

<b>Title</b>	<b>Complaints Management Policy</b>		
<b>Document sponsor</b>	Chief Customer Officer		
<b>Authorised by</b>	ET (Executive Team)	<b>Date first adopted:</b>	31/05/2017
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<b>Business Function</b>	Policy		
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## 1 Introduction

### 1.1 Purpose

This policy outlines and facilitates GMCT's best practice approach to complaint management, ensuring better outcomes for individuals and GMCT. It defines an open and transparent approach to complaint management to ensure the effective, timely, consistent and appropriate response to complaints.

### 1.2 Scope

This policy applies to all complaints received by GMCT, regardless of the method in which the complaint is received. It includes complaints about third parties, such as contractors. It applies to all GMCT staff and contractors.

Where a complaint involves monument safety, an incident request will be raised (where required outside of the normal inspection prioritization schedule) and a review conducted. Refer to 'Monument Safety Management Policy #104' for complaints relating to monument safety and OHS risk associated with monuments.

## 2 Policy statement

GMCT is committed to best practice complaint management as part of its customer-centric service philosophy.

We promote a culture that encourages feedback and complaints. We learn from complaints in order to improve our services.

Members of the public expect high quality, timely services and decisions that are transparent and fair. We acknowledge the right of members of the public to make a complaint when their experience and/or our services do not meet their expectations or the standards set in our customer charter.

## 3 Policy details

### 3.1 Guiding principles

This policy is based on the following seven principles:

#### 3.1.1 Commitment

We are committed to resolving complaints swiftly and fully. We promote a culture that recognises an individual's right to complain. We value complaints and recognise them as being an important part of our business improvement process. We will acknowledge receipt of all complaints received within 48 business hours, as per our customer charter.

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## 3.1.2 Accessibility

GMCT's complaint policy is simple to use, inclusive and detailed in its communication.

## 3.1.3 Transparency

We clearly communicate how to complain, where to complain and how the complaint will be handled. The steps taken in response to a complaint (refer Complaints Management Procedure) are recorded in the CRM system and will stand up to scrutiny.

## 3.1.4 Objectivity and fairness

Complaints are dealt with courteously, impartially, within established timeframes and are assessed on merit.

## 3.1.5 Privacy

Complaint information is handled according to privacy laws and other relevant legislation.

We provide clear information about how we handle personal information. Complaint data is de-identified if reported on more widely.

## 3.1.6 Accountability

We are accountable internally to the Board and externally to the Department of Health, for our decision making and complaint management performance. We provide explanations and reasons for decisions. Our decisions are subject to appropriate review processes and legal requirements.

## 3.1.7 Continuous improvement

Acting on, learning from and using complaint data helps us identify problems across the business and improve services.

## 3.2 Roles and responsibilities of GMCT staff

Frontline staff	<ul style="list-style-type: none"> <li>Take the initial complaint and assess it against pre-defined criteria for complaints [refer Complaints Management Procedure].</li> <li>Where assessed to be a complaint, create a case – 'customer feedback' in the CRM system.</li> </ul>
Complaints Administrator (CX)	<ul style="list-style-type: none"> <li>Acknowledge the complaint (case) to the complainant (as per customer charter).</li> <li>Manage investigation of the complaint.</li> <li>Resolve the complaint with the appropriate stakeholders.</li> <li>Communicate regularly with the complainant throughout the process up to resolution or closure (not all complaints will be resolved when closed), other than where a member of the Senior Leadership Team or Executive takes over the communication with the complainant.</li> <li>Record/log all complaints in the document management system with all relevant artefacts, linking to the deceased/location record where appropriate.             <ul style="list-style-type: none"> <li>We need a complete historical record of the complaint, steps taken, communications and outcome achieved, regardless of who owned the communication to closure stage.</li> </ul> </li> <li>Keeping the General Manager of Customer Experience briefed on all complaints and escalations (legal, media, OHS risks).</li> </ul>
General Manager Customer Experience	<ul style="list-style-type: none"> <li>Monitor (enforce) progress to closure within defined timeframes.</li> <li>Report against KPIs/SLAs.</li> <li>Escalate/draw on resources to resolve issue.</li> <li>Follow up on recommended learnings and business process changes through to implementation.</li> <li>Escalate to the appropriate Executive where required (media, legal, OHS risk) in a timely fashion.</li> </ul>

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	<ul style="list-style-type: none"> <li>Oversee all communications.</li> </ul>
<p>Executive NB: This is a point of escalation and referral</p>	<ul style="list-style-type: none"> <li>Ultimate accountability to resolve individual complaints brought to their directorate (finance, governance, customer, people and operations, future built environment, digital).</li> <li>Support and direct frontline staff, complaints administrator and General Manager CX to meet the requirements of this policy and our customer charter.</li> <li>Respond in accordance with the policy and workflow.</li> <li>Help, as needed, to resolve the complaint external to their directorate (as part of a complaints review / process).</li> </ul>
<p>Chief Executive Officer NB: This is a point of escalation and referral</p>	<ul style="list-style-type: none"> <li>The Office of the CEO will receive complaints via the Department of Health and/or Minister's Office. <ul style="list-style-type: none"> <li>The Minister's Office requires a written response within 3 working days.</li> </ul> </li> <li>Escalated from Executive in complex, serious or systemic complaints and, in relation to those complaints, the CEO will: <ul style="list-style-type: none"> <li>approve and sign correspondence.</li> <li>approve media statements/interviews.</li> <li>attend meetings with complainant as deemed appropriate.</li> <li>liaise with Department of Health.</li> <li>liaise with the Cemeteries and Crematoria Unit.</li> </ul> </li> </ul>
<p>Legal consultant</p>	<p>Reviews:</p> <ul style="list-style-type: none"> <li>written communication where appropriate.</li> <li>proposed compensation before offered.</li> <li>requests against the Act/privacy.</li> <li>planned process forward where required.</li> </ul>

### 3.3 How complaints can be made

Complaints can be submitted:

- In person at GMCT receptions or to any GMCT staff member
- written (via post, document handed to GMCT)
- by email
- by telephone
- via a third-party (e.g. Funeral Director, Stonemason, community Facebook page, councillor, the Ombudsman, the Department of Health)
- via GMCT's social pages (LinkedIn, Facebook)
- via a GMCT web-form
- other feedback channels, including but not limited to GMCT's online surveys.

Mail:

The Greater Metropolitan Cemeteries Trust PO Box 42  
FAWKNER VIC 3060

Phone:

1300 022 298

Email:

enquiries@gmct.com.au

In person: At any GMCT reception or to any member of GMCT staff.

### 3.4 Accessibility

Anyone who has been affected by a decision or action of GMCT (including a failure to make a

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decision or take action) can make a complaint.

We work with The National Relay Service to assist those with a hearing or speech impairment to make a complaint or provide feedback.

People who would like to make a complaint or provide feedback in a language other than English (LOTE) can use the certified Victorian interpreting and translation service (VITS). This information is provided in detail in our customer charter.

GMCT accepts and responds to anonymous complaints, where enough information has been provided.

## 3.5 Complaint management procedure

Details of how criteria, against which complaints are assessed, managed, recorded, resolved and reported against, are outlined in GMCT's Complaints Management Procedure.

The Complaints Management Procedure has four-tiers:

- I. frontline receipt/acceptance
- II. internal investigation of facts and evidence
- III. internal review of actions/decisions required
- IV. final resolution.

## 3.6 Complaints alleging corrupt conduct

Where a complaint involves allegations of corrupt conduct, it will be handled in line with GMCT's Fraud Control Policy (#21) and Protected Disclosure Policy (#11).

## 3.7 Recording complaints

All complaints are recorded in GMCT's complaint database other than when confidential (such as corruption claim or allegation against a staff member).

Complaint data is analysed and quarterly reports are provided to the audit and risk committee. The data is measured against KPIs and informs how we reduce complaints and improve services. Senior management is responsible for acting on report recommendations.

## 3.8 Reporting on performance

We use the following indicators to measure our performance:

- number of complaints received per month
- number of complaints (per month) resolved within the range of:
  - 1-14 days
  - 14-60 days
  - Over 60 days
- complaints escalated to the Victorian Ombudsman's office where GMCT's original decision has been overturned and/or proposals for action have been made by the Ombudsman
- complaints escalated to the Department of Health
- customer satisfaction, as part of the annual customer survey program.
- Issues recorded through the GMCT incident reporting system (at times separate to complaints).

We will report against our complaint management key performance indicators in our annual report.

## 4 References & Related Materials

### 4.1 Legislation & Regulations

- *Cemeteries & Crematoria Act 2003 (Vic)*
- *Cemeteries & Crematoria Regulations 2015 (Vic)*
- *Charter of Human Rights and Responsibilities Act 2006*
- *Freedom of Information Act 1982*
- *Independent Broad-based Anti-Corruption Commission Act 2011*
- *Privacy and Data Protection Act 2014*

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- *Protected Disclosure Act 2012*

## 4.2 Related GMCT documents

- Customer Service Charter No. 052
- Protected Disclosure Policy No. 011
- Social Media Policy No. 106
- Media Policy No. 054
- Complaints Framework and Workflow
- VPSC employee Code of Conduct
- Community Engagement Manual
- Complaint Procedure
- Monument Safety Management Policy #104

## 5 Policy History

Date	Details of Change
31 May 2017	New policy established
1 August 2023	Policy reviewed, revised and approved

## 6 Definitions

Term	Definition
complaint	A complaint is an expression of dissatisfaction with: <ul style="list-style-type: none"><li>• the quality of an action taken, decision made or service provided by an agency or its contractor.</li><li>• a delay or failure in providing a service, taking an action, or making a decision by an agency or its contractor.</li></ul>
Frontline staff	All staff who engage with the public as a part of their regular work, including burial operations and horticulture staff, reception and sales staff.
KPI	Key Performance Indicator
SLA	Service Level Agreement