

## Submission from Australian/New Zealand Ombudsman Association - ANZOA



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The "Comment Detail" field should describe the issue you feel should be addressed, and a justification for the proposed change.

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*Example: How to complete the comment form:*

*Sect./ Subsect. <sup>1</sup>	*Sect. ID	Para./Table /Fig./Comm ./Note	*Page No.	*Comment Type <sup>2</sup>	*Comment Detail	*Proposed Change
Clause	2.3	Table 1	16	Editorial	"diagram" incorrectly spelt	Correct spelling error
Appendix	C15.6		62	Technical	AS 5100.7 incorrectly referenced	Reference should be AS 5100.2

<sup>1</sup> Options include: Clause, Title, Table of Contents, Preface, Foreword, Introduction, Appendix, Bibliography or Index.

<sup>2</sup> Options include: Editorial, General or Technical.

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
General comment	None		General	0	There are references to complaint-handling; complaint handling; complaints handling and complaints-handling system; complaint handling system and complaints-handling manager and complaint-handling manager and complaint handling manager. Suggest consistent reference and spelling.	Ensure consistent references and spelling
General comment	None		General	0	ANZOA notes although the draft AS ISO 10002 is a very lengthy document, it is easy to read and use.	No action required
Foreword	Foreword	(g)	Technical	4	Add additional reason	Add additional reason  Implementation of the guidance set out in this Standard can: “(g) result in the attraction of consumers because of the positive reputation that the organization is mature and open to receiving and acting on complaints.”
Clause	4	4.1	Technical	6	Definition of complainant  The draft wording of the definition of “complainant” suggests that a representative of a person or organisation can be referred to as the “complainant” when they make a complaint.	Replace wording with:  “Person or organisation making a complaint (including clients, consumers, service users, customers, etc.) whether directly or through a representative.”

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# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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					<p>The current Standard (AS ISO 10002-2006) defines “complainant” as “person, organisation or its representative, making a complaint”. This wording is preferred to the wording in the Draft Standard, as it makes it clear that the “representative” is a representative of an organisation, and not of a person.</p> <p>In addition, the list of people or organisations that might be complainants, “...including clients, consumers, service users, customers, etc.”, currently appears to clarify the meaning of “representative” only.</p>	
Clause	4	4.6	Technical	6	<p>Terms and Definitions</p> <p>A definition of a ‘dispute’ needs to be included as the word dispute is used throughout the draft standard and is referenced as being something different to a complaint under 5.4.3.</p>	Include a definition of ‘dispute’ that reflects what is intended in 5.4.3.
Clause	5	5.1.1	Technical	6	<p>Guiding Principles - additional comment</p> <p>Throughout the document, there is little or no emphasis on the responsibility organizations have to ‘raise awareness’ people can make complaints. It talks about ‘enabling’ complaints which is different. It implies it is up to the consumer to take the initiative. Recommend an item relating to an organization promoting knowledge about a complaints process be included under 5 Guiding Principles</p>	<p>Add</p> <p>“An organization will promote knowledge about the existence of a complaints handling system to consumers”</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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Clause	5.1.4	1st Par, 1 <sup>st</sup> line	Technical	6	Wording to make the sentence clearer	Recommend rewording the first sentence to state:  "The organization should ensure the complaint handling system is accessible and easy to use for everyone."
Clause	5.1.4		Technical	6	Add wording to ensure organization recognises a complaint.	Add  "The organization should ensure it can recognize an expression of dissatisfaction even where the word 'complaint' has not explicitly been used, and refer the person expressing dissatisfaction to its complaint handling department in a timely manner."
Clause	5.2.2		Technical	7	Add wording to clarify what the position of the parties are while the complaint is in the complaints handling process.  Clarify the role of who can consider the complaint	Add wording to 5.2.2 – Objectivity and Fairness  "When a complaint is being investigated, is awaiting investigation or is being considered by an EDR body, the position of the parties should be preserved (for example, a debt should be quarantined or an administrative action withheld) until the dispute resolution process is complete."  Amend wording to 5.2.2 Delete  "The organization's complaint handling system should provide avenues for review of....people other than the original decision maker."

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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						<p>Insert</p> <p>“Conflicting interests should not interfere with, or be perceived to interfere with the handling and resolution of complaints. For example, the organization’s complaint handling system should provide avenues for review of the complaint outcome are people other than the original decision maker.”</p>
Clause	5.2.5		Technical	7	The reference to front line staff is unclear. Does the organization need to communicate with its front line staff or are front line staff meant to communicate explanations for policies etc to people who contact the organization.	Clause should be redrafted to ensure its intention is clear.
Clause	6.1		Technical	8	<p>6 Complaint Handling Framework (additional comment)</p> <p>Recommend there be something about telling people complaining the ‘whole complaint process’ from the outset, i.e. if not resolved there is an external body they can complain to and what that process is (if applicable external body). Many organizations are ‘reluctant’ to tell people complaining they may be able to go to an independent body if not resolved. Clause 6.3.1(e) talks about awareness ‘throughout the organization’ but not about externally.</p>	“The organization should ensure complainants are aware of the entire complaints handling process, including whether there is an external body the complainant can go to if the complaint remains unresolved internally.”

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Clause	6.1			8	There does not seem to be an overarching principle of assisting those having difficulty making a complaint – vulnerable, disabled, language, cultural barriers etc. It is picked up later on in the document (8.2 and Appendix B) but we suggest something in 6 specifically.	“The organization will provide assistance for those people who have difficulty making a complaint or who have special needs.”
Clause	6.3.1		Technical	9	Recommend the list be reordered into a logical sequence from beginning to end so it can be used as an effective checklist.	Reorder as follows: 1. (b) 2. (c) 3. (d) 4. (g) 5. (a) 6. (e) 7. (f) 8. (j) 9. (h) 10. (i)
Clause	6.3.1	(f)	Technical	9	Recommend redrafting 7(f) to make it clearer.	“Ensuring information about the complaint-handling policy is easily accessible, and communicated to the public in an easy to understand manner. “

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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Clause	6.3.2		Technical	9	Clarification required.  Addition to 6.3.2 (f)	6.3.2 Manager responsible for complaint handling  (e) (iii) the reference to provision of adequate documentation is unclear. What documentation is it referring to and who is it to be provided to? Recommend this be clarified.  Add to 6.3.2 (f)  "Implementing internal and external escalation procedures for unresolved complaints/disputes."
Clause	6.3.3		Technical	10	6.3.3 Operational Managers (h) what is a complaint event?	Recommend this be defined or rephrased to say a "complaint" so it is easier to understand the requirements.
Clause	6.4	(d)	Technical	10	6.4 Staff awareness (d) recommend this clause be redrafted:	"(d) report and refer material or persistent complaints which have, or have the potential to have, a significant impact on the service user or organization, in accordance with the organization's complaints handling procedure."
Clause	7.1		Technical	11	7.1 System The reference 'is reasonably perceived to be fair' is a complex statement. Recommend this clause be redrafted.	"The organization should plan and design an effective and efficient complaint handling system that is fair and is seen to be fair."

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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Clause	7.2		Technical	11	<p>This subsection provides a brief description of the three different levels of review and refers the reader to Appendix H for further details.</p> <p>Level one is resolution by frontline staff, as described in the first sentence of paragraph two. Level two is described in the first half of the second sentence in paragraph two as “Dissatisfied complainants should have the option of making a complaint to the organisation...”</p> <p>It appears the intention of this passage is to make it clear that complainants who are dissatisfied with how frontline staff have addressed their complaint should have the option of making a formal complaint to the organisation. The complaint will be dealt with by a higher-level / non-frontline staff member according to the organisation's complaint handling policy.</p> <p>The words “the option of making a complaint” potentially creates confusion, as it may be read to mean that the expression of dissatisfaction to front line staff is not a complaint. Alternative wording to avoid any such confusion is proposed below.</p>	<p>Replace wording with:</p> <p>“Complainants who are dissatisfied with how frontline staff have addressed their complaint should have the option of seeking a further internal review and if still dissatisfied to seek a review by an appropriate external complaint-handling mechanism.”</p>



# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Clause	7.4	(a)	Technical	11	Resources  Recommend the following be added to (a):	Add:  (a) ... against the number and nature of complaints received and resolved;
Clause	7.5		Technical	11	7.5 Integration with public relations/media activities  The purpose of this clause is not clear in the current drafting.	Recommend redrafting to ensure the purpose and intended benefit of integration is made clear for organizations trying to comply with the standard.
Clause	8.7.4		Technical	13	Requires an additional comment.	Recommend information about an organization's responsibility to advise a person complaining what external processes are available if the complaint remains unresolved, perhaps under 8.7.4.
Clause	8.3		Technical	12	8.3 Early Resolution  Recommend the reference to assessing whether a complaint resolved via early resolution should be recorded as clause 8.4 appears to make it clear when a record must be made.  Alternatively, greater guidance on when complaints should be recorded should be included under the early resolution section, including the benefits that recording these complaints can bring – internal analysis of what	Remove reference to making an assessment whether a complaint resolved via early resolution should be recorded.  Provide greater guidance on when complaints should be recorded in the early resolution section.

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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					resolves complaints early and what prevents escalation through the internal dispute resolution/external dispute resolution process.	
Clause	8.4		Technical	12	<p>8.4 Receipt of complaint</p> <p>Recommend that greater clarity be provided about keeping a separate case file and complaint file – so that the many organizations that do not hold case files understand this reference.</p> <p>Recommend adding at the top of the list:</p>	<p>Explain the meaning of case file and complaint file.</p> <p>“The record of complaint should identify the issue(s) complained about”</p>
Clause	8.7.1		Technical	13	Add as need to ensure consideration is given as to who needs to be involved in the complaints handling process.	<p>Add</p> <p>“(g) what parties need to be involved (ie such as another company)”</p>
Clause	8.7.2 and 8.7.3		Technical	13	<p>8.7.2 and 8.7.3 (additional comments)</p> <p>There is no mention of ‘investigating the complaint’. There is the problem if an organization only ‘considers’ the complaint, does that suggest they only consider what the person making the complaint says.</p> <p>While the draft provides for a wide range of options for resolution, there is nothing in the draft which requires resolutions to be tailored to the</p>	<p>Complainants do not ‘always know what they do not know’. Does the organization have a responsibility to consider/investigate beyond what the complainant may or may not know? (see current standard at clause 7.7)</p> <p>Have an addition to either 8.7.3 or Appendix J. See comments in Appendix J.</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
					root cause of each individual complaint.	
Clause	8.7.4		Technical	13	<p>8.7.4 Communicating with the complainant</p> <p>The current Standard at clause 7.7 outlines that a response to a complaint must be provided following an appropriate investigation and if this response does not resolve the complaint, action be taken to ensure it is effectively resolved.</p> <p>The draft Standard no longer includes this and organizations are now only required to advise the consumer of the 'outcome(s) of the complaint'.</p> <p>By removing this step in the complaint process it effectively removes the requirement for organization to engage complainants in the resolution process – which is vital to reaching effective outcomes.</p>	The intentions of 7.7 in the current Standard should be incorporated into the draft Standard.
Clause	8.8		Technical	14	Addition to wording of clause to specify the information to be included and prevent any misunderstanding about the outcome.	<p>8.8 Closing the complaint, review and record keeping</p> <p>Amended wording</p> <p>“ At the time of closing the complaint, a summary of the steps taken to resolve the matter, including any points of agreement, any promises made and timeframes for those promises to be acted upon, should be recorded to assist with further review processes”.</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Clause	8.9		Technical	14	8.9 Monitoring implementation of recommendations/remedies.  The draft text does not match the intention of the heading of this clause.	Recommend redrafting to state:  'The organization should put in place systems to ensure the implementation of outcome(s) are properly monitored and appropriately reported to the complaint-handling manager and/or senior management'.
Clause	9.5		Technical	15	Amend word conformity to adherence as better reflects the notion of an audit.	9.5 Auditing of the complaint-handling system  Recommend replacing the word 'conformity to' with 'adherence to' i.e. adherence to the complaint-handling procedure;
Clause	9.6.2		Technical	16	Add parties who may be considered or affected in making recommendations for improvements, to ensure the organization looks beyond itself.	Add to wording  “(g) Recommendations for improvements, including from consumers, stakeholders (internal and external) or other bodies where appropriate“
Appendix	A5		Technical	17	Add 'promptly' to ensure the organizational remains focussed on the complaint in a timely way.	Add to wording  “Acknowledge receipt of all complaints promptly if they are not received in person (a phone call or email may be sufficient) (see Clause 8.6).”

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	A7		Technical	17	<p>A7 Manage expectations Currently this section only provides guidance for small business on what to do if the action is likely to satisfy the complainant.</p> <p>Recommend including statement about what to do if the action will not satisfy the complainant.</p>	<p>Include the following statement:</p> <p>“Give information to the complainant about what you intend to do about the complaint, and evaluate the complainant’s response. Is it likely the action will satisfy the complainant? If yes, then move rapidly to take the action the complainant reasonable expects, bearing in mind the best practices within your industry (see Clause 8.7) If not, and where additional review or consideration of the complaint will be undertaken, provide the complainant with clear timeframes for when to expect a response, or when to expect a progress report.”</p>
Appendix	B1		Technical	19	<p>Appendix B – Guidance on accessibility - Additional comments</p> <p>1. B1 - are we talking about accessibility to products, system or services etc or are we talking about accessibility to a complaints process. The first sentence does not make sense. Should it be directed to accessing the complaints process?</p> <p>2. In B1, where should the responsibility for raising awareness and advising people of an organizations complaint-handling process?</p> <p>3. Somewhere in the standard do we need to remind an organization, people do not need to use the word “complaint”? The organization has</p>	<p>1. First sentence needs to be reworded.</p> <p>2. Ensure the organizational makes people aware there is a complaint-handling process available.</p> <p>3. A helpful tool for an organization is to ask people “do you wish to make a complaint?” It could be included in 5.1.4</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	B3	B3 (ii)		20	<p>the responsibility to recognize the expression of dissatisfaction.</p> <p>4. Recommend that along with the suggestion for using a TTY service for people with a hearing impairment that a reference to services for speech and hearing impairments such as the Australian National Relay Service and New Zealand Relay be included. These services offer a greater number of options for people with hearing and/or speech impairments and remove the need for a business to obtain and maintain a TTY service.</p>	4. Include reference to Australian National Relay Service and New Zealand Relay.
Appendix	C1		Technical	21	<p>Appendix C – Data Collection</p> <p>Recommend all references to customers be changed to complainant to ensure consistency throughout the Standard.</p>	Change wording throughout the standard from 'customer(s)' to 'complainant(s)'
Appendix	C3.1		Technical	21	<p>C3.1 General</p> <p>Recommend the explanation for what quantitative data be moved from the end of the section C3.1 to the start of C3.2</p>	Move the last paragraph in C3.1 to C3.2
Appendix	C3.2		Technical	22	<p>C3.2 Quantitative data</p> <p>1. Recommend clarification of (c) Referral Source be included, as it is not immediately apparent what sort of data is being recommended to collect here.</p>	<p>1. Reword (c)</p> <p>"(c) How the complainant was referred to the complaint handling system"</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
					<p>2. Recommend that the reference in (j) to the customer's satisfaction with the outcome be reworded to make it clear that a "satisfied" or "dissatisfied" outcome is sufficient – rather than the actual level of satisfaction as it is unlikely collection of this data by an organization at the finalisation of a complaint can be consider "quantitative" data.</p> <p>3. This raises the question whether satisfaction/dissatisfaction is with the outcome of the complaint or the actual process. Complainants can be are dissatisfied with the outcome (i.e. they did not get what they want) but are very satisfied with the process.</p>	<p>2. Reword (j) “(j) Whether the complaint is resolved to the satisfaction of the complainant, or whether the complainant is dissatisfied. “</p> <p>3. Add a new subclause to C3.2 “(k) The complainant's satisfaction with the outcome and the process.”</p>
Appendix	C4		Technical	22 and 23	<p>C4 Step Three: Analysis</p> <p>1. Recommend the reference to 'testing of hypotheses' be reworded to make it more accessible and more easily understandable.</p> <p>2. Recommend removing the methods of data analysis from the Standards completely. They are too complex, the wording is not clear and they could potentially act as a barrier for organizations undertaking data analysis because of the inherent complexities in the descriptions.</p> <p>3. The list of 'suggested data analysis' is detailed enough to cover the above methods of data analysis. One change to the list is recommended.</p>	<p>1. Reword 'testing of hypotheses'</p> <p>2. Remove the "methods of data analysis" from the Standards.</p> <p>3. Recommend the following changes to the suggested data analysis list:  (D) and (H) are the same thing and can be</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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						combined unless (D) refers to the initial complaint being made and (H) refers to response times during the complaints-handling process.
Appendix	D2		Technical	24	<p>Appendix D – Objectivity</p> <p>The numbering of impartiality and confidentiality did not match the standard.</p> <p>Recommend redrafting as some of the language is confusing and inconsistent or the intended purpose of the principle is unclear.</p>	<p>Reworded clauses:</p> <p>(b) Impartiality Avoiding any bias in dealing with the complainant, the person complained about or the organization. The process should be designed to protect the complainant from any negative impact as a result of making a complaint. ... If a complaint is made about staff, the investigation should not be carried out by those staff.</p> <p>(c) Confidentiality The process.....</p> <p>(d) Accessibility The organization .... in formats accessible to all complainants. When a complaint involves different parts of the organization, or contractors/ agents, a plan to coordinate a joint response should be made, where appropriate. The organization should ensure information about the cause of the complaint is made known to each relevant part of the organization or contractors/agents so improvements can be made and complaints can be avoided in future.</p>



# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	D2		Technical	24	D2 Objectivity for Staff Recommend changes to wording to first paragraph.	Reword “Complaint-handling procedures should ensure that those complained about are treated objectively and fairly. This includes: (a) informing them immediately and completely about any complaint about their performance;...”
Appendix	E1		Technical	26	E1 General 1. Recommend toning down the language in the opening statement or including a statement to ensure organizations understand that deciding someone is behaving unreasonably is a high threshold to reach. ‘Unreasonable behaviour’ does not apply to complainants who quite reasonably are dissatisfied with the responses they have been provided and persist with seeking a better response/resolution of their complaint.  2. The significance of the statement ‘unreasonable complainant conduct does not preclude valid issues being addressed by the	1. Reword language in the opening statement to include reference to high threshold.  2. Recommend expanding this, or moving under E1 General as the last paragraph in that section.

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
					organization' may be missed as one line at the bottom of a page describing unreasonable behaviour.	
Appendix	F2		Technical	28	F2 Skills Attributes and Authority  (i) and (o) appear to be the same thing, recommend that these be combined. If they are not the same thing, recommend better description for these items.	Combine (i) and (o) or clarify if they are not the same thing.
Appendix	F4			29	F4 Responsibilities for complaint-handling management 1. (a) and (b) both say the same thing about training.  2. Elaborate on to include other parts of the organization	1. Reword (a) and (b)  (a) "Recruit staff with required skills (b) Ensure staff are adequately trained in complaint handling, and have knowledge about the organization and its industry."  2. Add "(c) ... Actively work with other areas of the organization to -understand the benefits of a complaint handling process, or -develop an understanding of the complaint handling process and share information including trends and emerging issues."

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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Appendix	G		Technical	30	<p>Appendix G</p> <p>1. G2(c) the term “double deviations’ is a jargon term and not easily understood by many people.</p> <p>2. G4 conflict coaching While acknowledging the information in the appendices is informative only, it is uncertain how likely many organizations are able to offer conflict coaching, or how many complainants are likely to accept an ‘independent’ person (presumably paid for by the organization) to coach them on how to resolve their complaint. The model is problematic because if the coach is being paid by the organization they cannot reasonably be considered independent and this may prevent the complainant from being comfortable with accepting the advice of the coach when resolving their complaint.</p> <p>If the model is unlikely to be utilized by business and unlikely to be taken up by complainants, should it be in a Standard?</p>	<p>1. Use a different term to ‘double deviations’ or explain what it means.</p> <p>2. Consider removing conflict coaching from the Standard</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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Appendix	G6		Technical	31	<p>G6 Alternative Dispute Resolution</p> <p>1. Alternative Dispute Resolution cannot always be interchanged with External Dispute Resolution (EDR), so it is inaccurate to say ADR is also known as External Dispute Resolution.</p> <p>External Dispute Resolution is most commonly used to describe dispute resolution avenues that are external to the organizations being complained about – such as industry based Ombudsman, Commissions etc. These avenues used alternative dispute resolution methodologies, but it isn't appropriate to state the terms are interchangeable. ADR is far broader than this and covers ADR practitioners working as individuals (i.e. mediators) who would not described themselves as offering EDR services.</p> <p>2. The definitions for mediation and conciliation do not accurately reflect what these methods of ADR entail – (the mediation reference appears closer to conciliation and vice versa).</p> <p>Mediators do not offer advice or suggestions for resolution; Conciliators however can offer expert advice on the issues in dispute and can make suggestions for resolution.</p>	<p>1. If this section is meant to relate to EDR (Ombudsman, Commissioners etc) the heading should be changed and it should be made clearer the information is more limited than general information about ADR.</p> <p>2. Recommend the definitions be redrafted to better reflect what the process entails, using the definitions used by the National Advisory Council on Alternative Dispute Resolution as follows:</p> <p>Mediation is a process in which the participants to a dispute, with the assistance of a dispute resolution practitioner (the mediator), identify the disputed issues, develop options, consider alternatives and endeavour to reach an agreement. The mediator has no advisory or</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



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						<p>determinative role in regard to the content of the dispute or the outcome of its resolution, but may advise on or determine the process of mediation whereby resolution is attempted. Mediation may be undertaken voluntarily, under a court order, or subject to an existing contractual agreement.</p> <p>Conciliation is a process in which the participants, with the assistance of the dispute resolution practitioner (the conciliator), identify the issues in dispute, develop options, consider alternatives and endeavour to reach an agreement. A conciliator will provide advice on the matters in dispute and/or options for resolution, but will not make a determination. A conciliator may have professional expertise in the subject matter in dispute. The conciliator is responsible for managing the conciliation process.</p> <p>Note: the term `conciliation`, may be used broadly to refer to other processes used to resolve complaints and disputes including:</p> <ul style="list-style-type: none"> <li>informal discussions held between the participants and an external agency in an endeavour to avoid, resolve or manage a dispute</li> <li>combined processes in which, for example, an impartial practitioner facilitates discussion between the participants, provides advice on the</li> </ul>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
						<p>substance of the dispute, makes proposals for settlement or actively contributes to the terms of any agreement’.</p> <p>For more information please see: <a href="http://www.nadrac.gov.au/what_is_adr/GlossaryOfADRTerms/Pages/default.aspx#MM">http://www.nadrac.gov.au/what_is_adr/GlossaryOfADRTerms/Pages/default.aspx#MM</a></p>
Appendix	H		Technical	32	<p>Appendix H Three level model</p> <p>1. The information in this Appendix is confusing as it appears to create a further complaint handling procedure.</p> <p>2. Consumers should not be forced to go through each consecutive tier of the model when it is not appropriate or fair and may lead to complaint fatigue.</p> <p>For example, is Level 1 intended to reflect the Standard or are these informal complaints that would not be recorded? Is Level 2 then meant to reflect the Standard?</p> <p>Without practical guidance on how this fits with the Standard it could confuse organizations when trying to follow best practice.</p>	<p>1. Recommend the Appendix be rewritten in the context of the Complaint Handling Standard and make it clear at what stage the minimum requirements of the Standards begin and end.</p> <p>2. add to beginning of Appendix H</p> <p>“While the aim should be to resolve the majority of complaints at the first level, application of the three tier model should not be unduly rigid. The level of escalation should be relative to the seriousness of the complaint and the amount of previous contact the complainant has had with the organization.”</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	H1.3		Technical	33	H1.3 Level 3 The reference to external investigation needs to be clarified as it is unclear what sorts of organizations are being referred to here.	Clarify what sorts of organizations are being referred to.
Appendix	I		Technical	35	Appendix I Apologies Recommend references to harm be changed to include "harm or impact to the complainant" as sometimes people cannot point harm but nonetheless deserve an apology.	Reword 'harm' to include 'harm or impact to the complainant'
Appendix	J		Technical	37	Appendix J Redress Appendix J provides a wide range of options for resolving complaints and K deals with root cause analysis which have been made in the past. There is nothing in the draft which requires resolutions to be tailored to the root cause of each individual complaint.	Add wording: "Wherever possible, complaint resolutions should be tailored to the underlying cause of each complaint. Tailoring outcomes in this way represents a win-win outcome for both parties to the complaint, as the complainant is unlikely to have those same problems again."  This could be added in Appendix J or section 8.7.3.

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	J1.3		Technical	37	J1.3 Mitigation Recommend the language used be reconsidered as it is very legalistic and may not be accessible for those trying to implement these options.	Replace legalistic language with plain English accessible language. (detriment, mitigation, ceasing action, adverse consequences)
Appendix	K1		Technical	39	K1 General K1 – Add in a reference to “its customers/clients”	Add to clause K1  'When an organization receives a number of complaints.....or a single complaint with the potential to greatly impact its business, or its customers/clients, the organization may wish to .....
Appendix	K2.1		Technical	39	K2.1 Step one  The staffing suggestions and scope of the RCA team is so large it may have the unintended effect of being a barrier for small to medium organizations that simply do not have the staff to implement a process like the one suggested.  Guidance for small to medium businesses should be included here, as root cause analysis has many excellent benefits and can be done by anyone and does not require a large team to be done successfully.	Recommend this section be rewritten to ensure small to medium organizations are encouraged, not discouraged from using root cause analysis as a really effective means of resolving complaints and improving practices.



# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	K2.2	(e)	Technical	40	K2.2 Step two  '(e) Threats to a sustainable workforce skill set'. It is difficult to know what is meant by (e).	Recommend this be rewritten in plain English or include an explanation of what it means.
Appendix	K2.3.2		Technical	41  42	K2.3.2 Logic Tree  A practical example would assist organizations to understand how a logic tree works.	Recommend a practical example of how to use a logic tree should be included in K2.3.2  Recommend a logic tree of the scenario in K2.3.4 be included as a point of comparison
Appendix	K2.3.4	(a)	Technical	42	K2.3.4 Five 'whys'  (a) the scenario incorrectly references the removal of posters, rather than the early removal of ticket validators. As a result the scenario does not make sense.	Reword the scenario.

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	L		Technical	45	<p>Appendix L – Information to collect on a complaint form</p> <p>What is the difference between L1 – manage a complaint and L2 lodgement of a complaint in terms of what information is relevant.</p>	Is it possible to combine them?
Appendix	L	L1	Technical	45	<p>It appears the information in L1 relates to the information to be collected on a complaint form, as indicated by the title of the Appendix. However, the heading “General” and the lack of any reference to a complaint form, make this unclear. Further confusion is caused by much of the same “information to collect” being repeated in L2.2.</p> <p>It appears the distinction between L1 and L2 is L1 relates to information to be collected by means of a complaint form (ie provided by the complainant) while L2 relates to what the organisation will also record about the complaint, for example in any complaint-handling database or other capture method.</p> <p>To clarify this position, it is suggested the headings in L1 and L2 be amended. The amended headings can more fully reflect the title of this Appendix.</p> <p>In addition, paragraphs (k) and (l) of section L1 refer to information to be provided rather than information to be collected.</p>	<p>Change the heading of L1 from “General” to: “L1 INFORMATION TO COLLECT ON A COMPLAINT”</p> <p>Change the heading of L2 to: “L2 INTERNAL USE OF INFORMATION ABOUT A COMPLAINT”</p> <p>Remove paragraph (k) and paragraph (l) from part L1, and instead insert the following:</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
						<p>“The complaint form should also state where a complainant can find information about –</p> <p>(a) the organisation’s complaint policy and privacy statement.</p> <p>(b) the AS/NZS Standard, Guidelines for complaint handling in organisations (this Standard).”</p>
Appendix	L1		Technical	45	<p>L1 General</p> <p>Important to include the date the complaint was lodged to effectively manage a complaint.</p>	<p>Add to L1</p> <p>(m) the date the complaint was lodged</p>
Appendix	L2.3		Technical	46	<p>L2.3 Complaint response</p> <p>1. It is unclear whether para (g) refers to the date the complaint was closed or the fact the complaint is closed. It is suggested a close date also indicated the fact the complaint is closed, although an organisation’s complaint-handling system should permit a complaint to be reopened.</p> <p>Recommend whether the complaint is resolved (in part or whole) be included in the list of data to be captured to assist in the review of the complaint management process.</p>	<p>Amend para (g) of L2.3 “Complaint closed date.”</p> <p>Add to L2.3 (j) Whether the complaint is resolved (in part or in whole)</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	O1	(D)	Technical	50	<p>Appendix O The role of information in reducing complaints</p> <p>O1 Presentation of information (D) Recommend along with the suggestion for using a TTY service for people with a hearing impairment, a reference to services for speech and hearing impairments, such as the Australian National Relay Service and New Zealand Relay, be included. These services offer a greater number of options for people with hearing and/or speech impairments and remove the need for a business to obtain and maintain a TTY service.</p>	<p>Add to O1 “ Services provided by the Australian National Relay Service and New Zealand Relay “</p>
Appendix	O2		Technical	51	<p>O2 Assemble an information system design (ISD)</p> <p>Team or system sponsor Recommend a plain English term be used instead of an ISD team or system sponsor to ensure this section is accessible for small to medium organizations. This is something even small business will benefit from doing but may feel they are precluded from doing so because of the unnecessary use of business jargon.</p>	<p>Recommend the references be removed and renamed as follows: “O2 Review of the organizations information provision The organization should review the accuracy, timeliness and accessibility of the information it provides about its products, services, systems and/or role and functions. Reviews should be undertaken by internal staff that are suitably skilled and have the appropriate level of authority to recommend improvements to information provision. Alternatively the organization may appoint an external reviewer”</p>

# Submission from Australian/New Zealand Ombudsman Association - ANZOA



*Section <sup>1</sup>	*Section Identifier	Paragraph/ table/ figure/ commentary/ note	*Comment Type <sup>2</sup>	*Page No	*Comment Detail	*Proposed Change
Appendix	O3		Technical	51	O3 Implement the recommendations for improvements to information provision  Remove all references to the ISD or system sponsor for the reasons given in O2.	Remove all references to the ISD or system sponsor and replace it with reviewer.
Appendix	O4		Technical	51	O4 Evaluate the impact of the improvements to information provision Remove all references to the ISD or system sponsor for the reasons given in O2.	Remove all references to the ISD or system sponsor and replace it with reviewer.