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Enhancing Public Sector Complaints Management

A GSA point of view

Effective complaints management processes are becoming increasingly important across all levels of the public sector.

Data shows that complaint volumes are increasing in all areas, which coupled with the general trend of increased consumer expectations is creating the need for public service organisations to do more with static or diminishing resource levels. In addition, there has been an increased focus on integrity in public service, which has been highlighted in the findings of reviews, such as;

- The Australia and New Zealand School of Government Independent Review of the Australian Public Service (2019);
- The Review of Culture and Accountability in the Queensland Public Service (Coaldrake, 2022);
- Perceptions of Corruption and Integrity in Local Government report (The Queensland Crime and Corruption Commission, 2020).

This article explores the key attributes of an effective complaints management system, the typical challenges our clients are experiencing, and how GSA Management Consulting can support you to enhance complaints management in your organisation.

Key Attributes of Effective Complaints Management

Our previous experiences and extensive best practice research have shown there are five key attributes required for effective complaints management.

INDEPENDENT

The complaints handling process must not be undermined by actual or perceived bias, or be influenced by internal organisational priorities or external influences. The process must be conducted in such a manner to achieve consistency in process applied, and in the outcomes delivered.

EFFECTIVE AND FAIR

The process must result in outcomes that are fair and proportionate. The outcomes must be effective at reducing inappropriate and unacceptable behaviour. It is also essential that the process produces outcomes that stand up to scrutiny.

ACCESSIBLE AND RESPONSIVE

Complaints systems must be accessible and consider the needs of complainants from a variety of backgrounds. It must also enable all relevant information to come before decision-makers to deal with serious and sensitive matters expeditiously; and protect the human rights of all the people involved, including protecting good-faith complainants and whistleblowers from reprisal.

TRANSPARENT

The process must be simple and understandable to complainants. Furthermore, the process must be capable of being effectively reviewed; and must provide appropriate transparency while respecting both the necessary confidentiality of any disciplinary process and the privacy of individuals and their families.

TIMELY

The process must enable complaints to be processed in a timely manner, ensure potential breaches of codes of conduct can be accurately and promptly detected, and must deliver appropriate outcomes within a reasonable time period.



Complaints Management System

To create a holistic end-to-end complaints management system the following elements need to be considered:

Legislation

Legislative requirements must be clearly understood, including the jurisdiction of the agency and adjacent agencies. Requirements should be reflected in the documentation, structures and ways of working across the complaints management system.

Policy & Governance

Policy documentation in place aligning to legislative requirements and providing appropriate structure and boundaries for an effective complaints management system. Governance mechanisms in place to support effective decision-making and points of escalation as required.

Whistleblowing

Appropriate processes and controls must be in place for whistleblowing and Public Interest Disclosures which protect the anonymity of the whistleblower and mitigate any potential risks of reprisal. This can require a separate function from the core complaints management function.

Complaints Volume

A strong understanding of current and forecast complaint volumes must be in place including the segmentation of complaints by type and seriousness. This will enable the flows of complaints across the lifecycle to be modelled.

Process

Clear processes must be defined and in place across the complaint lifecycle. Critical to this are processes that will drive consistent decision-making throughout and are supported by appropriate quality assurance.

Resourcing

Roles and responsibilities must be clearly defined and enacted to enable complaint management. Resource numbers should be determined based upon the volume of complaints flowing through the system and the processes in place.

Conflict of Interest

Conflicts of Interest (Col) must be identified and effectively managed across the end-to-end complaint lifecycle. This needs to be underpinned by a robust approach for potential Col to be raised and a database of all such instances to be maintained on an ongoing basis.

Complaint Communication

Appropriate and timely communication must be embedded across the end-to-end complaint lifecycle from receipt of complaint to outcome. Communication requirements should consider both the complainant and the individual against whom the complaint has been made and should be underpinned by clear performance standards.

Reporting & Performance

Reporting internally and externally regarding complaint volumes and outcomes segregated by type, as well as reporting against defined performance standards including timescales. In addition, data analytics should be provided to identify trends and thematic issues to inform preventative activities.

Technology Systems

Technology systems should provide a single point of truth for all complaints, assessments and decisions. Ideally, this would encompass a single system or fully integrated systems which transcend the end-to-end complaints process, and include workflows and robust access controls to ensure integrity.



Critical Failure Themes

Our experience working with numerous organisations has shown that there are five common themes which undermine the effectiveness of the complaints management system. Each of these themes are explored below:

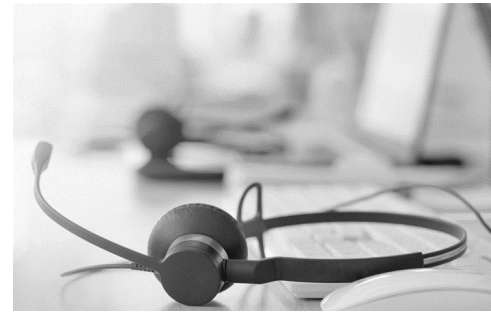
1

Ineffective channel management

Our clients commonly identify significant challenges with how complaints enter the organisation (internal and external complaints). Many organisations find themselves maintaining multiple channels of entry which are based upon legacy requirements rather than through strategic design. A lack of strategic channel design will typically drive significant inefficiencies and poor service across the organisation.

We support clients by:

- Analysing current channels to understand efficiency and effectiveness, including understanding volumes and customer / complainant needs.
- Developing a channel strategy which will optimise the organisations objectives. We subsequently work with clients to design all other organisational elements to ensure that the strategy is executed and achieved.



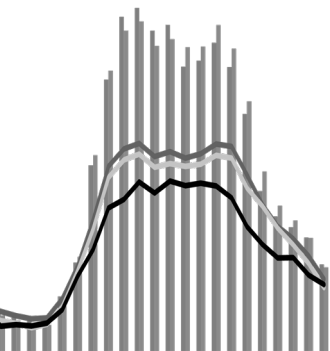
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Misalignment between internal resources and workload

One of the main issues we tend to observe is clients struggling to align their internal resources to the workload associated with complaints management. An inability to achieve good alignment will create significant stress on the overall system and undermine its integrity.

We support clients by:

- Designing frameworks to assess complaints and determine relative seriousness / priority.
- Redesigning processes to ensure that the end-to-end flow is optimally efficient and effective, including developing processes to provide ongoing quality assurance of decision-making.
- Modelling complaint volumes and the flow through the redesigned processes as well as calculating the resources required to execute the workload.
- Defining the organisation structure, roles and capabilities required to execute the new frameworks and processes.

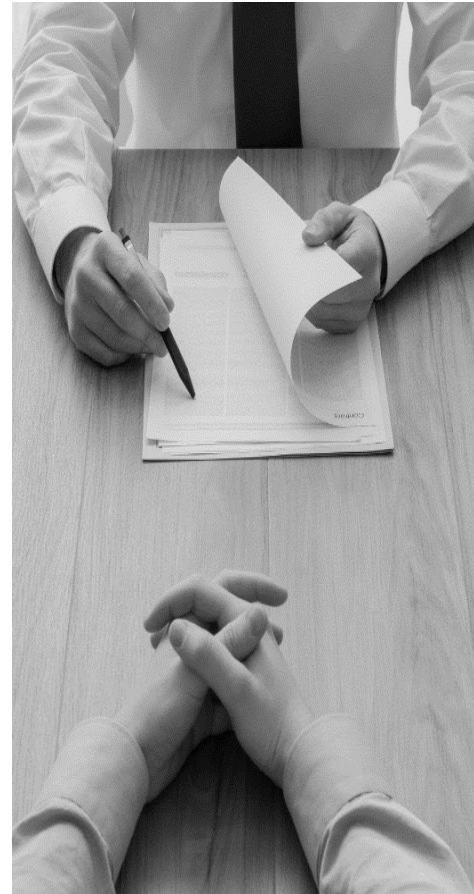


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Ineffective investigation

Our clients typically wrestle with three main issues relating to effective investigations:

- 1) Achieving consistency in the interface between assessment and investigations** – the work undertaken during the assessment phase can vary greatly depending upon the complaint. In the simplest of instances, assessment decisions can be taken very quickly based upon the information provided. However, in other instances, further work will be required to inform an assessment decision. This variability can create confusion in responsibilities between intake and assessment teams and investigative teams.
- 2) Establishing a threshold of evidential proof appropriate to complaints** – The level of evidential proof required to determine the outcome of a complaint has a lower threshold than a criminal investigation. Due to the specialist nature of undertaking investigations, we typically find that investigative teams comprise a significant proportion of individuals with a law enforcement background. Many of our clients have identified challenges with their investigative teams seeking an unnecessarily high level of evidential proof, thereby creating inefficiency.
- 3) Transparency in investigative planning and execution** – Undoubtedly the most complex matters require sophisticated investigative techniques to be employed and to an extent, an organic approach to be employed in following the evidence. This, however, isn't necessary the case for the majority of matters. Clients are often unhappy with the poor visibility that leadership has on the planned workscope and progress of individual investigations.



We support clients by:

- Redesigning investigative processes and supporting frameworks which:
 - Provide clarity between intake and assessment, and investigations.
 - Provide enhanced planning and monitoring through to outcome decision.



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Failure to use data to drive performance

Using data to support evidence-based decision making is an essential part of running an organisation – this is also the case within the scope of complaints management. The majority of organisations have legacy IT systems in place which undoubtedly makes effective complaint management increasingly challenging. In some organisations this limitation is used as justification for a lack of focus on performance. However, even with sub-optimal IT systems there remain significant opportunities to use data to drive performance.

We support clients by:

- Defining a suite of efficiency and effectiveness performance measures across the lifecycle including calculation methods, data collection and validation protocols, and analysis and interpretation.
- Designing and establishing performance reports to meet the needs of stakeholders and support operational decision making.
- Establishing models to provide ongoing comparisons of resource and workload balance to identify any required refinements to resourcing levels.
- Establishing governance structures to support evidence-based decision making, including monitoring of actions taken and the extent by which the actions delivered the intended outcomes.
- Establishing processes and protocols for ongoing interrogation of complaint data to identify and respond to thematic issues.



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Inadequate Focus on Implementation

The single most prevalent challenge raised by our clients, is the struggle to embed processes and ways of working which deliver sustainable results. Our experience shows that it is all too common for organisations to prioritise investment in undertaking a review, at the expense of prioritising the design and implementation.

We support clients by:

- Partnering with organisations to co-design a complaints management system drawing heavily on data to inform evidence-based decisions.
- Managing readiness, go-live and stabilisation of new ways of working. This includes ongoing coaching and support and monitoring and reviewing performance of key implementation metrics.
- Building capability within the client organisation to sustain the specific improvements but also to undertake leading practice design and implementation on future projects.



“ Effective complaints management is a critical component in delivering both community and employee satisfaction. Whilst the complaints ecosystem is complex, with the appropriate refinements public sector organisations can realistically enhance satisfaction and trust through the complaints process as opposed to eroding it”

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