

Queensland Ambulance Service

Customer Complaint Management

Policy Statement

Version 3.0

Effective 11 September 2026

1. STATEMENT

- 1.1.1.** The Queensland Ambulance Service (QAS) is committed to listening and responding to customer feedback. Feedback (compliments, suggestions and complaints) creates a valuable opportunity to identify what good service and quality care looks like and where the organisation can improve.
- 1.1.2.** The QAS supports and acknowledges the right of customers to make a complaint and is committed to managing these matters in an accountable, transparent, timely and fair manner that is compatible with human rights.

2. PURPOSE

- 2.1.1.** The Customer Complaint Management Policy forms part of the QAS Customer Complaint Management Framework and specifies the principles of complaint management and resolution.
- 2.1.2.** The QAS has adopted a three-level customer complaint management model:
- Level 1 – Initial complaint handling
 - Level 2 – Internal review
 - Level 3 – External review.
- 2.1.3.** This policy adheres to section 264 of the *Public Sector Act 2022*, and is compatible with the *Human Rights Act 2019*, the Queensland Public Service Customer Complaint Management Framework and Guideline, and the Australian Standard Guidelines for complaint management in organisations 10002:2022.

3. SCOPE

- 3.1.1.** This Policy Statement applies to all employees, volunteers, contractors and consultants of the QAS.
- 3.1.2.** The QAS defines a customer complaint as an expression of dissatisfaction about a service or action of the QAS and/or its staff. This may include, for example, a complaint about:
- a decision made, or a failure to make a decision
 - an act, or failure to act
 - the policies, procedures, products, projects or services delivered by the QAS
 - the formulation of a proposal or intention by the department
 - a recommendation made by the QAS
 - staff conduct, or the customer service provided by the organisation's staff.
- 3.1.3.** A customer complaint must be made by someone directly affected by the issue, or by a representative acting on behalf of an affected person (for example, a parent or guardian making a complaint on behalf of a child).
- 3.1.4.** All complaints received by the QAS will be managed through the QAS Customer Complaint Management Framework, regardless of the source of the complaint.



- Customer Complaints are managed in accordance with the QAS Procedure – Customer Complaints Management.
- Customer Complaints regarding services managed or provided by Retrieval Services Queensland (RSQ) are managed in accordance with the Retrieval Services Queensland Procedure – Customer Complaints Management (*for example, customer complaints relating to retrieval coordination, RSQ delivered virtual healthcare or health services delivered by a service provider of RSQ*).

3.2. Out of scope

- 3.2.1.** This Policy Statement does not apply to opinions, questions, enquiries or requests for information from a customer about a QAS service or action of the QAS, or its employees, volunteers, contractors and consultants.
- 3.2.2.** The following types of complaints are excluded under this policy and are managed through the relevant legislation, policies and procedures:
- Employee complaints;
 - Reports of suspected corrupt conduct and public interest disclosures that are dealt with under the *Crime and Corruption Act 2001* and the *Public Interest Disclosure Act 2010*;
 - Complaints dealt with under the *Right to Information Act 2009* and the *Information Privacy Act 2009*;
 - Reports of reportable conduct that are dealt with under the *Child Safe Organisation Act 2024*.
 - Complaints that are being managed by a third party such as the Queensland Police Service, Office of the Health Ombudsman, Queensland Ombudsman or the Queensland Human Rights Commission;
 - Complaints that are primarily contractual in nature;
 - Matters that are subject to legal proceedings;
 - Complaints and concerns raised by suppliers or members of the public about procurement activities that may be dealt with under the Queensland Procurement Policy;
 - Complaints about matters that have already been dealt with by the QAS; and
 - Complaints from customers who are not directly affected.

4. PRINCIPLES

- 4.1.1.** In line with the Queensland Public Service Customer Complaint Management Framework, the QAS' guiding customer complaints management principles are:
- **Customer focused** – people should be able to make a complaint via clear and accessible complaint management systems, with complainants respected and responses addressing all issues raised.
 - **Timely and fair** – complaint handling processes are clear, impartial, and confidential, with timely acknowledgement and responses.
 - **Clear communication** – there are clear and communicated expectations and standards for all parties involved in a complaint.
 - **Accountable** – roles and responsibilities for complaint management are clear and publicly available.
 - **Improving services** – complaints improve existing, and inform new, quality services, with the customer complaints management framework helping the QAS to prevent potential ongoing disputes.

5. POLICY CONTENT

5.1. Facilitating complaints

- 5.1.1.** The QAS respects and supports an individual's right to make a complaint and will ensure that:
- feedback and complaints can be received via email, online feedback form, social media, phone or in person;
 - potential vulnerability of a complainant is taken into consideration and relevant information on how to make a complaint is readily available and easy to access, understand and use;
 - assistance is provided to people who wish to gain access to information about making complaints, and guidance is provided about the complaints management process;
 - complaints can be made by representatives including, but not limited to, family members, friends or organisations that act in support of the complainant;
 - complainants have the right to be supported by a support person, friend, advocate, interpreter and/or community elder;
 - human rights, privacy and confidentiality are protected, respected and promoted;
 - people making complaints are treated with respect;
 - complainants are not adversely affected by the complaint made by them or made on their behalf;
 - anonymous complaints will be recorded as a complaint; however, this may limit how the QAS can address the complaint;
 - complainants will not be charged a fee to make a complaint;
 - all staff are aware of, and can provide information; and
 - employees responsible for the management and resolution of complaints have undertaken training in the QAS Customer Complaint Management Framework and act in accordance with the requirements of QAS Customer Complaint Management Framework.

5.2. Managing complaints

- 5.2.1.** The QAS will make all reasonable attempts to resolve complaints locally and informally in the first instance, wherever possible.
- 5.2.2.** The QAS will treat all complaints fairly and ensure that complaints management processes adhere to confidentiality and privacy principles.
- 5.2.3.** The QAS will endeavour to be as open and transparent as possible.
- 5.2.4.** The QAS will give proper consideration to human rights throughout the complaints management process and will act in a way that is compatible with human rights.
- 5.2.5.** All complaints will be:
- managed effectively and efficiently, and wherever possible, within established complaint resolution timeframes; and
 - resolved in a fair and objective manner having regard to the complexity of the issue/s comprising the complaint.
- 5.2.6.** Acknowledgement of a complaint must be made to the complainant. This should occur within three business days of receipt.
- 5.2.7.** Complaints should be resolved within 30 business days of receipt of the complaint unless they are determined to be complex and require further investigation, or other timeframes apply as prescribed by legislation (e.g. complaints involving human rights issues should be resolved

within 45 business days). In these cases, the complainant must be notified of the new anticipated resolution timeframe.

- 5.2.8.** The QAS will ensure complainants are provided with accurate and timely information including acknowledging the complaint, the process being undertaken to resolve the complaint, expected resolution timeframes and any issues, including timeframes that cannot be met and/or complaints that are unable to be dealt with.
- 5.2.9.** Where the customer complaint meets threshold criteria triggering legislative obligations, the QAS will manage and respond to the matter in accordance with the applicable legislation, including any obligations relating to timeframes, reporting, referring, assessing, investigating and/or notifying about matters relating to but not limited to:
- human rights under the *Human Rights Act 2019*;
 - suspected corrupt conduct under the *Crime and Corruption Act 2001*; or
 - reportable conduct under the *Child Safe Organisations Act 2024*.
- 5.2.10.** Actions taken to resolve complaints will:
- seek to implement appropriate remedies to the complainant and the QAS, taking into consideration the outcome sought by the complainant; and
 - ensure a consistent approach to decision making.
- 5.2.11.** Notification of the outcome of the complaint will be provided after a decision is made and will include adequate reasons for the decision. It will also include information about internal review rights as part of their level 1 complaint outcome response.
- 5.2.12.** Where a response identifies potential information privacy and human rights issues arising during an investigation of the customer complaint, complainants should be advised that an external review/oversight in relation to these issues may be available prior to an internal review process.
- 5.2.13.** If a complainant is dissatisfied with the complaint process and decision made to resolve the complaint, they can seek to have an internal review conducted. If a complainant is dissatisfied with the decision made at internal review, an application may be made to an appropriate independent authority for an external review, depending on the nature of the complaint, such as the Office of the Health Ombudsman, Queensland Ombudsman or Queensland Human Rights Commission.
- 5.2.14.** When a complaint resolution process identifies systemic issues, or opportunities for improvement, these actions will be considered by the QAS and actioned accordingly (e.g. making administrative or procedural changes to improve outcomes).

5.3. Managing the parties

- 5.3.1.** Complainants have a responsibility to work productively with the QAS so that the complaint can be resolved. The QAS will not tolerate conduct that is abusive, threatening, vexatious or unreasonable, including unreasonable persistence, unreasonable demands, unreasonable level of cooperation, unreasonable arguments, and unreasonable behaviour.
- 5.3.2.** Unreasonable complainant conduct includes actions or behaviours which, because of the nature or frequency, raises substantial health, safety, wellbeing, resource or equity issues for the QAS, its employees, its customers or the complainant.
- 5.3.3.** As part of managing a complaint, the QAS will ensure that:
- clear behavioural expectations are communicated to both QAS staff and complainants;
 - the processes ensure the health and safety of employees, including identity protection if needed;
 - there are strategies to manage unreasonable complainant conduct that will be underpinned by the principles of prevention, management and accountability;

- where multiple agencies or QAS work areas are involved in a complaint, appropriate processes are established to ensure pre-arranged responsibilities for investigation and response, being mindful of privacy and confidentiality obligations; and
- staff are empowered to manage complaints as relevant to their role in accordance with the QAS Customer Complaint Management Framework.

5.4. Accountability and learning

5.4.1. The QAS will ensure appropriate procedures are developed, maintained and reviewed regarding the management and resolution of complaints.

5.4.2. Through the QAS Customer Complaint Management Framework, complaints will be tracked and monitored to ensure compliance with established resolution timeframes.

5.4.3. The QAS will monitor and review complaints management processes regularly to:

- ensure reviews / investigations are complying with timeframes and maintaining appropriate levels of communication with the complainant/s;
- ensure all reporting requirements are being met and the complaints management systems in place are transparent and effective;
- identify complaint trends and outcomes;
- assess opportunities for improvement and the need for changes to the QAS Customer Complaint Management Framework and the operations of the QAS; and
- evaluate potential changes to the complaints management policy, procedures and supporting documents.

5.5. Responsibilities

5.5.1. The complainant must:

- Provide all relevant information including a clear idea of the problem and desired solution / outcome.
- Cooperate in a respectful way and be aware that unreasonable conduct will not be tolerated.
- Understand that complex customer complaints can take time to assess, manage and resolve.
- Be aware that some decisions cannot be overturned or changed using the QAS Customer Complaint Management Framework.
- Inform the QAS of changes affecting the customer complaint, including if help is no longer required.
- Request an internal review within 20 business days of receiving the outcome of the customer complaint if dissatisfied with the way the complaint was handled or if the outcome is unreasonable.

5.5.2. All employees, volunteers, contractors and consultants of the QAS must:

- Assist customers to provide feedback to the organisation in a spirit of helpful cooperation using the frontline resolution process.
- Treat others with respect, dignity and comply with standards of appropriate and ethical behaviour, as described in the Code of Conduct for the Queensland Public Sector and related policies/procedures.
- Be aware of the value of complaints and feedback generally to the QAS.

- Ensure they remain aware of the requirements of the QAS Customer Complaints Management Framework as outlined by this policy, its associated procedure, and supporting documents.
- Know how to recognise a customer complaint and have a general awareness of the various complaint types (e.g. customer, staff, corrupt conduct).
- Participate in the complaints management process by assisting and providing information where required.
- Engage in any processes in good faith, focusing on open, transparent, timely and fair resolution of issues.

5.5.3. Employees handling complaints must:

- Model appropriate and ethical behaviour at all times when dealing with complaints.
- Ensure complaints are considered seriously, dealt with fairly and in accordance with established procedures and timeframes.
- Manage complaints in an equitable, unbiased and objective manner.
- Not hold a conflict of interest as it relates to the complaint being handled.
- Be able to identify and effectively respond to people's support and communication needs and preferences.
- Ensure complaints management processes adhere to confidentiality and privacy principles and with consideration to human rights and victims' rights;
- Maintain confidentiality and provide support for a person who has made a Public Interest Disclosure, and monitor for signs of reprisal against a discloser, or any other person, particularly where a public interest disclosure has been made;
- Provide relevant and timely information about the progress of complaints to relevant parties;
- Ensure, where required, information or allegations of a serious nature are referred to the appropriate QAS unit and/or third party;
- Maintain accurate and up to date records and reporting regarding the handling of all complaints, including decisions, actions taken and reasons for decisions and actions;
- Ensure that all customer feedback data has been accurately entered into the QAS customer feedback information management system.
- Ensure all work practices and systems align with the requirements of the Policy Statement and Procedures comprising the QAS Customer Complaints Management Framework;
- Escalate complaints of concern or risk to the appropriate Executive and/or business unit;
- Utilise the designated systems and processes for identifying, gathering, classifying, maintaining and storing complaint related records; and
- Proactively identify systemic issues arising from complaints and ensure these are referred to the appropriate area for management.

5.5.4. Employees handling internal reviews of a customer complaint process or outcome must:

- Ensure internal reviews are managed according to the requirements outlined in the QAS Procedure – Customer Complaint Internal Review and the QAS Customer Complaint Management Framework;
- Have knowledge of internal review scope and processes relevant to their role and business area;
- Ensure minimum internal review data is captured and recorded;
- Treat complainants in a respectful and courteous manner; and

- Be able to identify and effectively respond to people's support and communication needs and preferences.

5.5.5. QAS Compliments and Complaints Unit must:

- Coordinate the organisation's customer complaint management process and assist in the timely management and resolution of customer complaints;
- Receive and coordinate customer feedback information and provide appropriate support to employees in relation to the management of customer complaints;
- Ensure that all customer feedback data has been accurately entered into the QAS customer feedback information system;
- Ensure that all customer complaints are acknowledged by telephone, letter or email within three business days of receiving the complaint;
- Identify and report on all customer complaints that remain unresolved by 30 business days (45 business days for complaints potentially engaging human rights).
- As required, escalate risks identified from a customer complaint;
- Prepare customer feedback reports and analysis for the QAS and/or external agencies;
- Support the Senior Customer Complaint Management Executive, Assistant Commissioner or Executive Director through the provision of appropriate data, to report on the effectiveness of, and compliance with, the QAS Customer Complaint Management Framework.
- Analyse data and outcomes to ensure that information obtained from customer feedback is considered as part of statewide quality improvement and risk management processes;
- Refer employee and/or suspected misconduct matters to the relevant QAS business unit; and
- As required, refer out-of-scope matters to the respective QAS business unit.

5.5.6. Assistant Commissioner or Executive Director must, as applicable within their area of responsibility:

- Ensure local complaint management processes are implemented which are compliant with the requirements of the QAS Customer Complaint Management Framework;
- Ensure local processes relating to customer complaint management are reviewed at least annually;
- Ensure their staff are aware of the QAS Customer Complaint Management Framework and its intent and objectives;
- Ensure staff handling customer complaints are appropriately trained and/or skilled and experienced.
- Ensure information about local processes are easily accessible to staff;
- Ensure there are processes in place to review trends and themes in customer complaints and the effectiveness and efficiency of local processes to inform annual maintenance and improvement activities; and
- Support the Senior Customer Complaint Management Executive, through the provision of appropriate data, to report on the effectiveness of, and compliance with, the QAS Customer Complaint Management Framework.

5.5.7. In addition to 5.5.6, the Executive Director, Retrieval Services Queensland must:

- Implement and maintain the Retrieval Services Queensland Procedure – Customer Complaints Management; and
- Implement systems and processes that are necessary to support the operation of the Retrieval Services Queensland Procedure – Customer Complaints Management, including the provision of advice and training.

- Notify the Senior Customer Complaint Management Executive (QAS Medical Director) of customer complaints involving issues about serious adverse events, sentinel events, long term damage or death.

5.5.8. Senior Customer Complaint Management Executive (QAS Medical Director) must:

- Ensure employees are aware of the QAS Customer Complaint Management Framework;
- Ensure information about the Customer Complaints Management Framework is easily accessible to members of the public and is communicated in an easy-to-understand manner;
- Oversee the process for performance monitoring, evaluation and reporting on customer complaint management;
- The implementation and ongoing maintenance of the QAS Procedures – Customer Complaints Management, and Customer Complaint Internal Review;
- Implementation of those systems and processes that are necessary to support the operation of the QAS Procedures – Customer Compliments, Complaints and General Feedback, and Customer Complaint Internal Review including the provision of advice, training, and reporting to a third party where necessary;
- Provide data to enable publication of the department's complaints management data as per the *Public Sector Act 2022* as required by 30 September each year;
- Provide data to enable publication of the department's human rights complaints data in the Annual Report as required by the *Queensland Human rights Act 2019*;
- Provide data to enable publication of the department's victims of crime complaints data in the Annual Report as required by the *Victims' Commissioner and Sexual Violence Review Board Act 2024* (Victims' Charter Rights);
- Provided data to support other government reporting as required;
- Provide advice and guidance on the Customer Complaint Management Framework; and
- Report to senior executive and other relevant stakeholders on the effectiveness of, and compliance with, the Customer Complaint Management Framework.

5.5.9. The Commissioner must:

- Implement and maintain the QAS Customer Complaints Management Framework;
- Implement and maintain the QAS Policy Statement – Customer Complaint Management;
- Cultivate a customer focus throughout the QAS; and
- Appoint a senior executive (Senior Customer Complaint Executive) with overall strategic responsibility and authority for customer complaint management within the QAS.

5.6. Review mechanism

- 5.6.1.** If a customer is dissatisfied with the outcome of their complaint, they may request that the QAS conduct an internal review.
- 5.6.2.** The QAS Procedure – Customer Complaint Internal Review outlines the minimum mandatory requirements for the QAS' internal review of complaints.
- 5.6.3.** Requests for an internal review must be made by the customer / complainant within 20 business days of receiving the complaint outcome. The QAS will complete the internal review within 20 business days of receiving the request. If it is not possible for the QAS to complete the review within this timeframe, the complainant will be advised of the reason for the delay and an anticipated review completion date.
- 5.6.4.** If the customer is dissatisfied with the outcome of an internal review, they may request an external review via:

- the Queensland Ombudsman; or
- the Office of the Health Ombudsman; or
- if the complaint is related to corrupt allegations, the Crime and Corruption Commission; or
- if the complaint relates to human rights, the Queensland Human Rights Commission; or
- if the complaint relates to victim's rights, the Queensland Office of the Victims' Commissioner.

5.7. Reporting

5.7.1. The QAS Compliments and Complaints Unit is responsible for collation and internal reporting of customer complaint management data. Further, the QAS Compliments and Complaints Unit is responsible for providing data to support the Governance Assurance and Information Management (GAIM) Branch's reporting and external publication of the QAS' complaints data, as defined under the *Public Sector Act 2022*, the *Victims' Commissioner and Sexual Violence Review Board Act 2024* and the *Queensland Human Rights Act 2019*.

6. Human Rights

The QAS will respect, protect and promote human rights in our decision-making and actions in accordance with the *Human Rights Act 2019*, in response to a complaint.

This policy does not limit human rights, as outlined in the *Human Rights Act 2019*. This policy enhances the right to recognition and equality before the law and right to freedom of expression, by ensuring that the QAS Policy Statement – Customer Complaint Management and supporting procedures are clear and accessible to all, and complaint handling processes are clear, impartial and confidential.

7. GLOSSARY

TERM	DEFINITION
Accessible	Easily available and understood.
Complainant	Person, organisation or their representative (including clients, consumers, service users, customers, etc.) who is apparently directly affected by the service or action of the QAS, making a complaint.
Complaint	Expression of dissatisfaction made to, or about, the QAS, 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. (Source: AS 10002:2022 <i>Guidelines for complaint management in organizations</i> .)
Customer	A consumer of the QAS' products and/or services. This definition applies to both external customers (e.g. the public) and internal customers (e.g. employees, contractors and consultants).
Customer complaint	(see section 264(4) of the <i>Public Sector Act 2022</i>) means 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.
Customer Complaint Management Framework	All policies, procedures, practices, systems, employees and resources used to manage customer complaints within an agency.

Customer feedback information management system	A tool that is part of the QAS Customer Complaint Management Framework and used to capture and record customer complaints data, including information about the complainant, their complaint, how the QAS has resolved the matter, and any reviews undertaken. Within the QAS Mincor is the system used. Within Retrieval Services Queensland, Riskman is used.
Employee complaint	An employee complaint is a complaint made by a current employee, where they have an honest belief, based on reasonable grounds, that: - an administrative decision, which they are aggrieved by, is unfair and unreasonable; - the conduct or behaviour of an employee, agent or contractor is unfair and unreasonable; - the conduct or behaviour of an employee, agent or contractor constitutes bullying in the workplace, sexual harassment, racial vilification, religious vilification, or vilification on the grounds of gender identity or sexuality; - the conduct or behaviour of an employee is a breach of the Code of Conduct for the Queensland Public Service; or - an act or decision is not compatible with human rights or a decision failed to give proper consideration to a relevant human right under the HR Act. <i>Note: If a QAS employee in a non-employment capacity is directly affected and dissatisfied with a QAS service (e.g., an employee requires a QAS or RSQ health response and is dissatisfied with the service provided), the complaint should be managed by the QAS Procedure – Customer Complaints Management or Retrieval Services Queensland Procedure – Customer Complaints Management. A complaint relating to an employee's employment with the QAS is to be managed through the QAS HR Procedure – Employee Complaints Management.</i>
External review	A process available to complainants where an oversight agency, such as the Queensland Ombudsman or other complaints handling organisation, investigates the handling of a complaint by an agency or deals with complaints that were previously the subject of a complaint to an agency.
Frivolous complaint	A complaint with no serious purpose or value and does not justify the resources that would be required to action it.
Human Rights	Human rights means the rights stated in part 2, divisions 2 and 3 of the <i>Queensland Human Rights Act 2019</i> .
Internal review	Is a merits review that involves a consideration of whether, based on the information/facts 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.
Internal review officer	An internal review officer is a QAS employee who conducts an internal review. The officer must be: - independent from the original customer complaint; and - in a position equal to, or higher than, the original decision-maker, or nominated by such a person. An internal review may involve more than one internal review officer.

Unreasonable complainant conduct	Is any behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues. Examples of unreasonable complainant conduct can include unreasonable persistence; unreasonable demands; unreasonable lack of cooperation; unreasonable arguments; and unreasonable behaviour (Australian Standard 10002:2022 Guidelines for complaint management in organisations).
Vexatious complaint	A complaint without reasonable or sound basis in fact, has little chance of succeeding, and is instead designed to harass, annoy, or create a resource burden for the QAS.
Victims' Rights	Victims' rights means the rights outlined in the Queensland Charter of Victims' Rights.

8. LEGISLATION

- *Ambulance Service Act 1991*
- *Child Safe Organisations Act 2024*
- *Human Rights Act 2019*
- *Information Privacy Act 2009*
- *Public Records Act 2023*
- *Public Sector Act 2022*
- *Right to Information Act 2009*
- *Victims' Commissioner and Sexual Violence Review Board Act 2024 (Victims' Charter Rights)*

9. SUPPORTING DOCUMENTS

- QAS Procedure – Customer Compliments, Complaints and General Feedback
- QAS Procedure – Customer Complaints Management
- Retrieval Services Queensland Procedure – Customer Complaints Management
- QAS Policy Statement – Child Safety
- Queensland Human Rights Commission Guide – Handling Human Rights Complaints
- Queensland Ombudsman – Policy and Procedure Guide
- Queensland Ombudsman Complaints management resource
- Queensland Ombudsman Policy and procedure guide
- Commonwealth Ombudsman Better Practice Complaint Handling Guide

10. AUTHORITY

This Policy Statement is issued under the authority of the Commissioner, QAS.

11. AMENDMENTS REGISTER

Version 1.0 – May 2021	Version 1.0 – new Policy Statement.
Version 2.0 – May 2023	This revised Policy Statement is Version 2.0 and has been updated to reflect the revised Australian Standards – Guidelines for complaints management in organisations (AS 10002-2022).
Version 3.0 – 11 September 2026	Major revision, including removal of employee complaint management, adds 'customer' in the policy title to improve clarity, and review to ensure child safe organisation matters are considered and included.