TIQ External complaints management policy

1. Policy Statement

At Trade and Investment Queensland (TIQ), we value and welcome feedback as it plays a key role in shaping the way we deliver our services, uphold our values, and achieve our objectives to support trade and investment opportunities for Queensland.

TIQ strives to provide a best practice customer complaints management system that is accessible, fair, and responsive. All customer complaints will be treated in the strictest confidence, with respect, and with consideration for human rights in accordance with the privacy principles contained in the *Information Privacy Act 2009* (Qld) (IP Act).

This policy should be read in conjunction with the TIQ external complaints management procedure.

2. Purpose

This policy supports TIQ's obligation to establish and implement a complaints management system for dealing with customer complaints, pursuant to section 264 of the *Public Sector Act 2022* (Qld) (PS Act). The system must enable TIQ to:

- manage the receipt, processing, and outcome of a customer complaint
- comply with the Australian Standard for complaints management
- notify a complainant about the outcome of their complaint (unless the complaint was anonymous).

TIQ also meets requirements under the:

- *Human Rights Act 2019* (Qld) for complaints that are also human rights complaints
- Australian Standard 10002:2022 (*Guidelines for Complaint Management in Organisations*)
- Queensland Public Service *Customer Complaint Management Framework* and *Customer Complaint Management Guideline.*

3. Scope

This policy applies to TIQ's workforce that comprises employees and non-employees including contractors, subcontractors, labour hire employees, work experience and industry placements, trainees, apprentices, and volunteers, including all TIQ employees whilst undertaking official duties for or on behalf of the State, TIQ domestic offices and/or international offices.

A complaint is an expression of dissatisfaction in relation to a TIQ policy or service, where a response or resolution is explicitly or implicitly expected or legally required. This includes actions of TIQ's workforce, such as:

- a decision or a failure to make a decision
- an act or failure to act
- an act or decision that breaches TIQ's obligations under the *Human Rights Act 2019* (Qld) (HR Act) (human rights complaint)
- an act or decision that breaches TIQ's obligations under the IP Act (privacy complaint)
- allegation of corrupt conduct as defined by the *Crime and Corruption Act 2001* (CC Act) (Qld) (which, if there is a reasonable suspicion of the aforementioned, must be noted with the Crime and Corruption Commission in accordance with sections 38 or 40 with regard to sections 14 and 15 of the CC Act).
- complaints assessed as public interest disclosures (PIDs) under the *Public Interest Disclosure Act 2009* (Qld) PID Act

- complaints in relation to Study Queensland (SQ) and Migration Queensland (MQ)
- the formulation of a proposal or intention
- the making of a recommendation
- customer service provided
- the handling of a complaint.

This policy does not apply to complaints about:

- another agency or organisation
- matters outside TIQ's direct responsibility
- a third-party agent or service provider where the matter is referred to the agent or service provider for direct investigation and/or response to the complainant.

4. Principles

TIQ's Complaints management policy is underpinned by the following five principles:

1	People focused	• Act and make decisions in a way that is compatible with human rights. • Recognise and respect everybody's right to provide feedback. • Demonstrate a commitment to addressing feedback in a timely manner and without charge. • Involve the complainant in the process as far as is practicable and appropriate. • Recognise everyone's right to work in a respectful, safe and healthy workforce free from all forms of violence, harassment and discrimination.
2	Visibility and access	• Ensure clear information is available on TIQ's websites (including SQ and MQ) about how and where to make a complaint and how complaints are managed. • Provide reasonable assistance to complainants with special needs in making complaints. • Recognise and address complaints provided anonymously, or through an authorised third party in the same manner as any other complaint.
3	Responsiveness	• Record, track, acknowledge and process complaints in a timely manner, in accordance with the relevant TIQ complaint procedure. • Ensure that the complainant is aware of the process, timeframes, their likely involvement, the possible outcomes of the complaint and any other necessary information.
4	Objectivity and fairness	• Manage complaints objectively and deal with them fairly, respectfully, consistently, in accordance with the principles of natural justice and without actual, potential or perceived conflicting interests. • Take all reasonable steps to ensure that a complainant is not adversely affected. • Protect the rights of officers where they are the subject of a complaint. • Deal with complaints confidentially to the extent possible and with personal information in accordance with the IP Act. • Refuse to investigate a complaint if it is considered to be abusive, trivial, or vexatious.
5	Improving services	• Record and report complaints in accordance with legislative and other requirements. • Commit to using complaints as an essential tool for continuous improvement.

5. Complaints management stages

TIQ's complaints management framework is based on the seven stages of a complaint lifecycle outlined in the Queensland Public Service *Customer Complaint Management Framework*:

- Stage 1: Receive
- Stage 2: Assist
- Stage 3: Acknowledge
- Stage 4: Assess
- Stage 5: Respond
- Stage 6: Report
- Stage 7: Learn and improve

Most complaints will progress through each stage, though this may not be linear, and some stages may be repeated.

6. Service standards

TIQ aims to address complaints as quickly as reasonably possible. Our service standards are in line with timeframes outlines in the Queensland Public Service *Customer Complaint Management Guideline*.

TIQ aims to provide:

- acknowledgements within three business days
- responses to internal review requests within 20 business days
- responses to human rights complaints within 45 business days
- responses to all other complaints within 30 business days
- progress updates depending on the duration of the complaints management process.

7. Delegations

TIQ's delegations are to be exercised in accordance with TIQ's Delegations Policy and associated schedules which are reviewed on a regular basis to ensure they remain current and relevant to the operational needs of TIQ. It is recommended that delegate authority levels are confirmed prior to exercising any powers in relation to this policy and supporting procedures to ensure the current version is being considered by employees at a point in time.

8. Roles and responsibilities

Role	Responsibilities
Chief Executive Officer	» Before 30 September after the end of each financial year, publish the following information on TIQ's website: » the number of customer complaints received in the year » the number of customer complaints resulting in further action – the number of customer complaints resulting in no further action.
Chief Operating Officer	» Reports to and liaises with the Queensland Crime and Corruption Commission. » Conducts preliminary assessment of complaints and directs to decision-makers thereafter.
Manager, Corporate Governance	» Act as a central referral and coordination point for the employees and the public on the requirements of this policy and associated procedures. » Promote requirements of this policy and associated procedures and implement appropriate awareness initiatives for employees.

Role	Responsibilities
Director, Human Resources	» Review, monitor, and report on complaints to ensure they are appropriately managed. » Receive, assess, refer, and/or case manage, monitor, and report on complaints in accordance with this policy and applicable measures, to ensure complaints are appropriately managed within TIQ. » Analyse, evaluate, and audit complaints and their outcomes in order to support quality improvements. » Coordinates the training and development associated with this policy, and associated procedure for TIQ employees. » Manage and maintain TIQ's complaints register. » Provide information on the complaints register to Corporate Governance as required.
General Manager, Study and Migration Queensland	» Receive, assess, refer, and/or case manage, monitor, and report on complaints in accordance with this policy and applicable measures, to ensure complaints are appropriately managed within TIQ.
Trade and Investment Commissioners	» Ensures appropriate procedures are in place for the receipt of local complaints. » Monitor the resolution of complaints and conduct regular audits on the implementation of this policy offshore.
Employees (receiving)	» Develops a working knowledge of the TIQ Complaints Management Policy and External Complaints Management Procedure to ensure complaints are appropriately managed. » Receives complaints at the first point of contact and resolves or refers unresolved complaints to the Director, Human Resources. » Records complaint details and resolution or reasons for referred in the Record of Complaints.

9. Human rights compatibility

TIQ is committed to respecting, protecting and fulfilling human rights. It recognises the interdependence and interrelationship between trade, investment, and human rights, and extends its commitment to individual stakeholders outside of Queensland.

The HR Act (Qld) requires government entities and public service employees to act and make decisions in a way that is compatible with human rights and, when making decisions, to give proper consideration to human rights. When deciding about gifts or benefits, decision-makers must comply with these procedural and substantive obligations.

10. Reporting

Under section 264(3) of the PS Act, TIQ publishes annual complaints data in its website within its Annual Report, including:

- the number of complaints received in the year
- the number of those complaints resulting in further action
- the number of those complaints resulting in no further action.

Under section 97 of the HR Act, TIQ publishes annual human rights complaints data in its Annual Report, including:

- the number of human rights complaints received
- the outcome of the complaints.

TIQ also reports quarterly to its internal executive leadership and provides an overview of complaints management performance, including any identified significant issues, identified systemic issues, or notable trends.

11. Related documents

- TIQ CEO Complaints Policy
- TIQ External Complaints Management Procedure
- TIQ Public Interest Disclosure Policy
- TIQ Public Interest Disclosure Procedure
- TIQ Right to Information Policy

12. Further information

For further information or clarification, please contact:

- Corporate Governance at CorporateGovernance@tiq.qld.gov.au

13. Storage of information

All information should be managed in accordance with the Queensland Government Information Management Framework, which includes the *Public Records Act 2023* (Qld) and Queensland Government Records Governance Policy. In addition, personal information should be managed in accordance with the IP Act.

14. Document control

Document owner		**Chief Operating Officer, Corporate Services**		
Contact details		CorporateGovernance@tiq.qld.gov.au		
Next review		June 2027		
Supersedes		N/A		
Version	**Issue Date**	**Reason**	**Author**	**Approver**
1.0	18 June 2025	New Policy	Governance Officer	TIQ Board

Appendix 1: Definitions

Term	Definition
Anonymous complaint	» The identity of the person making the complaint is unknown.
Branch Complaints Coordinator Network	» A complaints management network made up of one or more representatives from each branch of TIQ.
Complaint	» An expression of dissatisfaction made to or about TIQ related to its services or actions, or its staff.
Complainant	» A person or their representative, or an organisational representative who makes a complaint to TIQ. A representative must be authorised to make the complaint on behalf of the person or organisation (e.g., parents, relative, or person with enduring power of attorney or officer of an organisation).
Corrupt conduct	» Under the *CC Act*, there are two different types of corrupt conduct. » "Type A" corrupt conduct involves conduct that affects, or could affect, a public officer (an employee of a public sector agency) so that the performance of their functions or the exercise of their powers: » is not honest or impartial » knowingly or recklessly breaches public trust – involves the misuse of agency-related information or material. » Common examples of Type A corrupt conduct include fraud and theft, extortion, unauthorised release of information, obtaining or offering a secret commission, and nepotism. » "Type B" corrupt conduct involves specific types of conduct that impair, or could impair, public confidence in public administration. This may include: » collusive tendering » fraud relating to an application for a licence, permit, or other authority relating to public health or safety; the environment; or the state's natural, cultural, mining, or energy resources » dishonesty obtaining public funds or state assets » evading a state tax, levy, or duty or fraudulently causing a loss of state revenue – fraudulently obtaining or retaining an appointment. » Both Type A and Type B corrupt conduct must be either a criminal offence or serious enough to warrant dismissal. » Refer to section 15 of the CC Act *for the legal definition.*
Customer	» A person or organisation who is apparently directly affected by a service or action by TIQ.
Customer complaint	» Under section 264(4) of the PS Act a customer complaint is defined as 'a complaint about the service or action of a public sector entity or its staff, by a person who is apparently directly affected by the service or action'. Examples may include: – a decision made, or a failure to make a decision, by an employee of TIQ – an act, or failure to act, of TIQ – the formulation of a proposal or intention by TIQ » the making of a recommendation of TIQ. » The customer service provided by an employee of TIQ.

Term	Definition
Decision-maker	» They should have the appropriate authority and expertise in their role to make decisions and act, such as: » approve a complaint response (verbal or written) » use discretion to accept or decline a complaint (if there are reasonable grounds) » use discretion to overturn or amend a previous decision » offer an alternative complaint remedy or outcome » approve a plan to manage unreasonable complainant conduct.
Delegate	» The person authorised to perform a specific task or function on behalf of the TIQ Board. Delegations and authorisations are recorded in TIQ's delegation schedules.
Discloser	» The person who makes a PID under the PID Act.
Human rights complaint	» A complaint by an individual about an alleged breach by a public entity (including an agency) of their obligations under the HR Act – that an act or decision is not compatible with human rights or failed to give proper consideration to human rights that is relevant to the decision.
Internal review	» A merits review that involves a consideration of whether, based on the information available at the time, the decision made was the correct one (including whether the actions and decisions were lawful, reasonable, fair, and not improperly discriminatory). It is not a re-investigation of the complaint; it is an impartial review of a decision made about a complaint undertaken by an appropriate officer independent from the original decision-maker.
Public Interest Disclosure	» An appropriate disclosure of public interest information (such as a report of corrupt conduct, reprisal, maladministration that affects a person's interests in a substantial and specific way, substantial misuse of public resources, substantial and specific: danger to public health and safety the environment) made to a proper authority. Refer to Chapter 2 of the PID Act for the legal definition.
Privacy complaint	» A written complaint by an individual about an act or practice of an agency in relation to their personal information, which alleges a breach of the agency's obligations to comply with the privacy principles under the IP Act. A privacy complaint may also relate to an act or practice of a person or entity dealing with personal information on behalf of the department (such as a contractor or consultant).
Procedural fairness	» The common law duty to accord a person procedural when making a decision that affects their rights, interests or legitimate expectations. The duty to accord procedural fairness consists of three key rules: – the fair hearing rule, which requires a decision-maker to accord a person who may be adversely affected by a decision an opportunity to present their case – the rule against bias, which requires a decision-maker not to have an interest in the matter to be decided and not to appear to bring a prejudiced mind to the matter » the no evidence rule, which requires a decision to be based upon logically probative evidence.
Public official	» Under Schedule 2 of the CC Act, a public official means: » the ombudsman » the chief executive officer or a unit of public administration, including the commissioner of police » a person who constitutes a corporate entity that is a unit of public administration.