

Complaint handling: multiple agencies

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COMPLAINT HANDLING IN MULTI-AGENCY PROGRAMS

Many government services involve two or more Australian government agencies. Some agencies administer programs or deliver payments on behalf of other agencies. There are agencies that work alongside each other in the same location, such as in airports where police, customs and immigration officers are present. Information is shared between agencies in deciding income support entitlements, child support obligations and other matters. Agencies also work together to regulate activity in the private sector or to address crime.

Where does a client turn if something goes wrong and they want to complain? Confusion and frustration will quickly develop if the person does not know which agency is responsible for an action or where to complain. The situation will worsen if the agencies are equally uncertain and the client or their complaint is shuffled from one agency to another.

The public expects government agencies to act in a coordinated manner. Indeed, many people look at government as a single entity that will shoulder responsibility for problems that arise.

Government, too, has embraced a whole-of-government philosophy in policy development and service delivery. Agencies are expected to break down barriers and work cooperatively to address complex issues.

It is equally important to adopt a whole-of-government approach in complaint handling. The same basic principle should guide both government service delivery and complaints about a service: the process should be seamless for the public. That will not happen unless agencies work together to remove the barriers to effective complaint handling in multi-agency programs.

Choosing a complaint handling model

There are many different complaint handling models. Which model is appropriate will depend on the type and scale of a program, the volume of complaints, the number of agencies involved, and the extent to which each agency interacts with clients.

One option is for agencies that work closely together to set up a special joint complaint handling unit to liaise with clients and investigate matters—a 'one stop shop' approach. Staff of the unit can be authorised to resolve matters on behalf of all the agencies involved, or to refer more complex or sensitive matters to the appropriate line area.

A second option is to set up a central contact point for all complaints. This may be little more than a phone number, mail box or web address. Upon receipt, complaints can be filtered to identify those requiring referral to an agency for a further response or investigation. It will be likely that many complaints can be dealt with promptly, either at the initial contact point or after referral to an agency, especially if the complaint is in the nature of a request for information or clarification.

Alternatively, agencies might decide that each will deal separately with complaints about their own functions. If so, the agencies should adopt a protocol that clearly explains how complaints about a joint program will be handled, including how and when complaints are to be transferred between agencies and whether the complainant's consent should be sought before transfer. A core feature of the protocol should be an up-to-date list (or network) of agency liaison officers. The protocol can be supplemented by joint brochures or posters, web links between the agencies, and regular liaison to discuss complaint issues and trends.

Whichever model is adopted, it is important that all complaint handling arrangements meet the

minimum criteria for effective complaint handling that are spelt out in the Ombudsman's *Better Practice Guide to Complaint Handling* or the Australian Standard AS ISO 10002:2006, *Customer Satisfaction—guidelines for complaints handling in organizations*.

Designing a new program

It can be expected that every new program will give rise to unforeseen problems and grievances about how an agency is administering the program. Complaints are a fact of life. A multi-agency program is perhaps more likely to cause complaints either about service delivery problems or the difficulty of having complaints dealt with properly.

Complaint handling processes should be built into or aligned with each new program. There should be scenario testing of the types of complaints that may arise, where in the process they might occur and how they will be addressed. Where complaint issues touch the responsibility of more than one agency, there should be a clear and formal delineation of each agency's responsibility to resolve the complaint and to liaise with the other agencies. Regular joint agency review of complaint issues and processes should be an element of the complaint procedures.

Advice to clients

The key to effective complaint handling is clear communication with the public and individual complainants.

All agencies should give consistent, clear and accurate advice to the public on how to complain about program issues. It can be useful to develop agreed information resources (including standard letters and call centre scripts). It is also important to have visible and accessible public information about complaint handling, and who is doing what. Where there is no joint complaint handling unit, each agency should consider displaying information from the other agencies on how to complain, or develop a joint agency publication.

A person seeking information about their case should be able to access as much information as possible with the minimum delay. There should be clear guidance on what information is available from which agency. Decisions on access to shared information should be consistent amongst

agencies, particularly in relation to freedom of information requests.

Clients should be made aware if personal information is shared or transferred between agencies in the course of dealing with complaints in a multi-agency program. A client has a qualified right under Information Privacy Principles to refuse consent to disclosure of their personal information.

Staff

Staff who are the first point of contact with the public have a central role in minimising confusion and ensuring complaints are dealt with professionally. They must understand the different roles of all agencies in a multi-agency program, and the procedures of each agency for dealing with complaints.

Where agencies have a single contact point, staff should be able to provide information and resolve less complex complaints on behalf of all agencies. If staff of different agencies work alongside each other in a public area—such as the arrival and security screening areas of airports—steps should be taken for easy identification of staff and their employing agency, and for cooperation in dealing promptly with complaints.

Remedies

Agencies need to decide which of them will take responsibility for providing a remedy where one is warranted, including determining who is responsible for funding any compensation. It may be necessary to have an agreed agency consultation procedure when it is apparent that more than one agency should be involved in providing a remedy.

Where a complainant is not satisfied with the resolution of their complaint, care must be taken to ensure that the complainant is not 'fobbed off' by being encouraged to take the complaint elsewhere, including to other agencies in the same program, if this would be futile. Similarly, the complainant should not be encouraged unnecessarily to make multiple representations to different portfolio ministers on the same matter.

Accountability

Each agency involved in a program is responsible for addressing identified problems and reducing

the chance of recurrence, both within their own agency and across the program. A problem with one agency can lead to problems for all agencies. They should work together to ensure that systemic problems are identified and complaints are effectively handled.

The complaint management system needs to be regularly reviewed to ensure that it is operating efficiently and effectively and responds to changing needs.

Agencies should also ensure that public reporting on complaint numbers and trends for joint programs is meaningful. If necessary, agencies involved in delivering a joint program should present the same complaint information in their individual reports, and should also report on how identified problems have been addressed.

Programs that involve other parties

The need for cooperation in complaint handling between Australian government agencies can arise in other situations. Delivery of services to communities, particularly in rural and remote areas, often involves partnerships between the Australian Government and state, territory and local governments. Private individuals and organisations also play an essential role in service delivery. For example, doctors and other health professionals provide assessments that are used by government agencies, and financial institutions handle payment of government benefits.

Whether a joint complaint handling mechanism or protocol should be developed for those cooperative arrangements will depend on the circumstances. Alternatively, complaint handling can be included in a formal memorandum of understanding between the parties. Whatever the arrangements, the same guiding principles should apply: complaint handling should be a seamless process that minimises confusion amongst members of the public as to where they should direct their complaint and who is responsible for resolving it.

FURTHER INFORMATION

The Commonwealth Ombudsman has published a range of reports on complaints that involve multiple agencies administering a single program.

- *Own Motion Investigation into Complaint Handling in the Job Network*, Report No 2/2003
- *Complaint Handling in Australian Airports*, Report No 3/2007
- *Application of penalties under Welfare to Work*, Report No 16/2007
- *Damage caused to inbound international postal items*, Report No 4/2008
- *Assessment of claims for disability support pension from people with acute or terminal illness*, Report No 2/2009

More information?

If you would like copies of other Commonwealth Ombudsman fact sheets, more information about the work of the Ombudsman's office, or a more detailed briefing for agency staff, please contact the Director Public Affairs.

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