns about the viability of implementing a joint complaint handling system as it may cause duplication of their current systems. We also note that any recommendations requiring additional space, signage or resources at airports would need to be negotiated with airport authorities.

In relation to recommendation 6, the National Passenger Processing Committee (NPPC) is chaired by the Australian Customs Service, and membership consists of the Australian Quarantine Inspection Service, the Department of Immigration and Multicultural Affairs, the Department of Industry, Tourism and Resources, the Australian Federal Police, and the Department of Health and Ageing.

The recommendation will be referred to the NPPC for consideration and response directly to the Ombudsman.

Recommendations 7 – 15: Action Required by Individual Agencies

Report recommendations 7-15 relate to measures to be implemented by individual agencies where agreement is not reached regarding the establishment of a joint complaints management system.

Implementation of recommendations 7 and 8 will be dependent on the outcome of discussions with relevant agencies on recommendations 2 to 6. On the assumption that there is no/or partial agreement on recommendations 2 to 6, DIMA's response to recommendation 7 and 8 is as follows.

Recommendation 7*

We **recommend** that agencies incorporate a picture of their uniforms in their service charters and complaints brochures and on their web pages, and that complaints brochures be co-located at airports with those of other agencies.

DIMA Comment:

Taken for consideration. DIMA is currently developing a comprehensive communications strategy which will take account of the range of mechanisms available to publicise the feedback handling system including leaflets and posters, comment cards, information in correspondence to clients, information booklets available in client service areas and airports etc. Consideration will be given to including a picture of the DIMA border uniforms in aspects of the communications material where this is deemed to be relevant.

DIMA will co-locate complaints brochures (when available) with other border agencies within International airport environment where space allows.

Recommendation 8*

We **recommend** agencies develop an agency-specific complaints poster featuring their uniform, which can be posted in airports.

* Agencies should consider recommendations 7 and 8 only in the absence of an agreement on a joint complaint handling system.

DIMA Comment:

DIMA sees merit in this proposal however, as mentioned previously, the display of these posters would be subject to signage space availability at International airports.

Recommendation 9

We **recommend** that agencies demonstrate their commitment to good client service and continuous improvement by including a clearly marked “complaints and compliments” or “feedback” link on their home page. This link should lead to a page containing or providing access to all complaint related information. Agencies can consider the ACS complaints and compliments web page as best practice.

DIMA Comment:

Agree – DIMA is currently developing a comprehensive feedback handling communication strategy which includes a more prominent feedback link on the web home page. Our current website contains a link under “Contact Us” to a web based Feedback Form which is accessible to clients globally. It is anticipated that this site will be expanded to include other relevant complaint related information such as policy guidelines, links to the Client Service Charter and information on how complaints are handled in DIMA.

Recommendation 10

We recommend that agencies include direct links to complaint pages of other agencies.

DIMA Comment:

Agree - DIMA sees considerable benefit for our clients in implementing this proposal and will investigate the viability of implementing this recommendation with other relevant agencies.

Recommendation 11

We **recommend** that agencies ensure that their client service charter or complaints brochure:

- is translated into, or provides basic information in, the languages identified as the ten most commonly spoken languages by international passengers travelling to Australia. See www.immi.gov.au/statistics/stat_info/oad/totalmovs/totmova.htm
- lists all formats in which a complaint may be made
- incorporates contact information for disabled clients
- incorporates the number for the telephone interpreter service
- is available in a range of formats.

DIMA Comment:

Agree – DIMA complies with this recommendation.

- the DIMA client service charter is published in English and 27 community languages and is available in hard copy and web format
- the charter provides information on how to make a complaint via telephone, email and written correspondence
- the charter includes contact information on the National Relay Service for hearing impaired clients and is available in large bold print for visually impaired clients
- the charter incorporates the number for the telephone interpreter service
- the charter is available in hard copy and web-based format

Recommendation 12

We **recommend** that agencies review complaint information on their websites for compliance with the WC3 Web Content Accessibility Guidelines.

DIMA Comment:

Agree – DIMA complies with this recommendation. The new DIMA website launched on 1 June 2006 complies with the WC3 Web Content Accessibility Guidelines

Recommendation 13

We **recommend** that agencies provide information relevant to passenger rights and responsibilities when traveling to or from Australia in the languages identified as the ten most commonly spoken languages by international passengers traveling to Australia, and that this information be available from the home page of each agency's website from an icon which would be recognisable to non-English speaking passengers.

DIMA Comment:

Taken for consideration. DIMA will investigate the viability of implementing this recommendation with other relevant agencies.

Recommendation 14

We **recommend** that agencies institute a cross-agency referral process where agencies refer the complaint, rather than the complainant, to the appropriate agency. To this end, all feedback forms should include a statement that meets the requirements of Information Privacy Principle 11, making clear the agency's intention to forward complaints to the relevant department. Alternatively, a tick box at the bottom of a complaint form could be used by the complainant to indicate their permission for their complaint to be referred. Telephone complaint procedures should also be amended so that agency officers seek verbal permission from the complainant to refer their complaint.

DIMA Comment:

Agree. As part of the current review of feedback arrangements, DIMA is undertaking an assessment of compliance with the requirements of Information Privacy Principle 11 – including a review of the current web based Feedback Form. This will include consideration of the requirements to include the confirmation of approval for referral of complaints to relevant Departments. The viability of meeting this request in relation to telephone complaints will be considered as part of the overall review of complaint handling mechanisms.

Recommendation 15

We **recommend** that agencies promulgate cross-agency complaint investigation guidelines, which encourage inter-agency consultation during the investigation phase of a complaint.

DIMA Comment:

Taken for consideration. DIMA will investigate the viability of implementing this recommendation with other relevant agencies. It should be noted that DIMA currently liaises with relevant agencies during complaint investigations where a complaint is deemed to be “cross-agency”. DIMA believes that the current level of cross-agency consultation during these activities is meeting the needs of our clients however, discussions with other agencies will be initiated to identify any further guidelines required to improve service delivery.



THE HON ANDREW ROBB AO MP

Parliamentary Secretary to the Minister for Immigration and Multicultural Affairs

Prof. John McMillan
Commonwealth Ombudsman
GPO Box 442
CANBERRA ACT 2601

Dear Prof. McMillan

Thank you for your letter of 14 September 2006, to the Minister for Immigration and Multicultural Affairs, Senator the Hon Amanda Vanstone, concerning your intention to issue a report on your investigation into complaint handling in Australian airports. Senator Vanstone has asked that I reply on her behalf.

The Minister supports your whole of government approach to improving complaint handling arrangements for passengers in Australian airports. I understand the department has responded to the recommendations in your report that are specific to DIMA and have suggested minor editorial changes to the body of the report. I am also informed that you will be following up with the participating agencies in six months time regarding their progress on the possible implementation of the cross-agency recommendations.

Thank you for notifying the Minister of your intention to issue this report.

Yours sincerely

ANDREW ROBB



Secretary

Australian Government

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Professor John McMillan
Commonwealth Ombudsman
G P O Box 442
CANBERRA ACT 2601

Attention Ms Sue Prunster

Dear Mr McMillan

Complaint Handling at Australian Airports

Thank you for your letter of 23 August 2006 and copy of your draft report on “Complaint Handling in Australia’s Airports”. The Department of Industry, Tourism and Resources (DITR) is pleased to assist with your investigation.

Overall, DITR supports the thrust of the draft report and its recommendations, particularly those supporting a more coordinated and transparent complaints handling mechanism at international airports. Anecdotal evidence supports the view that travellers do not tend to differentiate between the different agencies represented at the border. A coordinated complaint management and reporting system therefore appears logical given the cooperation that already exists between border agencies.

DITR looks forward to your final report and will take an interest in border agencies’ responses.

Yours sincerely

Mark I Paterson

6 September 2006



Australian Government

Department of Transport and Regional Services

Secretary

Professor John McMillian
Commonwealth Ombudsman
G P O Box 442
CANBERRA ACT 2601

Dear Professor McMillan

I write in response to your letter of 23 August 2006 regarding the draft report on complaint handling in Australian Airports and the Ombudsman's subsequent recommendations for improvements in the future.

The Department is currently examining the comments in relation to aviation security with a view to ensuring there are appropriate complaints mechanisms in place. As your draft reports notes, many of the complaints at airports with respect to security do not involve the actions of Commonwealth officials. As you would be aware, the Department's Transport Security Officers (TSOs) do not have a role that places them directly in touch with the travelling public where complaints may arise. TSOs have an audit and compliance role in the regulation of airports and airlines. Notwithstanding this, the Department is keen to establish a leadership role with respect to the performance of security screening at airports. The department is developing and Screening and Clearing Code of Conduct for the benefit of passengers and aviation security screening officers at airports.

The code will be relevant wherever passenger screening takes place in airports, and will contain guidelines specifically dealing with the interaction between passengers and screening officer. As an added measure, the Department is focusing on developing information material that will advise passengers of their rights and additionally, will provide contact details should they wish to make a complaint about an experience that has occurred while going through a screening point at an Australian airport. It is expected that both the code and information material will be released in the early part of 2007.

Should you wish to discuss any aspect of the screening code initiative, the contact officer is Patrick McCrudden on 6274626.

Yours sincerely

Michael J Taylor
SECRETARY

12 September 2006