

Complaints Management Procedures

AEC Complaints Management Framework

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Introduction

Purpose

The Australian Electoral Commission's (AEC's) *Complaints Management Procedures* (the Procedures) are designed to assist staff to manage complaints in compliance with the [AEC's Complaints Management Policy](#) (the Policy).

The Policy, the Procedures and the [Internal Review Management Procedures](#) are part of the AEC's Complaints Management Framework (the Framework). The Framework is designed to provide a consistent professional structure for the decentralised management of complaints within the AEC.

The AEC's [Service Charter](#) explains the standard of service that the AEC is expected to provide. The Framework acknowledges that the public and other stakeholders have a right to make a complaint where it is viewed that the AEC has not met this quality of service, and the AEC has an obligation to manage complaints in compliance with the Framework.

Scope

The Framework applies to complaints that originate from external parties and are lodged with the AEC. Complaints management is a decentralised responsibility handled at the divisional, state/territory and National Office level. The Procedures are designed to provide consistent, national direction for complaints management that must be followed by all staff when managing complaints.

If a particular work area, such as a state/territory office or branch, creates localised complaints management arrangements to support the implementation of the Policy or the Procedures, the localised arrangements must not contradict the national Framework.

These Procedures should be read alongside the Policy and *Internal Review Management Procedures*.

The importance of effective complaints management

Managing complaints is one of the most important stakeholder relationship activities that staff undertake on behalf of the AEC. Effective complaints management is important because it provides us with the opportunity to:

- resolve an issue of dissatisfaction raised by a member of the public or stakeholder
- ensure that a complainant's overall experience of our services is positive
- improve the way we do business so that we reduce the volume of complaints received
- review our organisational performance
- implement business improvements, and
- strengthen our organisational reputation.

Other policies and procedures governing complaints management

There are also specific AEC policies and procedures that prescribe how legal, fraud, privacy and public interest disclosure complaints are to be managed, in order to meet specific legislative requirements.

These complaints are managed by the relevant business areas only, in compliance with the Framework and these other governing policy and procedures. The Procedures provide guidance on escalating these complaints to these business areas.

Operation during electoral event periods

The Framework applies at all times including during electoral events. During electoral events priority must be given for the acknowledgement of, and response to, electoral event related complaints.

Roles and responsibilities

All staff

All staff have a role in, and are responsible for, the effective management of complaints.

Whether managing a complaint, or providing information and assistance to another managing a complaint, all staff must understand their responsibilities in this process.

Staff responsibilities include:

- understanding the Framework and how it relates to their role
- acting in compliance with the Policy and these Procedures
- understanding any localised complaints management arrangements that support the implementation of the Policy and Procedures and acting in compliance with them
- acting in accordance with broader legislation, APS Code of Conduct and other requirements as AEC employees.

These responsibilities must be undertaken in a timely manner to ensure that complaints are resolved at the earliest opportunity.

Public engagement staff

Staff with specific responsibilities for public engagement, such as those with frontline roles in divisional offices, are likely to be the first point of contact for most complaints received by the AEC. It is especially important that these staff fully understand and comply with the Policy and Procedures.

State/territory Managers and Assistant Commissioners

State/territory managers and Assistant Commissioners are responsible for ensuring that their staff undertake complaint management in compliance with the Framework, Policy and Procedures, and for providing management support within their workplaces.

Assistant Commissioner, Education and Communications

The Assistant Commissioner, Education and Communications, is responsible for the Complaints Management Framework, which includes establishing and monitoring of the Policy, Procedures, other supporting documents and the system for recording and managing complaints, the Public Engagement Contact Tool. The Assistant Commissioner, Education and Communications is also the internal central contact for the receipt and escalation of internal review requests.

Public Engagement Contact Tool

The [Public Engagement Contact Tool](#) (the Tool) is the national system that supports the management of enquiries, complaints and feedback to the AEC.

Every complaint received by the AEC must be recorded in the Public Engagement Contact Tool. This includes less complex complaints that are resolved at first point of contact.

Recording all complaints in the Tool provides organisational benefits including:

- facilitating the efficient resolution of complaints
- improving communication in complaint management
- supporting staff in their engagement with complainants
- providing information to monitor performance in managing complaints
- providing information to review organisational performance
- providing information on trends and issues that can lead to business improvements.

The Tool is also the mechanism to escalate complaints to other staff and business areas for their response. A [reference guide](#) is available which provides instructions on how to record and manage a complaint in the Tool.

Record keeping

Staff must understand their [recordkeeping obligations and responsibilities](#) and adhere to the AEC's recordkeeping policy and supporting procedures in the management of complaints.

The record of a complaint in the Tool should include as attachments, all key correspondence that relates to the complaint. If there are any confidentiality or privacy issues with a complaint, identifying information should not be entered into or attached to the tool, but a file reference made to where it is kept.

In addition to the online Tool, it is expected that each state/territory and branch office will maintain consolidated files in relation to their complaint management.

Supporting resources

These procedures should be read alongside:

- [AEC Complaints Management Policy](#)
- AEC [Service Charter](#)

Further information on public enquiries and client contact is available on the AEC intranet:

- [Engaging with Stakeholders at the AEC – A Best Practice Guide](#)
- [Managing Public Enquiries and Dealing with Difficult People](#)
- [Public Enquiries intranet page](#)
- [List of recommended national office contact referral points for complaints](#) (at attachment b)

Complaints Management

Definition of a complaint

A complaint is where an individual or organisation has expressed dissatisfaction to the AEC in relation to an AEC service, process or program, or where it is viewed the AEC has not met its expected quality of service.

Complaints are one form of contact that the AEC has with the public and stakeholders through its external engagement channels. The vast majority of contact is in the form of an enquiry which is defined as a request for information or service, or the provision of feedback such as a suggestion or compliment. These must be managed in compliance with the information on the [Public Enquiries and client contact intranet page](#).

Types of complaints

The Policy defines complaints into the broad categories – general nature, legal nature, regarding electoral fraud, breach of privacy, Public Interest Disclosure and those that are outside AEC responsibilities.

Principles for complaints management

The Policy outlines six principles – accessibility, responsiveness, confidentiality, fairness, transparency and efficiency – that are fundamental to an effective complaints management process. It is important that you understand and follow these principles when managing complaints.

First point of contact resolution

Wherever possible, complaints should be resolved at the first point of contact. This means that the complaint is resolved by the person who initially receives the complaint and often at the same time the complaint is received.

Complaint management service standards

Acknowledgment

A complaint must be acknowledged within **three working days of its receipt** by the AEC.

During **electoral event periods**, acknowledging an election-related complaint must be given priority.

Response

A complainant should be provided with a response **within ten working days** of its receipt, unless they have been specifically informed the investigation will take longer.

During **electoral event periods**, an election-related complaint must be given priority and resolved as soon as possible after its receipt.

If a complaint is found to be more complex than originally expected and advised, a complainant must be advised of a revised timeframe for response **as soon as practicable**.

The Complaints Management Process

There are six steps in the AEC's complaints management process:



If you receive a complaint, it is imperative you follow the process, however, if the complaint can be resolved at first point of contact, the steps in the complaint management process may be undertaken concurrently, rather than sequentially.

1. Receipt



Channels for receipt of complaints

Complaints will be received by the AEC in a number of channels:

CHANNEL	FORMAT	AEC AREA OF RECEIPT
Online:	<u>I'd like to make a complaint form</u>	National office (Education and Communications Branch)
Post:	Australian Electoral Commission Reply Paid 9867 [your capital city]	All state/territory offices or national office
Phone:	13 23 26 (in Australia) +612 6273 5420 (Overseas)	All divisional offices and state/national offices (based on telephone routing arrangements)
In person:	Visiting your local <u>AEC office</u>	All AEC offices
Social media:	AEC Facebook or twitter accounts	National office (Education and Communications Branch)

When taking receipt of a complaint, the following information is to be considered, and communicated to a complainant wherever appropriate:

Extra support available to assist lodgement

You should make any complainant, who may require particular assistance to lodge a complaint, aware that there is extra assistance available to support them. This is part of the AEC's commitment to having an accessible complaint management process.

Extra assistance is available for:

- people who are deaf or have a hearing or speech impairment who can contact the AEC through the [National Relay Service](#)
- people who would prefer to contact the AEC in a language other than English who can contact the AEC through the [telephone interpreter service](#).

The AEC may also be able to provide other assistance to a complainant to assist them in the complaints process, on request. You should work with the complainant to ensure that they are adequately, and reasonably, supported during the complaints management process.

Complaints of a serious or complex nature lodged in person or phone

If a complaint is received in person or over the phone, and it is apparent that it is of a complex or serious nature, you should request that the complainant lodges their complaint in writing, wherever possible.

If it is not possible for a complainant to lodge their complaint in writing, it is critical that you promptly record all details of the complaint, along with the contact details of the complainant in the Tool.

Complaints lodged anonymously or using a pseudonym

The Policy outlines the right for complainants to lodge their complaint anonymously or using a pseudonym.

Complaints lodged anonymously are to be managed, as far as possible, in line with the Policy and these Procedures, however, if relevant information is not provided, and there is no other reasonable way to gain it, there may be limitations to the process.

Complaints lodged indicating 'no further contact'

The Policy outlines the option for complainants to specify whether they wish to be contacted regarding the complaint. If a complainant indicates that they do not wish to be contacted, the complaint is to be investigated but no acknowledgment or response is provided to the complainant.

Complaints which do not fall within AEC responsibility

If it is clear that the nature of the complaint relates to matters outside the AEC's area of responsibility, you should inform the complainant that the complaint cannot be managed by the AEC. In such cases, wherever possible, you should provide the details of an appropriate organisation to which the complainant can refer their complaint.

Managing difficult behaviour at lodgement

If a complaint is lodged with aggressive or rude behaviour or language, you are supported in communicating to complainants that their behaviour is not tolerated in our workplace.

The Policy sets out the complainant's responsibility to treat AEC staff with courtesy and respect, as well as the complainant's right to be treated with courtesy and respect.

Further information on managing difficult behaviour at lodgement is available from [*Managing Public Enquiries and Dealing with Difficult Behaviour*](#).

Managing unreasonable complaints

Some complaints received may require consideration as to whether they are unreasonable based on the content of the complaint itself. In these cases, the principles of the policy apply, including the complainant's right to be treated with courtesy and respect. Specific strategies to manage these complaints are outlined below.

Type of complaint	Management strategy
A complainant is seeking the AEC investigate the same issue (after an initial investigation and internal review have been conducted), when no new significant or relevant material has been provided.	<p>It should be clearly communicated to the complainant that they have reached the end of the AEC's complaints management process, and, in the case of repeated contact, is to be informed that no further correspondence will be entered into on this particular issue.</p> <p>Before actioning this strategy, approval must be sought from the relevant state manager or assistant commissioner. Please contact the Public engagement team for a template response.</p> <p>The receipt of the complaint and the determination of 'no further action' are to be recorded in the Tool.</p> <p>If a new issue or material is provided, consideration should be given as to whether it necessitates reconsideration of the entire issue.</p>
The issue or facts of the complaint are not able to be determined, or are incomprehensible.	<p>A complaint cannot be managed if there is no clear issue raised. Staff should provide a reasonable level of support to a complainant to elicit if there is a clear issue including asking clarifying questions to establish what the issue is and what the complainant sees as the AEC's role in it. A template response is available.</p> <p>If, after clarification is sought, there is still no clear issue raised, the complainant is to be notified that no further action will be taken. A template response is available.</p> <p>The receipt of the complaint and the determination of 'no further action' is to be recorded in the Tool.</p> <p>If the complaint is a mix of clear and undefined issues, only the clear issues are to be dealt with.</p>
A complainant makes unreasonable demands in relation to timeframe for resolution, or who in the AEC will manage their complaint.	<p>The complainant should be advised that the complaint will be managed in line with the AEC's policy and procedures, and that:</p> <ul style="list-style-type: none"> • while the AEC is committed to responding at the earliest opportunity, the timeframe is determined by the nature of the complaint, and • the nature of the complaint and the AEC's procedures will determine the most appropriate staff/ area to manage the complaint.

2. Assessment



Understanding the complaint

Complaints will be received on different issues and will range in regards to complexity of the issue and the available resolution.

Factors to assess the complaint

On receipt of a complaint, you are to assess the complaint against the following factors to determine:

- whether the complaint can be resolved at the first point of contact, or
- whether the complaint needs to be escalated and if so, to whom.

Factor	Assessment to determine	Example
Topic	<ul style="list-style-type: none"> • The topic or issue raised • Whether it falls within our responsibility • Whether the complaint or resolution requires specific business knowledge 	The complaint relates to a state/territory election, or relates to the registration of a political party
Clarity	<ul style="list-style-type: none"> • Is there a clear issue that is raised 	The complaint does not appear to raise a clear issue that can be resolved
Complexity	<ul style="list-style-type: none"> • What is the issue/s or circumstance that is raised 	The complaint relates to the legality of compulsory enrolment
Seriousness	<ul style="list-style-type: none"> • The urgency/seriousness of the complaint 	The complaint relates to an apparent incorrect how-to-vote card on election day
Risk	<ul style="list-style-type: none"> • The impact or risk to the complainant, other people, our staff or our business or reputation 	The complaint relates to the safety of the entrance to a polling place
Resourcing	<ul style="list-style-type: none"> • The level of resourcing needed to resolve the complaint 	The complaint requires research into historical records
Legislative requirements	<ul style="list-style-type: none"> • Whether there are specific legislative requirements for managing the complaint 	The complaint is a legal, fraud, privacy or PID complaint.
Resolution sought	<ul style="list-style-type: none"> • Whether the complainant has indicated the resolution they are seeking, and what level of approval this may require 	The complaint relates to a non-voting matter

Wherever possible, complaints should be resolved at first point of contact.

Complaints lodged without sufficient information

The Policy outlines the information that we request from complainants to assist in the investigation of their complaint, however, some complaints may be lodged without some of the requested information.

All complaints are to be investigated unless **critical** information to the investigation is not provided and cannot be obtained.

If there is not sufficient information, you should take all reasonable steps to seek the information, including, when appropriate, contacting the complainant. A [template response](#) is available if you need to contact the complainant to get a proper understanding of their concerns or further information is required. If sufficient information is subsequently provided, and the complaint is not able to be resolved within three working days, an acknowledgement must be then sent. A [template acknowledgement](#) is available.

If all reasonable steps have been taken and sufficient information is still not available, the complainant is to be informed that the AEC is unable to manage their complaint. A [template response](#) is available. In these cases, you are to record in the Tool the receipt of the complaint, and the steps undertaken to seek additional information along with 'no further action required'.

If a complaint is lodged without sufficient contact details of the complainant, and there is not a reasonable way to obtain them, the complaint is to be investigated, but an acknowledgement or response cannot be provided. In these cases, you are to record in the Tool the receipt of the complaint, the investigation and any remediating action taken along with 'no acknowledgement/response could be provided'.

3. Assignment



Resolving complaint at first point of contact

If the outcome of your assessment is that the complaint can be managed at the first point of contact, then you are responsible for conducting all the remaining steps in the management of the complaint.

You must record in the Tool the details of the complaint, and attach a copy of any related complainant's correspondence with the AEC. The Tool will assign the complaint with a unique identification number which is to be used in any further correspondence with the complainant.

Escalating complaints

If the outcome of your assessment is that the complaint needs to be escalated, you will need to take one of two actions depending on whether the complaint is a i) legal/fraud/privacy/Public Interest Disclosure complaint or ii) a general complaint.

If a complaint needs to be escalated, this must be undertaken at the latest within one working day. This will ensure that the process proceeds in a timely manner.

i) Escalating legal, fraud, privacy and Public Interest Disclosure complaints

If the complaint:

- is of a legal nature
- regards suspected electoral fraud
- regards a breach of privacy, or
- regards a Public Interest Disclosure





then the complaint must be escalated to the specialist area of the AEC to manage, in line with the Framework and according to other relevant Commonwealth law and policies.

To assist you to determine whether a complaint you have received is one of these types of complaints please refer to the following information:

Determining the type of complaint

- Is this a [legal complaint](#)?
- Is this a complaint regarding [electoral fraud](#)?
- Is this a complaint regarding a breach of [privacy](#)?
- Is this a complaint regarding [Public Interest Disclosure](#)?

If you do assess the complaint as one of these types of complaints you should immediately escalate the complaint to the specialist area of the AEC as indicated below:

Specialist area	Escalate to
Legal	
Fraud	
Privacy	
Public Interest Disclosure	

If you are unsure you should consult with your manager. Alternatively, you can contact the specialist business area above, by phone, and discuss with them the complaint that you have received.

Once a fraud/privacy/Public Interest Disclosure/legal request has been escalated to the relevant area, you are no longer responsible for management of the complaint.

The relevant area will be responsible for entering the complaint into the Tool.

ii) Escalating general complaints

If the complaint is a general complaint then you are to record the details of the complaint in the Tool, and attach copies of related correspondence. This will assign the complaint with a unique identification number which is to be used in any further correspondence with the complainant.

You are then to use the Tool to escalate the complaint, by assigning the complaint to a selected staff member or business area.

A list of [contact points](#) for escalating complaints, such as the Roll Management Helpdesk or Funding and Disclosure Helpdesk is available. When available, the generic contact point for the business area that the complaint relates to is the preferred referral point.

If a generic contact point or specific staff member, based on their job title, cannot be identified, you should consult with your manager to determine who the complaint should be escalated to.

If a complaint has been assessed as high in terms of risk, complexity, urgency or seriousness, once you have escalated it via the Tool you should also phone the relevant staff member/business area to draw their attention to it.

If there are any confidentiality or privacy issues with a complaint, identifying information should not be entered into or attached to the tool, but provided separately to the escalation point.

Once the complaint has been escalated you are no longer responsible for the management of the complaint.

Receiving an escalated complaint

If you have been escalated a complaint to manage via the Tool, you will receive advice via an email. You are now responsible for conducting the management of the complaint from step four 'Acknowledgement'.

It is also suggested that you revisit the assessment of the complaint against the factors outlined in step two 'Assessment' on [page 14](#).

4. Acknowledgement



The complaint must be assessed to determine the estimated timeframe needed to respond to the complainant. Once this is determined you must provide the complainant an acknowledgement of the AEC's receipt of their complaint.

If a complainant has indicated that they do not wish to be contacted regarding their complaint, an acknowledgement is not to be provided.

Responsibility for acknowledgement

Responsibility for acknowledgement of the complaint rests with you if you are now managing the complaint.

Timeframe for acknowledgement

All complaints must be acknowledged **within three working days** of receipt by the AEC.

If you estimate that a complaint can be resolved within three working days, and a response is subsequently provided within this time, an acknowledgement does not need to be provided.

If you estimate that a complaint can be resolved within three working days but a response is not subsequently provided within this time, **an acknowledgement which confirms receipt of the complaint must be provided on or before the third day.**

During electoral event periods, acknowledging an election-related complaint must be given priority.

Content of acknowledgement

A complaint acknowledgement is to confirm receipt of the complaint by the AEC, notify the complainant of our Complaints Management Policy and an expected timeframe for response.

Acknowledgement templates

The [complaint acknowledgement templates](#) must be used when providing an acknowledgement to a complaint.

These templates include space for you to include the unique reference number assigned to the complaint as well as an expected timeframe for response. You should also provide the complainant with your contact information so that they can contact you during the complaints management process if they have any questions or concerns.

It is important that the acknowledgement is kept brief and does not enter into any speculation about possible resolutions. A copy of the acknowledgement is to be attached to the complaint record in the Tool and filed according to branch/state record keeping arrangements.

Channel of acknowledgement

When acknowledging a complaint, generally you should provide the acknowledgement in the channel that the complaint was received. For example, if the complaint was received via email you should provide the acknowledgement by return email.

However, there may be some cases when specific consideration is needed to determine whether using the same channel is appropriate to provide the acknowledgement. This is particularly the case for more complex complaints that are received over the phone, via social media, or in person.

5. Investigation



If you are investigating a complaint you must first plan out the steps that you will need to take to properly investigate the complaint.

All AEC staff have a responsibility to provide information and assistance to another staff member investigating a complaint. This assistance must be provided at the earliest opportunity to ensure that complaints are resolved in a timely manner.

Level of investigation required

The time, resources and level of investigation needed to provide a response to a complaint may vary, as determined by:

- the assessment of the complaint
- any specific requirements in legislation, or
- AEC policy or procedures.

When conducting an investigation it is important to note that a complainant is to be provided with a response **within ten working days**, unless they have been specifically informed that the investigation will take longer.

How to conduct an investigation

Important steps to take in investigating a complaint include:

- taking all reasonable steps to gain an understanding of the complainant's views and their expectations
- seeking more information from a complainant, if this is required to clarify key issues

- reviewing supporting documentation
- gathering any relevant contextual information to gain a thorough understanding of the issues raised
- consulting with other staff or business areas who may have expertise relevant to the complaint
- reviewing any relevant legislation, internal policies and procedures
- speaking with any other staff who have had contact with the complainant
- considering resolutions provided to similar complaints, provided the information is current, and
- identifying all possible remedies, where appropriate, and assessing their suitability

You may request additional information from the complainant during the investigation or at any stage in the management of the complaint.

Further escalation of complaint

During the process of managing a complaint it may also become apparent that you are not the correct person to resolve the complaint, and need to further escalate the complaint. In these cases you are to escalate the complaint to another relevant staff member or business area using the Tool. Further information is outlined in step three 'Assignment – escalating a complaint' on page [16](#).

Delay in timeframe for investigation

During the investigation, other issues not immediately raised at the time of receipt may become apparent. Consideration must be given to whether this requires a reassessment and adjustment of the timeframe required to undertake the investigation.

If a complaint is found to be more complex than originally expected and it will take longer than expected to resolve, you must inform the complainant of a revised timeframe for response as soon as practicable. A [template response](#) is available.

6. Response



Following a properly conducted investigation, you should have a sufficient understanding of the issue/s to enable you to determine the most appropriate AEC response to the complaint.

Seeking approval for the response

Once you have determined the response, **you must consider whether you need approval** for the response that you intend to provide. If you need approval, you must

receive it before you provide any response to the complainant. If you are not sure whether any approval is needed, you should consult with your manager.

If a complaint has been assessed as high in terms of risk, complexity or seriousness the state/territory manager or Assistant Commissioner must provide approval for the response. You must also comply with any localised approval arrangements in place.

Content of the response

Once you have approval for your response you should advise the complainant as soon as practicable. In your response you should include:

- a clear statement of the AEC's decision in response to the complaint
- an explanation of the investigation undertaken including reference to any relevant legislation or policy
- an explanation of any corresponding action that we may be taking (for example, amending a process or updating information on our website)
- an apology, if there has been any AEC mistake or misunderstanding, and
- the internal review process available to them if they are dissatisfied with the process used to investigate their complaint, or with our response to their complaint.

Complaint response templates

The complaint [response templates](#) must be used when providing a response to a complaint.

If the complainant has requested that they not be contacted regarding the outcome of their complaint then do not provide them with a response.

Channel of response

When responding to a complaint, generally you should provide the response in the channel that the complaint was received. For example, if the complaint was received via email you should provide the response by return email.

However, there may be some cases when specific consideration is needed to determine whether using the same channel is appropriate to provide the response. This is particularly the case for more complex complaints that are received over the phone, via social media, or in person.

Timeframe for response

A complainant should be provided with a response **within ten working days** of its receipt, unless they have been specifically informed the investigation will take longer.

During **electoral event periods**, an election-related complaint must be given priority and resolved as soon as possible after its receipt.

If a complaint is found to be more complex than originally expected and advised, a complainant must be advised of a revised timeframe for response **as soon as practicable**. A [template response](#) is available.

Recording in the Public Engagement Contact Tool

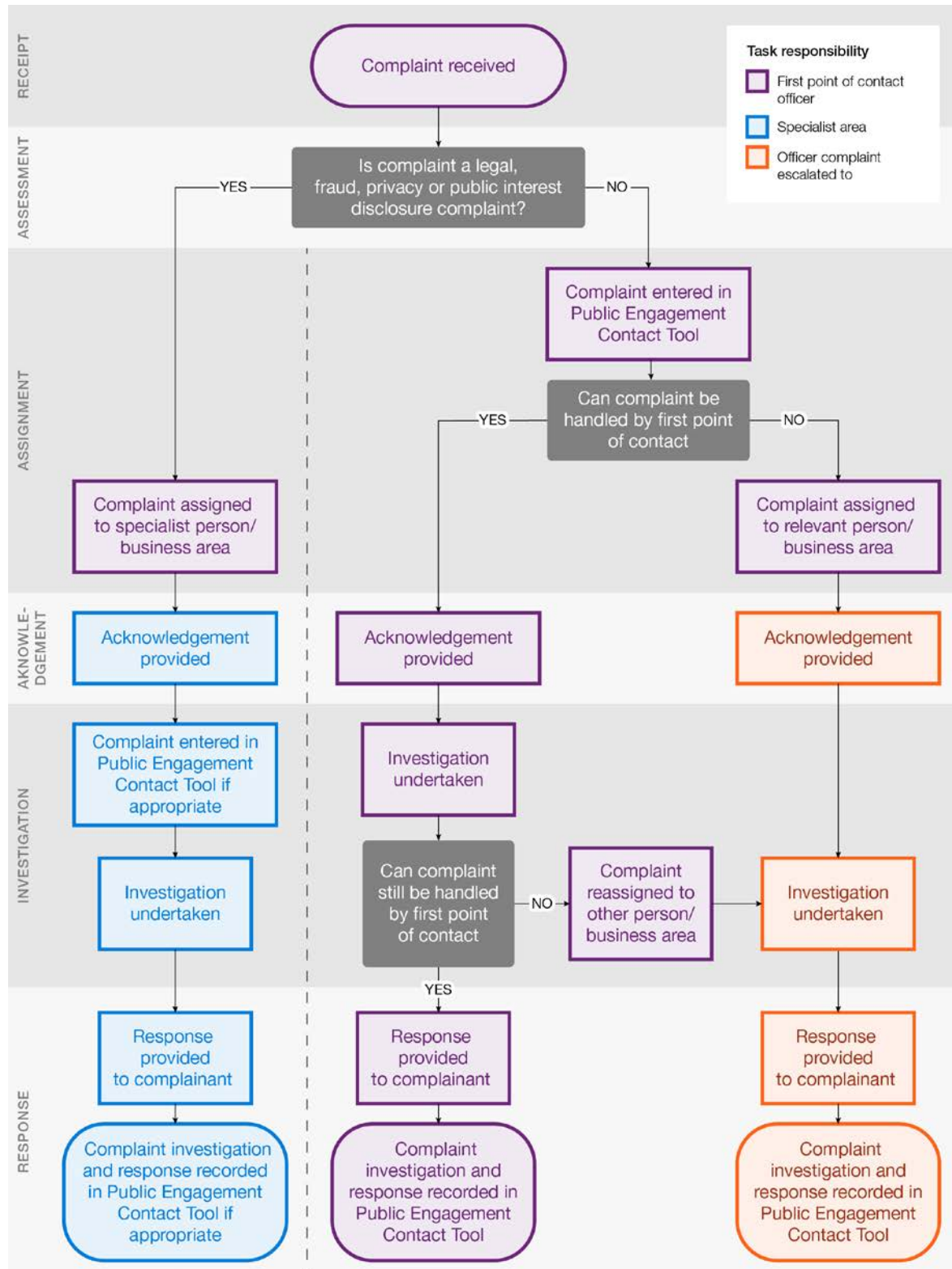
After the response has been provided to the complainant, details of the investigation undertaken and the response provided must be entered and/or attached to the complaint record in the Tool.

If there are any confidentiality or privacy issues with a complaint, identifying information should not be entered into or attached to the tool, but a file reference made to where it is kept.

Where a written response is not provided, it is important to record the response given over the phone or in person in the Tool. You should also include detail as to whether the complainant appeared satisfied with the response provided.

In addition to recording the details in the Tool, staff must understand their [recordkeeping obligations and responsibilities](#) and adhere to the recordkeeping policy and supporting procedures. It is expected that each state/territory and branch office will maintain consolidated files in relation to their complaint management.

An overview of the complaints management process



Internal review

Definition of an internal review

A complainant has the right to seek an internal review of our response to their complaint if they are dissatisfied with the process used to investigate their complaint or with our response. A complaint is only subject to one internal review.

When is dissatisfaction not cause for an internal review

Initial complainant dissatisfaction with a response we have provided to their complaint does not necessarily mean they are requesting an internal review. For example, it may be that we have not provided sufficient information to the complainant to explain why we have provided them with that specific response.

If providing further detail about the investigation that we undertook or clarification about the reasons for our response would satisfy the complainant, then it is not necessary to conduct an internal review process.

However, if further information or clarification does not satisfy the complainant, then it may be necessary to conduct an internal review process.

If, at any time, the complainant formally requests that we conduct an internal review, either orally or in writing, then an internal review **must** be conducted.

When not to use the internal review process

The internal review process does not relate to a complaint that:

- is of a legal nature
- regards fraud or suspected fraud
- regards a breach of privacy, or
- regards a Public Interest Disclosure matter.

To assist you to determine whether a request for an internal review you have received is one of these types of complaints please refer to the following information:

Determining the type of complaint

- Is this a [legal complaint](#)?
- Is this a complaint regarding [electoral fraud](#)?
- Is this a complaint regarding a breach of [privacy](#)?
- Is this a complaint regarding [Public Interest Disclosure](#)?

Requests for internal reviews of this nature should be immediately escalated to the specialist area of the AEC to manage in line with the framework and according to relevant Commonwealth law and policies.

Specialist area	Escalate to
Legal	[REDACTED] [REDACTED]
Fraud	[REDACTED] [REDACTED]
Privacy	[REDACTED] [REDACTED]
Public Interest Disclosure	[REDACTED] [REDACTED]

If you are unsure whether the request for an internal review relates to a legal, fraud, privacy or public interest disclosure matter, **you should consult immediately with your manager.** Alternatively, you can contact the relevant business area above, by phone, and discuss with them the complaint that you have received

If following this you are still unable to ascertain the type of complaint you should follow the escalation process in the internal review management process.

Once the request has been escalated to the specialist area, you are no longer responsible for the matter. The specialist area will be responsible, as applicable, for entering the complaint into the Tool.

The Internal Review Process

The internal review process is for the internal review of general complaints. The process is outlined in the *Internal Review Management Procedures*, in line with the *Complaints Management Policy*.

Receiving an internal review request

The Policy outlines that a request for an internal review of a complaint should be made, in writing wherever possible, to the AEC staff member who responded to the complaint, or as otherwise advised in the response provided.

When taking receipt of a request for an internal review, the following information is to be considered, and communicated to a complainant wherever appropriate:

Extra support available to assist lodgement

You should make any complainant who may require particular assistance aware that there is extra assistance available to support them. This is part of the AEC's commitment to having an accessible complaint management process.

Extra assistance is available for:

- People who are deaf or have a hearing or speech impairment who can contact the AEC through the [National Relay Service](#)
- People who would prefer to contact the AEC in a language other than English who can contact the AEC through the [telephone interpreter service](#).

The AEC may also be able to provide other assistance to a complainant to assist them in the complaints process, on request. You should work with the complainant to ensure that they are adequately, and reasonably, supported during the complaints management process.

Requests for an internal review lodged anonymously or using a pseudonym

The Policy outlines a complainant's right to lodge a request for an internal review anonymously or using a pseudonym. A request for an internal review lodged anonymously is still to be escalated.

Request for an internal review lodged with no contact details

The Policy requests complainants to provide contact details. If a complainant does not provide any/sufficient contact details, the request for an internal review is still to be escalated.

Request for an internal review lodged indicating 'no further contact'

The Policy outlines the option for complainants to specify whether they wish to be contacted regarding their request for an internal review. If a complainant indicates they do not wish to be contacted, the request for an internal review is still to be escalated.

Escalating a request for an internal review

If you receive a request for an internal review, you must escalate it to the **Assistant Commissioner, Education and Communications** via the Tool.

This escalation should occur **immediately, but as soon as possible on the same working day**, of receiving a request for an internal review.

When escalating the request, you should include as much detail as possible in the Tool, including specifically stating that the complainant has requested an internal review, and the time and date that they requested it.

Any supporting documentation to accompany the request, such as an email exchange between the complainant and the AEC, or a letter from the complainant, must be scanned and attached to the entry in the Tool.

If you believe that the complainant has not provided sufficient information for the AEC to undertake an internal review, you must still escalate the request. You should not seek further information yourself. When the request is assigned to staff to undertake the review, if there is not sufficient information then they will seek it themselves.

If you assess the request as high in terms of risk, complexity, urgency or seriousness, once you have escalated it via the Tool you should contact the Assistant Commissioner, Education and Communications to draw their attention to it.

If there are any confidentiality or privacy issues with a complaint, identifying information should not be entered into or attached to the Tool, but should be provided separately to the Assistant Commissioner, Education and Communications.

Whilst you may be called upon to assist during the internal review process, once a request for an internal review has been escalated to the Assistant Commissioner, Education and Communications, you are no longer responsible for the review.

External Review

Whilst we recommend that complainants use the AEC internal review process in the first instance, all complainants have the right to seek an external review if they are dissatisfied with the process used to investigate their complaint or with our response, or if they remain dissatisfied following the conduct of a review.

The conduct of any external review will be undertaken according to the policy and procedures of the relevant organisation or body. The Policy outlines some options for external review, and the AEC's responsibility to cooperate with legal requirements of any external review.

General advice, such as the options available for external review, may be provided to complainants seeking an external review, however, you are not to enter into any discussion about whether any external body will accept a request for a review or what the possible response could be from any external review process.

Reporting arrangements

Properly managing complaints is not just about dealing with and resolving individual complaints but it is also important in helping to deliver AEC services and to evaluate and make continuous improvement in the delivery.

Monitoring performance

The Policy outlines the AEC's commitment to monitoring our performance in managing complaints against the set service standards. This will be achieved by:

Regular review of complaints management data

The complaints information in the Tool is subject to ongoing review by all business areas with regard to the content of complaints but also AEC staff performance in meeting the set service standards. The Public Engagement Team in NO Education and Communications Branch will provide oversight for this through the reporting arrangements outlined below, but all managers are independently required to establish regular mechanism to monitor performance in their business area.

Sampling of complainants

The AEC will also at least once in each calendar year contact a sample of complainants to seek their external feedback on how we managed their complaint. Complainants who make a complaint via the complaints form on our website are advised that the AEC may contact them for feedback about how we managed their complaint. At this time, complainants who make a complaint via post, phone, social media or in person will not form part of this feedback.

Non-election complaints reporting arrangements

The reporting listed below is coordinated by the Public Engagement Team but requires the assistance of all staff through the consistent and accurate recording of complaints data in the Tool, and the assistance of other NO areas that manage specialist types of complaints.

These arrangements will be reviewed in its first year of operation, and any changes will be updated in the Procedures.

Quantitative monthly reports

A monthly report on the number of complaints recorded in the Tool will be provided to Assistant Commissioner Education and Communications.

This report will provide for each month:

- the overall number of complaints recorded in the Tool
- breakdown by complaint categories, channels for receipt, state/territory

- comparison of overall number to previous months
- detection of any key recurring issues.

Following the identification of a key issue, the Assistant Commissioner Education and Communications will provide the report to the relevant state/territory managers or NO branch manager with responsibility for the business area the issue relates to.

Consolidated quarterly reports

A quarterly report on complaints management over the previous quarter will be provided to the Operational Compliance Group. This report will provide for that quarter:

- the overall number of complaints recorded in the Tool, consolidated with complaints recorded in the Legal register
- breakdown by complaint categories, channels for receipt, state/territory
- comparison of overall number to previous quarter
- feedback from the sampling of complainants feedback (if undertaken in the quarter)
- detection of any key recurring issues.

Annual reporting

A consolidated financial year report will be provided to meet the legislative requirement to report on complaint management within each financial year within the agency's annual report.

Electoral event complaints reporting arrangements

During an electoral event, the reporting of public complaints will be integrated into the Election dashboard and closely monitored by the Public Engagement Team. The number and nature of complaints will also be integrated into the post-event evaluations and incorporated in Public Engagement Team Quarterly reporting.

Business improvements

Identification of business improvements

The provision of the complaints reporting provides an accurate and regular mechanism for the analysis of complaints data. This will assist the AEC to detect any systemic issues, to actively inform service delivery and identify potential business improvements. The responsibility for the analysis and implementation of improvements lies with the relevant business area.

Internal communications

Key examples of the input of complaints data into identifying business improvements will be highlighted to AEC staff through intranet news features.

Attachment A

Template acknowledgement and response documents

1. Complaint acknowledgement

To be used when a complaint has not been resolved at first point of contact and the resolution of the complaint will take longer than three days

- 1a. Acknowledgment by letter
- 1b. Acknowledgment by email
- 1c. Key messages for acknowledgment by phone/person

2. Advice of delay in provision of response

To be used when a complaint acknowledgement has been provided but the resolution will take longer than initially advised.

- 2a. Advice by letter
- 2b. Advice by email
- 2c. Key messages for advice by phone/in person

3. Advice of seeking further information to investigate a complaint

To be used when a complaint is made but the issue or facts of the complaint are not able to be determined.

- 3a. Advice by letter
- 3b. Advice by email
- 3c. Key messages for advice by phone/in person

4. Advice of no investigation and further contact

To be used when a complaint has been made but the issue or facts of the complaint are not able to be determined **and** no further clarification information is provided following contact with the complainant.

- 4a. Advice by letter
- 4b. Advice by email
- 4c. Key messages for advice by phone/in person

5. Response to complaint

To be used in responding to all complaints. This does not have to be used for complaints resolved at first point of contact.

- 5a. Response by letter
- 5b. Response by email
- 5c. Script for response by phone

1. Complaint acknowledgement templates

1a. Acknowledgement by letter

Dear [Name]

Reference number: [Insert]

Thank you for bringing your concerns to the attention of the Australian Electoral Commission in your complaint dated [date].

I am examining the **issue/s** you have raised and will provide you with a response within **10** working days. *[NB - this is the service standard, but adjust down accordingly]*

Please find enclosed a copy of the AEC's *Complaints Management Policy*. This policy explains how I will manage your complaint as well as your rights and responsibilities as a complainant.

In the meantime, if you have any questions, please do not hesitate to contact me.

Yours sincerely

[Name]

[Title]

[Address]

[Email]

[Phone]

1b. Acknowledgement by email

Dear [Name]

Reference number: [Insert]

Thank you for bringing your concerns to the attention of the Australian Electoral Commission in your complaint emailed on [date].

I am examining the **issue/s** you have raised and will provide you with a response within **10** working days. *[NB - this is the service standard, but adjust down accordingly]*

Please find a link to the AEC's *Complaints Management Policy* on our website. This policy explains how I will manage your complaint as well as your rights and responsibilities as a complainant.

In the meantime, if you have any questions, please do not hesitate to contact me.

Yours sincerely

[signature block]

1c. Acknowledgement by phone/person

These are key messages to cover:

- Thank you for bringing your concerns to attention of the Australian Electoral Commission.
- I have logged your complaint into our system and assigned it with a unique reference number which you are welcome to record, for your reference – [number].
- I will exam the issue/s you have raised and will provide you with a response within 10 working days *[NB - this is the service standard, but adjust down accordingly]*
- We have a formal Complaints Management Policy, which explains how I will manage your complaint as well as your rights and responsibilities as a complainant. The policy is available to view on our website or alternatively I can post or email you a copy.
- In the meantime, if you have any questions, please do not hesitate to contact me on [email], [phone].

2. Advice of delay in provision of response

2a. Advice by letter

Dear [Name]

Reference number: [Insert]

I am writing to update you on the progress of your complaint of [date] which I previously wrote to you on [date].

My investigation into the concerns you raised is taking longer than I initially advised and I will now provide you with a response by [insert new anticipated response date].

I apologise for the delay. If you have any questions, please do not hesitate to contact me.

Yours sincerely

[Name]

[Title]

[Address]

[Email]

[Phone]

2b. Advice by email

Dear [Name]

Reference number: [Insert]

I am emailing to update you on the progress of your complaint of [date] which I previously emailed you on [date].

My investigation into the concerns you raised is taking longer than initially advised and I will now provide you with a response by [insert new anticipated response date].

I apologise for the delay. If you have any questions, please do not hesitate to contact me.

Yours sincerely

[signature block]

2c. Advice by phone/in person

These are key messages to cover:

- I am calling with regards to the complaint that you made on [date].
- Unfortunately, my investigation into your concerns has taken longer than initially anticipated and I will not be able to provide you with a response by [insert previous date] as previously advised.
- I now will provide you with a response by [insert new anticipated response time].
- As I mentioned previously, we have a formal Complaints Management Policy, which explains how I will manage your complaint as well as your rights and responsibilities as a complainant. The policy is available from our website or alternatively, I can post or email you a copy if you wish.
- In the meantime, if you have any questions, please do not hesitate to contact me on [email], [phone].

3. Seeking further information to investigate a complaint

3a. Advice by letter

Dear [Name]

Reference number: [Insert]

I am writing in response to your complaint of [date].

Unfortunately I am unable to ascertain the nature of your complaint from the information that you provided.

In order for me to investigate your complaint further, I would appreciate if you could provide some additional information about the issues that you would like the Australian Electoral Commission (AEC) to investigate and the resolution that you are seeking from the AEC. (Consider if you can adjust this to specify what information you require)

If you have any questions please do not hesitate to contact me.

Yours sincerely

[Name]

[Title]

[Address]

[Email]

[Phone]

3b. Advice by email

Dear [Name]

Reference number: [Insert]

I am emailing in response to your complaint of [date].

Unfortunately I am unable to ascertain the nature of your complaint from the information that you provided.

In order for me to investigate your complaint further, I would appreciate if you could provide some additional information about the issues that you would like the Australian Electoral Commission (AEC) to investigate and the resolution that you are seeking from the AEC. (Consider if you can adjust this to specify what information you require)

If you have any questions please do not hesitate to contact me.

Yours sincerely

[signature block]

3c. Advice by phone/in person

These are key messages to cover:

- I am calling in response to your email/letter/phone call/complaint of [date].
- Unfortunately, I am unable to determine the nature of your complaint from the information provided.
- So I can investigate your complaint further, I would appreciate if you could explain to me a little bit more about the issues that you are seeking the AEC to look into.

[In the case that the complaint is complex in nature]:

- Thank you for providing that further explanation. Is there any chance that you would be able to provide that information in writing to me at [select the option most appropriate – email/letter/online form].

[In the case that the sufficient information has been provided]:

- Thank you for providing that information. I will now exam the issue/s you have raised and will provide you with a response within 10 working days[NB - this is the service standard, but adjust down accordingly]
- I have logged your complaint into our system and assigned it with a unique reference number which you are welcome to record, for your reference – [number].
- We have a formal Complaints Management Policy, which explains how I will manage your complaint as well as your rights and responsibilities as a complainant, which is available to view on our website. Alternatively, I can post or email you a copy.
- In the meantime, if you have any questions, please do not hesitate to contact me on [email], [phone].

[In the case sufficient information has NOT been provided]:

- Unfortunately I am still not clear about the issue that wish to raise with the AEC and so I am unable to look into this any further.
- May I suggest that if you do get additional information that you call me again or provide it in writing via the complaints form on the AEC website.

4. Advice of no investigation and further contact

4a. Advice by letter

Dear [Name]

Reference number: [Insert]

I am writing in response to your complaint of [date], which I previously wrote to you on [date] seeking further information which was required to investigate the complaint.

Thank you for responding to me on [date] but unfortunately I am still not able to ascertain the [issue/s] you are raising with the Australian Electoral Commission, and as such am not able to take any further action on this matter.

Please find enclosed a copy of the AEC's *Complaints Management Policy*. The policy details the information to provide when making a complaint and the process the AEC undertakes to investigate a complaint.

Yours sincerely

[Name]

[Title]

[Address]

[Email]

[Phone]

4b. Advice by email

Dear [Name]

Reference number: [Insert]

I am emailing in response to your complaint of [date], which I previously emailed you on [date] seeking further information which was required to investigate the complaint.

Thank you for responding to me on [date] but unfortunately I am still not able to ascertain the [issue/s] you are raising with the Australian Electoral Commission, and as such am not able to take any further action on this matter.

Please find a link to the AEC's *Complaints Management Policy* on our website. The policy details the information to provide when making a complaint and the process the AEC undertakes to investigate a complaint.

[signature block]

4c. Phone/person

Refer to 3c. message under: *[In the case sufficient information has NOT been provided]:*

5. Complaint response templates

5a. Response by letter

Dear [Name]

Reference number: [Insert]

I am writing in response to your complaint of [date] concerning [insert your understanding of the issues of concern, using a bulleted or numbered list if there is more than one point].

I have investigated the points that you raised and [insert]:

- a clear statement of the AEC's decision,
- an explanation of the investigation undertaken including reference to any relevant law or policy,
- an explanation of any corresponding action that we may be taking, and
- an apology, if there has been any AEC mistake or misunderstanding].

Please find enclosed a copy of the AEC's *Complaints Management Policy*. This policy explains the process I undertook in investigating your complaint and explains some of the review processes available to you.

If you have any questions about my response, or if I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely

[Name]

[Title]

[Address]

[Email]

[Phone]

5b. Response by email

Dear [Name]

Reference number: [Insert]

I am emailing in response to your complaint of [date] concerning [insert your understanding of the issues of concern, using a bulleted or numbered list if there is more than one point].

I have investigated the points that you raised and [insert response including:

- a clear statement of the AEC's decision,

- an explanation of the investigation undertaken including reference to any relevant law or policy,
- an explanation of any corresponding action that we may be taking,
- and an apology, if there has been any AEC mistake or misunderstanding].

Please find attached a copy of the AEC's *Complaints Management Policy*. This policy explains the process I undertook in investigating your complaint and explains some of the review processes available to you.

If you have any questions about my response, or if I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely

[signature block]

5c. Response by phone

These are key messages to cover:

- I am calling with regards to the complaint that you made regarding [state your understanding of the issues of concern].
- I have investigated the points that you raised and as a result the AEC will [insert what is the AEC's decision and an explanation of any action that we may be taking]
- As I mentioned previously, we have a Complaints Management Policy, which explains the process I undertook in investigating your complaint.

[In the case of any AEC mistake or misunderstanding].

- I also apologise for the inconvenience that this has caused you.

[In the case that the complainants is not satisfied with the response]

- I would like to further explain to you why this is the decision that the AEC has taken.

[In the case that the complainants remains not satisfied with the response]

- If you feel that I have not resolved the issues that you raised, the policy also outlines review options that may be available to you.
- The Policy is available from our website or alternatively, I can post or email you a copy if you wish.

Attachment B

National Office general referral points for escalating complaints

Branch/business area	email
Media	[REDACTED]
Roll Management	[REDACTED]
Payroll (PayGlobal)	[REDACTED]
Payroll - elections	[REDACTED]
Legal	[REDACTED]
Elections	[REDACTED]
ITSupport	[REDACTED]
Ministerial & parliamentary	[REDACTED]
Security Advisor	[REDACTED]
Funding & disclosure (FAD)	[REDACTED]
WSS (property maintenance)	[REDACTED]
Human Resources	[REDACTED]
Health, safety & wellbeing	[REDACTED]
Recruitment - AEC staff	[REDACTED]
Recruitment - CEA polling staff	[REDACTED]
Financial Management	[REDACTED]
International	[REDACTED]