

Complaint Management Policy

Owner: Operations

CS/OPS/0005

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Version: 2.00

1 Purpose

A person who is dissatisfied with, and is directly affected by, a service, action or decision made by the Queensland Academy of Sport (QAS), its staff or persons it has engaged to provide services may lodge a complaint in accordance with the [Public Sector Act 2022](#) (PS Act) and relevant QAS policies and procedures.

The purpose of this policy is to describe how QAS supports the effective notification, assessment and management of these complaints, underpinned by the complaint management principles outlined in the Australian Standards *ISA 10002:2018 Guidelines for complaints handling in organisations* and in compliance with the Queensland Public Service Customer Complaint Management [guideline](#) and [framework](#).

This policy does not replace, modify or revoke any legislative requirements that apply to the management of particular types of complaints (e.g., corrupt conduct under the [Crime and Corruption Act 2001](#), public interest disclosures under the [Public Interest Disclosure Act 2010](#), or complaints under the [Human Rights Act 2019](#)).

For the purposes of this policy, the term "complaints" is inclusive of grievances and disclosures. This ensures a comprehensive approach to addressing all concerns raised, regardless of their nature or classification, in alignment with our commitment to transparency, fairness, and accountability.

This policy is supported by the following documents:

- Complaint Management Framework
- Complaint Register
- [Complaint Management Procedures](#)

2 Statement

QAS recognise that complaints are opportunities to identify policies, procedures and practices that may require improvement and is committed to a positive complaint management environment.

QAS encourages feedback, which may be anonymous, and applies a complaints management system that enables effective management of feedback and complaints in a fair, accountable, and responsive manner.

QAS are committed to upholding the rights of children and young people. In handling complaints that relate to children and young people, QAS supports the National Office for Child Safety [complaint handling practices](#).

To achieve our objectives, QAS is committed to these guiding principles in managing complaints:

- Recognise and respect everybody's right to provide feedback.



- Provide reasonable assistance to complainants, such as arranging interpreters or directing them to further support, with QAS covering associated costs.
- Manage complaints objectively and deal with them fairly, respectfully, consistently, and transparently in accordance with natural justice, procedural fairness and without actual or perceived conflicting interests.
- Assess the nature of complaints, including human rights considerations, identify how and whom they should be dealt with.
- Monitor and analyse complaints to improve our work practices and complaints management system.
- Empower workers to effectively manage complaints by ensuring they are aware of the QAS Complaint Management Procedures.
- Where appropriate offer remedies that are fair to all parties, minimising the possibility of ongoing disputes.
- Handle complaints in a way that is culturally appropriate and responsive to special needs of those involved.
- Deal with complaints confidentially to the extent possible and with personal information in accordance with the [Information Privacy Act 2009](#).
- Complainants are to conduct themselves in a reasonable manner.
- Maintain communication with the complainant and provide outcome advice.
- Complaints will be recorded and reported in accordance with legislative requirements.

2.1 Complaint categories and procedures

QAS is required to address certain categories of complaints in specific ways. Complaints will be assessed and addressed as per the below table.

Category	Examples	How to make a complaint	How to address a complaint
Sport integrity	• Safeguarding children and young people • Competition manipulation and sports wagering • Participant protection • Improper use of drugs and medicine	• Online report form on QAS website.	Sports Integrity Complaint Policy and Procedure
Customer	• a decision made (or failure to make a decision) by a QAS worker • an act of QAS, or a failure of QAS to act • a proposal or intention formulated by QAS • a recommendation made by QAS • the customer service provided by QAS worker	• Qld Gov online report form • Email QASComplaints@sport.qld.gov.au	Complaint Management Procedure

Category	Examples	How to make a complaint	How to address a complaint
Employee Grievances	- an administrative decision, which an employee is aggrieved by, is unfair or unreasonable - the conduct of a QAS worker is unfair or unreasonable - the conduct or behaviour of a QAS worker constitutes bullying in the workplace, sexual harassment, racial vilification, religious vilification, or vilification on the grounds of gender identity or sexuality - the conduct or behaviour of a QAS worker is a breach of the Code of Conduct - an act or decision is not compatible with human rights or a decision failed to give proper consideration to a relevant human right under the Human Rights Act 2019	Email QASHR@sport.qld.gov.au	Employee Grievance Policy and Employee Grievance Management Procedure Individual employee grievances (Directive 11/20) Appeals (Directive 04/23)
Information Privacy and Right to Information	- concerns that personal information has not been dealt with in accordance with the Information Privacy Act 2009 - concerns that an access request has not been dealt with in accordance with the Right to Information Act 2009	- Qld Gov online report form - Email QASComplaints@sport.qld.gov.au	Information Privacy and Right to Information Complaint Management Procedure
Human Rights	an act or decision is not compatible with human rights or a decision failed to give proper consideration to a relevant human right under the Human Rights Act 2019	- Qld Gov online report form - Email QASComplaints@sport.qld.gov.au	Human Rights Complaints Management Procedure
Public Interest	A PID typically relates to:	QASEthics@sport.qld.gov.au	Public Interest Disclosure

Category	Examples	How to make a complaint	How to address a complaint
Disclosure (PID)	- corrupt conduct (e.g., fraud, bribery, or misuse of public resources) - maladministration (e.g., actions that are unlawful, unreasonable, or unjust) - substantial misuse of public resources - danger to public health or safety - danger to the environment - reprisal against someone for making a PID.	- Qld Gov online report form - a supervisor/manager in QAS - Chief Executive Officer - The Queensland Ombudsman - Crime and Corruption Commission (CCC), for matters involving corruption.	Management Procedure
Corrupt Conduct Allegation	Corrupt conduct has a specific meaning in section 15 of the Crime and Corruption Act 2001.	QASEthics@sport.qld.gov.au - Qld Gov online report form - Crime and Corruption Commission Liaison Officer - Head of Human Resources - a supervisor/manager in QAS - Chief Executive Officer - Crime and Corruption Commission (CCC) - otherwise lawfully made (for example, if suspected corrupt conduct involves a criminal offence, it may be reported to the Queensland Police Service).	Corrupt Conduct Management Procedure
Chief Executive Officer	A complaint that involves, or may involve, corrupt conduct by the Chief Executive Officer, as required by section 48A of the Crime and Corruption Act 2001.	- Nominated person: - Executive Director Corporate Services, or - Head of Human Resources. - The Crime and Corruption Commission (CCC), via this form on the CCC's website.	Complaints about the Chief Executive Officer Policy

2.2 How to make a complaint

In general, complaints may be made verbally (in person or phone) or in writing (online complaints form, email or post) by the complainant (or another authorised person).

The methods for submitting complaints differ based on the nature of the issue. Refer to the table in section 2.1 for guidance on how to submit complaints relating to specific matters.

Anonymous complaints, and those provided by an authorised third party are afforded the same consideration as other complaints.

Assistance is available to a person who wishes to make a complaint via the following services:

- Interpreter services
- National Relay Service.

A complaint is to be made within 12 months of the time from which the grounds of the complaint arose. If the complaint is submitted outside the 12-month timeframe, exceptional circumstances will need to be submitted explaining why the complaint is submitted outside this timeframe.

Exceptional circumstances include situations which are out of the ordinary, unusual, special, or uncommon (for example, ill-health and/or personal issues impacting on the complainant's ability to address the concerns).

The assessment of a complaint will consider any exceptional circumstances alongside the seriousness and complexity of the complaint.

Complaints are not accepted through the QAS social media channels.

2.3 Complaint management model

Level 1

Initial complaint handling

- Receipt of complaint
- Assistance offered, if needed
- Assess the complaint
- Acknowledge complaint in writing within 3 business days and advise relevant timeframe for a response
- Investigate the complaint
- Respond to complaint within 30 business days including review rights (unless communicated there is a delay)

Level 2

Internal Review

- Requested within 20 business days of receiving the decision
- Conducted by an equivalent or more senior level officer (to the original decision maker) who was not involved in the original complaint process
- Outcome provided within 20 business days (unless communicated there is a delay)
- Complainants advised if there is an appropriate external review body relevant to their complaint

Level 3

External Review

- Conducted by an agency independent of QAS, for example:
 - Queensland Ombudsman (for public interest disclosures)
 - Office of the Information Commissioner (for complaints about breaches of privacy)
 - Queensland Human Rights Commission (for complaints about human rights matters)
 - Queensland Industrial Relations Commission (for employee grievance appeals)
 - Crime and Corruption Commission Queensland (for complaints about corrupt conduct)
- QAS will work with external oversight organisations to assist their investigations as required

2.4 Complaint response timeframes

Complaints will be resolved within the timeframes that apply to the following level of complexity:

Action	Timeframe
Acknowledgement of complaint	3 business days from the date the complaint was received
Response to complaint	30 business days (unless notified of a delay)
Response to human rights, privacy and right to information complaints	45 business days
Response to sport integrity	As soon as practicable
Request for internal review	20 business days / 28 days for public interest disclosures
Response to internal review	20 business days (unless notified of a delay)

2.5 Managing unreasonable complainant behaviour

QAS recognises that in managing complaints fairly, efficiently, and effectively, all parties to a complaint (for example, complainants, complaint handlers and any people who are the subject of the complaint) have certain rights and responsibilities.

QAS will ensure that our work health and safety responsibilities and duty of care obligations are met. This obligation extends to QAS workers who deal with complaints.

QAS will ensure appropriate strategies are in place for managing unreasonable complainant conduct fairly, ethically, and reasonably (for example, unreasonable persistence, demands, lack of cooperation, unreasonable arguments and behaviour).

2.6 Withdrawing a complaint

A complaint can be withdrawn at any time. Withdrawing a complaint must be done in writing to QAS.

Where a complaint has been withdrawn, QAS may choose to progress the matter through the complaints process.

3 Authority

[Queensland Public Service Customer Complaint Management Framework](#)

[Queensland Public Service Customer Complaint Management Guideline](#)

[Public Sector Act 2022](#)

[Public Sector Ethics Act 1994](#)

[Queensland Public Service Code of Conduct](#)

[PSC Individual Employee Grievances Directive](#)

[Information Privacy Act 2009](#)

[Right to Information Act 2009](#)

[Human Rights Act 2019](#)

[Public Interest Disclosure Act 2010](#)

4 Scope

This policy applies to:

- a written or verbal complaint made by a person (the complainant or other authorised person) who is directly affected by a QAS policy or service
- all persons who perform work for QAS including:
 - Employees
 - permanent, fixed-term and temporary
 - secondees from other agencies (including staffing approved under interchange or mobility arrangements)
 - work placement staff (such as trainees, work experience students, cadets)
 - PhD students (engaged via a university contract)
 - non-executive employees engaged via a fixed term contract
 - senior officers and senior executives including those engaged via a section 155 contract remunerated at SES level or above.
 - Contractors
 - sub-contractors
 - consultants
 - their employees (including labour hire staff) who are engaged via contract or agreement.
 - QAS Board

Note: For application of this policy and supporting documents, the term 'worker' is used collectively to describe persons who perform work for QAS.

This policy does not apply to complaints about:

- another agency or organisation
- where a matter has previously been investigated and all options are exhausted
- matters subject to legal proceedings, such as a tribunal, commission, a judicial court or referred for investigation to another agency such as the Queensland Police Service
- matters outside our direct responsibility
- a third-party agent or service provider where the matter is referred to the agent or service provider for direct investigation and/or response to the customer.

For clarity, the following are not considered complaints:

- questions, enquiries and requests for information or action
- feedback obtained during public consultation processes
- feedback received about matters outside the direct responsibility of the department
- feedback received about another agency or organisation

- complaints that are primarily contractual disputes or are in relation to matters subject to legal proceedings.

5 Delegations

Delegations in relation to this document are to be exercised in accordance with the QAS Human Resource Delegation Instrument and Financial and Contractual Delegation Instrument.

Note: Delegation Instruments are reviewed on a regular basis to ensure they remain current and relevant to operational needs. It is recommended that delegate authority levels are confirmed prior to exercising any powers.

6 Responsibilities

Chief Executive Officer:

- ensure QAS has appropriate policies, guidelines and tools that support the complaint principles of the PS Act and ensure compliance with the Queensland Public Service Customer Complaint Management [guideline](#) and [framework](#)
- maintain accountability for the delivery of the complaints management function.

Executive Director Corporate Services:

- conduct an annual review of compliance with the policy and associated procedures
- promote agency wide awareness of the policy and procedures
- act as the CCC Liaison Officer for QAS (supported by the Head of Human Resources) and on direction of the CEO, notify the CCC where there is reasonable suspicion that a complaint involves or may involve corrupt conduct
- act as the Nominated Person for QAS (supported by the Head of Human Resources) for complaints that involve or may involve corrupt conduct by the CEO of QAS.

Senior Leadership Team:

- oversee resolution of complaints by workers in their teams and ensure reporting of resolved complaints and/or referral of complaints to Operations
- respond to complaints referred by Operations and investigate complaints if appropriate
- conduct internal reviews of decisions on complaints as requested and in accordance with the Complaints Management Procedure.

Operations:

- maintain oversight of the complaints management process
- coordinate the management of all customer complaints from initial assessment to finalisation of the complaint
- undertake an initial assessment of customer complaints and consider whether the complaint may fall under a different [category](#) and refer to the appropriate business unit for management
- acknowledge receipt and provide advice about the complaint process and timeframes to the complainant
- refer all or part of the complaint to the appropriate business unit for resolution
- ensure all records are kept confidential and secure and complaints are appropriately recorded in the complaints register
- provide reports to Senior Leadership Team and Board, as required

- ensure compliance with annual reporting requirements¹
- provide information, training and support to workers on complaint management processes.

Sports Integrity:

- coordinate the management of all sport integrity complaints in compliance with the Sport Integrity Complaints Policy and Procedure from initial assessment to finalisation of the complaint.

Legal Counsel:

- coordinate the management of all complaints regarding information privacy, right to information and human rights in accordance with the respective policy and procedure from initial assessment to finalisation of the complaint
- acknowledge receipt and provide advice about the complaint process and timeframes to the complainant
- ensure all records are kept confidential and secure and complaints are appropriately recorded in the complaints register.

Human Resources:

- coordinate the management of all complaints regarding employee grievances, PID or allegation of corrupt conduct in accordance with the respective policy and procedure from initial assessment to finalisation of the complaint
- acknowledge receipt and provide advice about the complaint process and timeframes to the complainant
- ensure all records are kept confidential and secure and complaints are appropriately recorded in the complaints register.

Workers (receiving a complaint):

- possess a working knowledge of the Complaints Management Procedures to ensure complaints are managed appropriately
- receive complaints at the first point of contact in consultation with manager
- resolve complaints or refer unresolved complaint to relevant business unit to manage.

7 Reporting requirements

A complaints register is maintained by QAS. The register and associated documentation are kept confidential and secure.

Under s. 264 (3) of the PS Act, QAS must publish the number of complaints received for the financial year on its website.

Under s. 97 of the HR Act, QAS must include in its annual report details of any human rights complaints received by the entity.

Customer complaints are reported yearly in the QAS annual report, detailing the number of complaints received during the reporting period and those which required further action.

QAS will meet its reporting requirements as per section 63 of the [Financial Accountability Act 2009](#) and section 21.4 of the [Annual report requirements for Queensland Government agencies](#), due by 30 September each year.

¹ Refer to s. 264 of [Public Sector Act 2022](#)

8 Storage of information

All information will be managed in accordance with the:

- [Public Records Act 2023](#)
- [Queensland Government Recordkeeping and Information Management Framework](#)
- [Queensland Government Records Governance Policy](#)

In addition, personal information will be managed in accordance with the [Information Privacy Act 2009](#), in particular the Queensland Privacy Principles (QPPs) in that Act.

9 Human rights considerations

This document is compatible with human rights under the [Human Rights Act 2019](#) because it limits a human right only to the extent that is reasonable and demonstrably justifiable in accordance with section 13 of that Act.

This document was last reviewed in 10/09/2025 to ensure actions and decisions under the policy are made in a manner compatible with human rights. Please note, when implementing this policy, workers must still consider if any human rights are relevant to and likely to be impacted by a particular decision, and whether any limitation of human rights are reasonable and justified.

10 Definitions

Word/Term/Acronym	Meaning
Child / children / young person	A person / people under 18 years of age
Complaint	A complaint is an expression of dissatisfaction in relation to a policy or service, where a response or resolution is explicitly or implicitly expected or legally required. A complaint may relate to actions of <u>workers</u>, such as: • a decision, or a failure to make a decision • an act or failure to act • an act or decision that is not compatible with human rights • the formulation of a proposal or intention • the making of a recommendation • customer service provided • the handling of a complaint. For clarity, the following are <u>not considered complaints</u>: • Questions, enquiries and requests for information or action • Feedback obtained during public consultation processes • Feedback received about matters outside the direct responsibility of QAS • Feedback received about another agency or organisation

Word/Term/Acronym	Meaning
	Complaints that are primarily contractual disputes or are in relation to matters subject to legal proceedings.
Complainant	A complainant is a customer or their representative, or an organisational representative who makes a complaint to QAS. A representative must be authorised to make a complaint on behalf of the customer or organisation e.g. parent, relative or person with enduring power of attorney, or officer of an organisation.
Crime and Corruption Commission Liaison Officer	The Crime and Corruption Commission (CCC) Liaison Officer is a designated worker in the QAS who has responsibility to notify the CCC if they reasonably suspect that corrupt conduct may have occurred. Legal Counsel is the designated CCC Liaison Officer, supported by the Head of Human Resources.
External review	A review avenue available to a complainant if they are unhappy with an internal review decision. An external review will only occur after the complainant has progressed through the QAS complaint process.
Internal review	A review of a decision a complainant has received on a complaint. A merits-based review of whether, based on the information/facts available at the time, the decision made was the correct one (including whether the actions and decisions were lawful, reasonable, fair and not improperly discriminatory). It is not a reinvestigation of a complaint but an impartial review of a decision made about a complaint undertaken by an officer at least as senior as the original decision maker and independent of the original process.
Natural justice (also referred to as Procedural Fairness)	The common law duty to accord a person procedural fairness when making a decision that affects their rights, interests or legitimate expectations. The duty to accord procedural fairness consists of three key rules: - The fair hearing rule, when requires a decision-maker to accord a person who may be adversely affected by a decision an opportunity to present his or her case - the rule against bias, which requires a decision-maker not to have an interest in the matter to be decided and not to appear to bring a prejudiced mind to the matter - The no evidence rule, which requires a decision to be based upon logically probative evidence.

11 Date of effect and review

This policy and its supporting documents:

- come into effect from the date of delegate approval
- will be reviewed within two years of the approval date unless otherwise:
 - stipulated in statutory obligations
 - triggered by circumstances determined appropriate by QAS.

12 Delegate approval

DAVID LYONS Chairperson Queensland Academy of Sport Board
Date: 10 September 2025

13 Version history

Version	Date	Author	Amendment description	Action
1.00	6/08/2025	Corporate Services	New document	Approved by the Board
2.00	10/09/2025	Corporate Services	Revised Nominated Person and CCC Liaison Officer assignments	Approved by the Board