



Image credit Queensland Fire and Emergency Services

Final report

for a

Complaints Management System Review

Prepared for

Queensland Fire Department

3 September 2024

Our Ref: QFES046

?rominence
CONSULTING

Important notice

Inherent limitations

This review report has been prepared as a redraft to Adobe PDF of the originally provided Microsoft PowerPoint version of the final report. The services provided in connection with this review comprise an advisory engagement, which is not subject to assurance, or other standards issued by the Australian Auditing and Assurance Standards Board and, consequently, no opinions or conclusions intended to convey assurance have been expressed. No warranty of completeness, accuracy or reliability is given in relation to the statements and representations made by, and the information and documentation provided by, the Queensland Fire Department (QFD) or its stakeholders, management and personnel consulted as part of the process. Prominence has not undertaken an independent analysis of the underlying legislation associated with the operation of QFD and this report does not constitute legal advice. Prominence has indicated within this report the sources of the information provided. We have not sought to independently verify those sources unless otherwise noted within the report.

Prominence is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the completion of the review process and after the report has been issued in final form. Any redistribution of this report is to be a complete and unaltered version of the report. Responsibility for the security of any distribution of this report (electronic or otherwise) remains the responsibility of QFD and Prominence accepts no liability if the report is or has been altered in any way by any person. The findings in this report have been formed on the above basis.

Third party reliance

This report has been prepared at the request of QFD, in accordance with the terms of Prominence's contract dated 19 July 2024. Other than our responsibility to QFD, neither Prominence nor any employee or associated consultant of Prominence undertakes responsibility arising in any way from reliance placed by a third party on this report. Any reliance placed is that party's sole responsibility.

QFES / QFD

On 1st July 2024, the former Queensland Fire and Emergency Services (QFES) became the Queensland Fire Department (QFD). QFD encompasses Queensland Fire and Rescue (QFR), Rural Fire Service Queensland (RFSQ), corporate services and State Operations. The review this report relates to was procured through a QFES commissioned Request for Quote. Through the entirety of the review, the department was QFES and all documentation received and reviewed was QFES owned. The transition to QFD occurred at the completion of the review process and during report development. All references to QFES or QFD throughout the report relate to one and the same.

It has also been noted that over the last three years, following in independent review Queensland Fire and Emergency Services (QFES) in 2021, QFES has progressed through a significant period of reform leading to the establishment of the Queensland Fire Department (QFD) and incorporation of the State Emergency Services into the Queensland Police Service. Whilst assessing the direct impact this reform has had on QFES' Complaints Management System is outside of the Terms of Reference of the Complaints Management System Review, it has been acknowledged that this period of reform is likely to have placed additional strain on the organisation.

Contents

Important notice	2
INHERENT LIMITATIONS	2
THIRD PARTY RELIANCE	2
QFES / QFD	2
Executive summary	4
METHODOLOGY	4
SUMMARY OF RECOMMENDATIONS (GROUPED BY CORE ORGANISATIONAL ELEMENT AREAS)	5
Abbreviations	8
Terminology and definitions	8
Introduction	9
BACKGROUND	9
TERMS OF REFERENCE	10
REVIEW SCOPE AND PURPOSE	12
REVIEW TEAM	15
Current state assessment	16
KEY STATISTICS	17
LEADERSHIP, MANAGEMENT AND CULTURE	19
GOVERNANCE AND PERFORMANCE	22
POLICY AND PROCESS	24
PEOPLE	28
TRAINING AND EDUCATION	29
TECHNOLOGY, DATA AND REPORTING	31
Conclusion	33

Attachments

Attachment 1	List of documents reviewed	34
Attachment 2	Prominence survey questions	36
Attachment 3	Prominence survey results	38
Attachment 4	Reference list	40
Attachment 5	List of stakeholder interviews	41
Attachment 6	Assessment of progress on previous recommendations	42
Attachment 7	Recommendations related to previous PwC report	46

Executive summary

The Queensland Fire Department (QFD), as a public sector entity, is both an employer and a service provider to the community. As such, it must adhere to government regulations, address employee and volunteer complaints, and respond to public complaints. The QFD Complaints Management System (CMS) is the primary mechanism for handling complaints and ensuring alignment with broader government standards and procedures.

Previous external reviews of the CMS in 2019 and 2014 highlighted systemic issues within the organisation (Allison, 2014) (Pricewaterhouse Coopers, 2019), particularly concerning sexual harassment and workplace bullying. These reviews highlighted that some improvements had been made, but challenges persisted.

In November 2023, Queensland Fire and Emergency Services (QFES)¹ issued a Request for Offer for an independent review of the CMS. In December 2023, Prominence Consulting was engaged as the independent third-party supplier to undertake a review into the QFD (CMS). This review sought to assess the effectiveness of the QFD CMS in addressing complaints, identifying strengths, weaknesses and opportunities for improvement. The scope of the review included both internal (employee and volunteer) and external (customer and stakeholder) complaints and systems². This review aimed to validate the suitability of the CMS to determine its effectiveness in handling complaints involving QFD employees and volunteers. It assessed compliance with legislation, government policies and best practices, examining the system's impact on organisational culture, employee satisfaction and service delivery.

The review was undertaken in a series of four (4) stages with associated milestones as requested by QFD through the tender procurement process.

Methodology

The subsequent methodology applied utilised research methods including document analysis, stakeholder consultations, benchmarking and data analysis. The findings and associated recommendations were summarised and grouped according to six core organisational elements (Leadership, Management and Culture; Governance and Performance; Policy and Process; People; Training and Education; Technology, Data and Reporting).

Prominence undertook a desktop review of relevant policies provided by QFD, and reviewed a selection of eighteen (18) deidentified cases to assess the CMS's compliance with legislation and Government directives. An initial gap analysis was applied to determine whether the recommendations from the previous 2019 review had been implemented and if not yet implemented, if they should be at a future date. Of the twenty-five (25) recommendations from the 2019 review, fourteen (14) were identified as not requiring action as they were either implemented or rejected by QFD; and the remaining eleven (11) were determined as requiring further action and where appropriate have been incorporated into the recommendations of this review.

In establishing a more detailed understanding of the current state based on a broad range of internal and external perspectives, a series of one-on-one and group stakeholder meetings were held, the CMS was benchmarked against other organisations and meetings were held with unions and professional associations and other public sector agencies including the Queensland Public Sector Commission (PSC). A survey was also developed and provided to QFD to send to individuals who may not have had the opportunity to provide input through the interview process.

The review outcome demonstrated that although QFD generally abides by and aligns to Queensland Government legislation and policy requirements, QFD remains challenged by cultural and performance issues that impact on the incidence of workplace conduct issues, the tendency to make complaints (or not) and the appropriateness, effectiveness and efficiency with which QFD handles and resolves complaints. The following recommendations were provided. All serve to improve the QFD approach to complaints handling and providing support to complainants, subject officers and those involved throughout the complaints management process.

¹ On 1st July 2024, QFES became QFD encompassing Queensland Fire and Rescue (QFR), Rural Fire Service Queensland (RFSQ), corporate services and State operations.

² Stakeholder engagement interview list included as Attachment 5; Survey Questions and Results included in Attachments 2 and 3.

Summary of recommendations (grouped by core organisational element areas)

LEADERSHIP, MANAGEMENT AND CULTURE	
1	Implement organisational initiatives to restore trust in the CMS, including leaders and managers communicating regularly with the workforce on the outcomes of this Review and other proactive preventative measures being taken. This will cultivate a “speak up” culture.
2	Implement changes to Policy, Procedure and Process with a view to strengthening warnings about victimisation and reprisals in letters, correspondence, training programs and at meetings, etc.
3	Ensure dedicated and separate case managers (adopting a single point of contact model) are appointed for both complainants and subject officers. These case managers should provide regular updates on progress, timeframes and outcomes, etc.
4	Provide a deidentified (and brief and very high-level) update once a quarter on total complaints and disciplinary actions taken so that all believe that there is “perpetrator accountability” and that employees and volunteers understand that behaviours (good and bad) have consequences.
5	Create a “customer care” manager or concierge role for customer complaints, so customers have a single point of contact for any complaints.
6	Review and monitor customer complaints for trends/themes that might inform future prevention plans.
7	Develop greater awareness and management of mental health issues related to the complaint process and complaints themselves focussing on what is required for all stakeholders including fact finders.
8	Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system).
9	Relevant personnel and mid to executive management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct.
10	Ensure frontline managers receive training in Business skills including ‘Having Difficult Conversations’, conflict resolution and psychological safety awareness and management incorporating psychological first aid training.
GOVERNANCE AND PERFORMANCE	
11	Establish a refreshed governance framework for the complaint management system with an emphasis on high-level oversight and monitoring at the executive level or a steering committee with an emphasis on prevention and management. Such reporting to include the number of cases, new complaints, timeframes, non-compliance, significant or matters with high risk flagged ensuring Director, Relations and Standards, Chief Operating Officer, Strategy and Corporate Services, and the Chief Human Resources Officer are briefed on all red flag or sensitive cases unless COI exists.
12	Implement a monthly case management meeting between various key stakeholders in the CMS process (such as People and Culture Division, Safety, Injury Management, Legal) to provide updates on each case, timeframes and matters of risk. Meeting should be chaired by Director, Relations and Standards.
13	For consistency, timeliness and streamlining of processes, ensure that only one responsible Senior Executive with the appropriate delegation is appointed for oversight for complex and serious investigation outcomes.
14	No serious matters should be managed with a single point of failure in the event of an officer or delegate being on extended leave. It is noted, however that discipline cases are often voluminous and any replacement has to

	fully appraise themselves of the entire case. Therefore, responsible Executives (delegates) must ensure active oversight on these matters at all times.
15	Undertake a detailed impact analysis of the new QFD Legislation including the development of an implementation and resourcing plan which contains “how and who” is responsible for the provision of procedural fairness and natural justice and how QFD commitments to the volunteer community and stakeholder groups will be met.
16	Where a person engaging with the CMS in any capacity, identifies as Indigenous, liaise with the new First Nations Strategy and Partnership Branch within QFD on cultural capability and awareness matters and obligations to ensure compliance with the new <i>Public Sector Act 2022</i> and relevant Directives.
17	Develop training for all levels of management to employ and support culturally diverse peoples, starting with the ability to identify cultural differences and handle them appropriately.
POLICY AND PROCESS	
18	Develop overarching guiding principles for the CMS such that these principles are embedded throughout the entire system and publicly available. These principles should also reflect the requirements of the QFD Commissioner as per Section 32 of the <i>Public Sector Act 2022</i> to develop and promote a workplace culture of respect and inclusion. Possible principles may include: Safe and Supportive, Fair and Impartial, Inclusive, Transparent, Easy to Use, Preventative Based, Timely and Responsive
19	Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management of complaints.
20	Develop and implement a person centric, trauma and gender informed approach for sexual harassment complaints including ensuring multiple pathways (such as informal complaints) to make a complaint or report sexual harassment and conducting training for relevant personnel who are involved in coordinating, managing and deciding sexual harassment (or sexual harassment like) complaints.
21	Develop and implement a revised and refreshed process for the categorisation of complaints using the CAPE model, with greater input from the SAWS roles and operational roles (where applicable).
22	Update the QFD Management Action Guide so it reflects current terminology and practice and ensure QFD policies and procedures use consistent terminology to describe its workforce.
23	Have a “stop the clock” concept built into the QFD policy and procedures for both complaints and disciplinary matters so that circumstances that occur outside of QFD management control are recognised and factored into compliance within statutory timeframes.
24	Report all exit interview data and statements to the Relations and Standards Branch (where applicable) for analysis and consideration as to whether follow up action is required with a particular focus on the reporting of sexual harassment and/or discrimination matters.
PEOPLE	
25	Review the SAWS role description, including undertaking a job analysis with evaluation and review of the role classification level – ensuring it is pitched at the right level to attract and retain the right people with the right skills. That said, diverse backgrounds and skill sets for these roles should be welcomed and embraced. For example, having a combination of people from an Employee Relations, Human Resources, Police, investigative and Legal backgrounds – and the collective knowledge, skills and experience this brings, should be embraced.

26	Undertake a resourcing review of the Relations and Standards Branch based on workload and not just a Full Time Equivalent (FTE) allocation. Specific acknowledgement should be given to the management of a large number of growing issues and complexity due to a large volunteer base (approximately 27,000) across a geographically dispersed state. This review to include an analysis of existing investigator capacity and capability with a view to build and maintain a casual (internal employees at the AO7/AO8 level) investigation pool of resources to immediately ease the burden and workload of existing internal investigators.
TRAINING AND EDUCATION	
27	Establish two yearly (Biennial) refreshers for all QFD employee and volunteers on Understanding and Prevention of Sexual Harassment, Workplace Bullying and Discrimination and Code of Conduct training.
28	Implement an on-line cultural capability and awareness and anti-racism short course for all employees and volunteers on First Nations issues to provide foundational knowledge and genuine awareness with respect to Indigenous Cultures.
29	Frontline managers need to be trained in specific cultural awareness and capability in terms of managing workplace issues involving First Nations peoples.
30	Provide Fact Finders with training on standards of proof, evidence gathering, note-taking and key legal concepts relevant to the role.
TECHNOLOGY, DATA AND REPORTING	
31	Replace the Nexus software with a more fit-for-purpose system that supports end-to-end case management. This will include support for enhanced case management capability, including: <ul style="list-style-type: none"> ○ email integration ○ less manual data entry ○ tiered security access that allows all parties equitable access to information ○ a portal for capturing complaints that includes an option for users to self-identify with demographic information such as gender, or First Nations status or other target groups such as people with a disability ○ document version control ○ workflow for approval routing ○ an audit history of all decisions made, information received and changes to documents.
32	Develop a records management framework to ensure compliance with the <i>Public Records Act 2002</i> at a minimum, this policy will address retention, archiving and disposal of all complaints management records.
33	Revise the reporting dashboards to meet Steering Committee or Senior Executive requirements for timely, accurate complaints information. This should highlight trends as well as provide insights into discipline and stakeholder satisfaction.
34	Undertake a high-level root cause analysis of complaints each year to identify trends and themes over time and implement preventative strategies based on science, data and facts.

Abbreviations

CaPE	Conduct and Performance Excellence
CMS	Complaints Management System
ELT	Executive Leadership Team
PSBA	Public Safety Business Agency
PwC	PricewaterhouseCoopers Australia
QFD	Queensland Fire Department
QFES	Queensland Fire and Emergency Services
SAWS	Senior Advisors Workplace Standards
WLU	Workforce Liaison Unit

Terminology and definitions

Benchmarking	A comparison of the QFD's performance and practices against the performance and practices used in similar Queensland Government departments. For this review, the benchmark comparison against other similar sized Queensland Government departments was included in the stage 3 (stakeholder engagement) scope and allowed for up to three (3) interviews with similar organisations.
CaPE Categorisation	The process of assigning a severity category to a CaPE complaint.
Conflict of Interest	Includes any actual, reasonably anticipated or perceived conflict of interest.
Customer	A person or organisation that is affected by the service or action of QFD or its workforce.
Employee	Any employee of the QFD, including Auxiliary firefighters.
Fact Finder	An employee (usually at Inspector level or above) who is tasked with establishing the facts related to a complaint.
Frontline Manager	Any manager supervising non-management employees and volunteers.
Middle Manager	Any manager between frontline management and the ELT.
Senior Advisors Workplace Standards	A dedicated QFD officer, based in a particular region who works closely with Relations and Standards Branch, senior manager, employees and volunteers to implement workplace conduct strategies and services.
Stakeholder	Any individual, group, or organisation that has a vested interest in the policies, decisions, or actions of the QFD.
Subject Officer	Refers to employees and volunteers subject to a complaint, allegations or a disciplinary process.
Volunteer	An unpaid member of the Rural Fire Service of Queensland, Disaster Assistance Response Teams, Community Engagement Officer, or Volunteer Scientific Officer.
Workforce Liaison Unit	The QFD unit tasked with categorising, managing and reporting on complaints.

Introduction

QFD occupies a pivotal role within the Queensland public sector. As both an employer and a service provider, it navigates a complex terrain of responsibilities, balancing its obligations to the government, its workforce and the broader community. This intricate position necessitates robust and equitable complaints management. Therefore, central to QFD operations is its CMS a framework designed to address concerns raised about its actions or decisions. Aligned with the broader Queensland Government complaints management process, the QFD CMS is underpinned by Australian standards and guidelines. Crucially, it caters to a diverse range of complainants, including customers, employees, volunteers and members of the public.

Recognising the importance of continuous improvement, QFD has undertaken comprehensive reviews of its complaints system and processes. In 2019, an independent consultant identified areas for enhancement, leading to the development of 25 recommendations. Building on this foundation, in 2023, the QFD³ Executive Leadership Team commissioned another independent review.

This latest review seeks to evaluate the CMS against a rigorous set of criteria, including compliance with relevant legislation and Queensland Government policies; Alignment to best practices prevalent within the Queensland Public Sector; and to ensure that the system guarantees safe, fair and timely outcomes for complaints involving QFD employees, volunteers and members of the public.

QFD understands the need to establish a CMS that fosters confidence and trust from the workforce and is inclusive, prioritising the needs of underrepresented groups such as women, First Nations peoples, and employees or volunteers with a disability. As the changes driven by the transition into the QFD progress, the CMS must evolve to remain fit for purpose and capable of meeting the challenges of this new era.

To achieve these goals, the CMS must be adequately supported through robust systems, sufficient resources and specialised expertise. Effective governance, strategic planning and comprehensive training are also essential components.

Ultimately, the success of the QFD CMS hinges on its ability to balance the diverse needs of its stakeholders while upholding the highest standards of fairness, transparency and accountability. This requires a deep understanding of the issues at hand, coupled with a rigorous approach to complaint handling.

Background

QFD, as a public sector entity, is both an employer and a service provider to the community and has an ethical and legal obligation to be responsive to the government of the day, its workforce (including employees and volunteers) and the wider community.

Complaints made about an action or decision by QFD are managed through the QFD CMS which is aligned to and linked with the Queensland Government complaints management process. Section 264 of the *Public Sector Act 2022* requires that QFD must have CMS that provides for the ability to take responsibility for managing the receipt, processing and outcome of customer complaints; That complies with the Australian Standard – Guidelines for complaints management in organizations (AS/NZS 10002- 2018); and provides for giving notice of the outcome of customer complaints to the complainant, unless the complaint was made anonymously. The CMS must also align with all applicable Queensland Government principles, policies and procedures.

In 2019, an independent consultant undertook a complaints management review within QFD to continue cultural improvement efforts relating to policy implementation, workforce understanding, culture and leadership. This review led to the development of 25 recommendations for implementation across QFD.

In 2023, the QFD Executive Leadership Team made the decision to engage an independent third party to conduct a further review into the QFD CMS.

³ The RFQ was commissioned by QFES. QFD replaced QFES on 1st July 2024

For this review, complaints and feedback refers to:

- customer complaints
- offence reporting
- workforce complaints
- Individual employee grievances and internal review
- Public Interest Disclosure
- referred complaints
- feedback.

PREVIOUS REVIEW REPORTS

In 2014, a critical incident within the Queensland Fire and Emergency Services (QFES) necessitated a comprehensive investigation into the organisation's handling of sexual harassment and workplace bullying. The then Queensland Premier commissioned Margaret Allison to conduct an independent review of both QFES and the Public Safety Business Agency (PSBA) in response to a severe breach of workplace conduct.

The Allison Review, delivered in December 2014, scrutinized the timeliness and effectiveness of the agencies' response to the incident, the nature of any remedial actions undertaken and the support provided to affected employees. The review's findings were highly critical, identifying systemic issues within QFES that impeded appropriate responses to such matters. As a result of this, the Queensland Government endorsed all 30 recommendations of the Allison Review, signalling a commitment to cultural reform within the organisation.

To monitor progress in implementing the Allison Review recommendations and to assess their impact on operational capabilities, QFES engaged PricewaterhouseCoopers Australia (PwC), in April 2018, to conduct an Implementation Review, focusing specifically on the complaints management processes. This assessment aimed to identify areas for improvement in policies, procedures, organisational structure, employee capabilities and leadership to foster a more positive and equitable workplace culture. The review yielded 25 recommendations, underscoring the ongoing challenges faced by QFES in addressing sexual harassment and bullying. The Implementation Review also laid the groundwork for more extensive long-term cultural reform initiatives planned for 2020.

These successive reviews highlight a sustained effort by the Queensland government and QFES to rectify past failures and create a safer, more respectful work environment for all employees. However, the persistence of such issues within the organisation indicates the complex and multifaceted nature of the problem, requiring ongoing vigilance and commitment to achieving lasting cultural change.

Terms of Reference⁴

REVIEW OBJECTIVES

To undertake an independent review of the current QFD CMS to ensure it:

1. is fit for purpose and meets legislative and Queensland Government policy requirements
2. meets best practice across the Queensland Public Sector
3. can produce safe, procedurally fair, timely, practical outcomes for complaints involving the QFD Workforce
4. has the appropriate focus, understanding and rigour across the workforce to enhance confidence in the QFD complaints system
5. provides a safe and trusted approach that delivers equitably for all, with a focus on employees and volunteers from underrepresented groups such as women, First Nations peoples, or employees and volunteers with a disability
6. is appropriately supported through systems, resourcing, expertise, governance, strategic planning and training
7. is appropriate for transition into the QFD.

⁴ Extract from "QFES Priority Initiative - Complaints Management System Review"

DELIVERABLES

1. Stage 1 – Review of the 2019 Complaints Management Review and Assessment and determine whether the recommendations have been:
 - a. Delivered and assess whether effective
 - b. Not delivered and determine relevance and need to be delivered
 - c. Recommend closure of recommendations no longer relevant for delivery.

Milestone 1 – Current state report on the status of the 2019 Complaints Management Review and Assessment, including advice on which recommendations remain relevant to be delivered.

2. Stage 2 – conduct a high-level desktop review of critical data, policies and procedures and complete interviews/consultation with key stakeholders to understand QFES' current state of complaints management and to determine gaps against good practice. Reviewing:
 - a. legislative and policy requirements
 - b. Government CMS framework
 - c. Complaints management documents including policies, procedures, guidelines
 - d. training provided
 - e. Working/Volunteering for Queensland data
 - f. CMS data from Nexus.

Milestone 2 – Current state report on complaints management in QFES and how it aligns with legislative and Queensland Government policy requirements.

3. Stage 3 – External and internal stakeholder consultation to:
 - a. test assumptions about QFES processes and gain insights into their implementation from key stakeholders
 - b. test understanding and awareness of current QFES complaints management policy, procedures and avenues to report
 - c. understand employee perceptions and experiences of the complaints management process and systems
 - d. understand the broader cultural environment surrounding complaints management including the perception and understanding of QFES efforts in line with the Continuous Improvement Directive
 - e. benchmark QFES against other similar-sized Queensland Government departments.

Interviewing/consulting:

- Executive Managers, Relations and Standards Branch (RSB)
- Complaints Assessment Team Members
- Senior Advisors, Workplace Standards
- Executive Manager, Health and Wellbeing
- Regional Leadership teams
- Public Service Commission
- Registered industrial Bodies
- Other similar sized Queensland Government Departments.

4. Stage 4 – Development of recommendations report and implementation plan.
 - a. Presentation of findings and recommendations to Director and Executive Managers.

Milestone 3 – Detailed report providing recommendations on QFES complaints management system to ensure it meets its legislative and policy requirements as well as the needs of employees, volunteers and the community.

Milestone 4 – Implementation Plan including resourcing, ICT investment, engagement strategies and cost to enable QFES to implement the recommendations made in Milestone 3.

VARIATION FOR COMPLAINTS MANAGEMENT SYSTEM REVIEW⁵

In July 2024, QFD requested that Prominence develop a report addendum. The document was to be in report format, Prominence branded, and include, and be limited to, the following sections:

- Executive summary
- Background and methodology
- Observations, findings, and recommendations
- Leadership, management and culture
- Governance and performance
- Policy and process
- People
- Training and education
- Technology, reporting and data.

Content for the report would be utilised from the final report prepared for Milestone 3. The background section included the Terms of Reference for this review and an organisational snapshot including roles and responsibilities. The methodology will outline the activities undertaken including documents reviewed and stakeholder engagement activities. A summary of the findings for the review of the previous 2019 PWC recommendations were to be included in this section.

The recommendations section included for each recommendation core element area, the findings, gaps and recommendations.

Review scope and purpose

The review aimed to validate the suitability of the CMS for its intended purpose, ensuring alignment with relevant legislation and Queensland Government policies. It sought to establish whether the CMS adheres to best practices within the Queensland Public Sector and can effectively deliver safe, fair, timely and practical resolutions for complaints involving QFD employees and volunteers. Furthermore, the review assessed the CMS's capacity to foster a workforce equipped with the necessary knowledge and commitment to build trust and confidence in the complaints system. A key focus was on ensuring the CMS provides a secure and equitable process for all individuals, with particular attention to the needs of underrepresented groups. Additionally, the project evaluated the system's support infrastructure, including resources, expertise, governance, planning and training, to determine its readiness for the transition to the new QFD.

APPROACH AND METHODOLOGY

Using a proven and effective methodology for undertaking similar reviews, which involved developing a clear understanding and documentation of the current state situation and the desired future state. This was achieved by reviewing existing information, undertaking well-structured stakeholder engagement (including individual and small group interviews), targeted use of surveys and workshops, conducting meaningful benchmarking, and academic literature where desired by QFD.

Stage 1 encompassed a detailed desktop review assessment of evidence submitted by QFD to understand the implementation progress and status of recommendations from the 2019 review. To support this process, targeted consultation was conducted with a sample of QFD executive and employees, along with related stakeholders. Milestone 1 was the delivery of a current state review on the status of the 2019 Complaints Management Review and Assessment, including advice on which recommendations remain relevant to be delivered.

⁵ QFES046 Variation for Complaints Management System Review

Stage 2 involved an additional high-level desktop review of critical data, policies and procedures to establish the current state alignment of the CMS with legislative and Queensland Government policy requirements. This stage included initial consultation with key stakeholders to help guide the current state assessment of the CMS against good practice.

Stage 3 was wholly focused on stakeholder engagement leveraging both one-on-one interviews, focus group style interviews, union engagement and an employee survey. QFD organised a broad range of interviews incorporating representation from QFD's diverse employees and volunteer teams.⁶ Similarly, to obtain a broad perspective across the organisation, a survey of 13 multiple choice questions was collaboratively developed with QFD and the survey provided for QFD to distribute across the organisation. It was distributed to thirty-six (36) employees.

Stage 4 consolidated all findings to produce a gap analysis with recommendations for improvements where gaps were noticed. This review was produced following consultation with key stakeholders to help guide the outcomes.

The overall approach treated each stage as discreet consecutive projects such that each stage could learn from and incorporate data and information from the previous stage, while focusing on meeting the objectives for each stage. However, to meet stakeholder availability and at the specific request of QFD, the stage 3 engagement activities were undertaken concurrently with Stage 2 activities.

The initial understanding formed through the earlier stages' information review was deepened by qualitative formal consultation. QFD nominated a broadly selected stakeholder engagement list to be interviewed which consisted of:

- 13 Focus Groups (approximately 80 employees in total) with key stakeholders involved in the complaints system from across the State
- 10 individual (one-on-one) interviews with QFD Leaders and Executive Management
- seven (7) Consultation and engagement meetings with key QFD stakeholders and partners, including unions and professional associations, including their regional representatives
- four (4) Engagement and Information gathering meetings with central agencies and similar emergency management agencies such as the Queensland Police Service and Queensland Ambulance Service regarding management of employees and volunteer complaints
- one (1) Engagement and Information gathering meeting with the Department of Transport and Main Roads about the management of customer complaints
- one (1) individual (one-on-one) interview with the Special Commissioner, Equity and Diversity, Public Sector Commission
- one (1) individual (one-on-one) interview with the QFD Director, First Nations Strategy and Partnerships Branch.

Quantitative data analysis was carried out in cases where sufficient data was available. This included:

- a desktop review of the progress on recommendations from the previous PwC Implementation Review
- review and measurement of the available metrics relating to the CMS including the number of complaints by year and timeframes for resolution including comparing and contrasting to other Public Sector Agencies
- a desktop review of a cross-section of 18 de-identified case files over a three-year period to assess process compliance
- a targeted survey of up to 36 employees with consideration and analysis of the themes and metrics from 17 responses
- a detailed document Review of QFD policies, procedures, management guides and training programs to assess compliance
- an analysis of similar reviews and relevant academic works and articles.

⁶ Stakeholder engagement interview list included in Attachment 5

REVIEW LIMITATIONS

It should be noted that there are certain limitations inherent in a review of this nature. Due to system limitations and the absence of comprehensive historical data within the Nexus system, a holistic analysis of case data and long-term trends was not feasible. The scope of this review did not encompass individual allegations, which have been referred back to the appropriate QFD channels for further consideration. Finally, it is important to note that the term “First Nations” is used throughout this report to refer to Aboriginal and Torres Strait Islander peoples of Australia. No disrespect is intended towards those who may have a different preference for terminology.

Lastly, the approach was limited by the reliance on QFD’s responsibility for stakeholder selection and survey distribution. The review was conducted based on the assumption that an adequate cross-section of QFD employees was selected (either for individual interviews⁷ or for survey participation⁸) to provide sufficient diversity and an accurate representation for the whole of QFD.

⁷ Total of 33 interviews conducted as listed in Attachment 5

⁸ Survey distributed to 36 employees

Review team

The following team were involved in completing the review and included a mixture of consultants with extensive experience of working across both the public and private sectors:

Engagement Lead: comes with over eighteen years' experience as a senior Human Resources (HR) and Employee Relations (ER) manager and has also led a significant number of similar reviews and workplace investigations across the Queensland Government. With qualifications including, but not limited to: Master of Business (Human Resource Management), Graduate Diploma in Industrial Relations and Bachelor of Business (BBA).

Engagement Consultant: focusing on the systems and process aspect of the review, comes with over 25 years' experience of working across both the public and private sector and holds qualifications including, but not limited to: Lean Six Sigma Black Belt, Master of Project Management, IPMA Certified Projects Director (Level A) and Certified Practising Project Director (AIPM)

Engagement Manager: with a key role of undertaking a peer review of the report to ensure it was accurate and that the review process was independent, is a senior strategic adviser and program leader with over 25 years' experience spanning both professional services and industry in Australia and North America. With tertiary qualifications including Master of Business Administration (MBA) and Bachelor of Applied Science (BAppSc) (Mathematics and Computer Science) and shorter courses and certificates including, but not limited to: Prince 2 Foundation and Practitioner, OCG Gateway Review accreditations and the Australian Institute of Company Directors (AICD) Foundations course.

Current state assessment

The aim of this review was to evaluate the current state of the CMS (including process, people and technology) within QFD. By examining existing complaints management policies, procedures and operations, we seek to validate the suitability of the current CMS for its intended purpose

The findings of this assessment provide a foundational understanding of current capabilities and identify areas requiring improvement or enhancement. Whilst a broad range of factors impact and influence the way complaints are managed within QFD, this review has focused on the core elements detailed in the model below in line with the project scope. Findings and recommendations are presented in line with these core elements to ensure consistency and clear alignment with project outcomes.

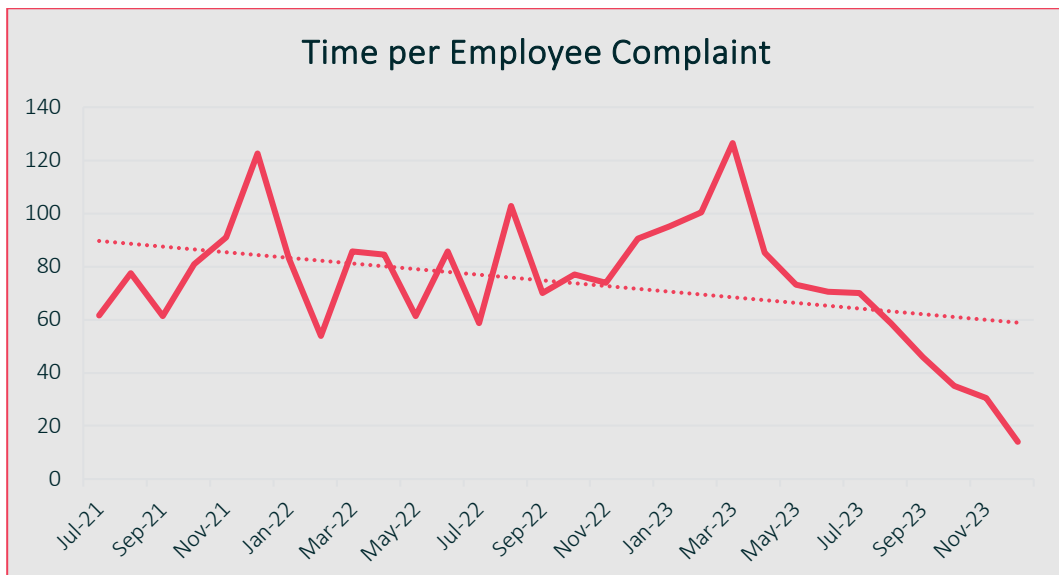
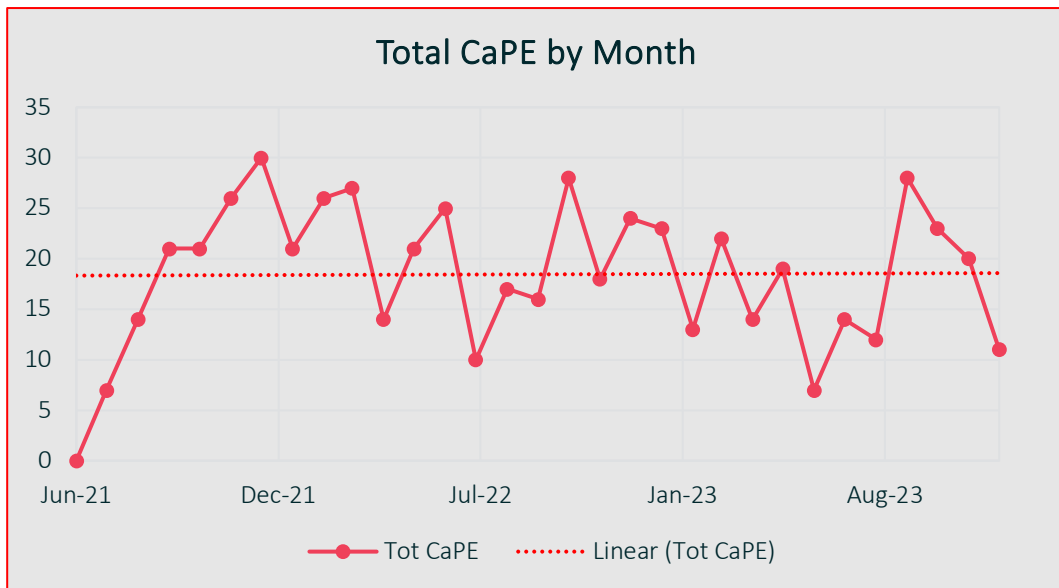


Key statistics

The analysis of statistics presented below is based on the Nexus complaints management information provided by QFD in the form of a file extract covering complaints in the period July 2021-December 2023.

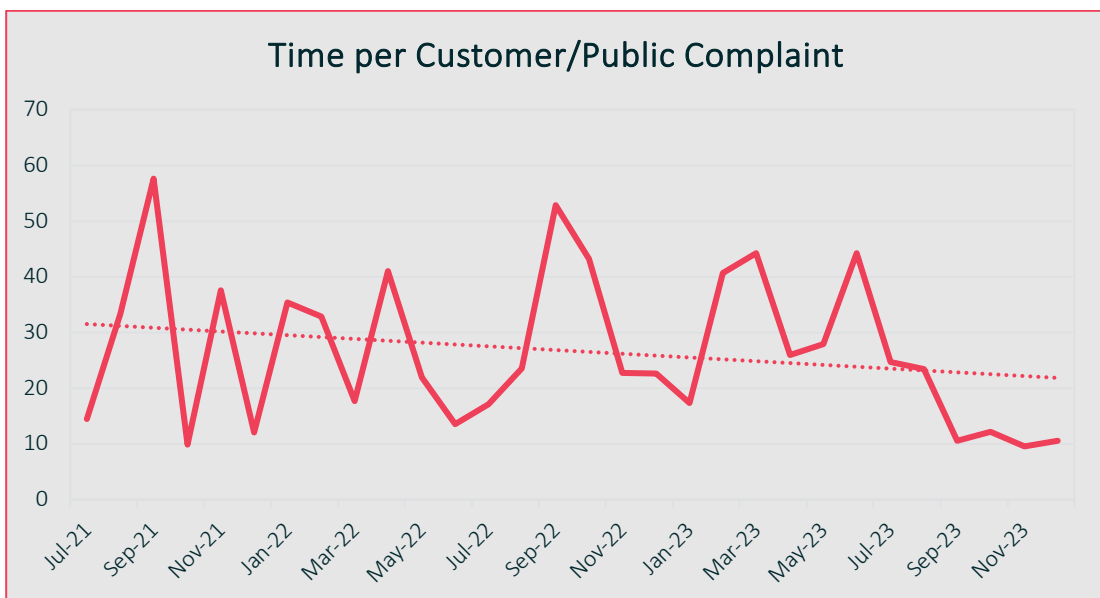
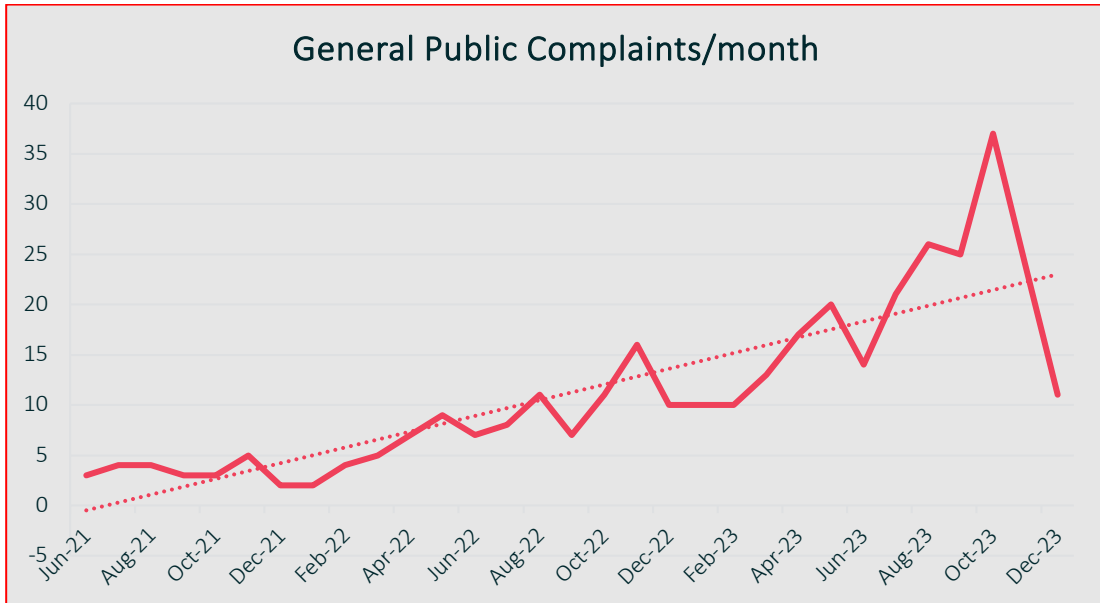
EMPLOYEE AND VOLUNTEER COMPLAINTS

Despite the number of CaPE complaints remaining almost constant between June 2021 and December 2023, internal process enhancements have led to a substantial reduction in complaint management time. However, the perception among employees and volunteers that complaint responses are still lengthy suggests that the benefits of these efficiency improvements have not been effectively communicated or realised across the organisation.



EXTERNAL CUSTOMER COMPLAINTS

The organisation is experiencing a concerning upward trend in customer and stakeholder complaints. The monthly average has surged from 28 in 2021 to a troubling 50 in 2023. While commendable strides have been made in reducing the time spent on individual complaint management, these improvements have proven inadequate to counterbalance the overall increase in complaints. To address this escalating issue, we have recommended that a potential solution may lie in adopting a “Concierge” model. By assigning a dedicated individual to serve as the initial point of contact for customers and stakeholders, akin to a Customer Care Manager, the organisation could potentially enhance complaint handling efficiency and foster stronger customer relationships. Furthermore, this role could extend to managing compliments, transforming negative feedback into opportunities for improvement and positive sentiment amplification.



Leadership, management and culture

QFD operates the management of complaints through the Relations and Standards Branch with ultimate decision-making kept at executive management level. The QFD *Customer Complaints Procedure PR3034.1.0* allocates accountability for complaints resolution, managing human rights and escalation for internal and external review of decisions to specific roles. Frontline management is responsible for various stages of this process. However, interview feedback suggests that this is not always the case.

The findings identified that Senior Management is committed to resolving the issues faced by the CMS. Improvements in the way complaints are managed are expected to enable improvements in management decision making regarding complaints.

Trust and confidence in leadership are foundational to cultivating an environment where misconduct is unequivocally condemned. A culture of openness hinges on the belief that concerns will be addressed fairly and without reprisal.

However, the review found there were still examples of a pervasive lack of trust throughout the QFD, particularly between management and employees with respect to the CMS. The issue of trust was raised repeatedly in focus groups. “*Why bother*” was a common comment and underlying theme from some employees. This breakdown in trust has fostered a culture of silence, where issues are often concealed rather than escalated. The fear of retribution, coupled with a perceived lack of independence in investigations, has created a climate where individuals feel unsafe to speak up.

There was also a belief expressed by many in focus groups that there was never any “perpetrator accountability”. People get off “*Scot free*” or similar comments was common. For privacy and confidentiality reasons, in many cases QFD is inhibited from sharing outcomes of the individual cases and/or disciplinary matters and it needs to balance the respective rights of complainants and subject officers. A key challenge is ensuring that the workforce at all levels know and understand that behaviour has consequences.

Moreover, the organisation’s traditional command-and-control structure, that is an essential part of all emergency management operational activity, may foster the belief in not challenging the “status quo”. Following the “chain of command” in an emergency situation is important and needed. But it can also stifle an individual’s ability and willingness to speak up in a non-emergency type scenario at work. Feedback in interviews indicated that there was an inclination to address problems internally, often through informal channels. While this has demonstrated camaraderie, the practice has inadvertently shielded perpetrators and discouraged formal complaints. A ‘shop floor justice’ mentality undermines the integrity of official grievance procedures and reinforces a culture of impunity.

“Everyone closes ranks, and you get nowhere.”⁹

To champion a safe and inclusive workplace, QFD must prioritise leadership development. While there are examples of effective leadership at lower levels, a more concerted effort is required to equip leaders with the skills to address difficult conversations, manage conflict and create psychologically safe work environments. Effective leadership at the lower levels should be competent in performance management, conflict resolution, managing grievances, and team motivation (Cole, 2001, pp. 724-761). Moreover, concerns were raised during stakeholder meetings by QFD Executive Management that the corporate areas must support and enable the frontline and middle managers to manage their people issues, but not manage their people issues for them, as may happen under current practice. There was also a strong view expressed during the stakeholders’ interviews with senior QFD Management that some of the frontline managers had not embraced the ‘people management’ side of their role and this gap identified in previous reviews remained. Through the consultation, it became evident that several frontline and middle managers were challenged in managing HR (people related) issues and events and they looked to their superiors to address the issues for them. This leans towards the need to address the training gap for those roles. Similarly, it was evident the need to enhance knowledge of the support services available to all parties involved in a complaint process.

⁹ Quote from interview participant

There was feedback provided where some individuals experienced additional barriers to making a complaint due to discrimination. Feedback during some interviews noted that many of these individuals may have chosen to exit the organisation rather than report their complaint. Targeted initiatives to support and empower diversity target groups are crucial to creating a truly inclusive workplace. Our recommendations highlight the need for QFD leaders take steps to recognise the unique challenges faced by equity and diversity target groups within the QFD landscape. For the avoidance of doubt, the *Public Sector Act 2022* defines a **diversity target group** as any of the following:

- b. Aboriginal peoples and Torres Strait Islander peoples;
- c. people from culturally and linguistically diverse backgrounds;
- d. people with disability;
- e. women; and
- f. a group prescribed by regulation for this definition.

Multiple stakeholders also reported that there is a perceived lack of skill and knowledge in managing unreasonable complainant behaviour.

The review's findings illuminate a complex interplay of factors contributing to a culture where speaking up is discouraged.

“Justice is supposed to be blind...It unfair how we treat non-uniform staff.... it shouldn't matter which union, what rank you are, what gender and which background you are from.”¹⁰

To effect meaningful change, a shift in organisational culture is required. We have made recommendations so QFD can take steps to address these issues comprehensively. This shift will transition to a culture that values open communication, collaboration, and accountability. By empowering employees and volunteers to voice their concerns without fear of reprisal, QFD can create a more inclusive, psychologically safe and high-performing organisation. By building trust, empowering leadership and establishing robust support systems, the organisation can create a workplace where everyone feels safe to contribute and thrive.

Otherwise, QFD faces an additional risk in meeting its obligations under the *Public Sector Act 2022* (Qld) to create a culture of respect and inclusion across the workforce. Section 27 of the *Public Sector Act 2022* (Qld) requires that experiences and perspectives of members of diversity target groups, and other groups of employees that are not diversity target groups, are invited and respected and in adhering to the *Managing the risk of Psychosocial hazards at work Code of Practice* Directive 2022 (Qld) which places an onus to prevent, minimise, reduce and eliminate psychological hazards at work for its entire workforce including employees and volunteers.

¹⁰ Quote from interview participant

The below table outlines recommendations developed to address the short-fall findings in the area of Leadership, Management and Culture influencing the effectiveness of CMS:

LEADERSHIP, MANAGEMENT AND CULTURE	
1	Implement organisational initiatives to restore trust in the CMS, including leaders and managers communicating regularly with the workforce on the outcomes of this Review and other proactive preventative measures being taken. This will cultivate a “speak up” culture.
2	Implement changes to Policy, Procedure and Process with a view to strengthening warnings about victimisation and reprisals in letters, correspondence, training programs and at meetings, etc.
3	Ensure dedicated and separate case managers (adopting a single point of contact model) are appointed for both complainants and subject officers. These case managers should provide regular updates on progress, timeframes and outcomes, etc.
4	Provide a deidentified (and brief and very high-level) update once a quarter on total complaints and disciplinary actions taken so that all believe that there is “perpetrator accountability” and that employees and volunteers understand that behaviours (good and bad) have consequences.
5	Create a “customer care” manager or concierge role for customer complaints, so customers have a single point of contact for any complaints.
6	Review and monitor customer complaints for trends/themes that might inform future prevention plans.
7	Develop greater awareness and management of mental health issues related to the complaint process and complaints themselves focussing on what is required for all stakeholders including fact finders.
8	Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system).
9	Relevant personnel and mid to senior management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct.
10	Ensure frontline I managers receive business skills training in ‘Having Difficult Conversations’, conflict resolution and psychological safety awareness and management incorporating psychological first aid training.

Governance and performance

The key QFD governance body responsible for overseeing the ongoing management of complaints is the Executive Leadership Team (ELT). The Chairperson of this committee is responsible for reporting on the effectiveness of the CMS, current and emerging risks and mitigation strategies¹¹. In practice this control is effectively delegated to the Relations and Standards Branch with approval provided by members of the ELT as required.

This current governance structure for the Complaint Management System (CMS) appears inadequate for an organisation of QFD's size and complexity. The centralisation of complaints management at this senior level appears to lack the degree of delegated responsibility and accountability for complaints that could provide broader responsiveness to individual cases. While policies and procedures outline a mechanism for regular reporting to executive leadership, the effectiveness of this process in driving improvements is questionable. Currently there is a concentration of decision-making authority for complaints on a small group of senior leaders. This model often creates bottlenecks and delays. The review understands that this is in accordance with the *Public Sector Act 2022* and QFD delegations.

While this approach may be necessary for complex cases, we feel it would be beneficial to distribute decision-making responsibilities to lower levels of the organisation whenever possible. By empowering frontline managers to handle routine complaints, the organisation can improve efficiency and reduce the workload of senior leaders.

Leaders at all levels must take ownership of the CMS, actively monitoring and evaluating its performance. They should be proactive in identifying areas for improvement and ensuring that the system is aligned with the organisation's values and goals. By demonstrating commitment to the CMS, leaders can foster a culture of transparency and accountability.

The lack of an end-to-end case management approach was noted by the PwC review. The PwC review recommended that a case manager be appointed for each case with clearly articulated responsibilities. To date, this approach to case management does not appear to have been implemented. This is a significant oversight and feedback from stakeholder interviews and focus groups is that often employees and volunteers are not clear on who is managing their case or complaint, and this leads to confusion and mistrust and in some cases is causing harm to employees and volunteers. Interviews with other public sector agencies¹² indicate that they use a case management approach to discipline and complaints management.

To enhance consistency and efficiency, a single Senior Executive should be designated as the primary overseer for high-profile and sensitive cases. This centralised approach will ensure that these complex matters receive the necessary attention and expertise. By consolidating responsibility, the organisation can streamline decision-making and reduce the risk of inconsistencies.

Early and ongoing engagement with experts in First Nations cultures and the associated legal frameworks is essential when handling complaints involving First Nations peoples. The review notes the recent appointment of the Director, First Nations Strategy and Partnerships Branch as a positive step towards increasing this engagement. The review, however, identified a gap overall in the understanding of issues related to First Nations people. A comprehensive understanding of the unique challenges and perspectives of the First Nations community is vital for developing appropriate and culturally sensitive responses.

The current system for categorising and triaging complaints is well defined in Appendix 1 of the QFD *Customer Complaints Procedure PR3034.1.0*. However, the application of this categorisation could be improved to enhance fairness and transparency. There are concerns about potential or perceived conflicts of interest in the assignment of case categories, which can impact the investigation and resolution process. Implementing clear guidelines and establishing independent review mechanisms can help address these issues and build trust among stakeholders.

QFD lacks a comprehensive understanding of the financial implications associated with managing complaints. By tracking and analysing the costs involved in various stages of the complaint process, the organisation can identify opportunities for efficiency and resource allocation. This data-driven approach will enable QFD to make informed decisions about complaint management strategies and allocate resources effectively.

¹¹ QFES Management of Complaints Policy No. 3.12 Dated 2019

¹² Interviews with the Queensland Police Service and Queensland Ambulance Service

The following table outlines recommendations to address limitations identified in the governance and performance of the CMS.

GOVERNANCE AND PERFORMANCE	
11	Establish a refreshed governance framework for the complaint management system with an emphasis on high-level oversight and monitoring at the executive level or a steering committee with an emphasis on prevention and management. Such reporting to include the number of cases, new complaints, timeframes, non-compliance, significant or matters with high risk flagged ensuring Director, Relations and Standards, Chief Operating Officer, Strategy and Corporate Services and the Chief Human Resources Officer are briefed on all red flag or sensitive cases unless COI exists.
12	Implement a monthly case management meeting between various key stakeholders in the CMS process (such as People and Culture Division, Safety, Injury Management, Legal,) to provide updates on each case, timeframes and matters of risk. Meeting should be chaired by Director, Relations and Standards.
13	For consistency, timeliness and streamlining of processes, ensure that only one responsible Senior Executive with the appropriate delegation is appointed for oversight for complex and serious investigation outcomes.
14	No serious matters should be managed with a single point of failure in the event of an officer or delegate being on extended leave. It is noted, however, that discipline cases are often voluminous, and any replacement has to fully appraise themselves of the entire case. Therefore, responsible Executives (delegates) must ensure active oversight on these matters at all times.
15	Undertake a detailed impact analysis of the new QFD Legislation including the development of an implementation and resourcing plan which contains "how and who" is responsible for the provision of procedural fairness and natural justice and how QFD commitments to the volunteer community and stakeholder groups will be met.
16	Where a person engaging with the CMS in any capacity, identifies as Indigenous, liaise with the new First Nations Strategy and Partnership Branch within QFD on cultural capability and awareness matters and obligations to ensure compliance with the new <i>Public Sector Act 2022</i> and relevant Directives.
17	Develop training for all levels of management to employ and support culturally diverse peoples, starting with the ability to identify cultural differences and handle them appropriately.

Policy and process

The review looked at both QFD’s alignment to Queensland Government legislation, policy and procedures regarding complaints management as well as process improvement opportunities in relation to better practice.

The management of complaints is well defined in QFD’s procedure “PR3026 – Management of Complaints”. Complaints come from a variety of sources including: emails, telephone calls, the QFD Complaints portal and the Queensland Government public complaints portal. In addition, the channels for managing a complaint appear to be well understood. Complaints may be lodged with a supervisor/manager, senior management, or the QFD Relations and Standards Branch and can be lodged anonymously. In cases where the complaint is about workplace conduct and human rights (*Human Rights Act 2019 (Qld)*), the complaint must be immediately referred to the Relations and Standards Branch for assessment.

Complaints are assessed by the Relations and Standards Branch Complaints Assessment Team (CAT) and recorded in the Nexus CMS. The CAT’s key functions are to categorise complaints and determine how they can be dealt with. One key exception to this process is the assignment and use of Fact Finders to ascertain the salient information related to a case. The complaint procedure merely notes that “the CAT will determine how the matter will be dealt with.” Major roles in the process and their responsibilities are outlined in the table below.

STEP	ACTION	RESPONSIBLE
1.	Making a complaint	Complainant
2.	During the complaints process staff, volunteers and contractors can seek advice/support	Complainant
3.	Complaints about workforce conduct and human rights must be immediately referred to the Relations and Standards Branch for assessment.	Complainant, or supervisor / manager
4.	Assessment of complaints (includes classifying severity of a complaint and identifying potential human rights issues)	Relations and Standards Branch – Complaints Assessment Team
5.	If a complainant’s human rights have been limited in a way that is not reasonable and demonstrably justifiable as per Human Rights Act 2019 (Qld), then remedies must be considered	Supervisor / manager and Relations Standards Branch
6.	Responding to human rights complaints	Supervisor / manager and relevant delegate
7a.	Managing a Category 1 complaint	Supervisor / manager
7b.	Managing Category 2, 3, Corrupt Conduct and Public Interest Disclosure matters.	Relations and Standards Branch
8.	Addressing identified staff conduct issues	Supervisor / manager
9.	Finalising / closing complaints	Supervisor / manager and Relations Standards Branch
10.	Requesting a review of a complaint decision	Complainant

While the organisation demonstrates adherence to government directives and legislation in certain areas of complaints management, a broader perspective reveals a system lagging behind contemporary standards and public expectations. There are no overarching principles that guide employees as to how to operate on a day-to-day basis within the system. Furthermore, a preventative approach, crucial for a modern CMS, is notably absent. The lack of a comprehensive prevention plan hinders progress towards best practices. Furthermore, the organisation seems to underestimate the impact of data and analytical limitations imposed by the current CMS (Nexus).

The *Public Sector Act 2022* places an onus on the Commissioner to create a workplace that is respectful and inclusive. Simply, even a complaints system that is seen by its workforce and stakeholders as responsive and fair, will not be enough

in the future. At its core, the system and the broader organisational culture must be focussed on preventing complaints. In similar ways to how fire services globally have moved to an educational approach of the public to prevent fires and ensure there are smoke alarms in place (Jennings, 2023), serious attempts must be made to prevent the escalation of issues and complaints.

An example of the requirement to prevent complaints before they occur is with respect to sexual harassment matters. There is positive duty now on the QFD Commissioner to prevent sexual harassment before it occurs. Furthermore, the integration of trauma-informed and gender-based approaches into QFD Policy and Procedures, mandated by recent changes to the *Preventing and Responding to Sexual Harassment Directive – 12/23*, could be better articulated. This appears to indicate a potential future gap in the management of sensitive complaints. Although the channels and pathways for lodging complaints are generally clear, a lack of confidence and trust in the system's outcomes is a significant barrier. This suggests underlying issues with the complaint handling process.

Additionally, inconsistencies in providing closure to both complainants and subject officers have been identified. The organisation is also falling short in meeting legislative timeframes for complaint resolution as evidenced by the relevant Public Sector data. This, coupled with a limited understanding of the overall system and associated timeframes, highlights areas for improvement. Outdated policies and procedures, such as the Management Action Guide and the need to streamline and ensure consistency in the terminology used further exacerbate these challenges. Clarity is required for the entire workforce on which policies and procedures apply to which part of the workforce. i.e. employee only or employee and volunteer or volunteer only.

Overall, while there is evidence of compliance in specific areas, the CMS requires a substantial overhaul to align with modern expectations, legislative requirements and best practices.

“The whole process is convoluted, extremely time consuming and passes through too many hands to deliver an effective result in a timely manner.”¹³

LEGISLATIVE AND POLICY ALIGNMENT

Section 264 of the *Public Sector Act 2022 (Qld)* requires that each public sector entity establish and implement a system for managing customer complaints that complies with the Australian Standard (AS 10002:2022). The *Public Sector Act* provides no guidance beyond the requirement to establish a compliant CMS.

QFD generally demonstrates a strong commitment to adhering to Queensland Public Service Legislation and Directives, as well as the Queensland Government Customer Complaint Management Framework. This includes the following legislation and directives:

- *Public Sector Act 2022 (Qld)*;
- *Public Sector Regulation 2023 (Qld)*;
- Queensland Public Service Customer Complaint Management Framework;
- Queensland Public Service Customer Complaint Management Guideline;
- Queensland Ombudsman Complaints Management Resource; and
- Queensland Government Directive – Individual employee grievances (Directive 11/20).

Evidence of this includes the establishment of a customer procedure on the QFES website, complete with performance statistics, the diligent tracking of timeframe extension requests for employee and volunteer matters and the appropriate identification of post-separation disciplinary processes for employees.

However, areas for improvement are evident. Timeframe compliance emerges as a significant challenge. Non-adherence to specified timelines was observed in multiple cases examined, a finding corroborated by the CMS data. While QFD is acknowledged to be addressing this issue, the persistence of similar problems across the broader public sector suggests

¹³ Quote from free text section of Prominence survey

the need for a more systematic approach. There was feedback that some of the delays (particularly with disciplinary matters) that occur are outside of the control of the QFD such as complainants and/or subject officers taking long term leave. The QFES “*Work Performance Matters 2022-23*” report to the Public Service Commissioner noted that 62.4% of matters were not resolved within benchmark timeframes. During interviews, Queensland Police Service (QPS) stakeholders advised that the QPS overcame this issue with respect to disciplinary matters by including the ability to pause timeframe countdowns in the practical application of the complaints process for delays that are expected to be beyond the control of the stakeholders to manage. Legislation in the *Police Administration Act 1990* (Qld) – Section 7.1.2.2 outlines the requirements for this mechanism. This *concept* was also suggested as a future QFD solution during an interview with a very senior QFD Executive.

Additionally, some minor inconsistencies in the categorisation of Conduct and Performance Excellence (CaPE) complaints were identified. While the ultimate outcomes in the examined cases were correct, a more rigorous approach to categorising CaPE complaints, particularly for customers versus employees and volunteers’ matters is necessary.

While support for complainants in sensitive cases is evident, there is an opportunity to enhance support for subject officers and witnesses. Feedback from multiple stakeholder groups indicated that organisational support for subject officers was inadequate. Recent legislative changes to the structure within the Rural Fire Service Queensland will impact volunteers (*Fire Services Act 1990 (Qld) Ch 3 Fire services*). These structural changes will require careful implementation to ensure natural justice and procedural fairness.

Furthermore, the desktop review of cases revealed that some of the letters provided to participants did not emphasise or include a paragraph on the “no victimisation” principle. There is a need to strengthen communication regarding the “no victimisation” principle (*Anti-Discrimination Act 1991 (Qld) Section 129*) to all parties involved in the complaint process as this will assist in building trust.

In many cases the desktop survey of cases revealed a lack of “final response to a complaint” letters being provided to all parties in the process. This was also a key concern raised by stakeholder groups.

A critical gap identified is the lack of substantial evidence demonstrating compliance with the *Public Records Act 2002 (Qld)*. This oversight represents a significant area for improvement.

While QFD demonstrates a foundation of compliance, targeted efforts are required to address identified shortcomings, particularly in relation to timeframes, CAPE categorisation, support for subject officers and witnesses and adherence to the *Public Records Act*.

EXIT INTERVIEWS

QFD as a large public sector entity should understand why employees are leaving (Johns, 2005) and if any issues of harassment, bullying and discrimination are raised by exiting employees, there is a legislative requirement (*Public Sector Act 2022 (Qld) Section 29*) that these matters be properly examined.

Furthermore, during the stakeholder engagement interview, the Public Service Commission noted that female firefighters have a higher rate of turnover than male firefighters and the reasons for this variance has not been properly considered by QFD¹⁴.

The management of exit interviews is currently overseen by the Workforce Experience team, which is part of the QFD Strategy and Services Branch. Currently at QFD, Exit Interviews are voluntary and can be completed in person with a representative of the Department, online (nexus) or in hardcopy.

Historically QFD has not had a mechanism in place for exit interviews with adverse findings to automatically flow into the Relations and Standards Branch for review or exploration with employees leaving the Department. Instead, where it was identified that an exit survey may hold adverse findings, it would be provided to the relevant Assistant Commissioner/Executive Director responsible for the work area, for their review and consideration of information supplied.

¹⁴ No data was provided to confirm this observation

The Relations and Standards Branch advised they have flagged this as an area of risk and in November 2023 commenced engagement with the Workforce Experience team to establish if there was ability for the network of Principal/Senior Advisors Workplace Standards to assist in the facilitation of exit interviews, so that specific questions could be explored with exiting personnel. In addition, the Relations and Standards Branch requested that if personnel provide information at certain questions (specifically questions in relation to bullying and harassment, sexual harassment and unlawful discrimination) that a process be built in for those exit surveys to be immediately referred to the Relations and Standards Branch QFES Complaints email, so that further conversations with the leaving employee could be facilitated and supports offered. The proper and ongoing implementation of this process would greatly improve the exit interview process and reduce unnecessary risk to the organisation.

Recommendations for CMS Policy and Process are summarised in the table below.

POLICY AND PROCESS	
18	Develop overarching guiding principles for the CMS such that these principles are embedded throughout the entire system and publicly available. These principles should also reflect the requirements of the QFD Commissioner as per Section 32 of the <i>Public Sector Act 2022</i> (QLD) to develop and promote a workplace culture of respect and inclusion. Possible principles may include: Safe and Supportive, Fair and Impartial, Inclusive, Transparent, Easy to Use, Preventative Based, Timely and Responsive
19	Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management.
20	Develop and implement a person centric, trauma and gender informed approach for sexual harassment complaints including ensuring multiple pathways (such as informal complaints) to make a complaint or report sexual harassment and conducting training for relevant personnel who are involved in coordinating, managing and deciding sexual harassment (or sexual harassment like) complaints.
21	Develop and implement a revised and refreshed process for the categorisation of complaints using the CAPE model, with greater input from the SAWS roles and operational roles (where applicable).
22	Update the QFD Management Action Guide so it reflects current terminology and practice and ensure QFD policies and procedures use consistent terminology to describe its workforce.
23	Have a “stop the clock” concept built into the QFD policy and procedures for both complaints and disciplinary matters so that circumstances that occur outside of QFD management control are recognised and factored into compliance within statutory timeframes.
24	Report all exit interview data and statements to the Relations and Standards Branch (where applicable) for analysis and consideration as to whether follow up action is required with a particular focus on the reporting of sexual harassment and/or discrimination matters.

People

The Relations and Standards Branch is primarily responsible for the CMS. The primary roles involved in complaints management include Senior Advisory Workplace Specialists (SAWS) and members of the Relations and Standards Branch. Feedback received during interviews indicates that some parts of the Relations and Standards Branch are operating under significant strain, with key personnel reporting that they are stretched beyond capacity. The review noted discrepancies on the number of additional resources needed. Estimates ranged from one to five additional resources. This unsustainable situation poses a serious risk to both the timeliness and quality of complaint handling. While SAWS are generally fulfilling their roles, there exists a wide disparity in their skill sets and knowledge base. Additionally, concerns have been raised about the perceived independence of some SAWS, with some interviewees stating that SAWS may side with line-managers in their region. There is also some ambiguity in terms of the breadth of their role and a clear position description for their role will assist in this regard.

A shortage of trained investigators is compounding these challenges as the current four (4) investigators must manage all cases. In some cases, this is leading to delays and timeframe blow-outs. Furthermore, inconsistencies in information sharing between departments, such as People and Culture, Safety, Wellbeing and Psychological Services, Health and Wellbeing and the Workplace Liaison Unit, are hindering overall coordination and case management. The excessive workload is resulting in prolonged resolution times, with numerous cases exceeding established benchmarks. This issue is exacerbated by the high turnover in key management positions, creating uncertainty, hindering decision-making and increasing the risk of failure in managing sensitive cases.

The QFES “*Work performance matters 2022-23*” report underscores the gravity of the situation, revealing that over 60% of matters were not resolved within stipulated timeframes. To address these systemic problems, a comprehensive review of the SAWS role is recommended as a high priority. This review should encompass a thorough job analysis to accurately reflect the complexities of the position and ensure it attracts and retains suitably qualified personnel. While recognising the value of diverse backgrounds, it is essential to cultivate a workforce possessing a comprehensive skill set, encompassing expertise in employee relations, human resources, investigations and legal matters.

Concurrently, a comprehensive resourcing audit of the Relations and Standards Branch is recommended to accurately assess workload demands, considering the unique challenges posed by the large and geographically dispersed volunteer base.

PEOPLE	
25	Review the SAWS role description, including undertaking a job analysis with evaluation and review of the role classification level – ensuring it is pitched at the right level to attract and retain the right people with the right skills. That said, diverse backgrounds and skill sets for these roles should be welcomed and embraced. For example, having a combination of people from an Employee Relations, Human Resources, Police, investigative and Legal backgrounds – and the collective knowledge, skills and experience this brings, should be embraced.
26	Undertake a resourcing review of the Relations and Standards Branch based on workload and not just a Full Time Equivalent (FTE) allocation. Specific acknowledgement should be given to the management of a large number of growing issues and complexity due to a large volunteer base (approximately 27,000) across a geographically dispersed state. This review to include an analysis of existing investigator capacity and capability with a view to build and maintain a casual (internal employees at the AO7/AO8 level) investigation pool of resources to immediately ease the burden and workload of existing internal investigators.

Training and education

CMS training currently available across QFD consists of the following.

- Initial training on the complaints management process is included in the induction for new starters and provided on request after this.
- “Having difficult conversations” training for managers provided once (and not repeated).
- Think, Say, Do (available on demand via the online Axcelerate platform).
- Workplace Behaviours information sessions (in person, completed every three weeks with new recruits starting and then arranged in Directorates on an as needed/requested basis).
- The SAWS based in regions work with their management groups to identify the information session needs for the region. All SAWS deliver information sessions that cover the topics such as Workplace Behaviours (Bullying, Sexual Harassment, Unlawful Discrimination, Victimisation, Vicarious Liability, Resolution and Support Options in QFES).

Other information sessions run on a need’s basis and are arranged with the SAWS include:

- Middle Management (Specifically designed leadership program) training program for officers at the Station Officer and AO7 or equivalent level
- Performance and Conduct Management / Positive Performance Management
- Complaints Management (Fact Finding)
- File Notes (Record of Event; Record of Meeting)
- Basic Conflict Resolution Strategies (Conflict Strategies Matrix and Scale of Conflict, ways to de-escalate)¹⁵.

It is also noted that the Relations and Standards Branch recently advertised an AO7 Principal Project Officer position to complete a 12-month project that will examine code of conduct training in the Department and arrange to update it to a more fit for purpose package (both content and delivery platforms) in addition to other governance training topics, such as Conflicts of Interest.

There is discipline training conducted, as discipline in accordance with the Public Sector Act 2022 and the PSC Directive 05/23 – Discipline is conducted by a suitable delegate as outlined in the HR Delegations and this is coordinated centrally by the Discipline and Delegations team.

The current training landscape within the organisation, whilst thorough still presents some challenges to its overall effectiveness and ability to foster a positive work environment. While initial training on the complaints process is provided during induction, its brevity due to time constraints renders it insufficient for equipping employees and volunteers with the necessary knowledge to navigate the intricacies of the process. This knowledge gap is compounded by the limited scope of Workplace Standards training, which is condensed into a single hour. Similarly, the “Having Difficult Conversations” training for managers was conducted as a one-off that has not been regularly repeated. A core issue lies in the inadequate preparation of frontline managers to manage complaints and conflicts. This need for further training was noted by several interviewees.

Moreover, the absence of regular refresher training, particularly in the realm of diversity and inclusion, including matters pertaining to First Nations peoples and other equity issues, is a critical oversight. The challenges are further exacerbated by the inadequate preparation of Fact Finders, who lack formal training in essential skills such as structured case notetaking and evidence gathering. This deficiency, coupled with the absence of a knowledge base derived from de-identified previous cases, may hinder continuous improvement and learning.

The organisation’s capacity to proactively address and resolve conflicts is compromised by the apparent absence of conflict management training for frontline managers (such as Station Officers). In fact, it was suggested by several interviewees that many Station Officers view their role as operational in nature only and that the people management part of their role should be exercised by higher levels within the organisation. This oversight empowers managers to escalate issues rather than resolving them at the source, potentially leading to increased tensions.

¹⁵ This information session tends to be facilitated by the SAWS in Central and Far North Regions.

To rectify these deficiencies, a comprehensive overhaul of the training and development framework is imperative. As outlined in the earlier PwC, a strategic approach is required to ensure that training is aligned with the organisation’s broader goals and objectives. By contextualizing training initiatives and demonstrating their relevance to the overall organisational strategy, engagement and buy-in can be fostered.

“I know people that are being tasked with fact finding for an investigation and they’ve had no training whatsoever”¹⁶

Finally, continuous monitoring and evaluation of training programs are recommended to ensure their ongoing relevance and impact. By gathering feedback from participants and analysing training uptake, the organisation can identify areas for improvement and tailor future training initiatives to meet specific needs.

Four key recommendations have been made to improve the current knowledge base for those responsible for managing complaints but also to foster a culture of continuous improvement.

TRAINING AND EDUCATION	
27	Establish two yearly (Biennial) refreshers for all QFD employee and volunteers on Understanding and Prevention of Sexual Harassment, Workplace Bullying and Discrimination and Code of Conduct training.
28	Implement an on-line cultural capability and awareness and anti-racism short course for all employees and volunteers on First Nations issues to provide foundational knowledge and genuine awareness with respect to Indigenous Cultures.
29	Frontline managers need to be trained in specific cultural awareness and capability in terms of managing workplace issues involving First Nations peoples.
30	Provide Fact Finders with training on standards of proof, evidence gathering, note-taking and key legal concepts relevant to the role.

¹⁶ Quote from free text section of Prominence survey

Technology, data and reporting

The review aimed to evaluate if the CMS is appropriately supported through its underlying technology system. Nexus is the underlying technology platform.

The Nexus CMS has reached the end of its operational life and is no longer capable of effectively fulfilling its intended purpose. A myriad of systemic issues have emerged, significantly hindering its ability to manage complaints efficiently and comprehensively.

Central to these problems is the system's antiquated design. Data entry is a laborious process, heavily reliant on manual cut-and-paste operations from external forms, a time-consuming and error-prone method. The absence of email integration is a critical oversight, given that the vast majority of complaints are initially lodged electronically. This deficiency not only hampers efficiency but also compromises the integrity of the evidence chain, as many emails remain outside the system and potentially inaccessible.

“We do bash Nexus around quite a bit and it is a very clunky system”¹⁷

The system's limitations extend to its inability to capture essential demographic data, such as cultural or diversity status, during the initial complaint registration. This omission, while supporting the complainants right to privacy, hinders the implementation of appropriate support mechanisms and the fulfillment of legislative obligations (Public Sector Act 2022 (Qld) – Ch 2&3, Human Rights Act 2018 (Qld) – Part 2). Furthermore, the system's security measures are inadequate, lacking granular controls and user-filtered views. The absence of version history for documents exacerbates these issues, making it difficult to track changes and maintain accountability.

Nexus's workflow capabilities are severely restricted, as it lacks the ability to automatically route cases to the appropriate personnel for action or approval. This manual process is time-consuming and error prone. The system's reporting functionality is equally deficient, providing limited insights into complaint trends and patterns. To compensate, the organisation has resorted to creating custom data extracts, a costly and inefficient workaround.

The consequences of these deficiencies are far-reaching. Executive management is hampered by inaccurate, untimely and cumbersome reporting, hindering their ability to identify trends, hotspots and areas for improvement. The absence of robust reporting tools makes it difficult to develop effective prevention strategies. To manage the workload, employees often rely on supplementary spreadsheets, creating a fragmented and inefficient approach to complaint management.

The lack of a comprehensive root cause analysis process, attributable to insufficient resources within the Relations and Standards Branch, further undermines the system's effectiveness. Without a clear understanding of underlying issues, it is challenging to implement preventive measures. Simply, it is hindering management's ability to understand where “hot spots” may be across state and to understand key themes and trends.

The absence of an integrated case management system across the branches within the People and Culture Division, creates silos and hinders a holistic approach to complaint resolution. This disjointedness can lead to inconsistencies and delays.

Finally, the system's failure to maintain complete and reliable complaint records, with information scattered across various platforms, including email and legacy systems that may no longer be accessible, is in direct contravention of the *Public Records Act 2002(Qld)*. The *Public Records Act* defines a public record is any of the following records:

- a. a record made for use by, or a purpose of, a public authority, other than a Minister or Assistant Minister;
- b. a record received or kept by a public authority, other than a Minister or Assistant Minister, in the exercise of its statutory, administrative or other public responsibilities or for a related purpose;
- c. a Ministerial record; or
- d. a record of an Assistant Minister.

¹⁷ Quote from interview participant

Section 7 – Making and keeping of public records of the Queensland Public Records Act 2002 requires that a public authority must:

- a. make and keep full and accurate records of its activities; and
- b. have regard to any relevant policy, standards and guidelines made by the archivist about the making and keeping of public records.

While Section 14 Public authority must ensure particular records remain accessible of the Queensland Public Records Act 2002 requires that:

- a. This section applies if a public record is an article or material from which information can be produced or made available only with the use of particular equipment or information technology.
- b. The public authority controlling the record must take all reasonable action to ensure the information remains able to be produced or made available.

The Nexus CMS has become a significant bottleneck, hindering the organisation’s ability to effectively address complaints. Its outdated design, limited functionality and lack of integration with other systems have created a complex and inefficient process. A comprehensive overhaul of the system is urgently required to ensure compliance with legislative requirements, improve operational efficiency and enhance the overall management of complaints. Investment in new technology and more user-friendly systems will lead to better and more informed decision making that when combined with other measures, ultimately will lead to a reduction in complaints and a reduction in costs in the long term.

TECHNOLOGY, DATA AND REPORTING	
31	<p>Replace the Nexus software with a more fit-for-purpose system that supports end-to-end case management. This will include support for enhanced case management capability, including:</p> <ul style="list-style-type: none"> ○ email integration ○ less manual data entry ○ tiered security access that allows all parties equitable access to information ○ a portal for capturing complaints that includes an option for users to self-identify with demographic information such as gender, or First Nations status or other target groups such as people with a disability ○ document version control ○ workflow for approval routing ○ an audit history of all decisions made, information received and changes to documents.
32	<p>Develop a records management framework to ensure compliance with the <i>Public Records Act 2002(Qld)</i> at a minimum, this policy will address retention, archiving and disposal of all complaints management records.</p>
33	<p>Revise the reporting dashboards to meet Steering Committee or Senior Executive requirements for timely, accurate complaints information. This should highlight trends as well as provide insights into discipline and stakeholder satisfaction.</p>
34	<p>Undertake a high-level root cause analysis of complaints each year to identify trends and themes over time and implement preventative strategies based on science, data and facts.</p>

Conclusion

The outcome of the assessment of the status of the 25 recommendations produced in the 2019 review¹⁸ was that 14 recommendations had been fully implemented. Nine recommendations were partially implemented with further strengthening of these outcomes possible. Finally, two recommendations had been deemed infeasible to progress in the short to medium term. The remaining 11 recommendations have been incorporated into the final set of recommendations for this review.

The QFD CMS broadly aligns to Queensland Government legislation and policy. However, better practice was observed at other public sector entities such as the Queensland Police Service and Queensland Ambulance Service.

We have summarised the findings of the reviewed as per the six core organisational element areas (Leadership, Management and Culture; Governance and Performance; Policy and Process; People; Training and Education; Technology, Data and Reporting). Thirty-four (34) recommendations have been provided to address inefficiencies and/or areas of improvements. However, this review underscores the persistent difficulties QFD encounters in managing complaints. Cultural and performance-related issues have consistently hindered the organisation's ability to address and resolve complaints effectively and efficiently. While similar challenges exist in other organisations with command-and-control cultures, such as the Australian Defence Force¹⁹, QFD has demonstrated a notable lag in addressing the underlying causes of these problems.

Queensland Government regulations (*Work Health and Safety (Psychosocial Risks) Amendment Regulation 2022*) demand workplaces that are free from harassment and bullying. To align with these expectations and fulfill legal obligations, QFD must undergo significant transformation. This change is imperative to establish a safe and respectful environment for all employees.

The recent Queensland Government restructure of the Emergency Services presents a unique opportunity for QFD to overhaul its CMS. This endeavour will undoubtedly require substantial effort and time, but the rewards are significant. A modernised, inclusive and efficient QFD CMS will enhance the experiences of both employees and volunteers, ensuring the organisation is fully aligned with the Queensland public service values of Integrity and impartiality and Accountability and transparency (*Code of Conduct For the Queensland Public Service, 2011*).

In Prominence's extensive experience in undertaking organisational reviews and cultural transformations, a workforce that feels valued and supported is more productive, performs better and experiences improved well-being. These benefits are undeniable and underscore the importance of seizing this opportunity for reform. QFD cannot afford to miss this chance to create a more positive and productive work environment.

An implementation planning workshop was held at the completion of the review to attempt to prioritise implementation of recommendations with relevant stakeholders. There was overwhelming appreciation for the process and production of the recommendations with an added enthusiasm to move as quickly as possible on implementation. This highlights the potential success and continuous improvement opportunity for the QFD.

To achieve the transformation to an improved workplace, QFD must prioritise a cultural shift that emphasises open communication, transparency and accountability. This includes fostering a culture where employees and volunteers feel empowered to raise concerns without fear of reprisal. Implementing robust training programs for all employees and volunteers, including leadership, on complaint handling procedures, workplace harassment and bullying prevention, and conflict resolution is essential.

¹⁸ See Attachment 6 – Assessment of Progress on previous recommendations

¹⁹ (Broderick, Report on the Review into the Treatment of Women in the Australian Defence Force Academy, Phase One of the Review into the treatment of women in the Australian Defence Force, 2011) (Broderick, Report on the Review into the Treatment of Women in the Australian Defence Force Academy, Phase Two of the Review into the treatment of women in the Australian Defence Force, 2012)

Attachment 1 List of documents reviewed

The following information and documents were reviewed during the information gathering stage of the review.

Documents (legislation, policy, procedure, etc)

- Workforce Conduct Policy
- Management of Complaints Policy No. 3.12 Effective Date: 26 March 2018
- Customer Complaints Procedure PR3034.1.0 Dated: 30 April 2018
- Management of Complaints about Employees, Volunteers and Contractors Procedure
- Complaints Management organisational structure
- Discipline Policy
- Complaints about the Commissioner Policy
- Complaint Notification Form
- Complaints Quick Guide
- ARCC Submission – QFES Complaints Dashboard, February 2024
- Management Action: A guide for supervisors when dealing with complaints/issues regarding the conduct of employees
- Complaints and Appeals (RTO) Procedure
- Customer Complaints Procedure
- Request for Internal Review Form
- QFES – PwC Report to Commissioner (final) – 18 July 2018
- AS 10002:2022 Guidelines for complaint management in organisations (ISO 10002:2018, NEQ)
- Queensland Public Service Customer Complaint Management Framework
- State of Volunteering in Queensland 2024 Report.

Data

- Historical complaints data (Jul 2021- Dec 2023)
 - Data retrieved from Nexus CMS.
- Internal survey 'COMPLAINTS SYSTEM SURVEY/APRIL 2024'
 - Restricted survey issued to 36 employees: April 23 to May 7, 2024
 - 17 responses recorded.

Queensland Public Sector Work Performance Matters Data – 2022/23 –
https://www.forgov.qld.gov.au/__data/assets/pdf_file/0022/413923/Queensland-Fire-and-Emergency-Services-Work-performance-matters-202223.pdf

De-identified case notes

- CaPE 1 – 1114 – 2021 – Redacted
- CaPE 1 – 2164 – 2023 – Redacted
- CaPE 1 – 2494 – 2023 – Redacted
- CaPE 2 – 1910 – 2022 – Redacted
- CaPE 2 – 2144 – 2023 – Redacted
- CaPE 2 – 2422 – 2023 – Redacted
- CaPE 2 – 2140 – 2022 – Redacted
- CaPE 2 – 2431 – 2023 – Redacted
- CaPE 3a – 2023 – Redacted
- Corrupt Conduct – 0200 – 2019 – Redacted
- CaPE 3 – 2121 – 2023 – Redacted
- Corrupt Conduct -1838 – 2023 – Redacted
- Customer complaint – 1643 – 2022 – Redacted
- Customer complaint – 1676 – 2022 – Redacted
- Customer complaint – 2029 – 2023 – Redacted
- Customer complaint – 2073 – 2023 – Redacted
- Customer complaint – 2403 – 2023 – Redacted
- First case in CMS – 2018 – CaPE 1 – Redacted.

Attachment 2 Prominence survey questions

A SURVEY QUESTIONS		
1.	How often does your role interact with the Complaints Management System?	<ul style="list-style-type: none"> ■ Very frequently ■ Frequently ■ Occasionally ■ Rarely ■ Never
2.	The QFES Complaints Management system is effective	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
3.	How well do you understand the complaints management process?	<ul style="list-style-type: none"> ■ Very well ■ Well ■ Moderately ■ Poorly ■ Not at all
4.	How well does your line manager understand the complaints management process?	<ul style="list-style-type: none"> ■ Very well ■ Well ■ Moderately ■ Poorly ■ Not at all
5.	Customers/clients/stakeholders and employees know and understand how they can make a complaint	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
6.	The QFES Relations and Standards Branch has the requisite expertise, knowledge and skill level to manage complaints in a way that is expected by QFES employees and the Queensland public.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
7.	The QFES line managers have the requisite expertise, knowledge and skill level to manage complaints in a way that is expected by QFES employees and the Queensland public.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
8.	Complaints should be managed by only one unit across all of QFES.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
9.	The current Complaints Management system is fair (on all parties), robust and legally defensible.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree

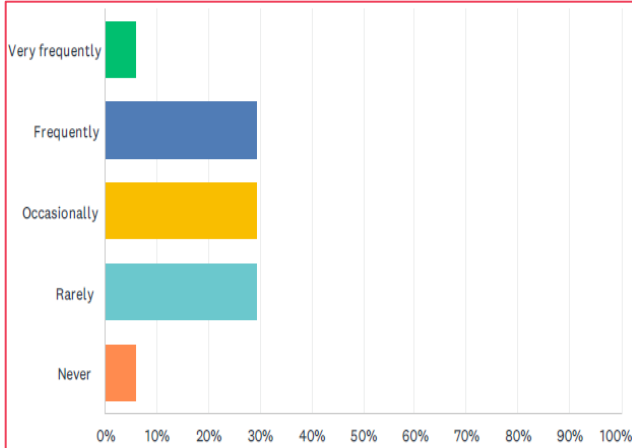
10.	It is clearly understood which roles have responsibility for complaints management.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree
11.	QFES Employees and Volunteers understand the Code of Conduct and issues such as sexual harassment, workplace bullying and diversity and inclusion.	<ul style="list-style-type: none"> ■ Strongly Agree ■ Agree ■ Neutral ■ Disagree ■ Strongly Disagree

A DEMOGRAPHIC QUESTIONS²⁰		
12.	How long have you worked for QFES?	<ul style="list-style-type: none"> ■ Less than 6 months ■ 6 months to 1 year ■ 1-3 years ■ 3-5 years ■ More than 5 years
A FREE TEXT QUESTIONS		
13.	Please share any other comments you have below:	

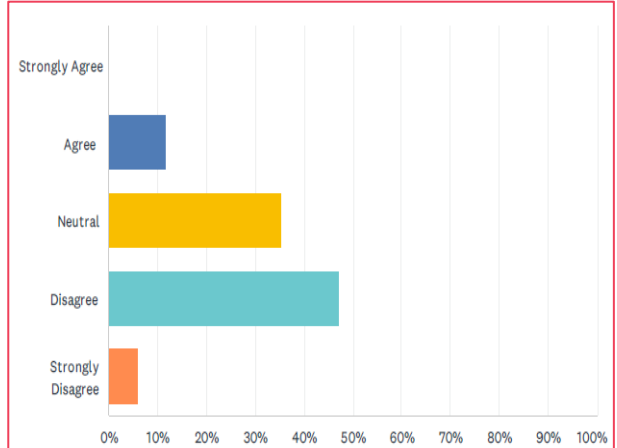
²⁰ Due to the limited sample size, additional demographic information was not collected to prevent identification of respondents.

Attachment 3 Prominence survey results

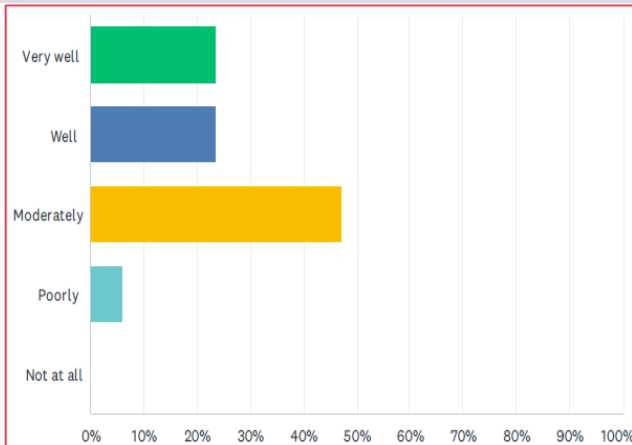
Q1 How often does your role interact with the Complaints Management System?



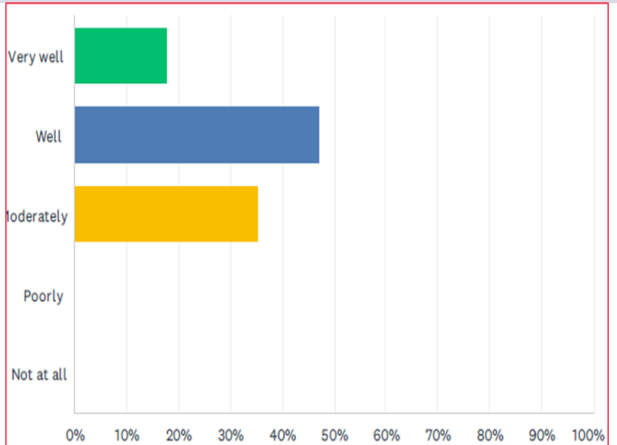
Q2 The QFES Complaints Management system is effective



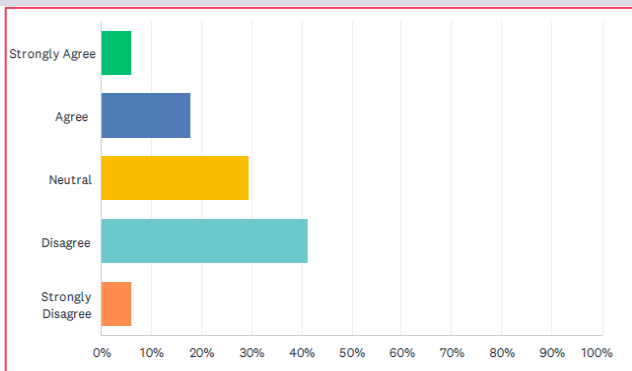
Q3 How well do you understand the complaints management process?



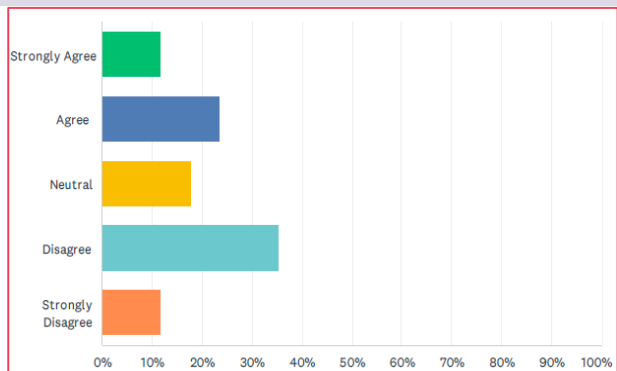
Q4 How well does your line manager understand the complaints management process?



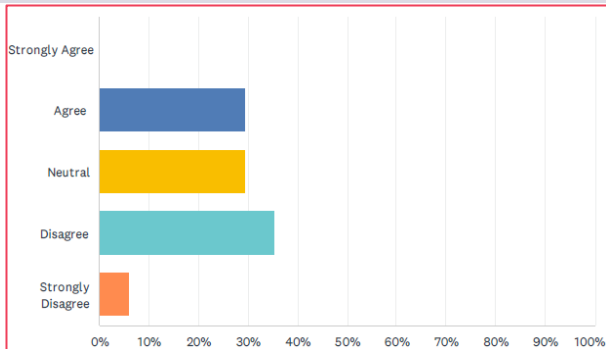
Q5 Customers/ clients/ stakeholders, Employees and Volunteers know and understand how they can make a complaint.



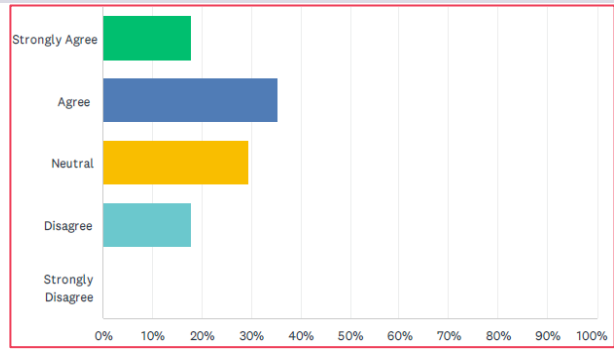
Q6 The QFES Relations and Standards Branch has the requisite expertise, knowledge and skill level to manage complaints in a way that is expected by QFES employees and the Queensland public.



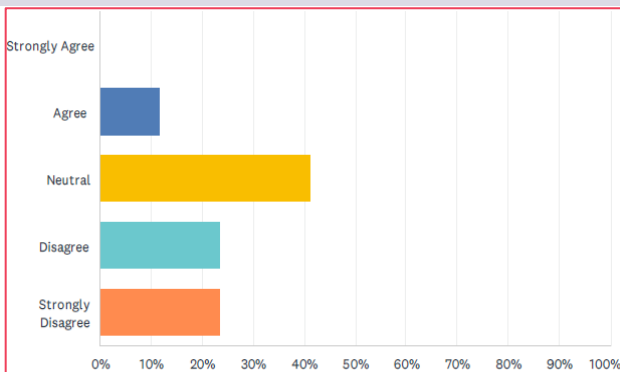
Q7 The QFES line managers have the requisite expertise, knowledge and skill level to manage complaints in a way that is expected by QFES employees and the Queensland public.



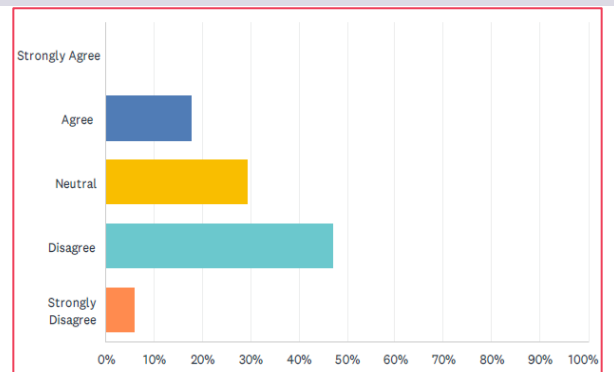
Q8 Complaints should be managed by only one unit across all of QFES.



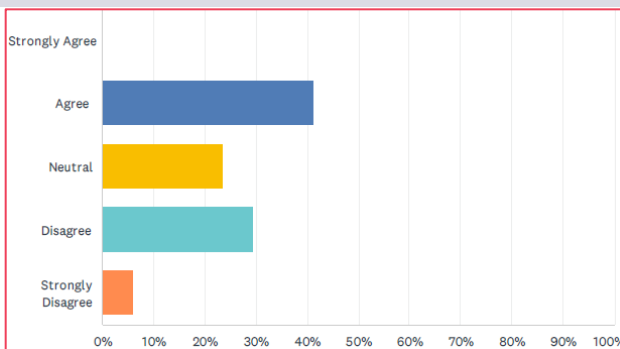
Q9 The current Complaints Management system is fair (on all parties), robust and legally defensible.



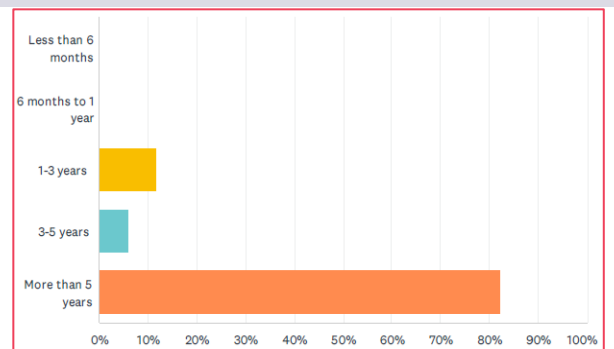
Q10 It is clearly understood which roles have responsibility for complaints management.



Q11 QFES Employees and Volunteers understand the Code of Conduct and issues such as sexual harassment, workplace bullying and diversity and inclusion.



Q12 How long have you worked for QFES?



Q13 Please share any other comments you have below:

1. From my experience the whole process is convoluted, extremely time consuming and passes through too many hands to deliver an effective result in a timely manner. I have witnessed the lack of support and gumption from executives to line managers.
2. Frustration through experience is the time taken from lodgement to completion of a complaint.
3. Happy to discuss my experiences with independent evaluation team. it is very important to get it right.
4. A greater emphasis on the conduct of investigations is required. Those doing the investigating require appropriate training to ensure investigations are conducted in a fair, objective and legally defensible manner.
5. An outsider's perspective would appear that the complaints unit is extremely under resourced timelines are not met and communication is not returned to personnel who submit complaints on the progress of the matters.
6. Inspectors are expected to be involved in fact finding processes to address complaints that have been made yet NO training has been provided to personnel on how this should be done effectively.
7. All complaints should be dealt with at State level to ensure consistent outcomes and impartiality
8. The current complaints process from my experience addresses their complaint however the categorisation of a complaint is generally downplayed with repeat offenders continually demonstrating repetitive poor behaviour without consequence.
9. Sometimes complaints are over-complicated and should be managed more locally. Additionally, clear expectation of the desired outcomes of a complaint should be submitted by the complainant so we know what they are after, and then their expectations managed throughout the complaints process.

Attachment 4 Reference list

References

- Allison, M. (2014). *Independent review of an incident involving Queensland Fire and Emergency Services employees*.
- Broderick, E. (2011). *Report on the Review into the Treatment of Women in the Australian Defence Force Academy, Phase One of the Review into the treatment of women in the Australian Defence Force*. Australian Human Rights Commission.
- Broderick, E. (2012). *Report on the Review into the Treatment of Women in the Australian Defence Force Academy, Phase Two of the Review into the treatment of women in the Australian Defence Force*. Australian Human Rights Commission.
- Cole, K. (2001). *Supervision - The Theory and Practice of First-Line Management*.
- Jennings, C. (2023). Fire Safety Education Campaigns. *Residential Fire Safety. The Society of Fire Protection Engineers Series*. Springer.
- Johns, R. &. (2005, 5(2)). The Usefulness of Exit Interviews and Employment Surveys in Understanding Employee Turnover. *Employment Relations Record*, pp. 1–10.
- Pricewaterhouse Coopers. (2019). *Complaints Management Review and Assessment*.
- QFES. (2019). *Management of Complaints Policy No. 3.12*.
- QFES. (2022). *PR3026 - Management of Complaints*.
- Queensland. (2002). Public Records Act.
- Queensland. (2011, January 1). Code of Conduct for the Queensland Public Service.
- Queensland. (2019). Human Rights Act.
- Queensland. (2020). Individual Employee Grievances (Directive 11/20).
- Queensland. (2022). Managing the risk of psychosocial hazards at work Code of Practice Directive .
- Queensland. (2022). Public Sector Act.
- Queensland. (2023). Public Sector Regulation.

Attachment 5 List of stakeholder interviews

Individual interviews and/or group interviews were conducted with the following:

- QFD internal leadership and management personnel from the following departments:
 - Strategy Services Branch
 - Strategy and Corporate Services
 - RFS Capability Development
 - Volunteer Training
 - Commissioners Office
 - Rural Fire Service Queensland (regional offices)
 - Assurance Directive
 - Fire and Rescue Service
 - Workforce Liaison Unit
 - Conduct Investigations Unit
 - Asset Services
 - Industrial Relations
 - Conduct and Investigations
 - Workforce Support Unit
 - Workplace Standards
 - Communications Training and Development Unit
 - Injury Management
 - Workplace Health and Safety
 - Workforce Development Unit
 - Public Information and Warnings
 - Workforce Experience Unit
 - Right to Information and Privacy Unit
 - Resilience and Risk Mitigation Branch
 - Relations and Standards Branch,
 - Media, Communications and Online Branch
 - First Nations Strategy and Partnerships Branch.
- Queensland Auxiliary Firefighters Association
- RFBAQ
- Together Union – (Rural Fire Division)
- Senior Officers Union
- Australian Manufacturing Workers Union (AMWU)
- United Firefighters Union Queensland
- Public Sector Commission.

Interviews were conducted with the following organisations as a benchmarking reference:

- Department of Transport and Main Roads
- Queensland Police Service
- Queensland Ambulance Service.

Attachment 6 Assessment of progress on previous recommendations

REC #	NAME/DESCRIPTION	ACCEPTED BY QFES	IMPLEMENTED	ACTION REQUIRED	STILL RELEVANT	PROMINENCE INTERIM RECOMMENDATIONS
1	Include a statement of intent or alignment to QFES values in relevant policies and procedures to set the tone to supporting workplace culture.			No		Complete and no further action.
2	Establish a regular process for reviewing policies, procedures and associated communications to ensure that materials are up to date and interconnected appropriately.			No		Complete and no further action.
3	Develop a “key terms” guide and consider changing the use of “management action” to improve clarity of process.			No		Complete and no further action.
4	Identify a case manager for each complaint and articulate clear responsibilities for that person to oversee the complaint through the process to ensure clear communication with the complainant and subject officer. The focus of this person should be a balance between the well-being of the stakeholders involved and ensuring the correct process is followed.			Yes		In place but case manager model may require strengthening and clarification.
5	Publish a high-level process map to improve transparency of process.			No		Complete and no further action.
6	Develop a clear complaint handling accountability framework for all levels within QFES to ensure that individuals are clear about their role, including when in temporary roles.			Yes		Subject to further review and recommendations as part of this review.
7	Ensure that communications with the complainant and subject officer are tailored to their specific circumstances and ideally, communicated in person with written correspondence to follow if required.			Yes		Subject to further review and recommendations as part of this review.
8	Undertake a review of cases where the complaint has been found to be substantiated but no further action determined.			Yes		Iterative process – should be ongoing – provided adequate documentation with reason and rationale and justification for no discipline taken – then is okay. Can be undertaken as part of this -process.
9	Consider implementing an abridged process whereby upon being notified of an allegation, subject officers are offered the opportunity for admission and acceptance of appropriate further action.			Yes		Analysis in next phase as to whether this is necessary and working.

	This would expedite the handling process and mitigate the need for lengthy management action.				
10	Bring the functions of the Employee Relations Unit (ERU) into QFES for the purpose of being able to manage complaints handling end to end and determine the appropriate level of resourcing for this function.			Yes	<p>Transition is underway from old PSBA. Important that QFES leadership have ownership of function but also understand and comply with WOB obligations.</p> <p>Capability and workload management audit may be necessary in future to examine what additional skills are required to manage cases – both volume and complexity.</p>
11	Establish a clear dashboard for reporting complaints trends and insights into the Board of Management. This should include prevalence data and trends as well as insights in discipline and stakeholder satisfaction.			Yes	<p>A Complaints Management Dashboard is reasonably well developed. While not live, data is actively reported on a quarterly basis.</p> <p>Access to the dashboard is limited to a few individuals.</p> <p>Analysis in the next phase on the potential to roll the dashboard out to a wider audience.</p>
12	Ensure that the Workplace Conduct Consultants are set up for success by: <ul style="list-style-type: none"> ensuring that in the new structure and reporting the consultants do not become responsible for managing all complaints in their region maintaining a formal reporting line (dotted line) to the WCB to share lessons learned and leading practice require employee relations, complaints management or human resources experience for any new hire undertake an assessment of the first year of the WCC model to review impact, relationships and the extent to which the intended role description matches the role in practice. 			Yes	<p>Needs further information and work and recommendations as part of next stages – is the resourcing right and is QFES getting right fits and skills for roles.</p> <p>Now called Senior Advisor Workplace Standards (SAWS).</p> <p>Role in place but need to examine how effective.</p> <p>Need to examine capability, skill, knowledge levels of WCCs and determine an appropriate classification level.</p>
13	As a matter of priority, establish a clear performance management framework for the purpose of enhancing professional development opportunities and separating performance issues from misconduct.			No	Iterative process.
14	Develop and implement guidance and training for how to have performance conversations, including but not solely			No	Iterative process.

	focussed on managing underperformance.				
15	State Emergency Service Group Leaders and Rural Fire Service First Officers should be provided specific training to have difficult conversations with their teams when issues arise.			Yes	Should be mandatory and paid training.
16	Update the Management Action Guide and develop other training materials to support managers to identify what management action might be appropriate and how to record, communicate and ultimately implement the agreed actions. Equip leaders with an understanding of the sorts of issues which are being raised through the complaints handling process and alternative resolutions that are available to them through performance conversations, setting team expectations and holding individuals accountable to the Workplace Conduct policy. This training needs to be done in small groups, face to face, tailored to the specific context and rank of the individuals involved.			No	Biennial review of management guide and training – every two/three years.
17	Mandatory two-year training for QFES employees and volunteers who hold management or supervisory roles – Think Say Do.			No	Iterative process.
18	Ensure that all volunteers have signed and understood the code of conduct and the way that QFES values are translated into acceptable behaviours.			No	Ongoing process.
19	Conduct a review of Nexus functionality and seek to upgrade system configuration to: minimise the ability for users to enter incorrect data align fields to Public Service Commission reporting requirements to reduce the need for manual data manipulation investigate ways in which Nexus may be leveraged to support relevant dashboard reporting to QFES leadership.			Yes	QFES determined to be too costly. Reasonable not to proceed at present but position that a more fit for purpose case management system is considered when Nexus is decommissioned next year.
20	Use the appointment of a new Commissioner as an opportunity to consolidate progress in the cultural transformation journey. As a priority the new Commissioner. Takes a listening tour, sharing a detailed report on what is heard. Works to address the top concern. Communicates back to stakeholders the plan to address other issues raised or reasons why they will not be addressed.			No	Complete and no further action.

21	Identify ways to embed QFES values and diversity and inclusion principles in all QFES training, rather than as specific culture modules.			No		Iterative process
22	Provide tailored inclusive leadership training to Assistant Commissioners and Chief Superintendents.			No		Ongoing
23	Develop a leadership framework that clearly articulates the roles and expectations of leaders at each level, including their accountability for managing performance and handling complaints.			No		Complete and no further action
24	Ensure that all communications and training on complaints handling is focussed on providing a safe and productive work environment, not investigations and data collection.			No		Iterative process
25	Take steps to clarify role expectations for Station Officers and empower them to resolve issues locally and appropriately. Formal delegations of authority (aligned to a performance framework) may be required to provide comfort. Changes should be communicated clearly and broadly across the organisation.			Yes		Not seen as feasible by QFES in the short to medium term. Position that should be included as part of longer-term strategy – 5-year timeframe – whilst devolution is encouraged and managing conflict at lowest level is admired goal, should only be done when skill and knowledge level in place and adequate infrastructure and architecture to support such a model.

Attachment 7 Recommendations related to previous PwC report

LEADERSHIP, MANAGEMENT AND CULTURE		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED	
1	Implement organisational initiatives to restore trust in the CMS, including leaders and managers communicating regularly with the workforce on the outcomes of this Review and other proactive preventative measures being taken. This will cultivate a “speak up” culture.		
2	Implement changes to Policy, Procedure and Process with a view to strengthening warnings about victimisation and reprisals in letters, correspondence, training programs and at meetings, etc.		
3	Ensure dedicated and separate case managers (adopting a single point of contact model) are appointed for both complainants and subject officers. These case managers should provide regular updates on progress, timeframes and outcomes, etc.	4 7	Identify a case manager for each complaint and articulate clear responsibilities for that person to oversee the complaint through the process to ensure clear communication with the complainant and subject officer. The focus of this person should be a balance between the well-being of the stakeholders involved and ensuring the correct process is followed. Ensure that communications with the complainant and subject officer are tailored to their specific circumstances and ideally, communicated in person with written correspondence to follow if required.
4	Provide a deidentified (and brief and very high-level) update once a quarter on total complaints and disciplinary actions taken so that all believe that there is “perpetrator accountability” and that employees and volunteers understand that behaviours (good and bad) have consequences.		
5	Create a “customer care” manager or concierge role for customer complaints, so customers have a single point of contact for any complaints.		
6	Review and monitor customer complaints for trends/themes that might inform future prevention plans.		
7	Develop greater awareness and management of mental health issues related to the complaint process and complaints themselves focussing on what is required for all stakeholders including fact finders.		
8	Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system).	25	Take steps to clarify role expectations for Station Officers and empower them to resolve issues locally and appropriately. Formal delegations of authority (aligned to a performance framework) may be required to provide comfort. Changes should be communicated clearly and broadly across the organisation.
9	Relevant personnel and mid to executive management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct.		

10	Ensure frontline managers receive training in Business skills including 'Having Difficult Conversations', conflict resolution and psychological safety awareness and management incorporating psychological first aid training.	15	State Emergency Service Group Leaders and Rural Fire Service First Officers should be provided specific training to have difficult conversations with their teams when issues arise.
GOVERNANCE AND PERFORMANCE		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED	
11	Establish a refreshed governance framework for the complaint management system with an emphasis on high-level oversight and monitoring at the executive level or a steering committee with an emphasis on prevention and management. Such reporting to include the number of cases, new complaints, timeframes, non-compliance, significant or matters with high risk flagged ensuring Director, Relations and Standards, Chief Operating Officer, Strategy and Corporate Services, and the Chief Human Resources Officer are briefed on all red flag or sensitive cases unless COI exists.	6	Develop a clear complaint handling accountability framework for all levels within QFES to ensure that individuals are clear about their role, including when in temporary roles.
12	Implement a monthly case management meeting between various key stakeholders in the CMS process (such as People and Culture Division, Safety, Injury Management, Legal) to provide updates on each case, timeframes and matters of risk. Meeting should be chaired by Director, Relations and Standards.	8	Undertake a review of cases where the complaint has been found to be substantiated but no further action determined.
13	For consistency, timeliness and streamlining of processes, ensure that only one responsible Senior Executive with the appropriate delegation is appointed for oversight for complex and serious investigation outcomes.		
14	No serious matters should be managed with a single point of failure in the event of an officer or delegate being on extended leave. It is noted, however that discipline cases are often voluminous, and any replacement has to fully appraise themselves of the entire case. Therefore, responsible Executives (delegates) must ensure active oversight on these matters at all times.		
15	Undertake a detailed impact analysis of the new QFD Legislation including the development of an implementation and resourcing plan which contains "how and who" is responsible for the provision of procedural fairness and natural justice and how QFD commitments to the volunteer community and stakeholder groups will be met.		
16	Where a person engaging with the CMS in any capacity, identifies as Indigenous, liaise with the new First Nations Strategy and Partnership Branch within QFD on cultural capability and awareness matters and obligations to ensure compliance with the new Public Sector Act 2022 and relevant Directives.		

17	Develop training for all levels of management to employ and support culturally diverse peoples, starting with the ability to identify cultural differences and handle them appropriately.		
POLICY AND PROCESS		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED	
18	Develop overarching guiding principles for the CMS such that these principles are embedded throughout the entire system and publicly available. These principles should also reflect the requirements of the QFD Commissioner as per Section 32 of the Public Sector Act 2022 to develop and promote a workplace culture of respect and inclusion. Possible principles may include: Safe and Supportive, Fair and Impartial, Inclusive, Transparent, Easy to Use, Preventative Based, Timely and Responsive		
19	Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management of complaints.		
20	Develop and implement a person centric, trauma and gender informed approach for sexual harassment complaints including ensuring multiple pathways (such as informal complaints) to make a complaint or report sexual harassment and conducting training for relevant personnel who are involved in coordinating, managing and deciding sexual harassment (or sexual harassment like) complaints.		
21	Develop and implement a revised and refreshed process for the categorisation of complaints using the CAPE model, with greater input from the SAWS roles and operational roles (where applicable).	9	Consider implementing an abridged process whereby upon being notified of an allegation, subject officers are offered the opportunity for admission and acceptance of appropriate further action. This would expedite the handling process and mitigate the need for lengthy management action.
22	Update the QFD Management Action Guide so it reflects current terminology and practice and ensure QFD policies and procedures use consistent terminology to describe its workforce.		
23	Have a “stop the clock” concept built into the QFD policy and procedures for both complaints and disciplinary matters so that circumstances that occur outside of QFD management control are recognised and factored into compliance within statutory timeframes.		
24	Report all exit interview data and statements to the Relations and Standards Branch (where applicable) for analysis and consideration as to whether follow up action is required with a particular focus on the reporting of sexual harassment and/or discrimination matters.		

PEOPLE		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED	
25	Review the SAWS role description, including undertaking a job analysis with evaluation and review of the role classification level – ensuring it is pitched at the right level to attract and retain the right people with the right skills. That said, diverse backgrounds and skill sets for these roles should be welcomed and embraced. For example, having a combination of people from an Employee Relations, Human Resources, Police, investigative and Legal backgrounds – and the collective knowledge, skills and experience this brings, should be embraced.	12	Ensure that the Workplace Conduct Consultants are set up for success by: <ul style="list-style-type: none"> ensuring that in the new structure and reporting the consultants do not become responsible for managing all complaints in their region maintaining a formal reporting line (dotted line) to the WCB to share lessons learned and leading practice require employee relations, complaints management or human resources experience for any new hire undertake an assessment of the first year of the WCC model to review impact, relationships and the extent to which the intended role description matches the role in practice.
26	Undertake a resourcing review of the Relations and Standards Branch based on workload and not just a Full Time Equivalent (FTE) allocation. Specific acknowledgement should be given to the management of a large number of growing issues and complexity due to a large volunteer base (approximately 27,000) across a geographically dispersed state. This review to include an analysis of existing investigator capacity and capability with a view to build and maintain a casual (internal employees at the AO7/AO8 level) investigation pool of resources to immediately ease the burden and workload of existing internal investigators.	10	Bring the functions of the Employee Relations Unit (ERU) into QFES for the purpose of being able to manage complaints handling end to end and determine the appropriate level of resourcing for this function.
TRAINING AND EDUCATION		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED	
27	Establish two yearly (Biennial) refreshers for all QFD employee and volunteers on Understanding and Prevention of Sexual Harassment, Workplace Bullying and Discrimination and Code of Cg.		
28	Implement an on-line cultural capability and awareness and anti-racism short course for all employees and volunteers on First Nations issues to provide foundational knowledge and genuine awareness with respect to Indigenous Cultures.		
29	Frontline managers need to be trained in specific cultural awareness and capability in terms of managing workplace issues involving First Nations peoples.		
30	Provide Fact Finders with training on standards of proof, evidence gathering, note-taking and key legal concepts relevant to the role.		

	TECHNOLOGY DATA AND REPORTING		ASSOCIATED PWC RECOMMENDATION YET TO BE FINALISED
31	<p>Replace the Nexus software with a more fit-for-purpose system that supports end-to-end case management. This will include support for enhanced case management capability, including:</p> <ul style="list-style-type: none"> ■ email integration ■ less manual data entry ■ tiered security access that allows all parties equitable access to information ■ a portal for capturing complaints that includes an option for users to self-identify with demographic information such as gender, or First Nations status or other target groups such as people with a disability ■ document version control ■ workflow for approval routing ■ an audit history of all decisions made, information received and changes to documents. 	19	<p>Conduct a review of Nexus functionality and seek to upgrade system configuration to:</p> <ul style="list-style-type: none"> ■ minimise the ability for users to enter incorrect data ■ align fields to Public Service Commission reporting requirements to reduce the need for manual data manipulation ■ investigate ways in which Nexus may be leveraged to support relevant dashboard reporting to QFES leadership.
32	<p>Develop a records management framework to ensure compliance with the Public Records Act 2002 at a minimum, this policy will address retention, archiving and disposal of all complaints management records.</p>		
33	<p>Revise the reporting dashboards to meet Steering Committee or Senior Executive requirements for timely, accurate complaints information. This should highlight trends as well as provide insights into discipline and stakeholder satisfaction.</p>	11	<p>Establish a clear dashboard for reporting complaints trends and insights into the Board of Management. This should include prevalence data and trends as well as insights in discipline and stakeholder satisfaction.</p>
34	<p>Undertake a high-level root cause analysis of complaints each year to identify trends and themes over time and implement preventative strategies based on science, data and facts.</p>		

Prominence

CONSULTING

PROMINENCE IS ISO9001 QUALITY MANAGEMENT CERTIFIED
BY BSI UNDER CERTIFICATE NUMBER FS52145



+61 7 3170 3766
enquiries@prominenceconsulting.com.au

Suite 909, 55 Railway Terrace, Milton Qld 4064
PO Box 66, Taigum Qld 4018

www.prominenceconsulting.com.au