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Complaints Policy

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Author	Manager Governance and Compliance
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1. Purpose

The purpose of this policy is to ensure complaints are managed and resolved in a manner that is consistent, respectful, responsive, fair and appropriate to the circumstances.

This policy forms part of Titles Queensland's Customer Complaints Management System (CMS) and supports continuous improvement in service delivery, systems, and decision-making.

2. Policy Statement

Titles Queensland is committed to effective and efficient complaints management. Titles Queensland operates a Customer Complaints Management System (CMS) that ensures complaints are managed consistently, transparently, and in accordance with applicable legislation, including the Human Rights Act 2019 (Qld).

Titles Queensland support the right to make a complaint and will manage complaints in a manner that is respectful, timely, fair, and consistent with its Customer Service Charter and statutory obligations.

Titles Queensland will:

- Treat complainants with courtesy and respect
- Ensure complainants can raise concerns without fear of detrimental action
- Provide accessible and easy-to-understand complaint information
- Offer reasonable assistance to complainants, including those with diverse needs or vulnerabilities
- Acknowledge complaints and keep complainants informed of progress, timeframes, and outcomes
- Allocate complaints to appropriate areas and escalate where required to ensure substantiated issues are resolved in a timely manner
- Ensure staff managing complaints are appropriately trained



Titles Queensland will ensure all complaint investigations and outcomes:

- Are evidence-based
- Follow principles of procedural fairness (natural justice)
- Provide clear, accurate, and meaningful reasons for outcomes

Titles Queensland will assess and respond to complaints in a manner that considers relevant human rights when making decisions.

3. Guiding Principles

Titles Queensland's complaints management approach is guided by the following principles:

- Customer focused
- Timely and fair
- Clear communication
- Accountability and transparency
- Continuous improvement

4. Scope

This policy applies to all Titles Queensland personnel and covers complaints relating to:

- Staff behaviour
- Titles Queensland facilities, products, or services
- Failure to act where Titles Queensland has undertaken to do so

5. Complaints Management Framework

Titles Queensland manages complaints using a three-level model:

- Level 1 – Initial complaint handling (early resolution)
- Level 2 – Internal review
- Level 3 – External review (e.g. Queensland Ombudsman)

Complaints will be assessed for severity and escalated where they present material legal, regulatory, financial or reputational risk in line with Titles Queensland's Complaints Procedure. This model supports timely resolution while providing escalation pathways where required.

6. Remediation

6.1 Where a complaint is substantiated (in full or in part), Titles Queensland will:

- Acknowledge the findings of the investigation in respect of the substantiated elements; and
- Consider appropriate corrective or remedial actions in accordance with applicable policies, procedures, and delegated authorities.

6.2 A substantiated finding does not, of itself, constitute an admission of legal liability or entitlement to financial compensation. Any financial, legal, or disciplinary outcomes will be determined separately in accordance with relevant governance frameworks and approvals.

7. Monitoring, Reporting and Improvement

Titles Queensland will:

- Record and analyse complaint data to identify systemic issues and trends
- Report outcomes and insights including performance metrics, trends and systemic issues to Executive Management and the Board



- Implement and track improvements arising from complaints
- Maintain accurate records of complaint management for auditability and external review processes.

8. Definitions

8.1 What is a Complaint

In line with AS/NZS 10002:2022 (*Guidelines for complaint management in organisations*) a complaint is an expression of dissatisfaction made to or about Titles Queensland regarding its products, services, staff, or complaint handling, where a response or resolution is expected.

8.2 What is not a complaint

A complaint is different from general feedback or requests for information or services. Feedback is a broader input that helps improve services, processes, or customer experience. Feedback includes suggestions, compliments, or general commentary that do not require formal resolution.

8.3 Substantiated Complaint

A complaint is considered substantiated where, following a documented and proportionate investigation, there is sufficient evidence to support one or more elements of the matters raised by the complainant.

8.4 Unsubstantiated Complaint

Following a documented and proportionate investigation, a complaint is deemed unsubstantiated where there is insufficient evidence to support the claims raised by the complainant.

8.5 Internal Review

A merits-based review of a complaint outcome or handling conducted by an independent and appropriate senior officer.

8.6 External Review

A review conducted by an independent oversight body, such as the Queensland Ombudsman.

9. Related Internal Controls/Policies

- Complaints Procedure
- Privacy Policy
- Customer Service Charter
- Whistleblower Policy
- Complaints About Public Official Policy