

Complaints Management Framework

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1. Our commitment to good complaints handling

The Department of Resources recognises the importance and value of listening and responding to concerns and complaints. We are committed to continuous improvement and achieving the highest standard we can in every area of our work. Receiving complaints is one of the most important ways of learning how we can do our job better. Every effort will be made to understand and resolve the complaint at the initial point of contact.

This Complaints Management Framework (the framework) applies to all our people – temporary and permanent staff including consultants, contractors or any other person that provides us with services on a paid or voluntary basis.

The framework forms part of our customer service and governance arrangements. It provides support for the Department of Resources' guiding principles of safety and wellbeing, respect, we deliver, and professional excellence.

2. Scope of the framework

Section 219A of the *Public Service Act 2008* (Public Service Act) requires that the Department of Resources has a system to manage customer complaints. This framework applies to all employees of the Department of Resources as defined by the Public Service Act. The Department of Resources is also required to comply with the *Human Rights Act 2019* (Qld) (HR Act) for customer complaints that relate to a breach of an individual's human rights.

Our system should comply with AS/NZS 10002-2014, *Guidelines for complaint management in organisations*, providing a process for the appropriate receipt and processing of complaints and communication with complainants.

In Scope

This policy applies to:

- complaints received from both external clients (i.e. the public) and internal clients (i.e. Department of Resources work units providing services to other Department of Resources work units);
- complaints received anonymously; and
- complaints received by Ministerial or Director-General correspondence or contact.

Out-of-scope

Customer complaints do not include:

- complaints alleging breach of legislation by other third parties;
- complaints not relating to the Department of Resources;
- complaints made by staff about decisions affecting their employment, e.g., grievances, appeals (Public Service Act);
- where a matter has been previously investigated and all options are exhausted;
- matters subjected to internal or appeal processes under Resources administered legislation;
- where a matter is being addressed in an external forum or court, e.g., a tribunal, a commission, a court or another agency;
- allegations of corrupt conduct made in accordance with the *Crime and Corruption Act 2001*;
- allegations of serious misconduct made against an employee in accordance with the Public Service Act;
- complaints made by a public officer made in accordance with the *Public Interest Disclosure Act 2010*;
- complaints made in accordance with the *Right to Information Act 2009* and the *Information Privacy Act 2009*.

3. Definitions - What is a customer complaint?

Under the Public Service Act, a complaint is a verbal or written expression of dissatisfaction made by a person or organisation about the service or action of the department, or its staff, by a person directly affected by the service or action. This includes complaints received by the Minister and Director-General.

Complaints may include, for example, any of the following concerns:

- a decision made, or failure to make a decision, by a public service employee of the Department of Resources;
- an act, or failure to act;
- the formulation of a proposal or intention by the Department of Resources;
- the making of a recommendation by the Department of Resources;
- the customer service provided by a Department of Resources officer (includes temporary and permanent staff, consultants, contractors or any other person that provides us with services on a paid or voluntary basis)

Key participants involved in the customer complaints process are described as follows:

Key Participants	Description
Complainant	Any person, organisation or their representative/advocate who lodges a complaint with the Department of Resources.
Receiving Officer	An employee who receives the complaint and will solve or address the issue/s in the first phone or face-to-face contact.
Investigating Officer	An employee appointed by a managing officer to investigate and resolve the complaint.
Managing Officer	A line manager or other senior employee appointed to oversee the complaint management process.
Chief Complaints Registrar	Responsible for allocating complaints received centrally to the department and reporting of complaints data to the Board.

4. Human Rights Complaints

One of the objectives of the HR Act aims to ensure that a culture is built in the Queensland Public Sector that respects and promotes human rights, accordingly placing human rights at the forefront of government decision-making and actions.

The HR Act protects and promotes 23 human rights, reflecting four basic principles: freedom, respect, equality and dignity. It creates obligations on all public entities, which includes government employees, to properly consider and act compatibly with human rights when making decisions, developing policies, making laws and delivering services.

Giving proper consideration to a human right in making a decision includes identifying:

- the human rights that may be affected by the proposed decision; and
- whether the proposed decision would be compatible with human rights (see section 58 of the HR Act)

The meaning of *compatible with human rights* is defined in section 8 of the HR Act. It states an act or decision will be compatible with human rights if:

- it does not limit a human right, or
- it limits a human right only to the extent that is reasonable and demonstrably justifiable, in accordance with section 13 of the HR Act.

When acting or making decisions please see the Guide: How to apply human rights in the Department of Resources available on the department's intranet:

https://resourcesintranet.lands.resnet.qg/_data/assets/pdf_file/0011/275591/how-to-apply-human-rights-act.pdf

You can also discuss the application of the HR Act with the Human Rights representative in your area in the Department of Resources.

Making a Human Rights Complaint

If an individual believes their human rights have been breached due to an action or decision (e.g. policy, program or service) of the Department of Resources, they can raise a customer complaint through the Department of Resources' existing complaints management process.

A complaint is only made to the Queensland Human Rights Commission (QHRC) where the complaint has not been resolved by the Department of Resources to the reasonable satisfaction of the complainant.

Assessing a Human Rights Complaint

The Department of Resources will assess all customer complaints for breaches of human rights, whether the individual has identified a human rights concern or not.

An initial assessment of the complaint may consider the context and circumstances of the complaint (and the individual who made the complaint) to determine its priority, how it should be managed and who should respond. If the basis of the complaint is not clear the Department of Resources can ask the individual for details on how they believe the decision or action breached their human rights or was not proportionate.

If the person reviewing the complaint is not the original decision-maker, they can seek further information about why the decision was made, and how any limitation on human rights is proportionate.

Three keys steps to identify and consider human rights are:

1. Identify the human rights relevant to the complaint.
2. Consider whether the action or decision limits those human rights.
3. Assess whether the limitation is justified and reasonable in the circumstances.

More information is available at:

Human Rights Portal: www.forgov.qld.gov.au/humanrights

QHRC: <https://www.qhrc.qld.gov.au/>

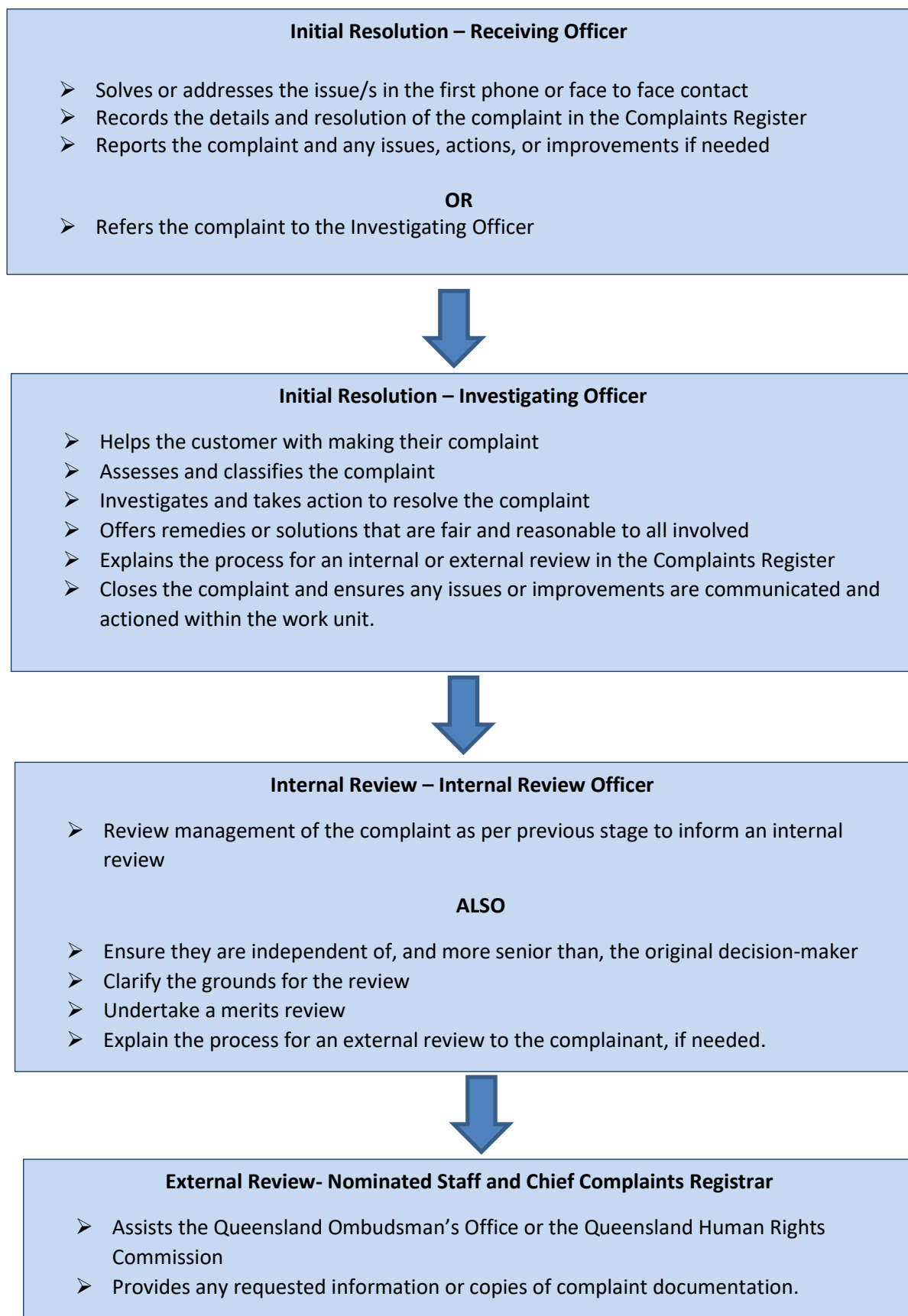
Queensland Ombudsman: <https://www.ombudsman.qld.gov.au/>

5. Complaints management principles

The following principles are the basis of our Complaints Management Framework.

Principle	What this means in the Department of Resources
People focus	Everybody has the right to complain. We will treat people making complaints with respect and promote and protect human rights. We will involve the customer in the process if possible and appropriate. We will protect privacy and confidentiality.
Visibility	Information about how and where a complaint may be made is well publicised on the Department of Resources' website and made available at frontline service locations.
Accessibility	We will ensure that our complaint handling process is accessible and easy to use for all our customers. We will accept complaints verbally and in writing via a range of formats. A complainant will not be charged a fee to lodge a complaint.
Responsiveness	We will acknowledge, update and respond to all complaints as quickly as possible. We will monitor and record a complaint until it is finalised.
Objectivity	We will address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our staff through the complaint handling process. We will identify if any human rights may be relevant to a complaint.
Confidentiality	We will observe strict confidentiality in complaint handling.
Customer focus	The interests of our customers are foremost in our approach to complaint handling as we are committed to resolving problems, improving relations and our reputation and building loyalty. We will work together with the complainant to look for a win-win solution that provides the best outcome for all parties within the resource and practical constraints the situation presents.
Accountability and reporting	We will ensure responsibilities are clearly outlined to staff. Our complaints will be reported internally and externally as appropriate.
Continuous improvement	<p>We will:</p> <ul style="list-style-type: none"> – identify trends for the purpose of improving service and business practice; – keep abreast of complaint management best practice; – foster a customer-focused approach; – provide training to staff to foster better complaint handling practices; – encourage innovation in complaint handling practices; – recognise exemplary complaint handling behaviour by our staff.

6. The Complaints Management Model



7. How to make a complaint

We always endeavour to resolve customer concerns prior to their escalation to a formal complaint. If this cannot be achieved, complaints can be communicated to us as follows:

- **In person** at any of our regional centres, listed at <https://www.resources.qld.gov.au/>
- **By telephone** to the Queensland Government switchboard 13 QGOV (13 74 68)
- **Via our Website** by completing the online form <https://www.resources.qld.gov.au/home/about-us/compliments-comments-complaints>
- **By email to** customerfeedback@resources.qld.gov.au
- **Via the Queensland Government website** <https://www.complaints.services.qld.gov.au/>
- **By mail to** Department of Resources, PO Box 15216, CITY EAST QLD 4002
- **Facebook and Twitter** comments that could be considered a complaint, will be assessed by the Social Media team who will request that the complaint is lodged formally. This will be provided to the Chief Complaints Registrar for dissemination to the appropriate division.
- **Verbal** complaints are to be recorded in writing and officers will assist customers to put their complaint in writing or to record it for the customer. Where verbal complaints are recorded in this way, the contents should be read to the customer to verify the details are accurate.

7.1. Accessibility and interpreter assistance

- For deaf and hearing-impaired customers, we recommend the following communication options using the National Relay Service:
 - TTY users' phone 133 677
 - Speak and listen (speech-to-speech relay) 1300 555 727
 - Internet relay users connect to the National Relay Service.
- For English language assistance, we recommend the following options available:
 - Telephone interpreters - Translating and Interpreting Service (TIS) National. TIS National is available 24 hours/ 7 days a week, for the cost of a local call on 131 450
 - Directory of Accredited Practitioners of Translating and Interpreting - National Accreditation Authority for Translators and Interpreters. NAATI Hotline 1300 557 470 within Australia

8. How we handle complaints

The Department of Resources aims to resolve customer complaints quickly at the frontline or the point where the complaint is received. We will make every reasonable effort to ensure a complaint is fully understood and to investigate all the circumstances and information surrounding it.

We will show empathy for our customer, but we will not attempt to take sides, lay blame, become defensive or create false expectations. We will treat customers with respect and will maintain their confidentiality.

All complaints will be dealt with using the principles of natural justice, fairness and objectivity.

Anonymous complaints can be made, however our ability to investigate them may be limited.

Complaints will be recorded according to the classification set out in the below table:

Classification	Description
Service Delivery	A complaint relating to how a service is provided including timeliness, quality or cost of the service
Staff Conduct	A complaint about the behaviour of a staff member when providing a service
Administrative Decision	A complaint about a decision made by a Department of Resources staff when providing a service
Policy / Procedure	A complaint about the process followed to provide a service
Statutory	A complaint about a decision/ actions that is covered by a process provided for outside this framework
Human Rights	A complaint by an individual about an alleged contravention of section 58(1) of the HR Act, that the Department of Resources have: <ul style="list-style-type: none"> acted or made a decision that is not compatible with human rights; or in making a decision, failed to give proper consideration to a human right relevant to the decision.

8.1. Complaints that won't be investigated

Some circumstances exist where a complaint will not be investigated. Where these circumstances exist, the customer must be notified and given the reasons as to why the complaint has been declined. In these cases, the customer may pursue the issues through other avenues such as lodging the complaint with the Office of the Queensland Ombudsman or QHRC.

These circumstances are:

- the Department of Resources is not the correct agency to address the concern
- the complainant does not have sufficient direct interest in the issue
- there are no sufficient demonstrated grounds for a complaint
- there is an existing right of appeal or review available to the complainant
- the resources required to handle the complaint are disproportionate to the likely outcome
- the matter has been previously investigated by the Department of Resources and all internal review options have been exercised
- the matter is currently being managed through a statutory process, or has already been adequately managed, by an external agency, court or tribunal, for example, the Queensland Civil and Administrative Tribunal (QCAT)
- it is impracticable to investigate a matter due to the length of time that has passed since its occurrence
- after assessment, the complaint is determined to be frivolous or vexatious.

8.2. Timeframes

We aim to address complaints as quickly and reasonably as possible within the following timeframes:

Within **one business day** of receipt of the complaint by the Department of Resources, allocate the complaint to the relevant work unit (if not resolved in first point of contact).

Within **five business days** of receipt of the complaint by the Department of Resources, the customer must be advised the complaint has been received and the expected timeframe for review and resolution.

Where possible, within **20 business days** of receipt of the complaint by the Department of Resources, the work unit must resolve the complaint or have made a genuine attempt to resolve the complaint.

In the event of an investigation proving more complex and requiring more time than previously advised, communicate the rationale for the extended time to the customer. The customer will be informed on a regular basis of progress with the complaint.

Timeframes for Human Rights Complaints

An individual must make a complaint to the Department of Resources in the first instance. After 45 business days the individual can then take their complaint to the QHRC. This does not mean that complaints must be resolved within 45 business days; there may be situations where a process extends beyond this time. The individual will be advised of the reason for the extended time and regularly updated on the complaint's progress.

8.3. Unreasonable complainant conduct

The complainant must work productively with the Department of Resources so the customer complaint can be resolved, and the complainant's conduct must not be unreasonable. Safety and wellbeing is paramount and if complainant conduct creates unacceptable risk, the Department of Resources may discontinue contact with them.

Such instances might include:

- frequent, lengthy, repeated or abusive telephone calls, which occupy significant staff time and resources
- frequent letters, emails, faxes or visits seeking resolution of issues beyond the scope of the original complaint or before the decision due date
- seeking information, advice or resolution from a variety of staff about the same issue
- any contact which involves abusive or threatening language or behaviour
- the customer continues to contact the Department of Resources after feedback has been provided regarding the complaint and all avenues of review have been exhausted.

To note: Any strategies used to manage unreasonable complainant conduct should be considered for compatibility with any relevant human rights to prevent a breach of an individual's human rights.

9. Further action / internal review

If a customer is not satisfied with the Department of Resources' response to a complaint, they may request that the Department of Resources conduct an internal review. When requesting an internal review, the customer must explain why the review is appropriate, i.e. why the original complaint outcome was not reasonable and/or the complaint handling process was unfair or deficient. The internal review will be conducted by an officer of at least the same level as the original Investigating Officer and will be independent of the original decision.

If the customer is not satisfied with the outcome of an independent review, they may contact the Queensland Ombudsman or Human Rights Commission to request an independent review on:

The Queensland Ombudsman

GPO Box 3314
Brisbane QLD 4001
Tel: 07 3005 7000 or
1800 068 908 (toll free outside Brisbane)

The Queensland Human Rights Commission

PO Box 15565
City East QLD 4002
Tel: 1300 130 670 (toll free in Queensland)

10. Remedies

When a complaint is considered justified, an appropriate remedy should be determined taking into consideration the available options including any remedies that are provided in legislation; the outcome sought by the complainant and/or the degree of detriment to the complainant. Informal resolution and compromise are attempted wherever possible.

If it is determined that the complainant's human rights have been limited in a way that is not reasonable or demonstrably justifiable, the next step is to determine how the complaint can be resolved to the satisfaction of both parties.

Possible remedies, alone or in combination, may include:

- acknowledgement of an error made
- apology
- change of decision
- change of policy, procedures, practice or product
- compensation or financial assistance such as an ex-gratia payment
- correction of misleading or incorrect records
- explanation of how and why the problem occurred and what steps the Department of Resources is taking or has taken to avoid it recurring
- offering more training to staff
- provision of information or technical assistance
- advising that disciplinary or management action has been taken (if appropriate)
- repair/rework
- provision of a substitute product or service.

11. Recording and reporting complaint data

The Department of Resources will keep accurate records documenting the complaint investigation in a Complaints Register. These records will include evidence of the process used to consider the complaint, records of meetings, telephone conversations and interviews, findings from the investigation and recommendations and approvals.

The complaint records will be available for internal and external review, subject to information privacy, right to information considerations and legislative obligation, e.g. *Ombudsman Act 2001*.

Customer complaints data must be reported quarterly to the Executive Management Board to inform activities such as risk management and strategic and operational planning, and drive service delivery improvements.

In accordance with section 219A of the Public Service Act, the Department of Resources must publish its annual customer complaints data to include:

- The number of customer complaints received by the Department of Resources in the year
- The number of those complaints resulting in further action
- The number of those complaints resulting in no further action

In accordance with the HR Act, the Department of Resources must publish its annual human rights complaints data to include:

- activities during the reporting period that further the objects of the HR Act
- human rights complaints received, including:
 - the number
 - the outcome
 - any other information prescribed by regulation relating to complaints
- reviews of policies, programs, procedures, practices or services for their compatibility with human rights.

12. Business improvement

Continuous business improvement requires analysis of complaints and trends so that business practices and behaviours can be evaluated and, through feedback to business areas, improved where necessary.

The Managing Officer involved with the complaint will ensure that their staff are informed of the circumstances of the complaint and its resolution to ensure processes are improved and rectified as necessary.

13. Staff education

This framework applies to all our people. Those with particular responsibilities in customer complaint management are trained in its application.

The Queensland Ombudsman, in conjunction with the Department of Resources, provides specialist complaint management training to all staff who are dealing with customers and their queries or complaints.

The QHRC also provides face-to-face and online training for Department of Resources staff on the HR Act.

14. Review of framework

This framework will be reviewed and updated, if required, every two years from the date of approval, unless circumstances indicate it should be reviewed earlier.

15. Roles and responsibilities

Role	Responsibility
Director-General	The Director-General will be accountable for: <ul style="list-style-type: none"> • the complaints management framework that puts the customer first • publishing an annual list of the Department of Resources' complaints by 30 September each year to comply with section 219A of the Public Service Act • publishing a list of the department's human rights complaints in the Annual Report to comply with the HR Act
Deputy Directors-General	Deputy Directors-General (DDG) will <ul style="list-style-type: none"> • be accountable for complaints management framework being followed in each division • ensure timely and effective resolution of complaints in accordance with this framework • decide if a complaint will NOT be investigated • ensure that appropriate action, including preventative action where warranted, is taken to address sources of complaints, adverse issues and trends identified and foster continuous improvement

	<ul style="list-style-type: none"> • provide appropriate training courses such as those offered by the Queensland Ombudsman on Complaints Management Training and Human Rights Complaints Training • provide Quarterly Reporting to the Chief Complaints Registrar inclusive of all complaints and human rights complaints received by the Department of Resources
Executive Directors	<p>Executive Directors will:</p> <ul style="list-style-type: none"> • allocate sufficient resources to ensure complaints are effectively managed, including the assignment of specific roles and responsibilities to staff • ensure that staff with roles in handling complaints are provided with appropriate information and training • immediately refer allegations of official misconduct or other fraudulent activity and public interest disclosures to the Manager, Employee Relations, Human Resources, for assessment • decide if a complaint will NOT be investigated or refer the complaint to the relevant DDG to decide • designate an internal reviewer or conduct the review if an internal review of a complaint is required • ensure that all human rights complaints are identified, considered and handled accordingly • ensure that the complaints register is used to manage and action complaints • ensure that the approved resolution actions are implemented • ensure that appropriate action, including preventative action where warranted, is taken to address sources of complaints, adverse issues and trends identified and foster continuous improvement
Chief Complaints Registrar	<p>The Chief Complaints Registrar will:</p> <ul style="list-style-type: none"> • allocate complaints received centrally within 1 day of receipt • manage the customer feedback inbox for any incoming complaints received • ensure that the complaint has been logged in the Complaints Register for tracking and reporting purposes, whether the complaint has been resolved or not • Quarterly Reports - provide the Board with statistics on the: <ul style="list-style-type: none"> – number of complaints received – number of complaints requiring further action and – number of complaints requiring no further action • Annual Report - provide the complaints information collected during the preceding financial year by 30 September to the Director- General for annual report publishing in accordance with the HR Act. The information will include statistics on the: <ul style="list-style-type: none"> – number of human rights complaints received, including the total number, – details of each human rights complaint and – the actions taken • Publish in accordance with section 219A of the Public Service Act the information will include statistics on the: <ul style="list-style-type: none"> – number of customer complaints received – number of those complaints requiring further action – number of those complaints requiring no further action

<p>Managing Officer (decision-maker)</p>	<p>The Managing Officer will:</p> <ul style="list-style-type: none"> • assess complaint and undertake immediate corrective action if necessary • ensure that every complaint is considered and assessed as a possible human rights complaint • ensure that the complaint has been logged into the Complaint Register for tracking and reporting purposes, whether the complaint has been resolved or not • attempt to address the complaint through an informal process • undertake an investigation into the complaint, or assign to an officer to manage the complaint if the informal process proves unsuccessful • ensure that natural justice is applied throughout the complaints process • approve the resolution and response for each complaint • advise the customer of the outcome • ensure that staff attend the complaints management training courses offered by the Queensland Ombudsman • ensure that staff attend the human rights complaints training courses offered by the QHRC
<p>Investigating Officer</p>	<p>The Officer who has been assigned to assess and investigate the complaint will:</p> <ul style="list-style-type: none"> • acknowledge receipt of the complaint with the customer within five business days and advise service standard timeframe for resolution of response • if possible, explore informal resolution with the customer • liaise with customer to obtain further information and provide advice regarding the progress of complaints • assess and investigate complaint • ensure that every complaint is considered and assessed as a possible human rights complaint • apply natural justice to customer and staff throughout the complaints process • recommend the resolution and response for each complaint to the Managing Officer • attend the complaints management training courses offered by the Queensland Ombudsman • attend the human rights complaints training courses offered by the QHRC
<p>All Staff</p>	<p>All staff will:</p> <ul style="list-style-type: none"> • deal with matters raised by customers locally in the first instance in order to minimise formal complaints • ensure that every complaint is considered and assessed as a possible human rights complaint • inform customers of the processes for lodging and managing complaints • provide assistance to enable customers to lodge complaints • encourage complainants to submit complete information through written form • maintain privacy and confidentiality • record and submit verbal complaints received to their Manager • ensure all complaint dealings (resolved and unresolved) are recorded in the complaints register • undertake training courses

16. Attachment A

How to apply the Human Rights Act 2019 in RESOURCES

Thursday, 19 December 2019

The *Human Rights Act 2019* (the Act) aims to ensure that respect for human rights becomes part of the culture of the Queensland public sector by putting human rights at the forefront of government decision making and actions. The Act protects and promote 23 human rights, reflecting four basic principles: freedom, respect, equality and dignity. It creates obligations on all public entities, which includes government employees, to properly consider and act compatibly with human rights when making decisions, developing policies, making laws and delivering services. To carry out these obligations, a public entity should:

STEP 1

Determine if the decision or action is about people

Only individuals have human rights. Non-human legal entities, such as statutory authorities, do not have human rights.

STEP 2

Identify the relevant human rights affected

Identify which of the human rights may be relevant to your decision or action (**the relevance question**). To do this, become familiar with the nature and scope of the human rights likely to be engaged in your work and the possible policy triggers. For more detail, see the DJAG guide at <https://www.forgov.qld.gov.au/file/46691>

STEP 3

Determine whether the decision or action limits or interferes with the human rights

Does the decision or action you are proposing do anything that limits or interferes with the scope of the rights you have identified? (**the limitation question**)

NO: If rights are not being limited, you are acting compatibly with human rights.

YES: If human rights are being limited, go to step 4. Human rights are not absolute and may be lawfully limited in the manner described under the Act.

STEP 4

To lawfully limit a human right:

4A. Identify the law you are relying on to limit the human right

Human rights may only be limited under law. Any limiting act or decision must conform to the legislation that authorised the decision-maker's action.

If you can't identify a law, you may not be able to limit the human right.

4B. Identify if an exemption to the obligation to properly consider human rights and act compatibly with human rights applies

The section 58(2) exemption applies if, because of a law (includes law of Commonwealth or another state) the public entity could not have *reasonably* acted differently or made a different decision. It applies in cases where a law requires a public entity to act or make a decision in a particular way that limits human rights. Determine if you are obliged by law to act or make a decision in a particular way which limits the human rights. If not, go to step 4C and properly consider the human rights affected.

4C. Determine if the limit is reasonable and justified the proper consideration test

You must properly consider human rights affected *before* making a decision. You will need to apply the justification exercise under section 13 to determine if the limit on the person's human rights and its impact on the person is reasonable and demonstrably justified after weighing up the relevant factors in section 13 described below. Supporting evidence will be required to demonstrate the justification.

a) *Nature of the right/s*

What interests do the human rights protects?

b) *The importance of the objective of the limitation*

Is the objective behind the limitation on the right important and significant?

c) *The relationship between the limitation and its objective?*

Is the limitation (the means used) rationally and proportionally connected to the objective you are trying to achieve? (**the proportionate question**)

d) *Are there less restrictive ways to achieve the objective?*

Is there a less restrictive way reasonably available to achieve the objective that the limitation seeks to achieve? If so, take the less restrictive option.

e-g) *The balance between the importance of the objective of the limitation and the importance of preserving the human right.*

Do the benefits gained by the limitation outweigh the harm caused to the human right?

h) *Any other relevant factors* (social, legal, moral, economic, administrative factors).

If the justification exercise concludes the limitation is reasonable and justified, then there is no breach of the Act.

STEP 5

Keep a record

Make a record to show how you justified any limitation.

16. Attachment B

Human rights protected under the Human Rights Act 2019

Recognition and equality before the law	Right to life	Protection from torture and cruel, inhuman or degrading treatment	Freedom from forced work
SECTION 15	SECTION 16	SECTION 17	SECTION 18
Freedom of movement	Freedom of thought, conscience, religion and belief	Freedom of expression	Peaceful assembly and freedom of association
SECTION 19	SECTION 20	SECTION 21	SECTION 22
Taking part in public life	Property rights	Privacy and reputation	Protection of families and children
SECTION 23	SECTION 24	SECTION 25	SECTION 26
Cultural rights – generally	Cultural rights – Aboriginal peoples and Torres Strait Islander peoples	Right to liberty and security of person	Humane treatment when deprived of liberty
SECTION 27	SECTION 28	SECTION 29	SECTION 30
Fair hearing	Rights in criminal proceedings	Children in the criminal process	Right not to be tried or punished more than once
SECTION 31	SECTION 32	SECTION 33	SECTION 34
Retrospective criminal laws	Right to education	Right to health services	
SECTION 35	SECTION 36	SECTION 37	
The human rights likely to be engaged in the type of work undertaken in RESOURCES are coloured blue.			

16. Attachment C: Nature of Scope of the *Human Rights Act 2019*

The human rights likely to be engaged in the type of work undertaken in the Department of Resources are detailed below including the nature of the right, internal limitation and possible policy triggers.

Recognition and equality before the law | Section 15 of the HR Act | Articles 16 & 26 ICCPR

Nature of the right

This right is a stand-alone right that also permeates all human rights.

It encompasses the right to recognition as a person before the law and the right to enjoy human rights without discrimination.

The right to recognition as a person before the law is both an absolute and non-derogable right at international law. This right reflects the essence of human rights: that every person holds the same human rights by virtue of being human and not because of some particular characteristic or membership of a particular social group.

Discrimination includes (but is not limited to) direct and indirect discrimination as defined in the *Anti-Discrimination Act 1991* (for example on the basis of age, impairment, political belief or activity, race, religious belief or religious activity, sex and sexuality). It may also be discrimination in a broader sense.

That part of the right that provides that a person is equal before the law and is entitled to the equal protection of the law without discrimination requires public entities, as well as courts and tribunals in undertaking certain functions, to treat people equally when applying the law and to not apply the law in a discriminatory or arbitrary way.

Section 15(4) of the HR Act provides a right to equal and effective protection against discrimination and entitles every person to a separate and positive right to be effectively protected against discrimination.

Internal limitation

The scope of this right is limited by subsection 15(5) of the HR Act.

The right contains an express exception for measures that are taken for the purpose of assisting or advancing persons or groups of persons disadvantaged because of discrimination: such measures do not constitute discrimination.

Possible policy triggers

- A policy or statutory provision that provides for an entitlement or the delivery of a service to some sectors of society and not others.
- A policy or statutory provision that, while stated in neutral terms, has the potential to have a disproportionate impact on a group in the community or members of the community who have a particular attribute (for example, elderly persons, persons with a disability, or individuals who are not fluent in English).
- A policy or statutory provision that establishes eligibility criteria for programs, entitlements or plans (for example, payment plans under the State Penalty Enforcement Register).
- A policy or statutory provision that engages any of the other protected human rights in a discriminatory way. For example, if a law is aimed at people living in relationships, it should be drafted so that, where relevant, it applies equally to married couples, de facto couples, and same-sex couples.

Right to life | Section 16 of the HR Act | Article 6 ICCPR

Nature of the right

The right to life is a non-derogable right at international law.

The right imposes substantive and procedural obligations on the State to take appropriate steps and adopt positive measures to protect life, including, for example effective criminal law and law enforcement provisions.

This protective obligation extends to requiring authorities to put in place measures that would protect an individual whose life is being put at risk by another's criminal activity. However, an authority's failure to perceive such a risk to an individual does not need to amount to gross negligence or wilful disregard of the right to protect life on the part of the law enforcement authority.

Another aspect of the positive obligation to protect life is a requirement that public authorities protect the lives of people in their care, including from harm they do to themselves. See *Keenan v United Kingdom* below.

The right may also require that the State supplements the substantive obligation by ensuring safeguards and mechanisms of review are in place for circumstances where it may appear that the substantive obligation has been breached (for example, through coronial review mechanisms).

Internal limitation

The scope of this right is limited by an internal limitation.

The right provides that a person has the right not be arbitrarily deprived of life.

Case authority suggests that 'arbitrary' in the human rights context refers to conduct that is capricious, unpredictable or unjust and also refers to interferences which are unreasonable in the sense of not being proportionate to a legitimate aim that is sought.

Possible policy triggers

- A policy or statutory provision that deals with withdrawal or withholding of life sustaining treatment.
- A policy or statutory provision that permits law enforcement officers to use force, including the use of weapons in the course of their duties.
- A policy or statutory provision that deals with the use of deadly force (for example, the law relating to self-defence).

Freedom of movement | Section 19 of the HR Act | Article 12 ICCPR

Nature of the right

Every person lawfully within Queensland has the right to move freely within Queensland, enter or leave Queensland, and choose where they live.

Notably, the right applies only to persons lawfully within Queensland. A person is not lawfully in Queensland if they are not an Australian citizen and are in breach of the *Migration Act 1958 (Cth)*. Further, a person who is prohibited from leaving another state or territory, under the laws of that state or territory, or pursuant to a court order made in that state or territory, is not lawfully in Queensland.

The right places an obligation on the State not to act in a way that unduly restricts the freedom of movement, but does not go so far as to require that the State take positive steps to promote the freedom of movement (such as, for example, providing free public transport).

Statutory provisions that provide for the imprisonment of people convicted of serious crimes are likely to be considered as imposing reasonable and justifiable limits on the right to freedom of movement.

Internal limitation

This right is limited to persons lawfully within Queensland.

Possible policy triggers

- A policy or statutory provision that imposes restrictions of movement or place of residence on persons.
- A policy or statutory provision that empowers a public entity to restrict people's movement based on national security considerations.
- A policy or statutory provision that allows for surveillance or monitoring of a person's movements.
- A policy or statutory provision that limits the ability to move through, remain in, or enter or depart from areas of public space.
- A policy or statutory provision that imposes planning controls by zoning residential locations away from commercial, industrial or agricultural areas.

Freedom of thought, conscience, religion and belief | Section 20 of the HR Act | Article 18 ICCPR

Nature of the right

The right to freedom of thought, conscience, religion and belief a non-derogable right at international law.

This right encompasses the right of everyone to develop autonomous thoughts and conscience, to think and believe what they want and to have or adopt a religion, free from external influence, and to demonstrate the religion or belief through worship, ritual, practice and teaching.

The concepts of 'religion' and 'belief' have been interpreted relatively broadly to include mainstream and alternative religions and beliefs. There is no requirement in the right that the religion or belief have any 'institutional characteristics' or practices associated with traditional or mainstream religions.

The right to demonstrate a religion (whether individually or collectively) encompasses a broad range of rights including engaging in worship, observance, practice and teaching. 'Worship' can include for example using ritual formulae and objects, displaying symbols, and observing holidays and days of rest. 'Observance' can include ceremonial acts, dietary regulations, wearing distinctive clothing and participating in rituals associated with certain life stages.

The right also includes the right of, and extends protections to, people who choose not to have, adopt or practise any religion or belief (such as atheists).

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that promotes, restricts or interferes with a particular religion or set of belief.
- A policy or statutory provision that requires disclosure of religion or belief.
- A policy or statutory provision that regulates conduct that will affect a person's worship, observance, practice or teaching of his or her religion or belief (for example, a dress code that does not accommodate religious dress).
- A policy or statutory provision that imposes requirements as a condition of receiving a benefit, or accessing a service, that prevents a person from adhering to their religion or belief.
- A policy or statutory provision that restricts the capacity for those under state control to observe their religion (for example, prisoners).

Freedom of expression | Section 21 of the HR Act | Article 19 ICCPR

Nature of the right

Protects the right of all persons to hold an opinion without interference and the right of all persons to seek, receive and express information and ideas (including verbal and non-verbal communication). Attempts to coerce someone into holding, changing or expressing any opinion would interfere with this right.

The forms of protected expression are also broad: expression can be oral, written, in print, art or any other medium. Means of expression may include spoken or sign language, books, newspapers, pamphlets, posters, banners, dress, legal submissions, and audio-visual, electronic and internet-based expressions.

Any act that would be perceived by reasonable members of the public as trying to convey some meaning would 'impart information and ideas', whether or not it actually conveys a particular meaning to a specific person, and whether the meaning conveyed is objectively clear and precise or subject to individual interpretation.

The UN Human Rights Committee has stated that article 19(2) of the ICCPR 'embraces a right of access to information held by public bodies ... regardless of the form in which the information is stored, its source and the date of production'.

The right to hold an opinion is considered a fundamental component of an individual's privacy, requiring absolute protection without external influence.

The right to freedom of expression and the free flow of information and ideas between people and through the media, particularly about public and political issues, is considered to be a touchstone of healthy democratic society. This right is central to the fulfilment of other rights such as cultural rights and freedom of thought, conscience and religion.

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that requires a person to obtain prior approval before expression may lawfully occur (for example, to hold a protest or busk in a particular area)
- A policy or statutory provision that regulates the contents of speech, publication, broadcast, display or promotion, or regulates offensive speech.
- A policy or statutory provision that imposes a dress code (for example, dress code that prohibits staff from wearing t-shirts displaying 'political messages')
- A policy or statutory provision that restricts or censors media coverage (for example, on the reporting of judicial proceedings).
- A policy or statutory provision that disadvantages a person, or any harassment, intimidation or stigmatisation of a person, on the basis of that person's opinion, may limit this right.

Peaceful assembly and freedom of association | Section 22 of the HR Act | Articles 21 & 22 ICCPR

Nature of the right

The right to peaceful assembly upholds the rights of individuals to gather together in order to exchange, give or receive information, to express views or to conduct a protest or demonstration.

The right is limited to peaceful assemblies that do not involve violence. Violent assemblies, such as riots and affrays, are not protected.

It covers both the preparing for and conducting of the assembly by the organisers and the participation in the assembly.

Not every assembly of individuals is protected by this right – ‘assembly’ in this context means the intentional, temporary gathering of several persons for a specific purpose.

The freedom of association protects the rights of individuals to join together with others to formally pursue a common interest – for example, political groups, sporting groups and trade unions. It includes the freedom to choose between existing organisations or to form new ones.

Under international law, the justifications for limiting the freedom of association must be based on real and not hypothetical concerns.

Internal limitation

The right is limited to peaceful assemblies.

Possible policy triggers

- A policy or statutory provision that limits the ability of a person or group of people to hold or participate in a public or private gathering or to come together for a common purpose (for example, restricting the areas where, or times at which, a demonstration, picket or public event can take place).
- A policy or statutory provision that compels a person to belong to a professional body or workplace association (note, however, that a requirement for compulsory membership of a professional body has not generally violated this right, particularly if the association is responsible for professional regulation).
- A policy or statutory provision that treats people differently on the basis of their membership of a group or association.
- A policy or statutory provision that prohibits membership in a group or association with certain persons (for example, in a criminal justice context).

Taking part in public life | Section 23 of the HR Act | Article 25 ICCPR

Nature of the right

This right affirms the right of all persons to contribute to and exercise their voice in relation to the public life of the State. It ensures that all persons have the opportunity to contribute to the political process and public governance. Participation in the conduct of public affairs may be direct or through freely chosen representatives.

A key aspect of the right to take part in public life is the right to vote and to be elected to public office. Participation in public life through representatives must be exercised through lawfully established voting processes. Moreover, the representatives elected by that process must actually exercise governmental power and be electorally accountable.

The United Nations (UN) Human Rights Committee has said that the opportunity to vote may require:

- positive measures to overcome specific difficulties, such as illiteracy, language barriers, poverty, or impediments to freedom of movement, which prevent persons entitled to vote from exercising their rights effectively; and
- information and materials about voting to be available in minority languages. Specific methods, such as photographs and symbols, should be adopted to ensure that illiterate voters have adequate information on which to base their choice.

The UN Human Rights Committee also considers the right to vote imposes obligations regarding the conduct of elections, including to establish an independent electoral authority to supervise and ensure the fairness, impartiality and lawfulness of the electoral process, and to allow independent scrutiny of the voting and counting processes.

The right to vote does not include as a corollary the right not to vote.

Section 23 also includes a right to have access, on general terms of equality, to the public service and to public office.

This right has been interpreted by the UN Human Rights Committee as providing a right of access, on general terms of equality, to positions in the public service and in public office.

The UN Human Rights Committee has said:

‘... affirmative measures may be taken in appropriate cases to ensure that there is equal access to public service for all citizens. Basing access to public service on equal opportunity and general principles of merit, and providing secured tenure, ensures that persons holding public service positions are free from political interference or pressures.’

The right interacts with the general right to equality (section 15) and includes that the criteria and processes for appointment, promotion, suspension and dismissal within the public service must be objective and reasonable, and non-discriminatory.

Internal limitation

The scope of this right is limited by an internal qualification.

The right is restricted to ‘eligible persons’. ‘Eligible’ is not defined by the Act, and instead will be determined by other Queensland legislation.

This qualification recognises that there are commonly accepted exceptions to universal suffrage such as children, certain prisoners and non-Queensland residents.

Possible policy triggers

- A policy or statutory provision that limits the ability of persons to take part in elections.
- A policy or statutory provision that imposes eligibility requirements for the public service and public office.
- A policy or statutory provision that sets processes and procedures for voting.

Property rights | Section 24 of the HR Act | Article 17 UDHR

Nature of the right

This right protects the right of all persons to own property (alone or with others) and provides that people have a right not be arbitrarily deprived of their property. The right does not provide a right to compensation.

Property is likely to include all real and personal property interests recognised under general law (e.g. interests in land, contractual rights and shares) and may include some statutory rights (especially if the right includes traditional aspects of property rights, such as to use, transfer, dispose and exclude).

Public entities may be obliged to take steps to prevent the unlawful deprivation of property occurring.

Internal limitation

The scope of this right is limited by an internal limitation. The right provides that a person has the right not be *arbitrarily* deprived of their property. Case authority suggests that ‘arbitrary’ in the human rights context refers to conduct that is capricious, unpredictable or unjust, and also refers to interferences which are unreasonable in the sense of not being proportionate to a legitimate aim that is sought.

Possible policy triggers

- A policy or statutory provision that provides for the acquisition, seizure or forfeiture of a person’s property under civil or criminal law (e.g., confiscations proceedings).
- A policy or statutory provision that gives a public entity a right of access to private property.
- A policy or statutory provision that implements Government control over its own property (e.g. resumption of land).

Nature of the right

The right to privacy protects the individual from all interferences and attacks upon their privacy, family, home, correspondence (written and verbal) and reputation.

The scope of the right to privacy is very broad.

It protects privacy in the sense of personal information, data collection and correspondence, but also extends to an individual's private life more generally. For example, the right to privacy protects the individual against interference with their physical and mental integrity, freedom of thought and conscience, legal personality, sexuality, family and home, and individual identity (including appearance, clothing and gender).

Only lawful and non-arbitrary intrusions may occur upon privacy, family, home, correspondence and reputation.

The task of identifying a person's home is to be approached in a common-sense and pragmatic way, relying on a person demonstrating 'sufficient and continuous links with a place.

The broad term 'families' recognises that families take many forms and accommodates the various social and cultural groups in Queensland whose understanding of family may differ.

Internal limitation

The scope of this right is limited by an internal limitation.

The right provides that a person has the right to have their privacy, family, home or correspondence unlawfully or arbitrarily interfered with. A person has the right not to have the person's reputation unlawfully attacked.

Case authority suggests that 'arbitrary' in the human rights context refers to conduct that is capricious, unpredictable or unjust, and also refers to interferences which are unreasonable in the sense of not being proportionate to a legitimate aim that is sought.

Possible policy triggers

- A policy or statutory provision that involves surveillance of persons for any purpose (for example, CCTV).
- A policy or statutory provision that deals with collection and/or publication of personal information (for example, results of surveillance, medical tests, electoral roll).
- A policy or statutory provision that regulates a person's name, private sexual behaviour, sexual orientation or gender identity.
- A policy or statutory provision that provides or amends requirements relating to the storage, security, retention and access to personal information.
- A policy or statutory provision that requires mandatory reporting of injuries or illnesses.
- A policy or statutory provision that deals with interfering with or inspecting mail and other communications, or preventing or monitoring correspondence between categories of people.
- A policy or statutory provision that provides for mandatory disclosure or reporting of information (including disclosure of convictions).
- A policy or statutory provision that establishes powers of entry/search (including personally invasive powers).
- A policy or statutory provision that provides for compulsory physical examination or intervention (for example, DNA, blood, breath or urine testing).

Protection of families and children | Section 26 of the HR Act | Articles 23(1) & 24(1) ICCPR

Nature of the right

The right entitles families to protection by both the State and society.

It also recognises that children have the same rights as adults, but with additional protections according to their best interests and the fact that they are children. One of the underlying principles International Convention on the Rights of the Child is that ‘the best interests of the child’ shall be a primary consideration in all actions concerning children.

The right also includes the right to a name and to birth registration.

The broad term ‘families’ recognises that families take many forms and accommodates the various social and cultural groups in Queensland whose understanding of family may differ. Cultural traditions may be relevant when considering whether a group of persons constitute a ‘family’.

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that regulates family contact for those in the care of public entities or enabling intervention orders to be granted between family members.
- A policy or statutory provision that provides for adoption and surrogacy.
- A policy or statutory provision that deals with removal of a child from a family unit or separating a child from parents/guardians/other adults responsible for their care.

Cultural rights – generally | Section 27 of the HR Act | Article 27 ICCPR

Nature of the right

Cultural rights are directed towards ensuring the survival and continued development of the cultural, religious and social identity of minorities. It affirms the right of all persons to enjoy their culture, to practise or declare their religion and to use their language, either alone or with others who share their background.

It is concerned with protecting a person from being denied the right to enjoy their culture, religion or language. A person may have been denied the right in this section if their enjoyment of a right is substantially restricted.

‘Culture’ is broadly interpreted as the maintenance of traditional beliefs and practices (for example, the wearing of traditional dress), but it may also include those social and economic activities that are part of a group’s tradition (for example, it may include traditional activities such as fishing or hunting).

The High Court has given a broad interpretation of what constitutes a ‘religion’.

‘Race’ also has broad meaning which may include colour, descent or ancestry, nationality or national origin, and ethnicity or ethnic origin.

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that limits the observance of any religious practices, regardless of the religion.
- A policy or statutory provision that restricts the capacity for persons to declare or make public their affiliation to a particular racial, religious or cultural group.

- A policy or statutory provision that limits or prohibits communication in languages other than English, including through the provision of information.
- A policy or statutory provision that restricts the provision of services or trade on religious holidays.
- A policy or statutory provision that regulates cultural or religious practices around the provision of secular public education.
- A policy or statutory provision that provides government information only in English and allows for access to services only by English speaking persons.
- A policy or statutory provision that licences or provides a restriction on the preparation and serving of food.

Cultural rights – Aboriginal peoples and Torres Strait Islander peoples

Section 28 of the HR Act | Articles 8, 25, 29, & 31 UNDRIP

Nature of the right

Aboriginal and Torres Strait Islander peoples are recognised as having a rich and diverse culture. There are many hundreds of distinct Aboriginal Torres Strait Islander groups in Australia, each with geographical boundaries and an intimate association with those areas. Many of these groups have their own languages, customs, laws and cultural practices.

Aboriginal and Torres Strait Islander are defined in the *Acts Interpretation Act 1954*.

It explicitly protects the right to live life as an Aboriginal person or Torres Strait Islander who is free to practise their culture. They must not be denied certain rights in relation to traditional knowledge, spiritual practices, language, kinship ties, relationship with land and resources, and protection of the environment.

Providing explicitly for the rights of Aboriginal peoples and Torres Strait Islander peoples to culture is consistent with Australia's international human rights commitments under UNDRIP.

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that prohibits the use of a traditional language.
- A policy or statutory provision that allows or limits the ability of Aboriginal or Torres Strait Islander persons to continue to take part in a cultural practice, or otherwise interferes with their distinct culture practices.
- A policy or statutory provision that interferes with the relationship between Aboriginal or Torres Strait Islander persons and land, water and resources.
- A policy or statutory provision that relates to the protection of Aboriginal and Torres Strait Islander cultural heritage, including Aboriginal human remains and secret or sacred objects.

Right not to be tried or punished more than once - Section 34 of the HR Act | Articles 14(7) ICCPR

Nature of the right

The right upholds the rule against double jeopardy – that is, that a person should not be taken to court or punished more than once for an offence of which they have already been convicted or acquitted.

The right applies only to criminal offences (and not civil proceedings). All criminal, quasi-criminal and regulatory offences, no matter how minor the consequences, fall within the provision, including, for example, parking offences.

The right does not prevent other non-penal consequences from flowing from the same conduct that gave rise to a criminal conviction and punishment (for example, professional regulatory disbarment or the like).

Internal limitation

This right does not have an internal limit or qualification.

Possible policy triggers

- A policy or statutory provision that creates new offences.
- A policy or statutory provision that is related to the double jeopardy exceptions under the Criminal Code.

Version history

Date	Version	Action	Description / comments
30 Jun 2014	Draft	New framework	For consideration by ED
27 Jan 2016	1.00	Amended to reflect final version issued to Department	
10 Feb 2016	1.01	Clarification to response delegations	Feedback incorporated including amended process map
20 Feb 2017	1.02	Update definition of a complaint	As approved BOM presentation 21 July 2016
20 Feb 2017	1.02	Update how to lodge verbal complaints	As per the Customer Complaints Management Handbook endorsed by the Board 21 July 2016
21 Feb 2017	1.02	Update reference on limiting contact by complainants with the department	As per the Customer Complaints Management Handbook endorsed by the Board 21 July 2016
21 Feb 2017	1.02	Clarified wording of service delivery timeframes in role description	As per the Customer Complaints Management Handbook endorsed by the Board 21 July 2016
22 Feb 2017	1.02	Updated role description for DDG and ED to reflect a decision not to investigate a complaint	As per the Complaints Framework endorsed by the Board 7 May 2015
30 June 2018	2.00	Reviewed and updated to reflect new department (former Department of Energy and Water Supply and former Department of Natural Resources and Mines.	Department of Natural Resources Mines and Energy
30 June 2020	3.00	Review and update to reflect the Human Rights Act 2019	Information incorporated to be considered during the complaints process.
31 March	3.01	Review and update to reflect new Department of Resources	Department of Resources

Keywords

CHB/2016/1982; Framework; handbook; complaints; register; complainant; customer complaint; assessing complaint; internal review of complaints