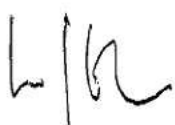
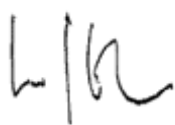




TIO POLICY & PROCESS

COMPLIMENTS AND COMPLAINTS POLICY

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POLICY AND PROCEDURE MANUAL

COMPLIMENTS AND COMPLAINTS POLICY

1 PURPOSE

The purpose of this policy is to provide external stakeholders with an avenue to lodge compliments and complaints about the Telecommunications Industry Ombudsman (TIO) and its staff, and to provide clear guidelines to stakeholders and staff members on how compliments and complaints will be handled.

It includes the approach to receiving and dealing with resolution of “privacy complaints”, that is, about how the TIO has itself complied with its obligations under privacy law regarding the handling of personal information.

It is intended to cover the requirement under the Australian Privacy Principles (APPs – particularly APP 1) to have a clear procedure for receiving and handling such privacy complaints.

Additionally, the TIO requires a mechanism by which compliments and complaints can be recorded and notes made, indicating any actions taken and outcomes achieved.

2 SCOPE

2.1 Who can complain or compliment the TIO?

This policy applies to any compliments and complaints from persons outside the TIO about the TIO and its staff, including compliments and complaints from:

- TIO complainants
- TIO members
- TIO contractors

2.2 Compliments and complaints included in this policy

The following list is a guide to the types of compliments and complaints included in this policy:

- Compliments and complaints made by a TIO complainant or TIO member about staff conduct. For example: rudeness, misconduct, exceptional service, unnecessary delays and conflicts of interest.
 - Complaints made by a complainant or member about breaches of policies or procedures. For example: repeated failure to return phone calls, or bias on the part of a TIO officer dealing with the complaint.
 - Compliments or complaints made about the conduct of an investigation. For example: unreasonable delays or insufficient time given to provide a response, or timely and complete interventions.
 - Compliments or complaints made by contractors about staff conduct.
-

- Complaints made by complainants or members about possible breaches by the TIO of privacy obligations (such as those under the APPs), the TIO's handling of personal information, or the TIO's refusal to provide access to or correct personal information that it holds about an individual.
- Anonymous complaints.

2.3 Matters not included in this policy

The following is a list of matters that are not dealt with under this policy:

- Dissatisfaction about the TIO's jurisdiction to deal with a complaint, or the outcome of a TIO complaint
 - *these complaints should be directed to the Review Process*
- Reclassification requests from members (including jurisdictional disputes)
 - *these complaints should be directed to the Reclassification Process*
- Concerns or comments made by a complainant or member about the TIO's procedures (apart from complaints about TIO's compliance with the Australian Privacy Principles, which are dealt with under this policy)
 - *these will be reviewed by the appropriate business area, a response provided, and any appropriate action taken. For example, complaints about standard TIO timeframes will be handled by the employee's team manager*
- Complaints by TIO staff members about other TIO staff members
 - *these should be handled under existing HR policies*
- Compliments made by TIO staff members about other TIO staff members
 - *these should be dealt with under the existing ADCOM procedure*

3 POLICY STATEMENT

The TIO has identified the need for a formal compliments and complaints policy to be established, as well as a process by which these can be recorded.

The aim of this policy is:

- to resolve complaints about the TIO in a fair and efficient manner
- to provide for a process that enables the recording of all compliments and complaints about the TIO in one central database
- to report on data for the purposes of transparency and to use the information to further improve the service provided by the TIO
- to review and analyse the TIO's processes in order that ongoing improvements can be made
- to assist staff in improving their skills when dealing with complaints, and
- to record compliments for the purposes of reward and recognition.

4 RESPONSIBILITIES

4.1 TIO's general responsibilities

The TIO recognises the right for stakeholders to complain and the responsibility it has to address those complaints.

The TIO also recognises the importance of supporting staff who have had a complaint made against them. This includes having a transparent and documented procedure, an efficient process and a system to record and monitor complaints. This policy is designed to ensure that the complaint investigation process is impartial, and that in relevant circumstances, the outcome of the investigation results in positive improvement in the service provided by the TIO. Any employee, who has a complaint made against them, should be made aware of the support offered by the TIO, including the EAP service.

The TIO will also ensure the confidentiality of staff details and complaint details when investigating a complaint under this policy. Unless otherwise required by law, at most only the Ombudsman, the Compliments and Complaints Manager, the relevant staff manager and those staff members who are investigating or assisting in the investigation of the complaint, or are a party to the complaint will be permitted to access records and information regarding that complaint.

4.2 Ombudsman's responsibilities

The Ombudsman is responsible for:

- providing leadership in demonstrating a commitment to the resolution of complaints and the recording of compliments to the TIO
- ensuring there is an effective, timely, impartial and just process for dealing with complaints, and
- making, where necessary, final decisions about complaints about the TIO.

4.3 Compliments and Complaints Manager's responsibilities

The Compliments and Complaints Manager is responsible for:

- administering and overseeing the policy
- directing complaints received from the public website to the relevant manager
- reporting on data collected under the policy, and
- conducting audits on the outcomes of complaint investigations.

4.4 Dispute Resolution Division Quality Manager

The Dispute Resolution Division Quality Manager is responsible for:

- exercising primary responsibility for receiving and resolving DRD complaints in a timely and fair way
- analysing complaints to determine any systemic issues which may impact the quality of work done by the TIO, and
- providing advice and assistance to people who have a complaint.

4.5 Privacy Officer's responsibilities

The Privacy Officer is responsible for:

- reviewing and resolving all privacy complaints in a timely and fair way
- analysing privacy complaints to determine any systemic issues which may affect TIO's compliance with the Australian Privacy Principles, and
- providing assistance to people who have a privacy complaint.

4.6 Managers' and Team Managers' responsibilities

The Managers and Team Managers are responsible for:

- exercising primary responsibility for receiving and resolving complaints in a timely and fair way
- advising people of their right to make a complaint, where appropriate, and
- providing advice and assistance to people who have a complaint.

4.7 Staff member's responsibilities

All TIO staff are responsible for:

- referring complaints, where appropriate, to the relevant person identified in this procedure
- providing a clear and honest account of the events that led to the complaint
- engaging openly in the complaint handling process, and
- respecting those individuals involved in the complaint handling process.

4.8 Complainants' responsibilities

Complainants are responsible for:

- providing a clear and honest account of their concerns and their expectations for the outcome of their complaint, including providing all relevant information and documents to assist in the investigation of the matter
- engaging openly in the complaint handling process, and
- respecting those individuals involved in the complaint handling process.

5 DEFINITIONS

Complaints about the TIO

A complaint is an expression of dissatisfaction made under this policy to or about the TIO, relating to our service, and can be made verbally or in writing.

Compliment

A compliment is an expression of satisfaction made to or about the TIO or TIO staff member, relating to our service, policies or procedures.

In order for a compliment to be recorded under this policy, it must, in most instances, be made in writing.

Complainant

A person who makes a complaint under this policy.

Privacy Complaint

A privacy complaint is a complaint made under this policy which relates to the TIO's handling of an individual's personal information (including health information), the TIO's compliance with privacy law including the Australian Privacy Principles and the Health Privacy Principles, or the TIO's refusal to provide access to or correct personal information that it holds about an individual.

6 PRINCIPLES

6.1 The Australian Standard

The TIO has aimed as far as possible to align the principles of this policy with the guiding principles of the *Australian Standard: Customer satisfaction – Guidelines for complaints handling in organisations (AS ISO 10002 – 2006)*. These principles are: visibility, accessibility, responsiveness, objectivity, confidentiality, a customer-focussed approach, accountability, and continual improvement.

6.2 Visibility and accessibility of the policy

The TIO will ensure that information about how and where to complain is well-publicised. With that in mind, a summary of the policy will be clearly outlined on the TIO website with a hyperlink to the full policy and an email link for those people who wish to provide a compliment or lodge a complaint. Additionally, information about the policy will be publicised on the Member News portal, for those members wishing to make a complaint or provide a compliment. Staff members should also make complainants aware of the policy, where appropriate, and a complaint form will be available in soft and hard copy for those people requesting one.

General information about the privacy complaint process is included in TIO's published privacy policy, in accordance with APP 1, available at www.tio.com.au/privacy. Information about the privacy policy is included in the TIO's web complaint form, IVR system and letters, and is available from its reception area. Complaints will be accepted verbally, by phone and in person, as well as in writing, via email, mail, website posting and fax. In this way, there should be no barriers to those people wishing to lodge a complaint under this policy. Access to the policy will also be free of charge.

6.3 Responsiveness and timeframes

A compliment or complaint will be acknowledged within 48 hours of a person lodging it. As a general rule, less serious complaints which can be handled informally, will be resolved and responded to within five (5) working days and more serious complaints that require investigation will be resolved and responded to within 20 working days.

Complaints should be prioritised by the TIO according to their urgency. For example, complaints involving serious health and safety issues or serious detriment should be addressed immediately. In all instances, complainants and staff members should be kept informed and updated on a regular basis.

6.4 Objectivity

As with all complaints that the TIO handles, complaints about the TIO should be dealt with in an equitable, objective and unbiased manner. This will involve allowing all parties to the dispute an opportunity to be heard, and where relevant, gathering information or evidence to assist in the decision-making process. Resolutions will be based on the information available and what is fair and reasonable in all of the circumstances.

6.5 Confidentiality

Personally identifiable information concerning the complainant should only be made available where this is needed and only for the purposes of addressing the complaint. Generally, details of the complaint and staff member details will only be made available to the staff member against whom the complaint is made, the manager who is addressing the complaint (or any manager they consult to assist in resolving the complaint), and the Complaints Manager, for administrative purposes. If requested, the staff member's manager or the Ombudsman may access this information.

Any staff member is entitled to have access to all complaints made about them, upon request.

Access to information about a privacy complaint following a request to the Privacy Officer, may be made subject to any conditions that the Privacy Officer may consider appropriate in the circumstances.

Details of complaints made should not be recorded in RADaR. Rather, the reference number of the Compliments and Complaints database should be recorded in RADaR, along with a brief note that a complaint, privacy complaint, or compliment had been lodged.

6.6 Accountability and continual improvement

The TIO will record all compliments and complaints under this policy in a centralised database. This will ensure that all compliments and complaints lodged, and all actions taken, will be accounted for. The data collected under this policy (not including private or personal information) will be used for reporting purposes. Data will be publicised in the TIO's annual report and will be used to report to Executive, the TIO Board, and to the TIO as a whole.

The Compliments and Complaints Manager will provide regular reports to the Ombudsman about complaints received under this policy, including any systemic issues identified. The Compliments and Complaints Manager will periodically conduct audits on the handling and outcomes of complaints lodged under this policy. This will ensure the continual improvement of the TIO's policies and procedures, as well as the complaints policy itself.

6.7 The Compliments and Complaints Manager

The TIO's Company Secretary will be the Compliments and Complaints Manager for this policy, with the Governance Adviser serving as backup whenever the Company Secretary is unavailable.

The Compliments and Complaints Manager role is primarily administrative, being responsible for the overseeing of the policy, directing complaints or compliments received via the website to the appropriate manager, reporting on data collected and performing audits.

The Compliments and Complaints Manager will play no role in the investigating and resolving of complaints under this policy, unless a complaint is made against one of their own staff members.

6.8 Benchmark for staff conduct

The TIO's Core Values and any relevant policies and procedures will be used to guide managers when considering complaints about staff conduct under this policy. The manager will need to decide whether a staff member's conduct is in accordance with the Core Values, policies and procedures, and if not, to take appropriate action to remedy the situation.

6.9 Privacy Complaints

TIO's aims when dealing with a privacy complaint are to:

- (1) respond to complaint issues raised by the complainant, and resolve the complainant's concerns where possible

- (2) identify and contain any ongoing risk to a complainant or others caused by a possible privacy breach
- (3) identify any procedural or systemic changes that may increase compliance with privacy laws, and
- (4) identify any staff performance or misconduct issues, and refer these to the staff member and/or their manager where appropriate.

6.10 Complainants behaving unreasonably

Occasionally, a person who makes complaint under this policy may be viewed as not acting reasonably. This may include where a staff member receives multiple complaints from a person regarding the same issue, even after a full response has been provided. In these instances, generally only one complaint should be recorded, which is then updated as new correspondence or information is received, or deferred to the relevant case management system dealing for any future correspondence.

In dealing with unreasonable complainant conduct under this policy, it should not vary from the way the TIO would normally handle these types of complainants. Below is a link to the TIO's intranet page that explains how we deal with these complaints. Additionally, the handling of these complaints will be informed by the NSW Ombudsman's manual on Managing Unreasonable Complainant Conduct.

<http://confluence.tio.com.au/display/Inv/Unreasonable+complainant+conduct>

6.11 Anonymous Complaints

A complainant may lodge an anonymous complaint under this policy. The complaint may be completely anonymous; that is, complainants are not required to provide their personal information, or they may request to keep their details from the person against whom they are lodging the complaint. They may also request to be identified by a pseudonym.

Although the TIO will accept anonymous complaints or use of a pseudonym, this may limit the TIO's capacity in investigating and resolving the complaint. Where possible, a complainant who wishes to lodge an anonymous complaint or use a pseudonym should be made aware of these limitations.

6.12 Complaints about the Ombudsman

Any complaints made about the Ombudsman should be directed by the Complaints Manager to the Chair of the TIO Board, who will then determine, in consultation with the Board as required, any steps to be taken to deal with the complaint.

6.13 Complaints about members of the Executive Team

Any complaints made about members of the Executive Team should be directed to the Ombudsman to investigate and resolve.

6.14 Manager's discretion

In some cases, it may not be immediately apparent as to whether a compliment or complaint should be recorded under this policy.

Although the TIO seeks to provide clear guidelines for this policy, there will be times when a manager will be required to use their discretion as to whether to record a compliment or a complaint. In the case of compliments, these will be recorded if they are received in writing; however, a manager may use their discretion to record a verbal compliment. This is the exception to the rule and should only be recorded under special circumstances. For example, a person may wish to provide positive feedback about a specific staff member, but is unable to do so in writing due to poor literacy.

Additionally, there will be times when a manager is uncertain as to whether to record a complaint. For example, a complainant may request to speak to a manager because they are dissatisfied with the outcome of an investigation or the advice they have received. These escalated calls can sometimes progress into a complaint about staff conduct. In these instances, the manager will need to determine the underlying reasons for the complaint and then make a decision as to whether a recorded complaint is justified.

7 COMPLIMENTS AND COMPLAINTS DATABASE

A database will be included on My TIO to record and monitor the compliments and complaints. All compliments and complaints that fall within this policy must be recorded in this database.

The purpose of the database is not to monitor staff performance, but simply to allow for a process by which the TIO can have a record that complaints have been actioned.

The database will contain information about the compliment or complaint, including:

- the name of the complainant
- the contact details of the complainant
- the dealing number (if any)
- the date the compliment or complaint has been made
- the name of the staff member about whom the compliment or complaint has been made
- the name of the manager to whom the compliment or complaint has been assigned to
- a description of the compliment or complaint
- the complainant's desired resolution
- a record of all actions taken on the compliment or complaint
- any documents relating to the compliment or complaint
- the outcome of the complaint
- the date the complaint was finalised
- any comments or observations about possible systemic issues identified by the complaint, and
- any comments or other matters the complaint investigator thinks ought to be included.

There will be strict restrictions placed on the database as to who can access information. Only those managers assigned to a complaint will be given access to the details of that complaint, along with the Compliments and Complaints Manager, who requires full visibility of the database, in order to run reports and conduct audits.

8 COMPLIMENTS

8.1 When to record a compliment

In general, compliments should only be recorded if they are received in writing. In some instances, a manager may use their discretion to record a verbal compliment, but this is the exception to the rule.

8.2 How to record a compliment

If a manager directly receives a compliment about one of their staff members, they should record the compliment in the Compliments and Complaints Database. Once they have recorded the compliment, they should forward the compliment to the relevant staff member for their own records.

If a staff member receives a compliment about themselves directly from a complainant, they should forward the compliment to their manager so that it can be recorded in the database.

If a staff member receives a compliment about another staff member, they should forward it to the relevant manager, who will then record it in the database and forward a copy to their staff member.

8.3 Reward and recognition of compliments

Compliments will not be used in staff performance appraisals; however, they may be rewarded and recognised in other ways, such as the Golden O awards.

9 COMPLAINTS

9.1 When to record a complaint

In order for a complaint to be recorded, it must adhere to the definition of a complaint outlined in this policy. For a guideline as to what and what should not be recorded, please refer to the section titled 'Scope' in this policy.

Where a complaint is made during a telephone call, or direct personal contact, and a staff member is able to resolve the complaint directly with the person who is making the complaint, there is no need to record it under this policy. The staff member should record the details of the matter in the case management system against the corresponding dealing number.

Where a person is not satisfied with the resolution offered by a staff member and asks to speak to a supervisor, the call must be escalated to the relevant manager and generally recorded in the database. Furthermore, all complaints received in writing (including email), will be forwarded to the relevant manager and will be recorded in the database.

9.2 How to log a complaint

If a complaint is received and it falls within the definition of a complaint for the purposes of this policy, it should be forwarded to the staff member's direct manager, unless the complaint is about privacy or information handling issues, in which case it should be forwarded to the Privacy Officer, by email at privacy@tio.com.au. That manager will then be responsible for investigating and resolving the complaint. If a manager is uncertain about how to deal with a complaint, it is a good idea to seek the advice of the relevant executive manager. Where the issue identified is in the Dispute Resolution Division, the DRD Quality Manager should be copied the advice that is sent to the direct manager. Complaints lodged via the website will be routed from the Compliments and Complaints Manager to the DRD Quality Manager.

The manager will log the complaint in the Compliments and Complaints database, recording all relevant information. The manager will then be responsible for updating the complaint until its completion.

The manager will acknowledge the complaint within 48 hours and notify the staff member at the most appropriate time. In all instances, the manager will attempt to notify the staff member as soon as practicable, but this timeframe can change according to the particular circumstances of the complaint.

Note that the Compliments and Complaints reference number should be recorded in RADaR, but that for privacy reasons details of the compliment or complaint should not be recorded in RADaR.

9.3 How to deal with a complaint, other than a privacy complaint

[For privacy complaints, see section 9.4]

(1) Process

In the first instance, the manager should familiarise themselves with the complainant's claims and make a note of the complainant's desired outcome.

For less serious complaints, an informal and outcome-focussed approach will be adopted. These complaints should be responded to and resolved in five (5) working days. For more serious matters, a more evidence-based approach may be necessary and will be responded to in 20 working days.

In dealing with a complaint, a manager will gather information regarding the matter, which may include speaking to the staff member against whom the complaint has been made, examining file notes and seeking advice or information on relevant policies and procedures. If appropriate, the manager may also speak to any witnesses to the event/s.

After the manager has gathered the information required, they should make a decision on an appropriate outcome. At all times, the manager will need to approach the complaint with independence of mind. Where the complaint relates to staff conduct, it is important that the person who is the subject of the complaint is provided with an opportunity to respond to it before the complaint is finalised.

(2) Outcomes

The outcomes will vary according to the information received. Possible outcomes could include an apology and an undertaking to conduct training if a manager determines that a staff member was at fault, or an acknowledgement of a complainant's dissatisfaction and a letter explaining that no further action will be taken if a staff member was not found to be at fault. The manager may offer advice or guidance to the officer concerned, or reallocate a case if the manager believes that the relationship has broken down too far to ensure a fair and effective investigation.

In some instances, the manager may determine that action is required under the TIO's Discipline Policy, depending on the seriousness of the staff conduct. If this occurs, steps will be taken in accordance with the Discipline Policy and, if appropriate, a copy of the report may be placed on the staff member's file.

Where complaints may indicate a systemic or policy issue, the complaint investigator should record this issue, including any recommendations.

Once a manager has made a decision on the most suitable outcome, they should communicate that decision to all parties to the dispute.

If investigation reveals that the complaint may have been unfounded or unwarranted, the complaint is to remain on the database, as the purpose of the database is for the TIO to record and note that a complaint has been actioned and whether or not the complaint was upheld.

(3) Progressing TIO Complaints

Managers should ensure, wherever possible, that the investigation of a TIO complaint is not held up while they are looking into a complaint about staff conduct. Additionally, if a complainant makes a complaint about the outcome of a TIO complaint and also lodges a complaint about the staff member who investigated the complaint, then the review or reclassification process should be conducted separately and should not be held up due to the corresponding staff complaint.

9.4 How privacy complaints are handled

(1) Privacy complaints and privacy incidents

A privacy complaint may also require notification to the TIO Privacy Officer (through privacy@tio.com.au or the TIO Legal Team) as a privacy incident, to be assessed by the TIO Legal Team in accordance with that process.

(2) Initial risk assessment

The Privacy Officer should conduct an initial risk assessment of a privacy complaint within 1 working day of receipt.

The Privacy Officer will:

- Assess the potential degree of risk or harm, and the priority of the complaint
- Consider whether an assessment should also be conducted by the Legal Team as a privacy incident assessment
- If necessary, direct appropriate TIO officers to take initial, common sense, steps to limit or contain any risk or harm. For example:
 - if a complaint relates to information being incorrectly sent to a third party, to ask that third party to delete or return that information
 - in a serious matter where there is a real risk of physical harm to a person, contacting that person to advise of the circumstances.

(3) Investigation

The Privacy Officer will:

- Investigate and form a view about:
 - factual matters relating to the complaint (e.g. what information was disclosed and to whom)
 - whether a breach of the Australian Privacy Principles may have occurred
 - any risks or harms that may have occurred as a result of the breach, and their seriousness
 - the cause of the breach, if any
 - what steps should be taken to address and resolve the complaint (including whether any notification needs to be sent a third party).

Where a privacy complaint involves an allegation of staff misconduct, the Privacy Officer will report it to, and liaise with, the Compliments and Complaints Manager to ensure coordination with the investigation of that allegation and the complaint handling process for that allegation.

(4) Actions

The Privacy Officer will:

- On receiving the complaint, give directions to other TIO staff members for such actions as appear to be appropriate to contain or mitigate any risks or harm caused by a potential privacy breach or mishandling of personal information.
- On completion of the investigation, inform the Compliments and Complaints Manager of the outcome of the complaint, for recording on the Compliments and Compliments database.

- For a complaint that only relates to privacy matters, provide appropriate summary details of TIO's investigation and actions to be taken be provided to the complainant and, if relevant and appropriate, any staff member who is the subject of the complaint.
- For a complaint that relates both to privacy matters and other issues that are separately investigated, request that for the privacy complaint appropriate summary details of TIO's investigation and actions to be taken be provided to the complainant and, if relevant and appropriate, any staff member who is the subject of the complaint.
- When informing the complainant about the outcome of the privacy complaint, inform them (or request that they be informed, where other issues are being investigated) that they may contact the OAIC if they are dissatisfied with the outcome of the privacy aspect of their complaint.
- Where the investigation concludes that there may have been a privacy breach, consider whether any system improvements should be considered to prevent further occurrences, and make recommendations to the appropriate TIO Executive.

9.5 What if the complainant is dissatisfied with the outcome of a non-privacy complaint?

If the complainant is dissatisfied with the manager's decision and wishes for the complaint to be escalated further, it can then be escalated to the relevant one-up manager. In order for this to occur, the complainant must generally put their complaint in writing, including reasons why they are not satisfied with the TIO's response. These complaints will be handled by the appropriate senior or executive manager.

In some circumstances, the complainant may have difficulty putting their complaint in writing (poor literacy or disadvantaged), in which case, the matter can be escalated verbally to the appropriate senior or executive manager.

Where required, the Ombudsman will have the final say about a complaint, and a complaint will not be escalated further.

9.6 What if the staff member is dissatisfied with the outcome?

If a staff member is not happy with the outcome of an investigation or is dissatisfied with how the investigation was conducted, they should discuss the matter with their relevant executive manager, or the Ombudsman.

10 ACTING MANAGERS

If a staff member is acting in a management position for a short period of time (under two weeks), then they will not have access to the Compliments and Complaints Database. If an acting manager is required to handle a complaint under this policy in that time, they should provide the details to the one-up manager to record in the database.

If a staff member is acting in a management position for more than two weeks, they will have access to the database. Once a staff member has completed their acting assignment, IT will be responsible for immediately removing that person's access to the database.

11 REPORTING

The Ombudsman will receive monthly reports on compliments and complaints received under this policy, in a form agreed to by the Compliments and Complaints Manager and the Ombudsman.

Each quarter, the Ombudsman will report to the TIO Board on:

- compliments and complaints received under this policy, and
- any systemic issues or areas for improvement identified as a result of complaints handled.

Each year, in the TIO Annual Report, the Ombudsman will report on compliments and complaints received under this policy.

12 QUERIES FROM GOVERNMENT DEPARTMENTS , MINISTERS AND AGENCIES

The TIO regularly receives queries and correspondence from government departments, ministers and agencies with responsibilities for communications and consumer affairs.

If such a request is made seeking an update or a status report regarding a particular TIO complaint, whilst privacy requirements (such as appropriate authorisation) will need to be satisfied, there will be no need to record the query as a complaint under this policy.

If, however, the request is based on a complaint or privacy complaint about the TIO, then the complaint will need to be captured in accordance with this policy, and the matter brought to the attention of the Ombudsman (and if it is a privacy complaint, also to the attention of the Privacy Officer).