

The essential elements of complaint handling: A discussion of the Australian Standard on Complaints Handling (AS4269)

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Today I want to talk about complaints handling, particularly in the context of charters.

I think it is important to reiterate how government agencies can be consumer responsive through charters. They can do this by:

- **regular and ongoing consultation and user inputs, including ongoing user participation;**
- **; adopting agreed, measurable standards and services;**
- **providing adequate and clear information to the users of the service; and**
- **providing complaints handling and redress.**

It is the issue of complaints handling that, in particular, I want to address today.

I wonder if I, Bill Dee, citizen, wanted to lodge a complaint about some aspect of service by your department whether I would find it easy to find out where to complain and how to complain? Would it be as simple as looking in the White Pages under your department, seeing an emboldened heading saying Complaints/Inquiries with a toll free or 13 number? Or would I have to be transferred several times or be told to ring another number, i.e. to be "ping ponged" around the agency?

The perception of government by some consumers is that of big bureaucracies as being threatening, inaccessible, overpowering and not very user/consumer friendly.

What role then does complaints handling have and why is it important to do something about it?

The importance of agencies adopting an effective complaints handling scheme is that it should:

- **increase the level of user satisfaction with the delivery of services and enhance the user/agency relationship;**
- **recognise, promote and protect users' rights, including the right to comment and complain;**

- provide an efficient, fair and accessible mechanisms for resolving user complaints;
- provide information to users on the complaints handling process for the service; and
- allow for monitoring of complaints and endeavour to improve the quality of services

What are the benefits of an agency setting in place an effective complaints handling system?

For a start I believe it can improve the image of the agency as being accessible and user friendly.

It can also be instrumental in getting rid of the "government service is inferior service" monkey off the back of agencies and their employees.

It can also provide feedback to the agency on the services themselves and the quality of their delivery because complaints are what your users are saying what they dislike about your service. One company I know calls complaints when they have come across the threshold "customer feedback". That is a good internal motivating label inside the enterprise because it denotes the proper use complaints can be put to but, externally, they should be characterised as complaints as consumers should feel they have a right to complain.

Complaints handling can also provide an ongoing "listening" mechanisms for agencies which they would not have otherwise.

Another benefit of a complaints handling system is that it underpins "a culture of service" throughout the agency and can be responsible for lifting staff morale. If you like, it is part of the notion of reinventing what is meant by "public service".

Complaints handling is also important for being part of the service benchmark process and can be part of the product and service design process.

Finally, it can be an "Ombudsman prevention" device. If an agency has a visible, accessible and responsive complaints handling system then consumers are less likely to turn to, or ultimately need the assistance of, the Ombudsman's Office.

What then are the key elements of a complaints handling mechanism?

Section 2 of the Australian Standard on Complaints Handling (AS 4269) sets down a list of essential elements for effective complaints handling. The three basic elements of any system are that it should be visible, accessible and responsive.

Visibility: users need to know "where to complain", that is, the complaints handling must be highly visible: this means that you do not just advertise your complaints handling point of contact through one source but several. Obviously a Complaints and Information Centre entry in bold in the White Pages under

your department's or agency's telephone entry would greatly assist consumers. Other means of getting the message across could include:

- **putting details about your complaints system in printed material;**
- **prominent signage giving details at service delivery points;**

Accessibility: users want to know "how to complain", that is, it must be relatively easy to lodge a complaint. Obviously toll free or local call fee facilities can give consumers access to appropriate complaint handling facilities within your agency. Accepting oral complaints gives consumers greater access to complaints handling, particularly those who have limited language skills.

Where it is considered essential to have complaints in writing then it is important that there should be simple and accessible arrangements for lodging complaints, that "help professionals" are provided or at the very least there is referral to such help, and that there be staff employed with language skills, particularly in those agencies that have a shopfront interface with the public.

The complaints procedure should also be straightforward and any writing material should be prepared by a communication/plain language expert;

Responsiveness: users want to feel that complaints are not only invited but are treated seriously, i.e. there is responsiveness within the organisation. Important responsiveness issues to take into account are that:

- **the complaints lines are answered quickly;**
- **that there are established target time limits which are reasonable for all stages of the complaints handling process;**
- **that customers are informed about the progress of their complaint; and**
- **that computer systems used for complaints handling have a resubmit facility for reply.**

While I have discussed the three most basic elements any worthwhile complaints handling system needs to have, there are other important issues which the Standards Australia Committee considered were needed if a complaints system was to be seen as being "fair dinkum".

It goes without saying that a complaints handling system will only work if there is both a "top down" and a "bottom up" commitment to complaints handling within the organisation. One way of getting acceptance of complaints within an organisation is, as I have suggested earlier, to view them as customer feedback which can be used to constantly improve the services your agency offers to the public. I think if you can encourage a "your problem is our problem" mindset amongst staff, then you are well down the track to having complaints not being seen as threatening, but as useful feedback, and demonstrating a service mentality in the organisation.

An absolutely vital element of commitment is that the Chief Executive Officer of the agency is personally committed to the process and gives his or her personal endorsement through staff directions and publicity regarding complaints

handling, and that an overall responsibility for complaints should be handled at the senior management level, with direct access to the CEO.

A related element of commitment from the top is to adequately resource the complaints handling system.

Employee acceptance of the benefit of complaints can not only come about by training and educating employees about the benefits, but as importantly, empowering staff to contribute to the improvement of the organisation's product or service, some of which will arise from customer feedback.

Another issue which the Standards Australia Committee considered was important was the issue of fairness. Obviously natural justice principles should apply. Complaints procedures need to be available for the public and the public should be given reasons for any decision not to uphold their complaint, and they should be informed about appeal rights and further review.

As I indicated under the heading "Commitment" any complaint handling system needs to be adequately resourced and some suggestions regarding resources are attached to my paper. Typically a complaints handling system should make provision for a toll free/local call free facility with sufficient capacity to receive call flow, adequate staffing, selection of the right personnel, and comfortable working conditions. State of the art practice in this area suggests that there should be an adequate number of personal computers with software which allows both the tracking of the progress of individual complaints and retrieval of aggregate data on complaints by conduct.

Another important element set out in the Standard is assistance, i.e. staff should have the necessary training to assist complainants on how to lodge complaints, e.g. assistance with filling in forms, and interpreter assistance.

On the issue of charges, the Committee considered that the cost of complaint handling should be free for consumers to encourage the lodging of complaints. Once fees are charged then barriers to entry start to arise and the system becomes discriminatory, particularly against those who cannot afford the fee.

AS 4269 also suggests that a complaints handling process should have the capacity to determine and implement remedies. Obviously different agencies will have different approaches on this and to some extent this may be dictated by the policies of the government of the day, but at the very least the public should have a right to an apology where, for example, a service standard has not been met.

Data collection about complaints is absolutely vital, not only to track individual complaints but to have the capacity to extract data to identify systemic and recurring complaints. Having identified the systemic and recurring complaints from the data collected, the Complaints Handling Standard then goes on to say that these should be classified and analysed for the identification and rectification of such problems.

The Standard also suggests that there should be some form of accountability in that there should be appropriate reporting on the operation of the complaints handling process against documented performance standards both externally, e.g. a regular section in the agency's annual report, and internally through ongoing reports to management.

Finally, any system needs to be reviewed regularly to ensure that it is efficiently delivering effective outcomes, for example, there needs to be evaluation against objectives and performance standards in the first twelve months of operation, and perhaps each two or three years thereafter. Credibility would be greatly enhanced if the review was an independent review. Such a review needs to be both qualitative and quantitative.

I have attached to my speech notes a copy of an "Action Checklist for Complaints Handling by Organisation" which not only sets out the essential elements listed in the Standard, but also has some suggested action points that you might wish to consider in devising your complaints areas handling system for your agency.

Complaints Handling: Action checklist for complaints handling by organisation

ESSENTIAL ELEMENT SUGGESTED ACTION

**Commitment Establishment of a Complaints and Information Centre
Adequate Budget**

CEO to give personal endorsement to staff directions and publicity re. complaints handling

Complaints to be managed by senior management with direct access to CEO

Allow staff and consumers to contribute to the improvement of the organisation's product or service

Encourage a 'your problem is our problem' and 'tell us not them' approach to complaints throughout the organisation

Material should encourage the lodging of complaints eg. naming the call centre the Complaints and Information Centre

Training/educating employees about the benefits of complaint handling

Ensure employees see complaints in a positive light

Include training by Complaints and Information Centre staff so that employees see these complaint handlers as people on employees' side

Fairness Provision for internal mediation

Procedures that allow for both parties to put their side of the story both orally and in writing, and to comment on anything prejudicial to their case

Training of complaints staff on the principles of natural justice

Complaints procedure to be set out in writing

Give reasons for decision not to uphold customer's complaint and inform them about appeal rights and further review

Have adequate security to ensure customer confidentiality

Adequate Resources Provision of a toll free/local call free facility with sufficient capacity to receive call flow

Easily accessed detailed complaints handling procedures manual and reference materials
Have adequate personal computers and software to allow tracking of progress of individual complaints and retrieval of data on complaints by conduct (see Appendix A)
Good telephone handling equipment to enable hands-free operation
Comfortable physical working environment which conforms to Occupational Health and Safety guidelines (see Appendix B)
Adequate work tools
Adequate staffing
Selection of the right personnel (see Appendix C)
Ongoing training and debriefing
Teaching of detachment skills and implementation of stress management practices
Visibility A Complaints and Information Centre entry in bold in the white pages
Easily understood information about the Complaints and Information Centre in printed material (eg. accounts, guarantees, advertising material) sent to customers
Prominent signage about the Centre and telephone number at service delivery point
Publicised by letter and media at launch
The Complaints and Information Centre existence and phone number should be prominently displayed on labelling of products
Accessibility Toll free/local call fee facilities
Simple and accessible arrangements for lodging complaints
Centre opened at times convenient to consumers, with answering machines when unstaffed
Policies which encourage complaints by the educationally disadvantaged and non-English speaking customers including:

- accepting oral complaints – the provision of, or referral to, appropriate help professionals – employing staff with language skills – provision of, or access to, appropriate translation and interpreter services – cross cultural training for staff

Complaints procedure should be straightforward
Written material to be prepared by a plain language expert
PC software to be user friendly with easy input
Assistance Staff should have necessary training to assist complainants on how to lodge complaint, e.g. assistance with filling in forms, interpreter assistance
Responsiveness Answer complaints line quickly
Have established target time limits which are reasonable for all stages of the complaints handling process
Keep customers informed about the progress of their complaint
Computer systems with resubmit facility for reply
Charges Cost of complaint handling should be free for consumers to encourage the lodgement of complaints
Remedies Policies on the provision of remedies should be developed
There should be an adequate range of remedies available, including

compensation

Staff in the complaints area should have sufficient authority to decide remedy up to an authorised limit with direct access to CEO/Senior Manager for remedies over the limit

Data Collection Keying in of data should not be complicated

Ability to track individual complaints

Capacity to extract data on systemic and recurring complaints

Addressing Systemic and

Recurring Problems Monthly reports should be made on systemic complaints to the CEO with recommendations for appropriate changes/remedial action in policy, product design or labelling, personnel, new structure, opportunities for new products, training, product recalls

Accountability Ongoing reports to management and regular reports (e.g. annual reports) to relevant interested bodies

Appropriate management responsibility for complaints handling, including a complaints handling procedure

Review Needs to be evaluation against objectives and performance standards in the first 12 months of operation and 2-3 years thereafter

The review should be an independent review

Review needs to be both qualitative and quantitative

The system needs to be monitored for the first 3 months to 'bed down' the system

Attachment A

Performance Standards for Complaints Handling Software and After Sales Service

Software

- **ability to retrieve up to a ten year period**
- **capacity to cover a ten year period**
- **guarantee of stability of the system, i.e., not losing data**
- **ability to withdraw data:**
 - **readily on an individual basis**
 - **on an aggregate basis**
- **the system is to be user friendly, i.e., to be able to key in from a live system**
- **adequate security profiles**
- **need to be able to identify sets of relevant complains data**

After Sales Service

- **the service provider should keep up stability of the system**
- **the service provider should have the ability to expand the system**
- **there should be access to a quick and reliable support function during times the operation is in use.**

Attachment B

Physical Working Environment for Complaints Handling

- **adequate room for staff**
- **low noise level**
- **ergonomically adequate office furniture, including:**

**adjustable PC keyboards
footstools**

- **adequate answering consoles and PCs**
- **an 'overflow' capacity**

Attachment C

Selection Criteria for Complaints Handling Personnel

- **Good interpersonal skills including the ability to empathise with complainants.**
- **Have enthusiasm for and commitment to an efficient, effective and fair complaint handling system.**
- **Good communication skills.**
- **A thorough knowledge, or the capacity to quickly acquire knowledge, of the organisation's products and structure, and a sense of pride and commitment to the company's mission and values.**
- **An ability to objectively assess all relevant factors about the complaints from the point of view of the complainant and the company.**
- **The ability to identify systemic complaints and to devise strategies to deal with them.**
- **The ability to handle stress in a calm and polite manner, and to be able to diffuse a customer's anger.**
- **A positive outlook on life.**
- **The ability to have a lateral approach to problem solving, including use of mediation and facilitation skills.**