



Complaint Handling Policy

1. PURPOSE

- 1.1. This policy provides guidance regarding how the Great Ocean Road Coast and Parks Authority (the Authority) and its staff will handle complaints, including aggressive, unreasonable or vexatious complaints, received via telephone, email or face to face.

2. SCOPE

- 2.1. This policy applies to:
 - (a) complaints made to the Authority by external stakeholders including community members and visitors; and
 - (b) all Authority staff managing and responding to complaints by external stakeholders.
- 2.2. Except where procurement complaints are considered aggressive or vexatious, this policy does not otherwise apply to complaints about procurement. Information regarding the Authority's Procurement Complaints Process can be found on the Authority's website.
- 2.3. This policy does not apply to workplace-related complaints made by Authority staff members. Staff should refer to the Authority's Grievance, Complaints and Dispute Resolution Policy and Procedure located on the staff intranet.

3. POLICY STATEMENT

Guiding Principles

- 3.1. The Authority values and relies on diverse opinions and constructive feedback from the community and visitors.
- 3.2. The Authority is equally committed to providing its staff with a safe and healthy workplace.
- 3.3. The Authority will ensure complaints are handled in a way that:
 - (c) is impartial, professional and fair to the complainant;
 - (d) balances the interests of the complainant and the public;
 - (e) ensures the health and safety of staff;
 - (f) ensures staff are aware of their roles and responsibilities in relation to the management of complaints; and

- (g) ensures that Authority staff feel confident and supported in taking appropriate action to manage complex complainant behaviour.

General Complaint Handling

3.4. Complaints can be made to the Authority via the following platforms:

- (a) [Report an issue \(openforms.com\)](https://openforms.com)
- (b) **Phone:** 1300 736 533
Email: info@greatoceanroadauthority.vic.gov.au
In person: 25 Baines Cres, Torquay, VIC 3228, Australia
Mail: P.O. Box 53, Torquay VIC 3228

3.5. Any Authority staff member who receives a formal complaint, regardless of whether or not they can resolve it, must send the complaint to the Customer Service Administrators (via info@greatoceanroadauthority.vic.gov.au) for recording on the Authority's complaint management system.

3.6. The Authority uses a four-tiered approach to investigating and resolving complaints.

Tier 1: First-contact complaint resolution

- (a) Frontline staff receive the complaint, assess it, and resolve it immediately, if possible.
- (b) For the purposes of item (a) above, 'frontline staff' can include any Authority staff member who may have direct contact with community members and visitors, including the Authority's Customer Service, Coastal Reserves, Conservation, Accommodation Services, Commercial and Community Engagement team members.
- (c) The Authority will provide all complainants with an acknowledgment of receipt of complaint as soon as reasonably practicable, but in any event within 5 business days.

Tier 2: Investigation and formal resolution

- (d) If frontline staff cannot resolve the complaint, they will refer it to a subject matter expert Authority staff member(s), for investigation and resolution.
- (e) The Authority staff member(s) who are referred the complaint must be listed as the 'Allocated' or 'Approver' staff member on the Authority's complaint management system for tracking.
- (f) The investigation actions taken will depend on the nature of the complaint.
- (g) The Authority aims to resolve all complaints within 28 business days. If it takes longer than 28 business days to resolve a complaint, the Authority will take all reasonably practical steps to alert a complainant of this delay and explain why.

Tier 3: Internal Review

- (h) If a complainant is aggrieved with the process or outcome of the resolution/investigation, they can request that an internal review be conducted by other staff member(s) who were not involved in the original investigation/resolution.

Tier 4: External Review

- (i) If a complainant is aggrieved with the process or outcome of the internal review, the Authority will inform the complainant of options to have the complaint reviewed externally. Complainants may access an external review at any point during the review process.

Privacy

- 3.7. When gathering information to respond to a complaint, the Authority will only:
- (a) use it to deal with the complaint or address systemic issues arising from the complaint;
 - (b) disclose it in a de-identified format when disclosing data to the public;
 - (c) share it with staff on a need-to-know basis.

Recording and Reporting

- 3.8. All complaints are recorded on the Authority's internal complaint management system. The data contained in this system is reported to the Authority's Board.

Aggressive and Vexatious Complaint Handling

- 3.9. Some complainant behaviour is clearly unreasonable. This includes, but is not limited to, aggressive behaviour, intimidation, coercion verbal abuse, threats to harm staff or other people and violence. This behaviour is never acceptable. The Authority has zero tolerance for violence and aggressive behaviour towards its staff. If such behaviour is exhibited, Authority staff may:
- (a) issue immediate warnings; and
 - (b) call out the behaviour and request that the behaviour stop.
- 3.10. Authority staff may also seek to limit a complainant's access in accordance with items 3.12 and 3.13 of this policy, if the behaviour continues.
- 3.11. A complaint may be regarded as vexatious if the complainant:
- (c) continues to pursue a complaint that has already been addressed and provides no new information that warrants further investigation or action;
 - (d) after reasonable efforts, fails or refuses to provide additional information which would be likely to be available, relevant to, and supportive of, the issues raised in the complaint;
 - (e) displays an unwillingness to cooperate with the Authority to resolve the complaint;
 - (f) insisting that the CEO or Board handle the complaint when it is not warranted;

- (g) makes unsubstantiated allegations, lies or gives misleading information.

Limiting Access

3.12. The Authority will limit the nature and scope of access in the following circumstances:

- (a) if full access would likely compromise the Authority's health and safety obligations as an employer;
- (b) if full access would likely compromise any statutory obligations the Authority has as an employer;
- (c) where full access would likely be wasteful of the Authority's resources whether through excessive contact or use of services;
- (d) where full access would be likely to encourage or allow aggressive, unreasonable and/or vexatious behaviour.

3.13. Limiting access for the purpose of item 3.11, may include the following:

- (a) Not providing direct contact information – It may be appropriate for Authority staff not to provide their direct contact information to a complainant. Where deemed necessary, Authority staff may communicate with a complainant via info@greatoceanroadauthority.vic.gov.au.
- (b) Not replying to written communication – It may be appropriate for Authority staff not to respond to written communication. Where deemed necessary, the Authority will respond to the author of the written communication confirming the Authority will not be investigating or responding to the complaint due to the vexatious or inappropriate nature of the communication and request the content of the communication be revised.
- (c) Terminating phone calls - It may be appropriate for Authority staff to inform the complainant that they will no longer deal with their complaints over the telephone and to terminate the call. This will only be done in circumstances where a complainant repeatedly telephones a staff member, or employs insulting, threatening or abusive language. In such instances the complainant will be asked to limit their communications to written correspondence to a designated Authority staff member pursuant to item 3.13 of this policy.
- (d) Limiting face to face contact – A complainant may be notified that personal attendance is terminated (i.e. they will be requested to leave the office). This may be a temporary termination or longer-term, if deemed appropriate. In this instance, a claimant may be notified that their communication is limited to written communication.

Excessive Contact Complaint Handling

3.14. Where a complainant makes excessive phone calls or visits, engages in excessive written communication or raises the same issues with different staff, the CEO may nominate a member of Authority staff to deal with all contact with the complainant for a specified period and the complainant will be informed accordingly. That one-on-one contact may still be limited in accordance with items 3.11 and 3.12 of this policy and the nominated Authority staff member should be adequately supported during this time.

Equality and Diversity

3.15. The Authority recognises that, in some circumstances, complainants may have a mental health condition and/or other disability where it may be difficult for them to either express themselves or communicate clearly and/or appropriately. Where unacceptable behaviour is evidenced under these circumstances, the Authority will consider the individual needs and circumstances of the complainant and its staff before deciding on how best to manage the situation.

Support for Staff

3.16. Staff who are affected by aggressive or vexatious complainant behaviour are encouraged to utilise the Authority's Employee Assistance Program (EAP) for support. Contact details for the Authority's EAP are located on the staff intranet.

4. ROLES AND RESPONSIBILITIES

CEO

4.1. The CEO is responsible for:

- (a) ensuring compliance with this policy;
- (b) modelling and promoting positive behaviours relating to complaint handling.

Staff

4.2. All Authority staff are responsible for familiarising themselves with and complying with the requirements of this policy when handling complaints.

Compliance, monitoring and review

4.3. This policy will be reviewed every two years or otherwise upon:

- (a) a significant event subject to this policy; or
- (b) legislative updates.

5. RELATED LEGISLATION AND DOCUMENTS

- Great Ocean Road and Environs Protection Act 2020
- Occupational Health and Safety Act 2004

- Charter of Human Rights and Responsibilities Act 2006
- Privacy and Data Protection Act 2014
- VPSC Code of Conduct
- Managing Unreasonable Conduct by a Complaint (Joint Manual prepared by the Australasian Parliamentary Ombudsman)

6. APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approver	CEO (or their delegate)
Administrator	CEO (or their delegate)
Next Review Date	25/10/2025

Approval and Amendment History	Details
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