



## Complaints Handling Policy and Procedure

### Introduction

Complaints are a valid way of alerting an organisation to potential problems in the way it conducts its business. Through the investigation of complaints, we can gain a clearer appreciation of how or where things might be going wrong. Properly handled, complaints allow us to analyse how we administer policies and programs, deal with clients and manage issues. They also help us to identify areas that need attention, and this in turn can lead to improvements in service delivery and better decision-making.<sup>1</sup>

Handling complaint can be difficult, especially when complainants are upset and emotional. Sometimes, by the time people feel 'wronged' enough to make a complaint, they have often developed a strong emotional link to the problem and its resolution. Sometimes this emotion is expressed in ways that most reasonable people would consider inappropriate. In these cases complainants may exhibit 'unreasonable conduct' and this conduct presents particular challenges for complaint handlers. Managing unreasonable complainant conduct is covered in detail in the procedures that follow.

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Chief Executive Officer  
February 2022

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<sup>1</sup> Prof. John McMillan, in the Foreword to the 'Better Practice Guide to Managing Unreasonable Complainant Conduct', Commonwealth Ombudsman, first edition, June 2009.

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## Complaint handling policy framework

To enable the Commission to ensure a high standard of service to complainants and meet our occupational health and safety and duty of care obligations to our staff, the following ground rules apply to the Commission's staff and to complainants.

It is the responsibility of the Commission to:

- ✓ deal with complaints professionally, efficiently and impartially;
- ✓ keep complainants informed of the progress and outcome of enquiries;
- ✓ provide clear reasons for our decisions; and
- ✓ treat complainants with courtesy and respect.

If the Commission does not meet its responsibilities in relation to handling a complaint the complainant may complain to the Ombudsman.

It is the responsibility of the complainant to:

- ✓ clearly identify the issues of complaint;
- ✓ give the Commission all the available information about the complaint in an organised format at the time of making the complaint;
- ✓ cooperate with the Commission's enquiries or investigations; and
- ✓ treat the Commission's staff with courtesy and respect.

If complainants do not meet their responsibilities the Commission may set limits or conditions on the handling of their complaint. Any abuse, harassment or threats to the safety or welfare of staff at the Commission will result in the complainant being warned that we will immediately cease handling the complaint if the behaviour continues. If the behaviour recurs the complaint handling process and all contact with the complainant should cease.

Complaints are handled by the Commission within a framework of public access rights and responsibilities. These include:

- ✓ the Commission has an obligation, within reasonable limits, to respond to correspondence and respond to telephone and face-to-face inquiries from the public;
- ✓ the Commission has an obligation to provide services to the public,
- ✓ in the absence of good reasons to the contrary members of the public have a right of access to the Commission and its services;
- ✓ people who have dealings with the Commission have a right to complain, and criticism and complaints are a legitimate and necessary part of the relationship between the Commission and its clients and the wider community;
- ✓ no one should unconditionally be deprived of the right to raise their concerns and have them addressed; and
- ✓ the Commission's obligation to use its resources efficiently and effectively may mean that it is reasonable to limit the nature or scope of actions taken in response to unreasonable complainant conduct.

## Complaint handling procedure

### Form and acknowledgment of complaints

The Commission will ordinarily not accept a complaint unless it is in writing.

Complainants contacting the Commission in person or by telephone should be asked to put their complaint in writing addressed to the CEO at the Commission's postal address or emailed to [legalaidact@legalaidact.org.au](mailto:legalaidact@legalaidact.org.au).

If a complainant finds it difficult to lodge a written complaint due to literacy, language or other disability they should be assisted to put their complaint in writing.

All complaints should be acknowledged in writing, either by letter or e-mail.

It is not necessary to respond to correspondence which has only been copied to the Commission unless the correspondence raises a significant issue concerning the Commission. If in doubt the copied correspondence should be referred to the CEO or DCEO.

Anonymous complaints should only be investigated where they raise issues of fraud or other serious misconduct that the CEO or DCEO consider warrant investigation.

### Types of complaints

Complaints received by the commission fall into two main categories – conduct complaints and complaints concerning the provision of legal assistance.

### Conduct complaints

Conduct complaints comprise:

1. complaints about services provided by, or other conduct of, Commission staff or contractors; and
2. complaints about services provided by, or other conduct of, private lawyers.

## Complaints about Commission staff

### *Identifying conduct complaints*

The Commission occasionally receive requests from legally assisted clients for whom the Legal Practice is acting to transfer their file to another in-house lawyer. A variety of reasons may be given for making these requests. At one end of the spectrum the reasons may constitute a complaint about the conduct of the lawyer handing the file, while at the other end of the spectrum the requests are not specific complaints but arise from a breakdown in the lawyer-client relationship. Many of these requests are appropriately dealt with at practice head level by asking the lawyer concerned to resolve the matter with the client, or by assigning the file to another lawyer. In other words, they are treated as routine service requests and handled informally rather than being treated as complaints for the purpose of the Complaints Handling Policy and Procedure.

The following guidelines are to be applied in determining what constitutes a complaint for the purpose of the Complaints Handling Policy and Procedure, and what may be handled informally by way of rectification of a routine service delivery issue.

1. Where the complainant is a client and it is unclear whether unsatisfactory conduct is involved the matter will be referred to the practice head or other manager to conduct a preliminary investigation and advise whether in their view unsatisfactory conduct is involved, or whether the matter can be resolved informally with the client by way of rectification of a service delivery issue.
2. If the practice head or other manager after investigating the matter considers that it discloses unsatisfactory conduct on the part of a member of staff, then the divisional head must be informed.
3. The divisional head will consider whether the conduct amounts to a serious breach of duty or Legal Aid ACT values and decide whether it should be escalated to the CEO to be dealt with under the following provisions of the Complaints Policy and Procedures.

### *Handling conduct complaints*

Complaints about services provided by, or other conduct of, Commission staff or contractors must be referred immediately to the personal assistant to the CEO/DCEO who will acknowledge the complaint; enter it in the Complaint Register, and forward the complaint to the CEO and DCEO.

If the complaint concerns Legal Practice staff the DCEO will notify the staff concerned and the relevant practice head who will promptly investigate the complaint and provide a written report to the DCEO. Once the DCEO is satisfied with the outcome of the investigation the DCEO will draft a response to the complaint for consideration by the CEO.

If the complaint concerns any other staff of the Commission, or contractors, the CEO will notify the relevant division head who will promptly investigate the complaint and provide a written report and draft response to the CEO.

Investigations should be completed and reports provided within ten working days of notification unless the CEO or DCEO has approved an extension of time.

### **Complaints about private lawyers**

Complaints about services provided by, or other conduct of, private lawyers must be referred immediately to the personal assistant to the CEO/ DCEO who will register the complaint and bring it to the attention of the CEO and the Client Services Manager.

The Client Services Manager will notify the private lawyer concerned and request a response to the complaint within a stipulated time.

On receipt of the private lawyer's response the Client Services Manager will prepare a report and draft a response to the complaint for consideration by the CEO.

### **Communicating with complainants regarding conduct complaints**

Following investigation a written response should be sent to the complainant that includes the decision made and reasons for that decision. The response should be as short and concise as possible, while containing sufficient information to provide the complainant with an appropriate response.

Communication with complainants should be courteous and respectful at all times and the basic principles to be kept in mind when interacting with complainants are that:

- ✓ the public has the right to access the Commission;
- ✓ unreasonable complainant conduct (see below) does not preclude there being a valid issue;
- ✓ the substance of the complaint dictates the resources allocated to it, not the behaviour of the complainant;
- ✓ the Commission owns the complaint, the complainant owns the issue.

### **When an apology should be made**

One of the most effective ways to defuse a complaint situation, or prevent the situation from escalating to a point where the complainant's conduct becomes unreasonable, is to offer a full or partial apology where this is warranted.

The Commission will sometimes make mistakes, and sometimes delays, omissions and misunderstandings occur. If this occurs, action should be taken immediately to remediate the problem. However, remediation on its own is generally not enough and an apology should be made as well.

When things go wrong, complainants generally want no more than to be listened to, understood, respected and ( if appropriate) given an explanation and apology. A prompt and sincere apology for any misunderstanding is likely to stop ongoing problems from developing.

The most effective apologies incorporate the following elements:

- ✓ an explicit recognition that the action or inaction was incorrect, inappropriate or unreasonable, and the acknowledgment of any harm caused;
- ✓ acceptance of responsibility for the wrong and any harm caused;
- ✓ an explanation of the cause in plain English;
- ✓ a sincere statement of regret; and
- ✓ an explanation of the action to be taken or proposed to address the problem and an indication that the action or inaction will not happen again;

#### *Legal implications of an apology*

The ACT has legislated to protect ‘full’ apologies - that is apologies that include an admission of fault or responsibility - from incurring civil liability, including liability in defamation.

Case law indicates that even if a person makes an apology that includes an acceptance or admission of fault or responsibility, this will not necessarily be regarded by the courts as an admission that creates legal liability in civil proceedings (see *Dovuro Pty Ltd v Wilkins* [2003] HCA 51 (11 September 2003)).

## Complaints about the provision of legal assistance

Most complaints concerning the provision of assistance are in the form of allegations that another person (usually a party to proceedings involving the complainant) does not qualify for assistance because of means or lack of legal merit. Because these complaints concern the affairs of others the Commission is prevented by section 92 of the *Legal Aid Act 1997* from divulging or communicating any information held by the Commission concerning the another person, unless one of the exceptions in section 92AA applies.<sup>2</sup>

However these complaints must not be ignored unless the allegations are known to be false. All allegations concerning the eligibility of a person for legal assistance should, if the person has applied for or been granted legal assistance, be investigated. However, the complainant must not be told whether or not the other person has applied for assistance, or be informed of the outcome of an investigation.

The normal procedure on receiving complaints of this type is for Client Services to acknowledge the allegations without disclosing whether the person has applied for legal assistance (because this is protected information). The acknowledgement of the allegations should be in the following terms or to like effect:

We acknowledge your [letter or email] of [date].

The privacy provisions of the *Legal Aid Act 1977* prohibit disclosure of any information that may be held by the Commission concerning the affairs of any person without that person's consent.

If appropriate your allegations will be investigated, but you will not be informed of the outcome of the investigation.

If the person has applied for and been refused legal assistance the allegations should be noted on the file but ordinarily no further action will be necessary.

If the person has been granted legal assistance Client Services should write to the lawyer acting for the person, informing them of the allegations (without disclosing the source) and request a response to the allegations within a stipulated time.

Details of action taken in response to allegations should be retained on the relevant file.

If the allegations raise important issues of policy or practice; or include allegations of misconduct on the part of Commission staff or others in circumstances which, if misconduct was established, could constitute a financial or business risk to the Commission, the Client Services Manager will notify the CEO before responding to the complainant.

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<sup>2</sup> The exceptions are where a person gives their express or implied consent to disclose information about them; or for the purpose of facilitating the investigation or prosecution of an offence against the Act; or in response to a subpoena under the *ACT Civil and Administrative Tribunal Act 2008*, in relation to an application to the ACAT under the *Legal Profession Act 2006*.



## Managing unreasonable complainant conduct

Sometimes we receive complaints from people who have come to the end of their tether. Some are justifiably upset, angry and generally difficult because they are caught up in what they perceive to be some outrageous wrong. Others are difficult for reasons that go beyond the circumstances of their case. These complainants often tend to be angry, aggressive and abusive. They may threaten harm; be dishonest or intentionally misleading in presenting the facts, and deliberately withhold relevant information. They may flood the Commission with unnecessary telephone calls, e-mails and large amounts of irrelevant printed material. These complainants tend to insist on outcomes that are not possible or appropriate, or demand things to which they are not entitled. At the end of the process they are often unwilling to accept decisions and continue to demand further action on their complaints. They frequently take their complaints to other forums such as the Ombudsman, Human Rights Commission, government ministers, or local MPs.

Sometimes these complainants change the focus of their complaints so that the substantial complaint is followed by a string of complaints about how their case is being handled. The same person's complaint can often be found in a number of agencies at the same time.

In summary, these are behaviours that go beyond what is acceptable, even allowing for the fact they may be experiencing high levels of stress about the issue of the complaint.

There is anecdotal information from the Ombudsman and other organisations that the number of people who present as difficult seems to be on the increase and the problems that agencies have to deal with seem to be getting more complex.

Over the years, the Commonwealth Ombudsman has observed changing complainant conduct which suggests increasing generalised failure to recognize the link between rights and responsibilities. Some complainants overlook the fact that a condition of being able to exercise one's own rights is, in most cases, an acceptance of the rights of others. They are not mindful of the need to balance their right to make a complaint with the rights of staff to safety and respect or the rights of other complainants to equal time and resources.

Unreasonable complainant behaviour can sometimes be seen as a nuisance, and a side issue that interferes with the core business of the organisation. This can lead to an unsystematic approach to dealing with more difficult complainants, which may in turn lead to problems with resource management, inequity in case handling and staff stress.

The following guidelines on managing unreasonable complainant conduct are based on the Commonwealth Ombudsman's *Better Practice Guide to Managing Unreasonable Complainant Conduct* (1<sup>st</sup> Edition, June 2009).

## Guidelines for managing unreasonable complainant conduct

### 1. Focus on the conduct, not the person

Complainants may engage in certain behaviours to an unreasonable degree for a variety of reasons, including:

- ✓ Emotional or psychological
  - anger or frustration as a result, for example, of unmet expectations;
  - refusing to accept an unfavourable outcome;
  - seeking vindication, retribution or revenge, holding an exaggerated sense of entitlement; or
  - needing to blame others.
- ✓ Attitudinal
  - dissatisfaction with the person, agency, government or life in general;
- ✓ Aspirational
  - seeking justice or a moral outcome;
  - focusing rigidly on a matter of principle
- ✓ Recreational
  - an all consuming hobby;
  - deriving pleasure from the activities associated with the complaint process; or
  - social contact.

The most effective way for complaint handlers to manage a complainant's challenging behaviour is to manage their own response to that behaviour. This is done by implementing strategies to manage that conduct. These strategies include:

- ✓ focusing on the conduct of the complainant, rather than on the complainant as a 'difficult' person - separating the behaviour of the complainant from the issue being complained about, so that the issue can be effectively addressed without it being clouded by behavioural problems; and
- ✓ targeting individual instances of observable conduct and citing that conduct as a reason for taking particular action.

### 2. Ensure ownership and control

No matter what the underlying reasons for unreasonable conduct may be, experience shows that the primary trigger for most unreasonable complainant conduct is likely to be a struggle for control over how a complaint is handled.

It needs to be made clear to complainants that the Commission owns the complaint and decides whether it will be dealt with; by whom it will be dealt with; how quickly it will be dealt with; what priority it will be given, and what the outcome will be. Complainants own their issues and, if dissatisfied with the Commission's response, are entitled to pursue them through other available avenues such as the ombudsman or the courts.

In the end the complaint must be handled and concluded to the Commission's satisfaction, not the complainant's satisfaction.

### 3. Good communication

It is important to provide clear, timely and firm communication with complainants. If complainants are not kept informed about what is happening, they are likely to make negative assumptions.

### 4. Manage complainant expectations

Complainants may hold unrealistic expectations about how their complaint will be handled.

They may believe that they have the right to dictate how the Commission will handle the complaint, including how the investigation should proceed and what the outcome should be. Some complainants have an unrealistic expectation that significant action will be taken as a result of their complaint, for example, that a particular staff member will be disciplined. Complainants sometimes think that their complaint is more important than any other complaint the agency is handling and expect such things as on demand attention from staff, urgent consideration of the matter, the provision of significant amounts, or particular types, of information and so on.

Unreasonable expectations can lead to unreasonable conduct. It is essential to manage complainant expectations from the very beginning of the complaint handling process.

Complainants need to be aware of:

- ✓ who will be handling the complaint;
- ✓ how the complaint will be handled;
- ✓ the timeframe for handling the complaint; and
- ✓ what is expected of the complainant in regard to handling the complaint.

Complainant expectations should be managed by:

- ✓ providing clear information about the complaint handling process on the public website;
- ✓ including in the letter or email acknowledging receipt of the complaint, information about the complaint handling process and the respective roles of the agency and the complainant. See the example acknowledgment in the **Appendix**.
- ✓ reality testing the complainant's expectations (*What do you hope to get from this process? What to expect the outcome to be? What did you hope to achieve when you decide to contact us?*) and then addressing and correcting any unrealistic expectations.

## **5. Insist on respect and cooperation**

Staff handling complaints should insist that complainants show respect and cooperate as a prerequisite to further contact and communication.

## **6. Show respect and impartiality**

An important part of preventing unreasonable conduct and giving complainants confidence in the complaint handling process is to remain calm in the face of unreasonable conduct, and to show respect for all complainants even under provocation.

It is also important to demonstrate impartiality. The complaint handler is not an advocate for the complainant, but nor should the complaint handler adopt an adversarial role.

## **7. Clarify the complaint**

If it is not clear from the initial complaint specifically what conduct or decisions the complainant is concerned about, telephone or write to the complainant before taking up the complaint to clarify or confirm the issues of their complaint. For example: *As I understand it you are complaining about . . . is this correct?*

## **8. Communicate clearly and appropriately**

Above all the complaint handler should maintain professionalism in all their dealings with the complainant, including the language they use in written and oral communications.

Written and oral communications should be clear, concise and firm, and appropriate to the specific complainant. For example, if a complainant has difficulties in comprehension, the communications should be in as simple language as possible.

Keep complainants informed of the progress of their complaint. If there is going to be a delay, contact them and explain why.

## **9. Provide clear reasons for decisions**

Complainants are more likely to be satisfied with the outcome of a complaint if clear and comprehensive reasons are provided for the decision that is made. Even if the complainant is not satisfied, the provision of adequate reasons will help to ensure that there are no grounds for legal or other challenge to the decision.

It is a good idea in the letter reporting on the outcome of the complaint to provide the reasons for the decision before stating the decision itself. This will maximize the likelihood of the complainant focusing on the arguments underpinning the decision.

## Strategies for dealing with types of unreasonable complainant conduct

Unreasonable complainant conduct can be grouped into five categories. Each category is briefly described in the table below and strategies for dealing with the type of conduct noted.

Conduct category	Unreasonable conduct (trigger)	Management strategies
<b>1. Unreasonable persistence</b>	<ul style="list-style-type: none"> <li>· Persisting with the complaint after it has been comprehensively considered and all avenues of review exhausted.</li> <li>· Reframing a complaint in an attempt to get it taken up again.</li> <li>· Showing an inability to accept the final decision.</li> <li>· Insisting that a particular solution is the correct one in the face of valid contrary or alternative arguments.</li> </ul>	<p>Strategies for dealing with unreasonable persistence are about saying 'no' and include:</p> <ul style="list-style-type: none"> <li>· communicating clearly that something is not going to happen;</li> <li>· telling complainants that not all problems have an institutional solution;</li> <li>· requiring complainants who want a review to provide an argument for one e.g. to explain how we have erred, or provide new information;</li> <li>· maintaining a 'no means no' stance following review;</li> <li>· adopting, when appropriate, a firm 'no further correspondence' or contact stance;</li> <li>· ending unproductive telephone calls;</li> <li>· asserting the Commission's position e.g. '<i>I acknowledge that your view is . . . , we see it differently</i>', or '<i>I acknowledge that your view differs from ours, however, our job is to make a decision about . . . and this is what we have decided</i>'.</li> </ul>
<b>2. Unreasonable demands</b>	<ul style="list-style-type: none"> <li>· Insisting on outcomes that are unattainable</li> <li>· Wanting revenge or retribution.</li> <li>· Issuing instructions and making demands about how a complaint should be handled.</li> <li>· Providing supporting evidence in extraordinary detail when the detail is not relevant to the</li> </ul>	<p>Strategies for dealing with unreasonable demands are about setting limits and include;</p> <ul style="list-style-type: none"> <li>· letting the complainant know in advance how the Commission intends to deal with the complaint;</li> <li>· restricting contact to defined times and staff</li> </ul>

	<p>complaint.</p> <ul style="list-style-type: none"> <li>· Making unreasonable resource demands out of proportion to the seriousness of the issue.</li> <li>· Showing reactions or demanding actions that are out of proportion to the significance of the issue.</li> <li>· Shopping around for a sympathetic ear.</li> <li>· Placing the Commission on extensive e-mail copy list and expecting responses to these e-mails.</li> <li>· Consistently creating complexity where there is none.</li> </ul>	<ul style="list-style-type: none"> <li>· members were necessary;</li> <li>· responding only to e-mails and mail addressed to the Commission directly, not communications where we are merely copied in;</li> <li>· limiting contact to writing only; and</li> <li>· as a last resort, informing the complainant that their interactions are unreasonably demanding and setting defined limits on further contact.</li> </ul>
<b>3. Unreasonable lack of cooperation</b>	<ul style="list-style-type: none"> <li>· Presenting a large quantities of information which is not organized or summarized when the complainant is capable of doing this.</li> <li>· Presenting information in dribs and drabs.</li> <li>· Changing the complaint and raising new issues while the complaint is being considered.</li> <li>· Withholding information, misquoting others, or swamping the Commission with documents.</li> </ul>	<p>Strategies for dealing with unreasonable lack of cooperation are about setting conditions and include:</p> <ul style="list-style-type: none"> <li>· requiring complainants to define what their issues are or pursue further inquiries before we will look at the complaint;</li> <li>· ending our involvement in the complaint if it is discovered that the complainant has been wilfully misleading or untruthful in a significant way.</li> </ul>
<b>4. Unreasonable arguments</b>	<ul style="list-style-type: none"> <li>· Holding irrational beliefs -- e.g. seeing cause and effects links where there are none.</li> <li>· Holding what is clearly a conspiracy theory unsupported by evidence.</li> <li>· Insisting on the importance of an issue that is clearly trivial.</li> </ul>	<ul style="list-style-type: none"> <li>· These complaints should be declined at the beginning, or discontinued as soon as it becomes clear that the complaint is groundless.</li> <li>· Alternatively, if unreasonable arguments are mixed with reasonable arguments, the strategy is to refuse to deal with the unreasonable portion.</li> </ul>
<b>5. Unreasonable behaviour</b>	<ul style="list-style-type: none"> <li>· Displaying confronting behaviour e.g. rudeness, aggression, threats or harassment.</li> <li>· Sending rude, confronting or threatening letters.</li> <li>· Making threats of self harm or harm to others.</li> </ul>	<p>The strategies for dealing with unreasonable behaviour are primarily about saying 'no' to unacceptable behaviours, and setting limits and conditions for future interactions.</p> <ul style="list-style-type: none"> <li>· Overt anger, aggression and threats in person, on the phone</li> </ul>

	<ul style="list-style-type: none"> <li>· Displaying manipulative behaviour.</li> </ul>	<ul style="list-style-type: none"> <li>· or in writing are never acceptable.</li> <li>· Return letters framed in rude and intemperate language and request that the complainant reframe their concerns in more moderate language.</li> <li>· Point out that more moderate language is clearer and more likely to achieve better outcomes.</li> <li>· End telephone calls and interviews if the complainant becomes abusive and confronting.</li> </ul>
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### **Closing off the complaint process**

One of the most troubling types of behaviour for complaint handlers to deal with is the unwillingness of complainants to listen to or accept advice or decisions, resulting in unreasonable persistence.

Provided that the complaint handler has done their job properly and is confident that the decision or advice is correct, it is not the complaint handlers responsibility or problem if the complainant is unable to accept the decision or advice. Once you have outlined the reasoning behind the decision once or twice, and it is clear that the interaction with the complainant is becoming unproductive, the complaint process can be ended at this point, with or without an acknowledgment that the complainant has a differing view to the one the Commission has come to.

In the end it is for the Commission, not the complainant, to be satisfied that the complaint has been properly handled.

### **Limiting complainant access**

In extreme cases where unreasonable complainant conduct is involved, limiting the complainant's contact with the Commission may need to be considered, but only as a last resort and with the CEO's approval. The CEO should sign the correspondence informing the complainant of such limitations.

Contact can be limited in terms of the times a complainant may make contact with us; the staff the complainant may have contact with, or the form in which contact may take place (e.g. in writing, with a direction not to enter the Commission's premises).

In the small number of cases where it is clear that the complainant will not accept a decision on the matter, and all appropriate avenues of internal review had been exhausted, it may be appropriate to notify the complainant that in future their telephone calls will not be taken, and correspondence received will be read and filed, but only acknowledged or responded to if it contains significant new information or raises new issues warranting fresh action.

The only circumstances where the Commission would contemplate withdrawing services or refusing access altogether would be where the complainant:

- ✓ is consistently abusive, or intimidates or threatens physical harm to staff or others;
- ✓ is physically violent; or
- ✓ causes damage to Commission property.



## Appendix 1

### Letter acknowledging complaint

Dear

**[Brief reference to nature of complaint]**

We have received your complaint concerning this matter.

Your complaint will be investigated and we will respond as soon as our investigation is completed.

If for any reason the investigation cannot be completed within 14 days we will let you know when we expect to be able to respond.

If you are dissatisfied with our response to your complaint, you may discuss it with us or make a complaint to the Ombudsman.

Yours sincerely,