



**Review of the Office of the Health Services  
Commissioner Against Australian Standard  
AS 4269-1995 and International Standard  
ISO-10002**

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# 1 Project Scope

## 1.1 Purpose Statement

To review and assess Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling and the Office of the Health Services Commissioner (OHSC) compliance with these standards and the relevance of the standards to the Office.

## 1.2 Goals

To review and investigate the Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling, and review the Office of the Health Services Commissioner against these standards. In conjunction should any key areas be deficient methods should be identified to improve these.

## 1.3 Objectives

- The relevance of the standards to the Office of the Health Services Commissioner;
- How the standards impact on the functions of the Office of the Health Services Commissioner as an Independent Statutory body;
- Does the Office of the Health Services Commissioner meet these Standards, if not what percentage do they meet;
- Suggestions on how the Office of the Health Services Commissioner may work to meet the standards and achieve 100% compliance if possible;

## 1.4 Constraints

- Time: The project is to be completed during my university placement. This limits the time from commencement to completion to 19 days. The project is quite large, with vast amounts of reading, research and reviewing to be done before the project can be deemed feasible and accurate. The time frame that the project has been placed in may prove the project challenging to complete. For the project to be completed I must dedicate time out side of office hours to read, research and review the Standards and the associated literature.

- Financial: The Office of the Health Services Commissioner is an Independent Statutory Body that receives all funding directly from the Department of Human Services which in turn receives funding from the Victorian Government. Therefore limited budgetary resources exist. In the event that it is necessary for changes, training programs or subsequent departmental reviews to occur, it may be impossible to do so due to inadequate funds. By law however, the Office of the Health Services Commissioner is required to allocate 3% of their annual budget to staff development that includes staff training.
- Interpretation: Both AS 4269-1995 and ISO-10002 are very complicated standards. As a student these standards can prove difficult to comprehend and analyse. Therefore it was imperative that I had the assistance of a staff member that has previously interpreted the standards.
- Relevance: Are the standards relevant and useful to the Office of the Health Services Commissioner? The Office of the Health Services Commissioner uses “in-house” resolution processes. The relevance of the Standards must be understood and if they only cater for advocate organisations identified. The standards must be reviewed, analysed and dissected to make this assumption.
- Availability: Completing the project requires communication with the staff at the Office of the Health Services Commissioner. These staff members include Business Executives, Lawyers, Conciliators, and Review staff, all these staff members are very busy. They have limited timeframes in which they can spend informing me about their roles and how these roles directly involve both AS 4269-1995 and ISO-10002. Appropriate times in which meetings can run must be identified and appointments must be made where appropriate.

## 1.5 Project Definition

Project Name	Review of the Office of the Health Services Commissioner Against Australian Standard AS 4269-1995 and International Standard ISO-10002.
Project Sponsor(s)	Michael McDonald, Manager, Executive Services
Project Manager	Susan Joseph, Placement Supervisor
Project Team	Haroula Skliros 95% Susan Joseph 5%
Problem Statement	To review and assess Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling and the Office of the Health Services Commissioner compliance with these standards and the relevance of the standards to the Office.
Project Description/Narrative	<p>The Office of the Health Services Commissioner strives to comply with the Australian Standard AS 4269-1995 and the International Standard ISO-10002. A comprehensive review and a subsequent report of the actual level of compliance had never been performed. Therefore it appeared suitable and challenging for a student to execute the project. The project was also deemed an excellent method of familiarising the student with the procedures and processes followed by the various teams at the Office of the Health Services Commissioner.</p> <p>The project is aimed at identifying areas that could be further improved to achieve the best possible compliance with the Standards. The project also strives to identify the relevance of the Standards to the Office of the Health Services Commissioner and how useful they are to the nature of work carried out. If the Standards are deemed relevant and implemented the expected benefits would include compliance, better practice and further client satisfaction.</p>
Start Date/Est. Timeline	03/05/05
Completion Target Date	02/06/05

## **1.6 Assumptions**

- Haroula Skliros working at 95% dedicated time.
- Susan Joseph working at 5% dedicated time.
- Staff working hours occur on a 9.00am-5.00pm schedule.
- Total of workdays dedicated to project equal 19.
- The Office of the Health Services Commissioner does not fully comply with the Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling.
- The Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling may not be relevant to the Office of the Health Services Commissioner.
- The staff at the Office of the Health Services Commissioner will remain in their current roles for the duration of the project.
- The staff at the Office of the Health Services Commissioner will be readily available throughout the duration of the project to answer queries related to their compliance with the Australian Standard AS 4269-1995 and the International Standard ISO-10002 on Complaint Handling.
- Project scope will not be modified in any way during the course of the project.

## **2 DISCUSSION**

The OHSC is an independent statutory authority established to receive and resolve complaints about health service providers.

International Standard ISO-10002 is not relevant to the OHSC. As the OHSC is an external complaints handling body, and it is not applicable to disputes referred for resolution outside the organisation.

The Australian Standard AS 4269-1995 is relevant to the OHSC and is discussed below, each individual essential element is cited and then the findings and recommendations are discussed.

### **COMMITMENT AS 4269-1995 Section 2.2 and 2.3**

**2.2** There shall be a commitment to efficient and fair resolution of Complaints by people in the organisation at all levels, including the chief executive or ruling body. This is shown by an organisational culture which acknowledges consumers' rights to complain and which actively solicits feedback from consumers. The policy on complaints handling shall be in writing.

**3.2** For effective complaints handling, there needs to be commitment at all levels within the organisation. It is particularly important that this is demonstrated at, and promoted from, the organisation's highest level. A commitment to responding positively to complaints should cover both internal and external complaints, allowing staff and consumers to contribute to the improvement of the organisation's services or products. This is an essential prerequisite for the development of an organisational culture which acknowledges the consumers' right to complain and which actively solicits consumer feedback.

This commitment should be reflected in the adoption and dissemination of documented policies and procedures for the resolution of complaints. Management commitment is also demonstrated in the provision of training.

The development and review of policies should be given sufficient organisational priority and be adequately and appropriately researched.

**Findings:**

- AS 4269-1995 states that "commitment should be reflected in the adoption and dissemination of documented policies and procedures for the resolution of complaints". The OHSC does not have any documented policy or procedure manuals for the resolution of complaints.
- OHSC displays commitment to complaints handling and promotes positive complaint handling procedures in accordance with AS 4269-1995.
- The importance of "provision of training" is also highlighted in AS 4269-1995. The OHSC budget allocates funding for staff training and development.
- The OHSC has an organisational culture which acknowledges the consumer's right to complain and solicits consumer feedback and therefore complies with AS 4269-1995.

**Recommendations:**

- Written policy and procedure manuals on the OHSC complaints handling system should be documented and implemented. These policy and procedures should be annually reviewed with strategies for improvement identified and implemented.

**2.3** A complaints handling process shall recognise the need to be fair to both the complainant and the organisation or person against whom the complaint is made.

**3.3** The complaints process shall recognise the need to be fair to both the complainant and the organisation or person against whom the complaint is made. The process shall be based on the complainant's right to—

- (a) be heard;
- (b) know whether the organisation's relevant product and service guidelines have been followed;
- (c) provide and request all relevant material to support the complaint;

- (d) be informed of the criteria and processes, including the avenues for further review, applied by the organisation dealing with complaints;
- (e) be informed of the response of the person or organisation complained of;
- (f) be informed of the organisation's decision and the reasons for that decision;
- (g) know that the complaint is being reviewed independently where possible; and
- (h) confidentiality, if requested.

The person or organisation about whom the complaint is made shall have the right to—

- (i) amass sufficient detail about the complaint to enable that person or the organisation to properly investigate and respond to the complaint;
- (ii) place all relevant material before the person investigating the complaint; and
- (iii) be informed of the decision and the reason for the decision.

**Findings:**

- The OHSC complies with this standard.
- The OHSC encourages free and open discussion with both parties given the opportunity to put forward their point of view.

**Recommendations:**

- Independent assessment of consumer and staff awareness of the complaints handling process. Best practice would be 95% of staff and consumers to be aware of the complaint process.

**RESOURCES AS 4269-1995 Section 2.4 and 3.4**

**2.4** There shall be adequate resources for complaints handling with sufficient levels of delegated authority.

**3.4** People are the single most important resource in the complaints handling process. It is important that staff are appropriately selected and provided with sufficient training and support to ensure that complaints are dealt with appropriately. Such training should form part of induction for new staff and be regularly reinforced and updated.

In organisations which have staff dedicated to complaints handling or investigation, threshold be training in product or service knowledge, interpersonal and communications skills as well as the details of the policies and procedures of the organisation.

Handling complaints over a period of time can cause stress. Therefore consideration should be given to include measures for stress minimization. In some circumstances rotating staff through complaints handling areas can develop management skills but also reduce the likelihood of stress.

It is important for staff handling complaints to have resources that will enable them to perform their duties efficiently and effectively. Adequate numbers of staff with sufficient delegated authority shall be available in the decision-making process.

These resources could include—

- (a) easily accessed, detailed complaints handling procedures manuals, reference material and databases—preferably computerized;
- (b) good telephone handling equipment to enable hands-free operation;
- (c) a user-friendly complaints handling environment, e.g. low noise level, interview facilities;
- (d) adequate work tools; e.g. telephone systems, photocopiers, fax machines, answering machines;
- (e) facilities to record and store information on complaints; and
- (f) access to all levels of the organisation as necessary to solve a complaint.

**Findings:**

- OHSC receives annual funding from the Victorian Government through DHS, so it can provide a free service to consumers.
- Annually, the Commissioner assesses how much funding will be needed to sustain the office and then a proposal is forwarded to DHS.
- The OHSC promotes stress minimisation in accordance with AS 4269-1995. A yoga program subsidised by the office is available to all staff weekly.
- Staff rotation as specified by AS 4269-1995 does not take place.
- All other aspects of this standard are met.

**Recommendations:**

- Rotating staff through complaints handling areas can develop management skills but also reduce the likelihood of stress

**VISIBILITY AS 4269-1995 Section 2.5 and 3.5**

**2.5** A complaints handling process shall be well publicised to consumers and staff, and shall include information to consumers about the right to complain.

**3.5** The existence of the complaints handling system, its purpose and the method of accessing it, need to be publicized in such a way that people with complaints are encouraged to make their complaints known to the relevant organisations.

It is crucial for an organisation to promote the system—

- (a) internally for staff as well as externally to consumers and the community; and
- (b) as widely as possible and according to the special needs of consumers.

Methods to promote the system may include :

- (i) Advertising in telephone directories and the mass media.
- (ii) Posters and brochures at the place(s) of business.
- (iii) Inclusion on documents such as contracts and account statements.
- (iv) Hotlines or toll free telephone numbers displayed on product labels, instruction booklets, guarantees or warranties.
- (v) Satisfaction surveys or questionnaires at point of sale or post sale.
- (vi) Reporting—e.g. Annual reports.

**Findings:**

- The OHSC has a very informative website that informs consumers about the complaints handling system.
- The OHSC publishes brochures that are widely available in health service settings.
- OHSC posters are a common sight in doctor's waiting rooms.
- The OHSC can be contacted using a toll free 1800 number.
- The OHSC publishes annual reports.

**Recommendations:**

- The OHSC should establish an intranet that could include a detailed description of the complaints handling system, so that staff can utilise a useful reference.

**ACCESS AS 4269-1995 Section 2.6 and 3.6**

**2.6** A complaints handling process shall be accessible to all and ensure that information is readily available on the details of making and resolving complaints. The complaints handling process and supporting information shall be easy to understand and use, and be in plain language.

**3.6** The characteristics of an accessible complaints handling process include :

(a) Information on how, when, where and to whom to make complaints, being readily accessible to all consumers.

(b) Information about the process being prominently displayed and circulated at the point of delivery.

(c) Information describing an uncomplicated process expressed in plain English and other community languages, and in large print.

(d) Methods of making complaints which are flexible in order to meet the needs of all consumers. The process of submitting complaints should not be limited to one form of communication.

(e) Simple and accessible arrangements for lodging complaints.

(f) Consumers being able to submit complaints without charge.

(g) A time frame for determining a complaint which encourages its making.

Complainants should be advised as to when a decision can be expected or whether there will be delays.

(h) Consumers should know that their complaints are being treated seriously and when necessary in strictest confidence.

(i) Special arrangements should be made for people with disabilities or specific needs, e.g. ramps for wheelchairs and special staff skills.

**Findings:**

- The OHSC information booklet is available in 15 languages, in accordance with AS 4269-1995.
- The service offered by the OHSC is free and confidential.

- The OHSC educates staff on communication, multicultural and Aboriginal cultural awareness.
- A system of support and mediation is in place in accordance with AS 4269-1995.

**Recommendations:**

- Periodic review of customer access involving staff and complainants to identify strategies to improve access.

**ASSISTANCE AS 4269-1995 Section 2.7 and 3.7**

**2.7** Assistance shall be available for complainants in the formulation and lodgement of complaints.

**3.7** Assistance should be available by way of an explanatory brochure, publicity, telephone advice, direct communication, interview or correspondence. The assistance should be designed to allow a complaint to be made in a way which ensures it can be dealt with by the complaints handling process of the organisation. Examples could include assistance with filling in forms for those with limited literacy skills, and interpreter assistance for people with limited English.

**Findings:**

- The OHSC is contactable by a toll free 1800 number.
- The complaint assessments staff are trained to assist consumers to lodge a complaint if they have limited literacy or require an interpreter.
- The OHSC distributes evaluation forms to complainants and respondents.

**RESPONSIVENESS AS 4269-1995 Section 2.8 and 3.8**

**2.8** Complaints shall be dealt with quickly and the complainants shall be treated courteously.

**3.8 RESPONSIVENESS** The organisation should establish target time limits which are reasonable for all stages of the complaints handling process. A complainant shall be told how long it will take to deal with a complaint in accordance with target time limits for action. Complainants shall be kept informed of progress by telephone advice, correspondence or interview.

**Findings:**

- The OHSC stays in touch with the complainant until a suitable reply has been received from the organisation/person the complaint has been brought against.
- The OHSC is available to both parties to give advice or guidance through the complaint process.

- The OHSC aims to have a response to the complainant within two weeks of the complaint being sent to the respondent.
- The OHSC aims to finalise the outcome of complaints within the legislated time frame.

**Recommendations:**

- The OHSC should undertake bench marking with other healthcare and external (non-healthcare) services.

**CHARGES AS 4269-1995 Section 2.9 and 3.9**

**2.9** Complaints handling shall be at no charge to the complainant, subject to statutory requirements.

**3.9** If a consumer has a complaint about a product or a service, the complaints handling process should be provided free of charge, (subject to statutory requirements). If the complaints handling process is not free to consumers, and they are deterred from making complaints, the provider may not receive relevant feedback.

**Findings:**

- The OHSC is funded by the Victorian Government and this enables the office to offer a free service to consumers.

**REMEDIES AS 4269-1995 Section 2.10 and 3.10**

**2.10** A complaints handling process shall have the capacity to determine and implement remedies.

**3.10** The organisation should develop policies on the provision of remedies which reflect what is fair and reasonable in the circumstances, legal obligations and good industry practice.

Such policies include—

- (a) refunds;
- (b) replacement;
- (c) repair;
- (d) substitutes;
- (e) technical assistance;
- (f) information;
- (g) referral;
- (h) financial assistance;
- (i) other assistance;
- (j) compensation;
- (k) apology; and
- (l) goodwill gift or token.

Issues to be considered include—

- (i) addressing all aspects of the complaint;
- (ii) following-up where appropriate; and
- (iii) whether it is appropriate to offer remedies to others who may have suffered in the same way as the complainant but did not make a formal complaint.

**Findings:**

- The OHSC does not impose remedies, but negotiates a remedy with the complainant and the respondent to the complaint
- The OHSC is an independent statutory body and does not work as an advocate.
- This element does not apply to the OHSC.

## **DATA COLLECTION AS 4269-1995 Section 2.2 and 3.2**

**2.11** There shall be appropriate systematic recording of complaints and their outcomes.

**3.11** There is a need for a recording system to assist in monitoring the progress of complaints and to identify repetitive complaints. These types of complaints often indicate a fault in the product or service system which can be rectified.

Issues to be considered include—

- (a) the range of topics;
- (b) the level of detail; and
- (c) format and content for statistical reports, which could include information about the—
  - (ii) services or products about which complaints are made;
  - (iii) business practices about which complaints are made;
  - (iv) response time;
  - (v) demographic analysis—people, product, service, department, branch, organisation and market segment;
  - (vi) referral source;
  - (vii) staff resources analysis;
  - (viii) action taken, includes remedies/determinations/results; and
  - (ix) trend analyses.

Statistical analysis is important in assisting an organisation for strategic planning and product/service development and improvement.

**Findings:**

- All complaints received by the OHSC are recorded and a central register of all such complaints and all complaints shown on returns supplied by providers are maintained.
- The OHSC performs statistical analysis of the OHSC and this plays an important role in assisting in strategic planning and product/service development and improvement.

- The OHSC compiles with the Data Collection Standard fully. Therefore no recommendations are made.

## **SYSTEMIC AND RECURRING PROBLEMS AS 4269-1995 Section 2.12 and 3.12**

**2.12** Complaints shall be classified and analysed for the identification and rectification of systemic and recurring problems.

**3.12** By evaluating data an organisation is able to determine the causes of complaints and whether remedial action is warranted.

Aggregated data highlighting systemic complaints can be used to—

- (a) redesign products and services;
- (b) change organisational practices and procedures;
- (c) retrain staff on product and service delivery;
- (d) re-assess consumer information needs, e.g. labelling;
- (e) assess the performance of after-sales service; and
- (f) give early warning about potential product and service defects.

### **Findings:**

- This standard does not apply to the OHSC as the OHSC does not have the power to impose any remedial action.

## **ACCOUNTABILITY AS 4269-1995 Section 2.13 and 2.14**

**2.13** There shall be appropriate reporting on the operation of the complaints handling process against documented performance standards.

**3.13** All organisations should have an appropriate culture of accountability which includes:

- (a) Each level accepting responsibility for effective complaints handling.
- (b) Managers having responsibility for effective complaints handling procedures including—
  - (i) setting performance criteria;
  - (ii) performance monitoring and evaluation;
  - (iii) management reports on complaints handling performance;
  - (iv) reporting on complaints handling;
  - (v) a proactive approach to consumers and staff feedback; and
  - (vi) regular independent auditing of the complaints handling process

### **Findings:**

- The OHSC organisational structure clearly identifies delegated persons responsible for the management of complaints handling processes, who have authority together with senior management to resolve complaints.

**Recommendations:**

- The system of delegation is documented in the service's policy and procedure manuals.
- The OHSC should aim to be committed to empowering and enabling frontline staff to resolve complaints within their level of authority. To achieve this, assessment methods should be used to measure staff and complainant satisfaction with complaint handling process through interviews or surveys.

**REVIEWS AS 4269-1995 Section 2.14 and 3.14**

**2.14** A complaints handling process shall be reviewed regularly to ensure that it is efficiently delivering effective outcomes.

**3.14** The complaints handling process should be reviewed on a regular basis. The actual depth and frequency of such reviews would vary with the nature of the organisation and its policy.

**Findings:**

- The OHSC was last externally reviewed in 1994.
- The OHSC was last internally reviewed in 2001.

**Recommendations:**

- Periodic reviews should be conducted on the complaints handling procedures followed by the OHSC.
- The findings and recommendations of these reviews should be acted upon in a timely manner.
- Where possible reviews should be conducted by an independent body.

**PROCESSING ORAL COMPLAINTS AS 4269-1995 Section 4.2**

**4.2** The steps are:

- (a) Identify yourself, listen, record details and determine what the complainant wants.
- (b) Confirm the details received.
- (c) Empathize with the complainant in a courteous manner.
- (d) Explain the courses of action available.
- (e) Do not attempt to lay blame or be defensive.
- (f) Resolve the complaint if possible or commit to doing something immediately, irrespective of who will ultimately handle the complaint.
- (g) Ensure that the consumer is informed the complaint is receiving attention, without creating false expectations.
- (h) Check whether the consumer is satisfied with the proposed action and, if not, advise alternative courses of action.
- (i) Provide acknowledgment; e.g. a thank-you letter, a telephone call.

(j) Follow up as appropriate and monitor to ensure the consumer remains satisfied as well as receives feedback.

**Findings:**

- The OHSC complies with this standard, and routinely performs the specified steps.

### **PROCESSING WRITTEN COMPLAINTS AS 4269-1995 Section 4.3**

**4.3** In principle, this is the same as processing oral complaints, however, in this situation, a response should be given promptly, in writing.

**Findings:**

- The OHSC complies with this standard, and routinely performs the specified steps.

### **MINIMIZING DISPUTES AS 4269-1995 Section 4.4**

**4.4** Handling a difficult consumer and the consumer's complaint efficiently needs patience and skill to avoid an initial 'negative' situation becoming even more negative and degenerating into a dispute.

The two main elements in a complaint situation that need to be effectively handled to minimize the likelihood of dispute are:

(a) Dealing with the complainant's feelings:

(i) *Listen*—this is the first step in reducing the tension.

(ii) *Acknowledge the complainant's feelings*—denying that the complainant is, or has the right to be upset may antagonize the complainant.

(iii) *Empathize*—relieves tension and so opens channels of communication.

(iv) *Do not* offer excuses, or argue with the complainant.

(b) Dealing with the specifics of the complaint:

(i) *Ask the necessary questions in a polite and even-handed manner*—to obtain the most detailed response.

(ii) *Agree on a solution*—without appearing to dictate terms in order to avoid the likelihood of re-raising tension.

(iii) *Set a timetable*.

(iv) *Take action on the agreed solution*.

**Findings:**

- The OHSC effectively deals with the complainant's feelings.

The OHSC effectively deals with the specifics of the complaint

## **SECTION 5 DISPUTES**

**5.1 GENERAL** It is preferable to direct efforts towards satisfying the complaint rather than allowing it to remain unresolved and escalate into a dispute.

**5.2 SCOPE** Whilst the Standard applies to complaints handling, sometimes unresolved complaints, i.e. disputes, are handled by an organisation before being referred to any other forum. Where a solution to a complaint cannot be found after more than one attempt, further procedures and remedies are available.

### **DISPUTE RESOLUTION AS 4269-1995 Section 5.3**

**5.3** The system design for dispute resolution should be a staged process of intervention—going from least interventionist to the most interventionist (litigation through court). The least interventionist is also the most informal process, leaving most of the control with the parties involved in the dispute (unresolved complaint).

#### **Findings:**

- The OHSC follows a staged process of intervention for dispute resolution.
- This includes assessment of the complaint and if needed conciliation.
- The OHSC does not however perform litigation through court.

### **DISPUTE RESOLUTION SYSTEM BASICS AS 4269-1995 Section 5.4**

**5.4** The fundamental characteristics of any dispute resolution system embody:

- (a) Early resolution.
- (b) Accurate communication.
- (c) Use of the least interventionist process first, then staged intervention before the most interventionist process. Also, allow reversion to lesser intervention.
- (d) Time limits for each stage of the processes.
- (e) Simplicity.
- (f) Easy access.
- (g) Cost efficiency.
- (h) Objectives which endeavour to satisfy the parties in dispute regarding—
- (i) fairness and reasonableness; and
- (ii) promotion of the system.

#### **Findings:**

- The OHSC embodies the fundamental characteristics of a good and comprehensive dispute resolution system.

### **3 CONCLUSION**

It is imperative for a comprehensive complaints handling system to have documented policy and procedures. This report discovered that no such documentation exists at the OHSC.

It is vital for periodic reviews to be performed on the effectiveness, consumer satisfaction and staff satisfaction in relation to the complaints handling procedure. The areas that are proved deficient through these reviews should be acted upon in a timely manner.

The actual complaint handling procedure performed complied with AS 4269-1995, but the lack of documentation on this procedure, and the fact that periodic reviews are not performed, causes the compliance of the OHSC to AS 4269-1995 to be questioned.

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