



PERFORMANCE AUDIT

24 September 2020

Responding to complaints from people with impaired capacity

**Part 1: The Public Trustee
of Queensland**

Report 5: 2020–21

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The Honourable C Pitt MP
Speaker of the Legislative Assembly
Parliament House
BRISBANE QLD 4000

24 September 2020

This report is prepared under Part 3 Division 3 of the *Auditor-General Act 2009*.



Brendan Worrall
Auditor-General

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About this audit

What is Queensland's guardianship and administration system?

The Queensland guardianship and administration system helps adults with impaired decision-making capacity manage their personal and financial matters.

Impaired decision-making capacity means a person cannot:

- understand the facts and choices involved
- weigh up the consequences of a decision
- communicate the decision.

The Queensland Civil and Administrative Tribunal (QCAT) appoints guardians and administrators as substitute decision-makers for adults with impaired decision-making capacity.

In Queensland, the public guardians and administrators are:

- **The Public Trustee of Queensland (PTQ)**—provides financial administration services
- **Office of the Public Guardian (OPG)**—manages personal matters, such as where a person will live and health services a person may need.



Different conditions affect a person's decision-making capacity, such as:

- intellectual disability
- acquired brain injury
- mental illness
- dementia
- alcohol and drug abuse.

Source: Public Advocate's submission to Queensland Audit Office.

What is complaints management?

Complaints management means resolving complaints and identifying opportunities to make systemic improvements in service. Every organisation that deals with the public will receive complaints. The community expects government organisations to respond helpfully and quickly to the needs of the people they serve.



It should be easy for people to understand how and where to make a complaint about the guardianship and administration system. Everyone should receive advice and support when they make a complaint.

Good complaints management involves:

- receiving—making it easy for people to make a complaint
- recording—keeping records of each complaint received, action taken, decisions made and the result
- responding—promptly letting people know their complaint was received, handling the complaint and keeping the complainant informed
- reporting—measuring performance, being accountable and identifying trends—so that anyone can see how well the government is responding to complaints and solving problems.

Our audit

We looked at how well Queensland's guardianship and administration system manages complaints to improve the protection of people with impaired decision-making capacity.

We will report our findings in two parts. This report (Part 1) looks at managing complaints in the administration system and whether the Public Trustee:

- has effective systems and processes to receive, manage and review complaints
- responds to complaints on time
- reviews the effectiveness of its complaint management system and process to make improvements.

We will report our findings on the Office of the Public Guardian later in 2020–21.

Appendix B has further details on the audit scope, including what we did not cover in this audit. For instance, this report does not analyse complaints about will making, only financial administration complaints.

1. What we found



How quickly does the Public Trustee respond to complaints?

- The Public Trustee of Queensland (PTQ) does not measure or report on response times and, therefore, does not know how many complaints it completes within target time frames.
- Our analysis found that:
 - 99 per cent of complaints received were acknowledged within the target time frame of five days. This means PTQ promptly let people know their complaint had been received
 - 80 per cent of total complaints were resolved within target time frames, but 47 per cent of moderate rated complaints were not. Complaints are rated according to how complex they are (see Figure 4A on page 11). Simple complaints were fixed quickly, but more difficult complaints were often not resolved on time.
- Poor response times could reduce customer confidence in how PTQ handles and responds to complaints. This could discourage people from making further complaints.



Is the complaints management system easy to use for people with impaired capacity?

- PTQ's complaints management system is not properly designed for people with impaired capacity.
- It is not easy enough to navigate or be understood by its customers, which could stop them making a complaint.
- Information is only available in text—it is not written in Easy English or supported by pictures to explain concepts.
- PTQ does not offer other options to help those with impaired capacity, disability or who do not speak English—such as video or audio.





Does PTQ have complaints management policies and procedures?

- PTQ has proper complaints management policies and procedures but they could be written more clearly.
- The internal complaints handling process follows good practice.



Is the complaints management IT system fit for purpose?

- PTQ's complaints management information technology (IT) system is not fit for purpose. It does not support staff to efficiently record, manage and report on complaints.
- Some controls are missing in the complaints system, which may mean that not all information is correctly recorded. This reduces PTQ's ability to accurately measure and report about whether complaints are resolved on time.



Are staff well trained in complaints management?

- PTQ has a team of people to coordinate and monitor the complaints management system.
- However, most complaints are handled by regional staff. These staff are not sufficiently trained in complaints management to help them identify and manage complaints.



Does PTQ assess whether its complaints management is effective?

- PTQ does not know if its complaints management system is meeting the needs of its customers and the business because it has not formally evaluated its effectiveness.
- PTQ does not seek feedback from customers about its handling of complaints. Therefore, it does not know how easy the system is to use or where it can be improved.



Are insights from complaints used to improve service?

- PTQ's complaints data is not good enough to analyse how well its systems and processes work. Current information does not help PTQ understand and identify what it can improve.
- PTQ has a plan to improve service delivery for all its customers, including adults with impaired capacity. The plan is known as the Customers First Agenda. But it does not include specific plans to improve complaints management.
- PTQ has implemented over 40 improvement actions as part of this plan, but it is too early to assess the impact on service delivery. Other actions were on hold due to COVID-19, but have recently started again.



Our recommendations

We made six recommendations to make it easier to complain to The Public Trustee of Queensland and to measure and report on its performance in resolving complaints. Further detail on our recommendations is on page 7.

Our conclusions

PTQ could improve how it protects people with impaired decision-making capacity by making it easier to make a complaint and understand the system. The limitations in PTQ's complaints management system present barriers, which could prevent people from making a complaint.

In 2019, PTQ started to change the way it worked so that it put the customer first in all parts of the business. It introduced the Customers First Agenda to improve leadership, to learn from mistakes, and to be more efficient and accountable. The implementation of this agenda will address many of the issues raised in this report.



2. Recommendations



We recommend that The Public Trustee of Queensland:

1. monitors complaint response times and reports regularly on how many complaints are finalised within target time frames
2. makes its complaints management system easier to use, by
 - making information clearer and easy to understand with alternative language or using video, audio or graphics
 - offering an online complaints form and options for those with hearing or speech difficulties
3. makes the *Complaints Management Policy* easier to understand
4. improves its complaints management information technology system by
 - having better controls over data
 - using automatic notifications and reminders of due dates and overdue complaints
 - recording all information needed to manage complaints effectively
5. improves complaints management training for staff including
 - targeted training in handling complaints from customers with impaired capacity
 - reviewing training effectiveness to ensure it meets both organisational and staff needs
6. improves system and process effectiveness, by
 - seeking customer feedback on complaints handling
 - developing better data to identify issues and to inform improvement
 - measuring and reporting on performance.

Reference to comments

In accordance with s. 64 of the *Auditor-General Act 2009*, we provided a copy of this report to The Public Trustee of Queensland. In reaching our conclusions, we considered its views and represented them to the extent we deemed relevant and fair. Any formal response from the agency is at Appendix A.



3. Detailed findings—Being responsive and accessible

Background

It is difficult for adults with impaired decision-making capacity to raise issues, so complaints management in the guardianship and administration system needs to be well designed.

A good complaints management system should:

- acknowledge and respond to complaints in a timely and fair manner
- recognise the needs and expectations of people who complain
- be easy to find, access, understand and use.



Response times are not measured and monitored

The Public Trustee (PTQ) does not measure or report response times because it does not capture the right data to do this. PTQ therefore does not know what proportion of complaints are finalised within target time frames.

Our analysis found that almost half of moderate rated complaints were not resolved within target time frames.

Delays in responding to complaints can lead to a loss of customer confidence in how PTQ handles and responds to complaints. This could discourage people from making further complaints.

PTQ sets target response time frames

PTQ has agreed on response time frames for acknowledging and responding to complaints. The target time frames for responding to and resolving complaints depend on the type and complexity of the complaint.

The time frames set are comparable with other similar organisations and states.

PTQ does not meet all response time frames

Because PTQ does not measure or report on response times for resolving complaints received, it is difficult for PTQ to assess whether the resources allocated to complaints handling are adequate and whether it is dealing with complaints efficiently.

QAO analysis of response time frames

We therefore analysed the data from PTQ's complaints management IT system (CMS) to assess whether PTQ is meeting target time frames.

We found that:

- 99 per cent of complaints received were acknowledged within the target of five days.
- 80 per cent of all complaints were resolved within target time frames.
- 47 per cent of moderate rated complaints were not resolved within target time frames.

PTQ rates complaints received based on complexity and risk as either minor, moderate or major. Internal reviews are done for more serious complaints.

While moderate, major and internal review complaints are more complex than minor complaints, the target time frames are longer to allow for this.

Figure 3A shows the number and proportion of complaints by type not meeting target time frames.



Figure 3A

Number of financial administration complaints that did not meet target time frames— January 2017 to June 2020

| Complaint type | Total number of complaints | Number resolved within target time frame | Number exceeding target time frame | Proportion of complaints not resolved in target time frame |
|-----------------|----------------------------|------------------------------------------|------------------------------------|------------------------------------------------------------|
| Minor | 958 | 821 | 137 | 14% |
| Moderate | 175 | 93 | 82 | 47% |
| Major | 10 | 6 | 4 | 40% |
| Internal review | 13 | 6 | 7 | 54% |

Note: we have excluded privacy and human rights complaints as there were only three in total—all resolved within target time frames.

Source: Queensland Audit Office analysis using PTQ's CMS data.

We did further analysis to look at:

- the extent of the delay for complaints not resolved in target time frames
- trends over time.

We found that some complaints took more than 10 weeks to resolve from first receiving the complaint. We also found that while there was a big reduction in the proportion of complaints exceeding target time frames between 2017 and 2018, the figures have trended upwards since then.

Our analysis shows the value of measuring and reporting on performance. It would help PTQ to monitor and report on the efficiency and effectiveness of its complaints management. It would also help identify systemic issues, trends and areas for improvement.



Recommendation

The Public Trustee monitors complaint response times and reports regularly on how many complaints are finalised within target time frames.



The complaints management system should be easier to use

Making a complaint

Everyone has a right to make a complaint as a consumer.

The system should be easy to understand and access.

While PTQ has the basic elements in place for a complaints management system, it has not designed it to specifically assist customers with impaired decision-making capacity to make a complaint.

Making a complaint is not easy for some people

PTQ offers traditional methods to lodge a complaint—in person, by phone (including a toll-free number) or in writing (by email, letter, or online enquiry).

But PTQ does not offer other options to easily help those with impaired capacity, disability or who do not speak English to make a complaint.

Other options that would help include:

- an online complaints form to guide a complainant through the process
- a telecommunications device for those with hearing or speech difficulties.

Important information should be easy to find. The home page on the PTQ website includes a link to compliments and complaints, but it is not easy to navigate—users must scroll down through text to find out how to make a complaint.

PTQ accepts complaints from family members, friends, agents, advocates or others who act on behalf of, or support, a person. PTQ staff can also lodge a complaint on another person's behalf that is made to them verbally or in person.



Information needs to be clearer

Information on the PTQ website on how to lodge a complaint and what an individual can reasonably expect to happen if they choose to do so is generally clear and written in plain English. However, it is only available in text. Information in this format may have little value for some individuals, particularly those with visual impairment, or language or literacy difficulties.

Information is not supported by other language or display options, such as video, audio, graphics, or Easy English to ensure the information is sufficient for adults with impaired capacity.

PTQ offers a translating and interpreting service for complainants who speak a language other than English. However, the individual must first be able to read information on the website that explains how this service can be accessed. PTQ does not know how many of its customers speak a language other than English as it does not record this information in its Client Information Management system.



Recommendation

The Public Trustee makes its complaints management system easier to use, by:

- making information clearer and easy to understand with alternative language or using video, audio or graphics
- offering an online complaints form and options for those with hearing or speech difficulties.

4. Detailed findings—Having an effective system

Background

A complaints management system includes all policies, procedures, processes, staff, and technology. It covers the receiving, recording, responding to, and reporting about complaints.

An effective complaints management system should:

- have sound policies, procedures, and information systems to manage complaints
- have enough suitably trained staff to deal with the complaints
- provide information to analyse complaints and review the effectiveness of the complaints management system to make improvements.

Complaints are a valuable source of information on what is and what is not working within the Public Trustee's (PTQ) programs and services. Regular analysis of complaints data can help to identify trends, systemic issues, and potential weaknesses, and to improve services.



Number of complaints received by the Public Trustee

Figure 4A shows the number of complaints received by the PTQ over the last three years. They are broken down by complaint type.

Figure 4A
Number of financial administration complaints received by type—2017 to 2019

| Complaint type | 2017 | 2018 | 2019 |
|---------------------------|------|------|------|
| Minor | 234 | 364 | 266 |
| Moderate | 128 | 60 | 65 |
| Major | 4 | 2 | 3 |
| Privacy | 2 | 2 | 1 |
| Internal review (level 2) | 4 | 5 | 8 |
| External review (level 3) | 1 | 0 | 0 |
| Totals | 373 | 433 | 343 |

Source: The Public Trustee, complaints management system.

Most complaints are handled by frontline staff and are rated either minor, moderate or major depending on how complex or serious the complaint is. Internal reviews are done by senior staff for more serious complaints or where the complainant is dissatisfied with the initial review. Level 3 complaints are handled by an external organisation, such as the Queensland Ombudsman.

Across the three years, the number of complaints:

- increased by 16 per cent from 2017 to 2018
- decreased by 21 per cent from 2018 to 2019
- were mostly rated as minor, ranging from 63 per cent in 2017; to 77 per cent in 2019 and 84 per cent in 2018.



Complaints management procedures and processes are generally sound

Policies and procedures are in place

PTQ has appropriate complaints management policies and procedures in place, but the publicly available policy could be written and presented more clearly. This would help people with impaired capacity to easily recognise when they have grounds for making a complaint and understand how the complaints process works.



Recommendation

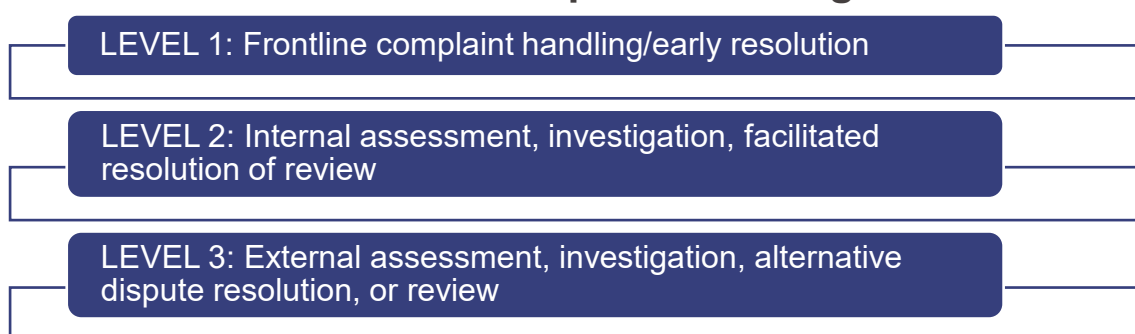
The Public Trustee makes the *Complaints Management Policy* easier to understand.

Complaints handling process follows good practice

PTQ has documented its complaints management process, providing staff with clear guidance on how to receive, record, respond to and report on complaints.

Figure 4B outlines the three levels of review in PTQ's complaints management process, which is consistent with good practice.

Figure 4B
Three levels of complaints management



Source: *The Public Trustee complaints management policy.*



PTQ has good processes for:

- assessing complaints received and rating them based on complexity, risk, potential loss, and how much investigation is needed to deal with the complaint
- assigning them to an appropriate person to deal with, including senior officers for more complex or serious complaints
- escalating complaints to other staff if the complainant is dissatisfied with the initial review.

PTQ aims to resolve most complaints at the first level of complaints management—frontline complaint handling with early resolution. Level 1 major and level 2 complaints are handled, at minimum, by a director independent of the region. Level 3 complaints are handled by an external organisation, such as the Queensland Ombudsman.

PTQ does not have quality checks in place to provide assurance that the management of these complaints complies with PTQ's policy and procedures, or that the complaint outcome was appropriate. PTQ's quality assurance and continuous improvement team is considering addressing this gap.



Complaints management IT system is not fit for purpose

PTQ's complaints management IT system (CMS) is not fit for purpose. It does not adequately support staff to monitor, manage and report on complaints. A lack of controls reduces the completeness and accuracy of data. This prevents accurate measurement and reporting against expected time frames.

Our testing and data analysis identified missing data fields and data errors. For example, dates are entered manually and, if the wrong date is entered, it makes tracking complaints against time frames difficult.

CMS cannot produce reports, so data must be exported to Excel for analysis and reporting purposes. This creates a risk that data could be accidentally changed.

Acknowledging and monitoring complaints is not efficient

CMS does not help PTQ to acknowledge and monitor complaints effectively. Instead, the processes are manual and inefficient.

CMS does not automatically acknowledge a complaint when received and entered in the system. Staff must manually send an email or letter or notify the complainant by phone. This may mean that staff forget to send an acknowledgement, send it late or do not record the date in the system.

CMS lists overdue complaints and complaints due soon on its dashboard but does not automatically escalate a complaint or generate reminders for staff. This means that effective monitoring relies on the complaints team checking due dates and emailing allocated officers with reminders. This may be manageable if the number of complaints received is low. However, in times of heavy workloads, competing priorities or leave arrangements, there is a risk that this may not occur.

CMS does not have a field to record when complaints are escalated to another officer—it relies on an officer making notes in a free text box.

Managing unreasonable complainant conduct needs better documenting

Some complainants may act unreasonably in seeking to have their concerns addressed. For example, they might make many unnecessary calls or emails or be aggressive towards staff. PTQ has formal procedures for managing unreasonable complainant conduct, but it does not formally or comprehensively document these cases.

CMS does not have a field to record instances of unreasonable complainant conduct. Sometimes trust officers make notes in the Customer Information Management System, but there is no standard procedure or approach.

To minimise the risk that any subsequent action is perceived as unfair or unreasonable, it is critical that decisions and actions are clearly documented.





Recommendation

The Public Trustee improves its complaints management information technology system by:

- having **better controls over data**
- using automatic notifications and reminders of due dates and overdue complaints
- recording all information needed to manage complaints effectively.



Staff need more targeted training

PTQ has a team of people to coordinate and monitor the complaints management system. However, regional staff are responsible for resolving most complaints, and they are not properly trained in dealing with complaints or required to have any specific skills for complaints handling.

PTQ offers some training activities to support staff with complaint management responsibilities. However, refresher training or training in effectively dealing with complaints from customers with impaired capacity is limited.

PTQ has recently developed two new training courses for frontline staff that focus on improving customer interactions within the guardianship and administration system. PTQ has started delivering the training to staff and it should be completed by the end of the year.

PTQ does not review the effectiveness of the training delivered to ensure the needs of both the organisation and staff are met. It has also not undertaken a strategic skills assessment to identify skill gaps or acknowledge areas of strength. This means PTQ does not have a full appreciation of its current skill base for managing complaints, and the skills and capabilities it needs.



Recommendation

The Public Trustee improves complaints management training for staff including:

- targeted training in handling complaints from customers with impaired capacity
- reviewing training effectiveness to ensure it meets both organisational and staff needs.



Complaints management is not evaluated

PTQ has not formally evaluated the effectiveness of its complaints management system and processes to assess if they are meeting the needs of the business and its customers.

PTQ conducts customer satisfaction surveys across all of its services to get feedback on processes, services, and overall satisfaction. But PTQ does not seek customer feedback on how it handles complaints or how easy the system is to use or where it can be improved.

Informal feedback from customers has led PTQ to make some improvements. For example, it has developed letter templates written in plain English for standard customer communications.

Reporting on complaints needs improving

The lack of useful complaints data means PTQ does not report on complaints received. The data is not sufficient to analyse complaints to identify issues and trends and use the information to improve customer service.

Monthly reports cover the number of complaints received by type and issue but not the priority, response times, customer satisfaction with actions taken or cause analysis. PTQ is reviewing the report with the aim of including more useful data and analysis to improve results. This is a priority for the team, but there is no time frame for completion or specific details on what it may include.



Externally, PTQ reports in its annual report how many complaints it received throughout the year and publishes a complaints management report on its website. It reports on the number of complaints received, and how many resulted in further action or no further action. But it does not report trends or systemic issues.

Public sector entities are required to monitor and report on the effectiveness of their services externally through service delivery statements and annual reports. However, PTQ has only one effectiveness measure on its financial management service (overall customer satisfaction), which is a new measure for 2019–20. PTQ does not have any efficiency measures or other effectiveness measures for its financial management service, such as clearance rates for complaints or proportion of complaints finalised within target response times.



Recommendation

The Public Trustee improves system and process effectiveness, by:

- seeking customer feedback on complaints handling
- developing better data to identify trends and systemic issues and inform improvement
- measuring and reporting on performance.



Insufficient information to draw insights

The information recorded in CMS is not good enough to identify areas for service improvement. Complaints can provide a rich source of information about how well an entity is performing and what improvements it may make. But the data PTQ currently collects and reports on means it cannot perform meaningful analysis to identify systemic issues and trends, to review its processes and improve customer service.

The available information may inform areas for improvement at a basic level. For example, data on the number of complaints relating to a specific issue could assist in identifying areas for policy improvement or training opportunities.

Initiatives to improve effectiveness are under way

PTQ has continuous improvement initiatives in place driven by its Customers First Agenda. Its aim is to create more positive experiences for customers and to be more efficient and accountable.

While the proposed initiatives aim to improve service delivery for all of its customers, none are specifically aimed at improving complaints management.

Examples of proposed activities most likely to benefit those with impaired decision-making capacity include:

- developing guidance for adults with impaired capacity to help them gain or increase financial independence
- creating online videos to access information on PTQ's processes and procedures
- making the website easier to use
- using a variety of communication methods that are customer-friendly and clear
- analysing data to learn more about the needs of customers and find more informed ways to improve services to customers.

PTQ has implemented over 40 actions as part of the Customers First Agenda, but it is too early to assess the impact on service delivery. Other actions were on hold due to COVID-19, but they are now progressing.



Appendices

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A. Entity responses

As mandated in Section 64 of the *Auditor-General Act 2009*, the Queensland Audit Office gave a copy of this report with a request for comments to The Public Trustee of Queensland.

The head of the entity is responsible for the accuracy, fairness and balance of its comments.

This appendix contains its detailed response to our audit recommendations.



Comments received from Acting Public Trustee of Queensland and CEO, The Public Trustee of Queensland

444 Queen Street Brisbane Qld 4000
GPO Box 1449 Brisbane Qld 4001



For reply please quote: S&G/JF – T20/84 – D20/23535
Your reference:

16 September 2020

Mr Brendan Worrall
Auditor-General
Queensland Audit Office
PO Box 15396
CITY EAST QLD 4002

Dear Mr Worrall

Thank you for your letter of 2 September 2020 regarding the Queensland Audit Office's Performance Audit on responding to complaints from people with impaired capacity (the Performance Audit).

I acknowledge the report's conclusions and thank you for the recommendations the report makes to improve the Public Trustee's complaints management system, particularly for people with impaired capacity. Our response is enclosed and addresses each of the recommendations you have identified.

It was encouraging to read the positive assessment in your Performance Audit of the Public Trustee's commitment to continuous improvement as part of our Customers First Agenda. Our commitment to Customers First, including implementing best practice complaint handling processes is reflected in our *Strategic Plan 2020–2024*.

I note the Public Trustee has started to implement changes to its complaints management system to improve accessibility. The recommendations made in your Performance Audit will assist in the review of our processes and will no doubt lead to improved outcomes for people with impaired capacity.

Yours sincerely

Samay Zhouand
Acting Public Trustee of Queensland and CEO

The Public Trustee

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- Enduring powers of attorney

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Responses to recommendations

The Public Trustee of Queensland

Responding to complaints from people with impaired capacity

Response to recommendations provided by A/Public Trustee and CEO on 16 September 2020

| Recommendation | Agree/ Disagree | Timeframe for implementation (Quarter and year) | Additional comments |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>We recommend that the Public Trustee:</p> <ol style="list-style-type: none"> 1. monitors complaint response times and reports regularly on how many complaints are finalised within target timeframes | Agree | Q2 2020–21 | <p>The Public Trustee has developed a weekly open complaints snapshot report which is provided to relevant Executives and Senior Officers on the status of open complaints, including where responses might be overdue.</p> <p>In addition, a quarterly complaints report has been developed which will monitor and report on response times. The first report has been prepared, encompassing the 2019-20 Financial Year as the basis for future reports.</p> |
| <ol style="list-style-type: none"> 2. makes its complaints management system easier to use, by: <ul style="list-style-type: none"> • making information clearer and easy to understand with alternative language or using video, audio or graphics • offering an on-line complaints form and options for those with hearing or speech difficulties | Agree | <p>Q4 2020-21</p> <p>Q2 2020-21</p> | <p>The Public Trustee will be commencing a project to develop a package of easy English materials, including website content to support customers with impaired-decision making to understand their rights and to lodge a complaint.</p> <p>The current Public Trustee website has the provision for people to make contact by submitting an online enquiry form. A specific complaints form will be developed and made available online to assist customers to lodge complaints.</p> |
| <ol style="list-style-type: none"> 3. makes the Complaints Management Policy easier to understand | Agree | Q2 2020–21 | <p>The Public Trustee has developed a Complaint Journey Brochure which uses graphics and simple language. This is now available in Public Trustee regional offices, attached to complaint responses and included in the Welcome Pack sent to new financial administration customers.</p> |

| Recommendation | Agree/ Disagree | Timeframe for implementation (Quarter and year) | Additional comments |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Q4 2020-21 | In addition, the Public Trustee will develop Easy English versions of documentation including the website content, Complaints Management Policy and Complaints Journey Brochure. |
| 4. improves its complaints management information technology system by: <ul style="list-style-type: none"> • having better controls over data • using automatic notifications and reminders of due dates and overdue complaints • recording all information needed to manage complaints effectively. | Agree | Q4 2020-21 | The Public Trustee will commence a review of its complaints management information technology system with a view to implementing an appropriate system that is efficient, cost-effective and supports best practice complaint management. |
| 5. improves complaints management training for staff including: <ul style="list-style-type: none"> • targeted training in handling complaints from customers with impaired capacity. • reviewing training effectiveness to ensure it meets both organisational and staff needs. | Agree | Completed | <p>The Public Trustee has delivered Structured Decision Making (SDM) Framework Workshops for all frontline staff as part of changes to the <i>Guardianship and Administration Act 2009</i>. The Framework focuses on the customer and their support networks, and takes into account customers' human rights, views, wishes and preferences when it comes to decision making.</p> |
| | | Q2 2020-21 | SDM will also be delivered to all non-frontline staff. |
| | | Q3 2020-21 | SDM Training will be complemented with training for all frontline staff on Customer Clinical Awareness and Employee Self Care. |
| | | Q3 2020-21 | Internal Review Complaints Training will be delivered to Regional and Assistant Managers, Directors, and other staff who deal with complex complaints. |

| Recommendation | Agree/ Disagree | Timeframe for implementation (Quarter and year) | Additional comments |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Q3 2020-21 | The current online Complaints training module will be reviewed to ensure it includes targeted information for handling complaints from customers with impaired decision making. In addition, staff will be required to complete the training annually as part of the Public Trustee's Mandatory Compliance Program. |
| 6. improves system and process effectiveness, by: | Agree | Completed | The Public Trustee has developed a quarterly complaints report, which reports on issues and trends and use the information to improve customer service. The first report has been prepared, encompassing the 2019-20 Financial Year as the basis for future reports. |
| <ul style="list-style-type: none"> seeking customer feedback on complaints handling developing better data to identify issues and to inform improvement measuring and reporting on performance. | | Q4 2020-21 | As part of the complaints management information technology system enhancements, the Public Trustee will seek to identify improvements in data capture and quality to better identify issues and future opportunities for improvements. |
| | | Q1 2021–22 | The Public Trustee will develop a process for obtaining customer feedback on their experience with the complaints system. |
| | | Q1 2021-22 | Enhanced reporting of Complaints data in published PTQ Annual Reports. |

B. Audit objectives and methods

This audit has been performed in accordance with the Standards on Assurance Engagements ASAE 3500 Performance Engagements, issued by the Auditing and Assurance Standards Board. This standard establishes mandatory requirements and provides explanatory guidance for undertaking and reporting on performance engagements.

The conclusions in our report provide reasonable assurance that the objectives of our audit have been achieved. Our objectives and criteria are set out below.

Audit objective and scope

We looked at how well Queensland's guardianship and administration system manages complaints to improve the protection of people with impaired decision-making capacity.

We did this by assessing whether the Public Trustee (PTQ):

- has effective systems and processes to receive, manage and review complaints
- responds to complaints within expected time frames
- reviews the effectiveness of its complaint management system and process to make improvements

| Sub-objective | Audit criteria |
|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 PTQ has effective systems and processes to capture, manage and review complaints and investigations. | 1.1 The complaints management process is clear and accessible to the public. |
| | 1.2 PTQ has sound processes and practices to manage complaints and investigations. |
| | 1.3 PTQ reviews the effectiveness of its complaint management process to improve the accessibility and management of its complaints management systems. |
| | 1.4 PTQ provides staff with adequate resources to support their work. |
| 2 PTQ responds to complaints on time, and improves its services to all its customers. | 2.1 PTQ responds to complaints and investigations within expected time frames |
| | 2.2 PTQ monitors progress of cases and takes appropriate actions to follow up on old cases. |
| | 2.3 PTQ analyses its complaints to inform continuous improvement of its services to people with impaired decision-making capacity. |

Source: Queensland Audit Office.

Entities subject to this audit

The audit included the following offices that provide guardianship and administration services and can be appointed to make decisions about personal and financial matters for people with impaired decision-making capacity:

- The Public Trustee of Queensland—Part 1 report
- The Office of the Public Guardian—Part 2 report.



Time periods covered by the audit

PTQ implemented its Complaint management IT system (CMS) in January 2017. Therefore, CMS data was only available from 1 January 2017. In our analysis, we reported on the calendar year instead of financial year, to allow for a full three-year comparison (see Figure 5A).

When analysing response time, we used data from 1 January 2017 to 30 June 2020 (see Figure 4A).

Scope exclusions

The audit did not examine the effectiveness of the:

- complaints managed by other entities that receive complaints from the Public Trustee and the Public Guardian
- complaints and investigations relating to children under the care of Queensland's guardianship and administration system
- Queensland Civil and Administrative Tribunal, who appoints guardians and administrators as substitute decision-makers but does not manage complaints made against those agencies
- Public Advocate, who undertakes systems advocacy to protect and promote the rights, autonomy and participation of people with impaired decision-making capacity but is not authorised to action complaints about another agency, organisation or service provider.

In analysing PTQ's complaints data we excluded complaints received about will making and deceased estate management. Our analysis only included financial administration complaints.



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