



Complaints Management System Review – September 2024

Queensland Fire Department

RESPONSE

In December 2023, the then Queensland Fire and Emergency Services, now Queensland Fire Department (QFD), engaged independent third party Prominence Consulting to review the department's complaints management system, report on its findings and make recommendations for improvement.

The review encompasses the broad suite of complaint and feedback mechanisms available to the QFD workforce, customers and community and forms an element of the wider program of cultural reform being driven across QFD in response to the findings of earlier reviews.

Prominence Consulting delivered the *Final Report for a Complaints Management System Review* (the review report) to QFD on 3 September 2024.

The review report notes the sustained effort by the Queensland Government and the department to create a safer, more respectful work environment and the ongoing vigilance and commitment required to achieve lasting cultural change. This sustained effort has included:

- Organisational commitment to values including release of the Values Charter and development of team charters across the department.
- Governance and structural changes to support cultural goals including: restructure of the Relations and Standards Branch with a focus on workforce conduct and including the Workforce Support Unit; establishment of the First Nations Strategy and Partnership Branch; establishment of a dedicated Principal Social Policy Officer position focused on diversity and equity; and establishment of a specific governance committee for people and culture and a Gender Equity Advisory Group.
- New and revised strategies, policies and standards including a Strategic Workforce Plan; Equity and Diversity Plan; Reframing the Relationship Plan; Aboriginal and Torres Strait Islander Cultural Capability Action Plan and Workplace Behaviour Standards.
- Enhanced training across the QFD workforce including: delivery of Think Say Do combined conduct and workplace behaviours training; development and delivery of Leadership Foundation Programs – Leading Self and Leading Others; delivery of Leadership Foundations – Connecting Women Pilot Program; corporate induction focussed on values, wellbeing and positive experience; and the Cultural Agility Development Program “Building on the



Strengths of Our Stories”. QFD Foundations Forums held in early July 2024 and involving over 700 leaders from across the department also included key sessions on behavioural expectations and complaints management.

- Launch of programs aimed at driving diversity and equity outcomes and sharing successes such as: the Annual QFES Women within Fire and Emergency Services Awards; Allies of Inclusion program with nearly 500 active allies of inclusion; an online program supporting the psychological wellbeing of volunteers; Frontline Women’s Network for the fire services; and Sexual Harassment Contact Officer Network
- Engagement with external initiatives to amplify QFD’s commitment to diversity and equity including: membership of the Australasian Fire and Emergency Services Authority Council Diversity and Inclusion Group; Working with the office of the Special Commissioner, Equity Diversity to deliver the departmental Equity and Diversity Audit; White Ribbon accreditation; membership of the Leading Women’s Network and hosting of Leading Women’s Network “Inclusion, Not Just Diversity” podcast series; Executive Leadership Team pledge to end domestic and family violence; participation in *Respect in the Workplace Survey*; membership of Champions of Change; and the inaugural Girls Firefighting Experience camp pilot program to promote firefighting as a genuine career option for women.
- Regular communication of QFD’s cultural goals and workplace behaviour expectations.

With the commencement of the QFD, a refreshed culture development approach has been developed that includes key pillars for ongoing cultural improvement such as a Workforce Culture Assessment, more action to embed values in all QFD activities, more comprehensive onboarding and induction programs, piloting of the next two phases of the Leadership Foundations Program – Leading Leaders and Leading Organisations, more meaningful workforce experience surveys, and a new Diversity and Equity Plan. Actions under the refreshed approach are progressing.

QFD acknowledges that a robust complaints management system is an important factor in supporting QFD’s ongoing program of work. In its review report Prominence Consulting makes 34 recommendations for the complaints management system under the themes of: leadership, management and culture; governance and performance; policy and process; people; training and education; and technology, data and reporting. QFD accepts in principle 33 recommendations and does not support one recommendation. Recommendations are set out in the table below.

To ensure recommendations can be effectively delivered, QFD will consider the recommendations in detail and develop an implementation plan, including options for appropriate resourcing, in conjunction with relevant agencies. Importantly, implementation planning will be focussed on actions to build trust in the complaints management system.

An appropriately qualified independent person will be appointed to monitor implementation of actions.



Leadership, Management and Culture

No.	Recommendation	QFD Position	Departmental Response
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.	Accepted-in-Principle	<p>QFD is committed to building trust in the complaints management system.</p> <p>Leaders and managers utilise a range of mechanisms to communicate with the QFD workforce about proactive preventative measures being taken. QFD will identify appropriate methods to incorporate regular messaging around the outcomes and implementation of this review.</p>
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.	Accepted-in-Principle	<p>QFD recognises that there is scope to strengthen warnings about victimisation and reprisals.</p> <p>An assessment of complaints management policy, procedure and templates will be undertaken to identify opportunities to strengthen the message.</p>
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.	Accepted-in-Principle	<p>QFD supports strong case management principles in addressing complaints and has an existing commitment to applying case management principles.</p> <p>QFD will consider options to achieve dedicated points of contact for complainants and subject officers while ensuring currency of information and consistency of message.</p> <p>A practice of providing regular updates forms part of existing case management principles. QFD will ensure this is emphasised in complaints management training as part of its business skills training suite.</p>

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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.	Accepted-in-Principle	<p>Conduct and Performance Excellence (CaPE) information (levels 2 and 3) is published on the Public Service Commission website and is publicly available.</p> <p>QFD will enhance internal communication with outcomes of finalised complaints with the aim to educate about appropriate behaviours within the workplace, and in the context of the privacy of complainants and subject officers.</p>
5	Create a “customer care” manager or concierge role for customer complaints, so customers have a single point of contact for any complaints.	Accepted-in-Principle	<p>Complaints management business process mapping has commenced which will inform potential changes to the complaints intake and triaging processes, to deliver on the intent of a single point of contact.</p> <p>This work will align with any updates to case management principles.</p> <p>Options to enhance this process through implementation of an ICT solution will be considered subject available funding sources.</p> <p>QFD will engage with the Public Sector Commission’s Complaints Clearinghouse Program and the Complaints Handling Improvement Centre on development of the clearinghouse model and whole of government work planned and underway that may address this recommendation.</p>
6	Review and monitor customer complaints for trends/themes that might inform future prevention plans	Accepted-in-Principle	<p>QFD will explore how to enhance manual monitoring for themes and trends.</p> <p>Future implementation of an ICT solution (subject to available funding sources) is expected to deliver more efficient trend analysis.</p>



			As noted in Recommendation 5, QFD will engage with the Complaints Clearinghouse Program on relevant work programs.
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.	Accepted-in-Principle	<p>QFD invests significantly in mental health services for its workforce including:</p> <ul style="list-style-type: none"> • Confidential professional counselling available for all staff, volunteers and immediate families • 24-hour telephone counselling for after hours support • Peer Support Program • Critical Incident Response and Management program • Disaster mental health service the provides education, resources and support for managing the challenges of disaster operations • Leadership advice services • A broad range of training, education and resources to promote mental health awareness and support services available to staff and volunteers <p>A new Mental Health Strategy has recently been delivered and new positions of Manager, Mental Health Services in each regional hub are now in place.</p> <p>Research around best practice management of mental health in the complaints process will enable QFD to leverage existing services to better support participants in complaints.</p>
8	Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system).	Accepted-in-Principle	<p>QFD will refresh and build on the QFD Leadership Framework and associated Leadership Foundation Programs. Two foundation programs are in place and being delivered across the workforce and two further programs are in development.</p> <p>QFD will also continue to deliver the newly developed Connecting Women leadership development program.</p>

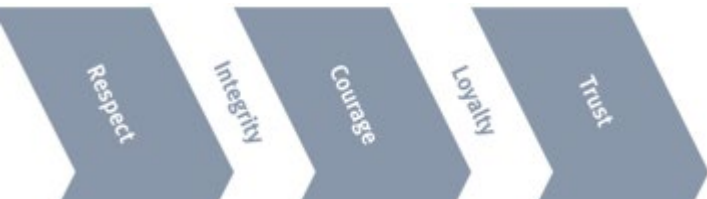


			<p>Regular complaints management training and mentoring will also continue to be delivered through the Senior Advisor Workplace Standards network.</p> <p>A new business skills for leaders project has commenced identifying skills gaps and organisational needs. Complaints management training will be included as part of the business skills suite.</p>
9	Relevant personnel and mid to executive management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct.	Accepted-in-Principle	<p>Enhanced complaints management training, as part of the business skills suite, will address unreasonable conduct.</p> <p>The current project to determine a baseline of mandatory training will ensure that skills critical to the roles of managers and other relevant personnel are included within mandatory training packages.</p>
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.	Accepted-in-Principle	<p>The business skills for leaders package will include elements addressing difficult conversations and navigating the complaints management system.</p> <p>As QFD rolls out psychosocial safety awareness more generally across its workforce, psychosocial safety in the context of complaints management will be addressed.</p>

Summary of Areas for Action

In addressing these recommendations QFD will explore:

- Enhancements to leadership programs and further opportunities for complaints management training.
- Utilising internal communications channels to better engage the QFD workforce on review outcomes, proactive preventative measures, summaries of outcomes and appropriate behaviours, particularly related to reprisals.
- Opportunities to enhance policies and procedures to underpin improved outcomes.
- Options for delivery of more focussed case management, including consideration of single points of contact and clear connections to mental health services.



Governance and Performance

No.	Recommendation	QFD Position	Departmental Response
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.	Accepted-in-Principle	<p>With the establishment of QFD from 1 July 2024, new governance arrangements are being implemented including a senior level Executive Leadership Team and dedicated People and Culture Committee and Workplace Health and Safety Committee.</p> <p>QFD will consider how this recommendation can be addressed in the work program of relevant new committees, including appropriate and timely reporting of significant or high risk matters. Protecting the independence of delegates in complaints matters who may also be representatives on relevant committees will be a key element of this consideration.</p> <p>Consideration will also be given to the ongoing efficacy of existing briefing on these matters to the Audit, Risk and Compliance Committee.</p>
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.	Accepted-in-Principle	<p>Case management meetings currently occur in regions and this process will be replicated for state office where relevant.</p> <p>A more detailed assessment of the appropriate chair for state office case management meetings will be required to ensure the Director, Relations and Standards can continue to be a point of escalation for individual cases.</p>
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.	Accepted-in-Principle	<p>QFD will confirm the appropriate delegate is appointed for oversight for complex and serious investigation outcomes.</p> <p>Matters will be allocated based on the area of responsibility for each executive where possible, in the context of caseload and operational priorities.</p>

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			Leadership and training initiatives proposed in response to other recommendations are expected to assist in achieving the intent of this recommendation.
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.	Accepted-in-Principle	A combination of enhanced case management practices, case management meeting processes and executive oversight will address the intent of this recommendation that single points of failure be avoided.
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	Accepted-in-Principle	Legislative impact analysis has been undertaken in respect of new QFD legislation. Doctrine relevant to volunteers is being developed to address matters identified through impact analysis. Who is responsible for procedural fairness is addressed in the QFD Instruments of Delegation. Processes for application are being developed through doctrine with guidance provided by Public Sector Commission directives.
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	Accepted-in-Principle	QFD will build cultural capability into its complaints management system and ensure compliance with the <i>Public Sector Act 2022</i> and relevant directives. Review of complaints management policy and procedures, collateral and training will include a cultural lens to ensure processes and practices reflect culturally safe service delivery.
17	Develop training for all levels of management to employ and support culturally diverse peoples,	Accepted-in-Principle	QFD is currently committed to a range of cultural capability initiatives including development of the QFD Reframing the



	starting with the ability to identify cultural differences and handle them appropriately		<p>Relationship Plan. The Reframing the Relationship Plan sets out a series of objectives including promotion of cultural safety and cultural capability at all levels of the department. Training initiatives are part of this commitment.</p> <p>On online cultural awareness training module is available and has had substantial uptake, cultural awareness is included in induction programs and new face to face training opportunities are also being trialled.</p>
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Summary of Areas for Action

In addressing these recommendations QFD will explore:

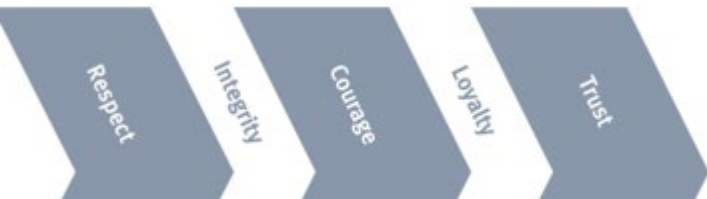
- Enhanced governance arrangements for the complaints management system in the context of the new governance framework being established for the QFD.
- Streamlined reporting that ensures high risk matters are visible to key executives in a timely manner.
- Continued expansion of case management procedures in alignment with best practice, including specific consideration of first nations and volunteer perspectives.
- Any unaddressed impacts from implementation of QFD legislation.

Policy and Process

No.	Recommendation	QFD Position	Departmental Response
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	Accepted-in-Principle	QFD will develop guiding principles for the complaints management system aligned to QFDs values and specific to the findings of this review.



19	Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management of complaints.	Accepted-in-Principle	<p>QFD will develop a prevention plan that is closely aligned to QFDs culture development approach and informed by complaints management trends.</p> <p>Planning will be deferred until the relevant recommendations from this review (e.g. better trend analysis) have been implemented to ensure the plan builds on those successes.</p>
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.	Accepted-in-Principle	<p>QFD has developed a sexual harassment policy in alignment with Public Sector Commission directives which sets out the procedure for making complaints.</p> <p>The sexual harassment policy will be revisited to ensure it clearly specifies the appropriate pathways for making complaints.</p> <p>A Sexual Harassment Contact Officer Network has been established.</p> <p>Person centric, trauma and gender informed approaches will be covered in revised training frameworks.</p>
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).	Accepted-in-Principle	<p>QFD will consider options for resourcing complaint assessment and categorisation to address bottlenecks, recognising the need for clear separation of roles to preserve independence at each stage of the complaints management process.</p> <p>Categorisation methods used are in line with government requirements.</p>
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	Accepted-in-Principle	<p>QFD will update the Management Action Guide with current and consistent terminology.</p>



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.	Not accepted	This recommendation is not accepted as it is inconsistent with timeframe requirements that apply to the majority of Queensland Government departments under the <i>Public Sector Act 2022</i> .
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.	Accepted-in-Principle	QFD’s current practice is to refer all allegations of misconduct or other matters (including sexual harassment) raised through exit interviews to the Relations and Standards Branch for consideration of necessary action. This practice will continue.

Summary of Areas for Action

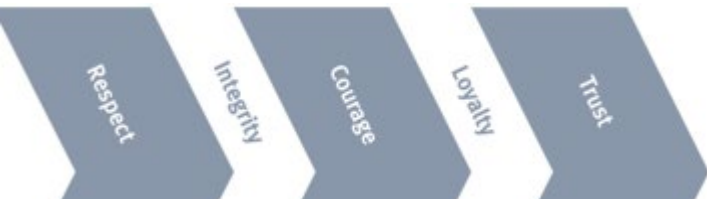
In addressing these recommendations QFD will explore:

- Opportunities to enhance the existing complaints management framework and process to encompass guiding principles, best practice intake and triaging processes, consistent terminology, and management of available data.
- Updates to sexual harassment policy to better reflect person centric, trauma and gender informed approaches.
- Expansion of sexual harassment training and support frameworks.
- Further focus on prevention, including specific prevention planning.

Note that Recommendation 23 is not accepted as it is inconsistent with requirements of the *Public Sector Act 2022* which sets out timeframes to ensure timely response to complaint matters is prioritised within agencies.

People

No.	Recommendation	QFD Position	Departmental Response
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	Accepted-in-Principle	An assessment of the services provided by the People and Culture directorate has commenced, including business process mapping.

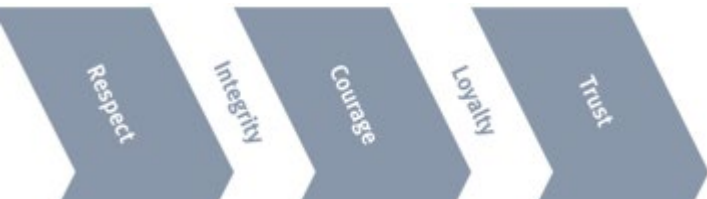


	and skill sets for these roles should be welcomed and embraced. For example, having a combination of people from an Employee Relations, Human Resources, Police, investigative and Legal backgrounds – and the collective knowledge, skills and experience this brings, should be embraced.		<p>This, combined with the recommendations of this review, will enable QFD to meaningfully review purpose, function and work flows, including capability, capacity and consistency in practice.</p> <p>Potential changes in work value will be assessed through job evaluation processes.</p> <p>Diverse backgrounds and skills will continue to be welcomed to the Senior Advisor Workplace Standards role.</p> <p>Consultation with industrial representatives will be undertaken on any actions (for this and other recommendations) that impact on the workplace entitlements of staff.</p>
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.	Accepted-in-Principle	Resourcing for the Relations and Standards Branch and the complaints management function, including investigators, will be considered in the context of the assessment of services provided by the People and Culture directorate and associated business process mapping.

Summary of Areas for Action

In addressing these recommendations QFD will explore:

- The role of the Senior Advisor Workplace Standards, in the context of wider consideration of QFD People and Culture services, including relevant workflows.
- Appropriate resourcing for complaints management processes.



Training and Education

No.	Recommendation	QFD Position	Departmental Response
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.	Accepted-in-Principle	<p>QFD will consider training requirements for understanding and prevention of sexual harassment, workplace bullying and discrimination, and Code of Conduct, in the context of mandatory training frameworks currently under development.</p> <p>Delivery of training will be influenced by the needs of the volunteer workforce.</p> <p>QFD notes the work being undertaken by the Public Sector Commission on a whole of government sexual harassment training package and will leverage this work where appropriate in addressing this recommendation.</p>
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.	Accepted-in-Principle	<p>QFD will consider how existing cultural capability training can be leveraged to achieve broader uptake.</p> <p>Anti-racism resources and learnings will be made available to the QFD workforce through the Racism It Stops with Me campaign as part of QFD's commitment under the Queensland Government Multicultural Action Plan.</p>
29	Frontline managers need to be trained in specific cultural awareness and capability in terms of managing workplace issues involving First Nations peoples.	Accepted-in-Principle	QFD will apply a first nations lens to training packages developed for the complaints management system including seeking advice from the First Nations Reference Group where relevant.
30	Provide Fact Finders with training on standards of proof, evidence gathering, note-taking and key legal concepts relevant to the role.	Accepted-in-Principle	QFD will consider how existing training for fact finders can be enhanced/delivered to ensure confidence in key skills relevant to the role.

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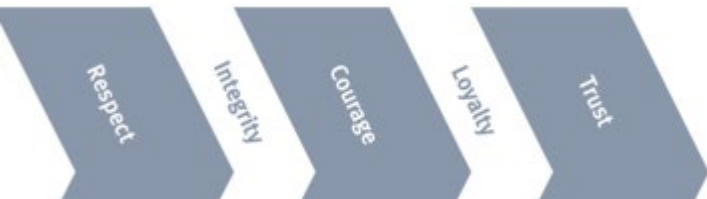
Summary of Areas for Action

In addressing these recommendations QFD will explore:

- Updates to the QFD training suite and options for training delivery channels that provide most effective coverage of QFD’s diverse and widely dispersed workforce.

Technology, Data and Reporting

No.	Recommendation	QFD Position	Departmental Response
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"> o email integration o less manual data entry o tiered security access that allows all parties equitable access to information o 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 o document version control o workflow for approval routing o an audit history of all decisions made, information received and changes to document. 	Accepted-in-Principle	<p>QFD will undertake a scoping exercise to identify the system requirements to enable best practice complaints management and consider options for resourcing system replacement.</p> <p>The commitment of the Queensland Government to establishing a technologically enabled complaints clearinghouse is relevant to this recommendation and QFD will engage with the Complaints Clearinghouse Program on this initiative.</p>
32	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.	Accepted-in-Principle	QFD will consider actions to enhance complaint management record keeping in the context of current compliance with the <i>Public Records Act 2002</i> and in alignment with a broader



			departmental ICT project on records and information management currently in progress.
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.	Accepted-in-Principle	QFD will continue to enhance reporting dashboards, in alignment with governance considerations highlighted in Recommendation 11.
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.	Accepted-in-Principle	As noted at Recommendation 2, QFD will explore how to enhance manual monitoring for themes and trends. Implementation of root cause analysis will be considered once fundamental improvements are in place.

Summary of Areas for Action

In addressing these recommendations QFD will explore:

- Options for ICT systems support for case management.
- Integration of records management requirements within case management procedure and ICT system scoping.
- Opportunities to better utilise trend analysis to inform preventative actions.

