

POLICY

Title

Customer Resolution and Feedback Policy

Contact Officer at version effective date

Position

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TAFE SA Policies are issued under the TAFE SA Policy Management Framework. They are binding on all TAFE SA employees

Policy Owner: Director, Governance and Research

1 Policy

TAFE SA's Complaint Management Framework standardises how complaints and feedback are managed across the business and enables reporting and analysis of complaints and feedback to be conducted regularly. The TAFE SA Customer Resolution and Feedback Policy communicates the overarching principles for managing customer feedback and the timely resolution of complaints requiring action and resolution.

This policy replaces PPMF|TAFESA|42 Student Complaint Resolution Policy for Non-Academic Matters and is to be read in conjunction with related policies, procedures, guidelines and local work instructions.

2 Scope

Complaints or feedback may be received at any time by staff across the organisation concerning TAFE SA products, services or staff. This policy applies to all TAFE SA managers, employees, contractors, volunteers and students. The following types of customer issues are dealt with through other [policy instruments](#):

- students seeking to make an assessment or academic appeal concerning a final result decision feedback or complaint/s concerning the misconduct of a TAFE SA employee
- reports made to the Independent Commissioner Against Corruption (ICAC) concerning reasonable suspicion of corruption, misconduct and maladministration. Complaints of this nature are assessed and managed by the Office for Public Integrity (OPI)
- whistleblowers, allegations of fraud, corruption or maladministration.

3 Definitions

Australian Standard	Adherence to the Australian Standard (AS/NZS10002: 2014) Guidelines for Complaint Management in Organisations - will ensure all agencies have in place a framework that: <ul style="list-style-type: none"> • informs customers of their right to complain about a service and what to expect if they make a complaint, including the resolution of their complaint • ensures complaints are handled in a fair, transparent and timely manner • monitor and evaluates the handling of complaints to inform service improvements.
Complainant	A person or their representative making a complaint.
Complaint	As defined in the Australian Standard (AS/NZS10002:2014) Guidelines for complaint management in organisations, a complaint is an ' <i>expression of dissatisfaction made to or about an organisation related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.</i> ' May be a written or verbal communication from a customer who believes they have been unfairly treated.
Complaint Handler	A TAFE SA employee with relevant authority who can receive and make a decision in order to resolve the matter quickly and efficiently. This may include (but is not limited too) a Program Support Manager, Education Manager, Business Operation Manager or Business Unit Director. A complaint handler is responsible for: <ul style="list-style-type: none"> • overseeing TAFE SA's management of the complaint until the matter has been resolved

	<ul style="list-style-type: none"> determine the appropriate actions to be taken and ensure follow up in a timely manner ensure the creation of records detailing all verbal and written engagement associated with the complaint and decisions made.
Complaint Management Framework	A term contained in the Australian Standards that refers to the policies, procedures, practices, staff, hardware and software used by TAFE SA to manage the receipt, processing and outcome of complaints (refer Appendix 1). TAFE SA will refer to the complaint management system as its 'framework.'
Customer	<p>For the purpose of this policy, a 'customer' is:</p> <ul style="list-style-type: none"> an individual member of the public, including current, potential and former students an individual's advocate or guardian a business or government agency or representative. <p>A representative, advocate or guardian may include a local Member of Parliament, the Office of the Training Advocate, Equal Opportunity Commission, Ombudsman SA or another representative, such as a family member or friend to be actioned on behalf of customers.</p>
Feedback	Feedback may be a positive compliment or negative comment about a service received. Feedback does not necessarily require a response but will be acknowledged.
Harassment	Deliberate, aggressive behaviour which can be a form of bullying if it is repeated or persists over a period of time.
Resolution Officer	<p>Monitors and supports complaint handlers with facilitation and resolution to a complex issue. A resolutions officer will be independent to the business unit from which the original complaint relates; demonstrates impartiality on the issue and reviews the complaint in liaison with relevant senior managers where required. The Resolution Officer is responsible for:</p> <ul style="list-style-type: none"> providing guidance, direction and support to staff involved in complaints handling ensuring maintenance of a running timeline of actions taken in relation to a complainant matter; including all verbal and written communication with the complainant coordinating the flow of information and advice to the Executive Director, Chief Executive, Ministers' Office and external parties ensuring any comprehensive investigations are thoroughly completed, recorded and reported to the responsible delegate/s coordinating the appeal panel process; ensuring adequate record of meeting outcomes, decisions and communication with the complainant ensuring follow up action has taken place to negate any further complaint by engaging with relevant employees.
Student	A customer who has a current registration with TAFE SA. This includes international and domestic students as well as students participating in accredited or non-accredited units of study.
Unreasonable Complainant Conduct (UCC)	Any behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to a complaint. Parties to a complaint may include the complaint handlers, resolution officer, the subject person or respondent to a complaint, a complainant or other customers.

4 Related policies

PPMF TAFESA 142	Creation and Capture of Official Records
PPMF TAFESA 164	Customer Resolution and Feedback Procedure
PPMF TAFESA 188	Fraud and Corruption Policy and Procedure
PPMF TAFESA 1019	Privacy Policy
PPMF TAFESA 38	TAFE SA Access and Equity Policy and Procedure
PPMF TAFESA 1012	TAFE SA Assessment and Academic Grievances Policy
PPMF TAFE SA 1010	TAFE SA Respectful Behaviours Policy
PPMF TAFESA 1005	Whistleblowers Protection Policy and Procedure
PPMF TAFESA 116	Work Health and Safety Policy

5 References

Circular	PC012 - Information Privacy Principles (IPPS) Instructions
Circular	PC013 - Annual Reporting Requirements
Circular	PC039 - Complaint Management in the South Australian Public Sector
Legislation	<i>Education Services for Overseas Students Act, 2000 (ESOS Act)</i>
Legislation	<i>Equal Employment Opportunity Act, 1984 (SA)</i>
Legislation	<i>Higher Education Support Act, 2003 (Cwth)</i>
Legislation	<i>Independent Commissioner Against Corruption Act, 2012 (SA)</i>
Legislation	<i>Privacy Act, 1988 (Cwth)</i>
Legislation	<i>Public Sector Act, 2009 (SA)</i>
Legislation	<i>State Records Act, 1997 (SA)</i>
Legislation	<i>TAFE SA Act 2012 (SA)</i>
Legislation	<i>VET Student Loans Act, 2016</i>
Legislation	<i>Work Health and Safety Act, 2012 (SA)</i>
National Code	National Code of Practice for Providers of Education and Training to Overseas Students 2018
Policy	Building a Stronger South Australia: A modern public service
Policy	Code of Ethics for the South Australian Public Sector
Report	An Audit of State Government Agencies' Complaint Handling, Ombudsman SA (November, 2014)
Report	Complaint Management Framework, Ombudsman SA (March, 2016)
Standard	Guidelines for complaint management in organisations (AS/NZS10002: 2014)
Standard	Higher Education Standards Framework (Threshold Standards) 2015
Standard	Standards for Registered Training Organisations (RTOs), 2015

6 Guiding Principles

TAFE SA embraces its legislative obligations as a South Australian government owned organisation; a registered training organisation; and a higher education provider. The following outlines the guiding principles and frameworks TAFE SA complies with in relation to complaints handling:

Ombudsman SA's Complaints Management Framework

TAFE SA is committed to the management of complaints and feedback in a manner consistent with the principles of natural justice and equity of access. Complaint handling 'good practice' requires staff to exercise reasonableness, impartiality, fairness and ethics in the decision-making process by officially acting in the public interest.

TAFE SA will follow the guiding principles of the Ombudsman SA's Complaint Management Framework ([Appendix 2](#)) which are:

- **Commitment:** develop a culture that values complaints
- **Facilitation:** make it easy for people to make complaints to your organisation
- **Resourcing:** appropriately train, empower and adequately resource staff managing complaints
- **Learning:** analyse complaints and their outcomes to improve systems and processes
- **Guidance:** develop policies and procedures to guide staff in the management of complaints.

Higher Education Standards Framework (Threshold Standards) 2015

TAFE SA will ensure the confidential resolution of grievances (complaints and feedback) as effectively as possible, to minimise the occurrence of unresolved grievances, and to minimise lasting adverse effects for the provider or customer. TAFE SA will make a genuine attempt to resolve genuine complaints through consistent and fair application of policies and procedures without retribution. Particularly, TAFE SA will ensure:

- policies and procedures are current, known to staff and cater for any aspect of a student's experience, including with agents and related parties
- complaints information is accurate, current and publicly available to students and will include who to contact within the organisation
- implementation of complaints practices is consistent with this policy including costs, fairness, confidentiality, absence of reprisal, provision of advice and support
- processes are reviewed and improved upon to reduce reoccurring complaints relating to the same issue or process
- independent review by specified independent third parties.

Standards for Registered Training Organisations (RTOs), 2015

TAFE SA is required to comply with the Standards for Registered Training Organisations (RTOs), 2015 and must meet a number of regulatory standards as a training provider to ensure nationally consistent, high quality training and assessment across the vocational education and training system. TAFE SA's Complaint Management Framework is designed to ensure compliance with these standards, and in particular Standard 6 – Managing Complaints and Appeals Fairly. The Framework embodies a process for managing complaints, appeals and feedback and to identify opportunities for business units to improve service delivery and training and assessment strategies in response to customer feedback. Business unit managers are expected to periodically review reports provided through the Complaint Management Framework, in addition to other informal feedback channels, to identify and take appropriate corrective action or eliminate or mitigate the likelihood of reoccurrence (this action is in accordance with Standard 6, Clause 6.5 - Standards for Registered Training Organisations (RTOs) 2015).

Strategic Direction

The TAFE SA [Strategic Plan 2016-2019](#) outlines TAFE SA's vision and mission statements. All TAFE SA employees are expected to demonstrate behaviour that reflects our values:

- **Service excellence:** we meet the needs of all customers effectively and enthusiastically

- **Work as one team:** we display a can do attitude and work together to deliver solutions
- **Success focused:** we always strive to do better
- **Accountability:** we take responsibility for our behaviours, actions and outcomes
- **Respect:** we demonstrate respect for our customers, our people and our organisation.

[South Australia's Strategic Plan](#) aims to lift customer satisfaction with government service, while in the ten [Economic Priorities](#) the government has pledged to 'establish the most responsive and efficient public sector in the nation.'

Code of Ethics for the South Australian Public Sector / Privacy & Respectful Behaviours Policy

The [Code of Ethics](#), TAFE SA values and the TAFE SA Respectful Behaviours Policy ([PPMF|TAFESA|1010](#)) identify the behaviours and professional standards expected from all TAFE SA employees in terms of how we interact with our customers and colleagues. All TAFE SA employees are required to comply with these behaviours and the Information Privacy Principles (refer [PPMF|TAFESA|1019 Privacy Policy](#)) when involved in complaint resolution matters.

TAFE SA Student Service Charter

The [service charter](#) ensures students have a clear understanding of the service standards they can expect from all staff. All staff are expected to comply with TAFE SA's service delivery promise as detailed in the charter.

7 Service Recovery, Improvement and Governance

An effective approach to complaints and feedback management is at the cornerstone of service excellence and continuous improvement practices. Information gathered from the Complaint Management Framework will be used to identify the primary cause of complaints so solutions can be implemented and future occurrences prevented. Through the Complaint Management Framework, TAFE SA will gain greater insight into the service standards our customers expect.

Continuous Improvement Commitment

Customers have a right to make a complaint or provide feedback (at no cost) if they are dissatisfied with the service, while we have responsibility to rectify genuine issues and problems in a timely and professional way.

The Framework requirements include regular monitoring and reporting to identify opportunities for improving customer satisfaction through changes to services, processes or products. All complaints and feedback will be periodically reviewed and analysed to:

- identify systemic issues to further improve performance practices and processes
- identify trends and frequency of repeat complaints
- determine resolution outcomes of complaints; applying greater consistency in decision making or potential resolution options
- identify and implement improved practices for particular customer groups including vulnerable people, people living in regional and remote areas, Aboriginal and Torres Strait Islander people
- determine improvements to remedy issues based on customer feedback.

The TAFE SA Quality Committee will, at least quarterly, put in place remedial action plans stemming from an analysis of complaints and feedback. Progress against these action plans will be monitored and periodically reported to TAFE SA Executive and used for other reporting purposes (Appendix 3 - Complaint and Feedback Governance Arrangements). Operational service improvements will be published and promoted to customers.

Service Recovery

Together with TAFE SA's core values and service charter, the service recovery model below demonstrates good practice concerning service recovery principles adopted by the government. Where a matter cannot easily be resolved or requires a coordinated response staff will be supported through a similar process by the TAFE SA Customer Management team in accordance with the Complaint Management Framework (refer procedure document for specific process information).



Source: Customer Quotient - Government of South Australia – Service Recovery Model
<http://servicesauat.share.sa.gov.au/CQServiceExcellence/Pages/Service-Recovery-Model.aspx>

8 Complaint Handling

The four major stages in the complaint and feedback handling process are:



The supporting Customer Resolution and Feedback Procedure (PPMF|TAFESA|164) outlines further detail concerning TAFE SA's processes and requirements for effective complaint handling.

9 Reporting

In accordance with the Premier's Circular PC013 - Annual Reporting Requirements, the annual reports of all agencies will state how many and what complaints have been received. TAFE SA is required to report against the:

- number of complaints received
- category of complaints and feedback received
- service improvements made as a result
- root cause categories used for reporting purposes.

In addition, a bi-annual report will be made available to the Higher Education Academic Board for business units undertaking higher education delivery. Compliance audits are conducted by the

Australian Skills Quality Authority (ASQA), the Department of Education and Training (DET) and the Tertiary Education Quality and Standards Agency (TEQSA). Reviews may be conducted at the request of Ombudsman SA.

All of these agencies periodically assess TAFE SA's complaint handling practices. All records of complaints and feedback must be completed at a standard that enables the above level of reporting to occur.

10 Record keeping

It is the responsibility of all employees to be aware of the legislative and regulatory framework under which they work and ensure that an adequate record is created or captured in all circumstances (refer PPMF|TAFESA|142 - Creation and Capture of Official Records). Under the *State Records Act 1997* (SA), TAFE SA is required to keep full and accurate record of its activities. TAFE SA will also securely maintain a record of all complaints and appeals and their outcomes in accordance with (Clause 6.5) Standard 6 - Standards for Registered Training Organisations (RTOs) 2015. A complaint or feedback may be received verbally or in writing, in all instances, an official record will be created and maintained within the established database.

11 Responsibilities

11.1 Specific responsibility of complainant

Complainants are responsible for:

- adhering to the [Terms and Conditions of Enrolment](#) and [Student Code of Behavior](#) and related policies
- behaving in a responsible, courteous and non-discriminatory manner when interacting with other students, staff and members of the public
- seeking support in instances where they require additional assistance with their feedback or complaint [TAFE SA student services](#) can assist customers to mediate their concerns in the first instance
- participating in good faith by being fair, honest and accountable and not making malicious, vexatious or false claims
- listening and responding appropriately to the views and concerns of others
- interacting with TAFE SA on their own behalf within an adult learning environment. In circumstances where a complainant requires an advocate (i.e. parent or friend) they will be responsible for providing formal consent to act on their behalf.

11.2 Unreasonable complainant conduct

A small number of customers may act unreasonably when seeking to have their concerns addressed by TAFE SA. For example, their anger about a complaint or its outcome may translate to aggressive or verbally abusive behavior toward employees. These complainants may lose perspective and change the focus of their complaint from the issue to the organisation or people managing the complaint. They may continue to make unnecessary phone calls or emails, make inappropriate demands on the organisation's time and resources and refuse to accept decisions and recommendations in relation to their complaints. When customers behave in these ways, the organisation may consider such conduct unreasonable. The definition is applied to the behaviour of the customer, not the person.

Under work health and safety legislation, TAFE SA must take reasonable care to ensure that these complainants do not adversely affect the health and safety of others. Unreasonable behaviour does

not preclude valid issues being addressed by TAFE SA. It is important that in these circumstances TAFE SA managers, with the support from the TAFE SA Customer Management Team, ensure:

- principles of fairness and equity apply
- resource allocation and efficiency
- protection of staff wellbeing, health and safety, in accordance with PPMF|TAFESA|116 - Work Health and Safety Policy.

Where TAFE SA has undertaken all reasonable steps to resolve the complaint and the customer remains unsatisfied and continues to make contact, their behaviour is known as vexatious. In these instances support will be facilitated by the TAFE SA Customer Management Team in accordance with approved guidelines and the [TAFE SA By-Laws](#).

12 Specific responsibility of TAFE SA staff

The Chief Executive, TAFE SA:

- encourages an environment where complaints and feedback are handled promptly and fairly.
- ensures the executive is accountable and responsive to complaints that relate to its areas of responsibility.
- ensures relevant executive staff take responsibility for reviewing education and learning practices when these are identified areas of concern from complaints and feedback.
- ensures that information about the complaint and feedback handling policy is easily accessible to customers and is communicated in an easy to understand manner.
- ensures employees are compliant with the Complaint Management Framework and that effective processes and communications are in place.

The Director, Governance and Research:

- leads the ongoing management of the Complaint Management Framework and subsequent customer experience.
- reports any significant complaints (deemed to be high-risk) to the Chief Executive and other executive and senior management members as required.
- manages TAFE SA's relationship with key stakeholders such as the Ministers Office, Ombudsman SA, Equal Opportunity Commission and Office of the Training Advocate.
- ensures there is a process in place for timely and appropriate resolution of any significant complaints or systemic issues identified through complaints.
- reports to executive on a quarterly basis the number and nature of complaints and feedback.

Complaint Coordinator:

- identifies complaint trends and collaborates with managers to develop and implement continuous improvement opportunities to services, preventing a problem from re-occurring and therefore reducing risk to the organisation.
- oversees the process to facilitate employee training (in collaboration with Workforce Development) and promote staff understanding the Complaint Management Framework.
- ensures escalated or high-risk complaints are managed effectively to a high standard through relevant decision makers/delegates (complaint handlers) and/or case managers.
- ensures complaint handling data is available for review, analysis and reporting purposes.
- encourage employees to identify opportunities for service improvements that may arise.
- encourages the effective resolution of a complaint through arranging commencement of an internal investigation, appeal process and/or mediation with relevant parties when required.
- coordination of a TAFE SA response to external agencies representing a complainant.
- provides leadership and guidance to employees involved in complaints handling processes
- reviews the Complaint Management Framework on a regular basis in order to ensure continued suitability, adequacy, effectiveness and efficiency.

- identifies and addresses issues of framework non-conformance with relevant managers.

Resolution Officer/[Complaint Handler](#):

- ensure the effective and efficient resolution of complaints and feedback within their areas of control/authority/decision making in accordance with published delegations.
- ensuring staff within their respective business unit/s are aware of the Complaint Management Framework and the requirement to receive and log complaints and feedback.
- collaborate on developing and implementing continuous improvement to services that cause complaints.
- establish local work instructions or procedures for identified and localised operational issues in collaboration with the Complaints Coordinator and consistent with the Complaint Management Framework.

All TAFE SA employees must:

- read and familiarise themselves with this policy, and comply with the Complaint Management Framework and guiding principles.
- have a good understanding of their role, responsibility and authority in respect to complaints handling and seek support or advice when required. This includes:
 - knowing what procedures to follow and what information to give complainants
 - being proactive in responding appropriately to expressions of dissatisfaction in accordance with the Complaint Management Framework.
- have an understanding of the ethical issues that might arise as part of their role, including conflict of interest, procedural fairness and the importance of maintaining confidentiality (this includes ensuring communications are limited to parties involved or supporting a response) and privacy.

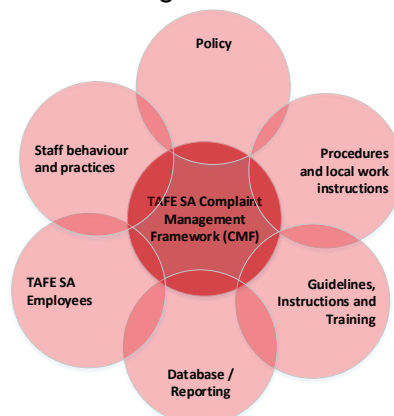
13 Review of TAFE SA Policy

TAFE SA policies must undertake a full review process, including staff consultation and TAFE SA Executive/Board approval, at least every three years, but may be actioned earlier according to strategic priorities, reforms or feedback received.

14 Appendix 1 - Overview of the TAFE SA Complaint Management Framework

Each of the elements below are integral components of the TAFE SA Complaint Management Framework and demonstrates how, together, they support effective complaint management and improve general business operations. The Complaint Management Framework is intended to:

- enable response to complaints in a timely and cost-effective way
- boost public confidence in our administrative processes
- provide information that can be used by TAFE SA to deliver quality improvements in our products, services, systems and complaint handling.



15 Appendix 2 - Guiding principles

OMBUDSMAN SA COMPLAINT MANAGEMENT FRAMEWORK (MARCH 2016)

Commitment: Develop a culture that values complaints

- **People focus:** Be open to complaints from members of the public about standards of service delivery and organisational policies, procedures and practices. Be committed to promoting and implementing an accessible complaints system as a means to address problems with service delivery and to enhance the performance of the organisation and its staff.
- **Responsiveness:** Respond to complaints in a timely manner. Recognise and reward good complaint handling by staff.
- **Objectivity and fairness:** Address each complaint with integrity and in an objective and impartial manner.
- **No detriment:** Take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint is made by them or on their behalf.

Facilitation: Make it easy for people to make complaints to your organisation

- **Visibility and transparency:** Widely publicise information about how and where complaints may be made to your organisation.
- **Accessibility:** Implement a system to manage complaints that is easy to understand and accessible to people who may require assistance.
- **Supporting:** Support and assist people who need help to make a complaint.
- **Flexibility:** Be flexible in how complaints may be made to or about your organisation. Ensure making complaint is free of charge.
- **Acceptance:** Accept anonymous complaints where they raise significant issues and there is enough information to be able to look into the issues raised.

Resourcing: Appropriately train, empower and adequately resource staff managing complaints

- **Training:** Provide appropriate training, support and resources to staff who handle complaints.
- **Recognition:** Recognise and reward good complaint handling by staff.
- **Delegations:** Provide staff with appropriate authority and guidance to be able to resolve issues that commonly arise in the handling of complaints.
- **Empowering:** Empower staff to effectively implement the organisation's complaint handling policies and procedures as relevant to their role.

Learning: Analyse complaints and their outcomes to improve systems and processes

- **Record keeping:** Have appropriate record keeping policies and procedures in place and implemented to ensure that adequate records are made and retained about the receipt, handling and outcomes of complaints.
- **Monitor trends:** Organisations should monitor trends on a regular basis as part of their activities directed at continuous improvement.
- **Continuous improvement:** Regularly analyse, report and review the subject matter and outcomes of complaints to measure the quality of the organisation's service and make system improvements.
- **Integration:** Use information gathered from complaints to review the products, systems, services and procedures or the organisation as a whole.

Guidance: Develop policies and procedures to guide staff in the management of complaints

- **Clarity:** Develop policies and procedures regarding how complaints will be received, recorded, managed and reported.
- **Availability:** Ensure policies regarding how complaints will be managed are available and communicated clearly to the public and staff.

16 Appendix 3 - Complaint and Feedback Governance

