



OFFICIAL: Sensitive

Client Feedback

Policy Statement

Document ID (PPN)	VM-3001
TRIM record number	ADD2024/102865256
BCS Function	Visa and Migration Management
Document owner	First Assistant Secretary, Immigration & Citizenship Services Division
Approval date	31/01/2025
Document Contact	Global Feedback Unit, feedback@homeaffairs.gov.au

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive

OFFICIAL: Sensitive

Table of Contents

1. Purpose	3
1.1 Client Feedback	3
1.2 Types of Feedback	3
2 Scope	3
2.1 In Scope	3
2.2 Out of Scope	4
2.3 Out of Jurisdiction	5
3 Policy Statement	5
3.1 Feedback Channels	5
3.2 Assistance with Providing Feedback	5
3.3 Management of Feedback	5
3.4 Service Standards	6
3.5 Review of Feedback	6
3.6 Anonymous Feedback	6
3.7 Withdrawn Feedback	6
3.8 Unreasonable Client Conduct	7
3.9 Privacy	7
4 Accountabilities and Responsibilities	8
5 Version Control	8
Attachment A – Definitions	9
Attachment B – Related Documents	10
Attachment C – Related guidance and legislation	11
Attachment D – Consultation	11
1.1. Internal Consultation	11
Attachment E – Feedback Process Map	12

Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

1. Purpose

1.1 Client Feedback

This Client Feedback – Policy Statement replaces the former Department of Immigration and Border Protection's Client Feedback Policy of 7 Aug 2018. It has been developed by the Department's Global Feedback Unit (GFU) to provide clear guidance on how the Department receives and responds to client feedback about its immigration, citizenship and border control functions.

The Department of Home Affairs (the Department) has an open and accountable client feedback culture that is fair, lawful and reasonable. Feedback informs business improvement opportunities across the diverse range of functions and services delivered by the Department, including Australian Border Force (ABF) and the GFU is a designated channel for clients to share their observations and experiences in context with the feedback definitions prescribed in Section 1.2 and the Scope prescribed in Section 2.

This policy is underpinned by the Commonwealth Ombudsman's *Better Practice Guide to Complaint Handling*.

1.2 Types of Feedback

Under this policy, feedback is categorised as compliments, complaints and suggestions:

- Compliments are praise or congratulations about Department or ABF program delivery, services or performance
- Complaints are expressions of dissatisfaction about departmental and ABF policies, service delivery or how we conduct our business
- Suggestions are ideas on how we could improve our services or do our business differently.

Feedback informs business improvement opportunities and further enhances the quality of our services. Complaints and suggestions helps us to refine and improve our policies, processes and systems. Similarly, compliments help us recognise when we are meeting or exceeding community standards for service and performance.

2 Scope

2.1 In Scope

This Client Feedback - Policy Statement specifically relates to the immigration, citizenship and border control functions of the Department of Home Affairs.

Client feedback which falls within the scope of this policy includes compliments, complaints and suggestions about:

- Visa and Citizenship applications and pathways
- Travel through Australian border controls
- Tourist Refund Scheme (TRS)
- The Department and ABF policy and procedures
- International movement of trade and goods

OFFICIAL: Sensitive

- Departmental service providers and partners
- Onshore Immigration Detention Centres (IDC)
- Translating and Interpreting Services (TIS National)
- Services provided by departmental and ABF employees
- Services provided by contractors on behalf of the Department or ABF, subject to the scope elsewhere defined in this policy.
- Departmental fees and charges
- Immigration and border-control investigation and compliance activities.

Feedback addressed to the Home Affairs Secretary and ABF Commissioner relating to in-scope matters will be referred to the relevant work area by the GFU for investigation and response.

2.2 Out of Scope

Some feedback about the Department does not fall within the scope of this policy.

This policy **does not** cover:

- General enquiries about departmental services and processes
- Feedback about policy, services or client experiences provided by other departments or agencies within the Home Affairs Portfolio but outside of immigration, citizenship and border control functions.
- Allegations against an employee or representative of the Department suspected of corrupt or illegal behaviour. Such allegations must be referred to Border Watch Allegations and Referral Team (BWART) through the Border Watch Online Report form.
- Decisions where an external review or appeal mechanism already exists, such as the Administrative Review Tribunal.
- Applications for compensation related to departmental or ABF activities. Compensation can be claimed for loss suffered as a result of legal liability, defective administration and 'special' circumstances arising out of Commonwealth administration. More information on the compensation schemes and the procedure for making a claim is available: <https://www.homeaffairs.gov.au/help-and-support/claiming-compensation-from-us>
- Feedback about Regional Processing Centres (RPC). Feedback of this nature should be directed to the Home Affairs Minister's office through the Contact the Minister form.
- Comments made about the Department or ABF via social media platforms. Such platforms are not recognised channels for feedback under this policy
- Issues relating to the conduct and services provided by Migration Agents in Australia. Concerns relating to the behaviour of Migration Agents should be referred to the Office of the Migration Agents Registration Authority (OMARA) via BWART.
- Information or requests relating to Human Resource matters or departmental employment issues and/or conditions.
- Feedback addressed directly to the Minister. This correspondence will be forwarded to Ministerial Support for investigation and response.
- Enquiries addressed to the Minister. Correspondence will be channel managed to: <https://www.homeaffairs.gov.au/help-and-support/departmental-forms/online-forms/contact-the-minister>

Released by the Department of Home Affairs under the Freedom of Information Act 1982

OFFICIAL: Sensitive

2.3 Out of Jurisdiction

The GFU is unable to record and action feedback about matters beyond the jurisdiction of the Department and/or ABF. This includes:

- Feedback about other Australian or state government departments, agencies and/or their functions
- Feedback about the conduct or practices of private or commercial organisations
- Feedback about the laws, practices and policies of other countries
- Other matters, as determined by the Assistant Director, GFU.

3 Policy Statement

3.1 Feedback Channels

Feedback can be provided by individuals, businesses and other organisations both inside and outside of Australia. Clients can submit feedback about the Department and the ABF by web form, telephone or mail.

The Department's preferred method of receiving feedback is via our online feedback form.

Online Clients can provide feedback via our [online feedback form](#) which is accessible through the [Department of Home Affairs' website](#).

Phone 131 881 (within Australia only)
Office hours are 9.00am to 5.00pm (AEST) Monday to Friday.

Mail The Manager
Global Feedback Unit
Department of Home Affairs
GPO Box 241
Melbourne, Victoria, Australia 3001

3.2 Assistance with Providing Feedback

The following services are available to provide assistance to clients providing feedback by phone:

- Translating and Interpreting Service (TIS National) on 131 450 (within Australia).
- Text telephone (TTY) or modem callers can contact the National Relay Service (NRS) on 133 677 (within Australia)
- Speech to Speech Relay (SSR) via the NRS on 1300 555 727 (within Australia).

3.3 Management of Feedback

The GFU will record the case on Departmental systems, acknowledge receipt of the case, and either respond to the client or refer the case for investigation and response.

Section 3.4 outlines the Department's service standards in acknowledging and responding to feedback. If the matter is complex it may take longer to investigate, in which case an interim response may be provided to the client, pending completion of the case.

The Department will not respond to feedback which is out of scope, out of jurisdiction, is made anonymously, or does not contain sufficient information to enable investigation. If feedback is out of scope or out of

OFFICIAL: Sensitive

jurisdiction, the GFU will notify the client and, where possible, direct the client to the correct Department, agency or organisation.

3.4 Service Standards

The Department has the following service standards for managing feedback:

1. Department complaint handling service standards

Acknowledge within	Respond within	Target for resolution
Two working days (on receipt by the GFU)	15 working days (starts from date of referral by the GFU to the responsible business area)	90 per cent

Note: the GFU is located in Melbourne, Victoria, and adheres to all state and national public holidays; service standards may be extended accordingly by these prescribed dates.

3.5 Review of Feedback

If the client is not satisfied with the response they have received to their feedback, they can request the GFU initiate an internal review.

Requests for internal reviews must be submitted in writing to the GFU, stating the reasons for the request and quoting the Reference number (IMMI-XX-XXXXX) of the feedback case.

All internal reviews will be conducted within 15 working days of receipt of a written request for review. The GFU will notify the client of the outcome in writing when the case is completed.

If a client is not satisfied with the outcome of a feedback case or internal review, they can contact the Commonwealth Ombudsman or Australian Human Rights Commission to request further investigation of their concerns.

3.6 Anonymous Feedback

Anonymous feedback can be submitted by members of the public if they choose to withhold identifying details.

Anonymous feedback can be processed by the GFU, however, it is preferred that clients identify themselves by name or other identifying reference numbers or details to enable investigation of their feedback.

Where anonymous feedback is received, the feedback will be recorded and referred to the Responsible Business Area (RBA) for information only.

3.7 Withdrawn Feedback

If a client decides to withdraw their feedback, they should provide the request by replying directly to the GFU acknowledgment email or letter, quoting their Feedback Reference number. The matter will then be closed by the Department.

OFFICIAL: Sensitive**3.8 Unreasonable Client Conduct**

Whilst the Department values feedback, it will not accept unreasonable client conduct by clients providing feedback.

In line with the Commonwealth Ombudsman's advice, unreasonable client conduct is defined as:

- Aggressive or abusive language, including insults, profanity, and/or language that offends, discriminates and/or vilifies on the basis of race, religion, gender, sexual orientation or other personal traits.
- Threats of violence and harm against individuals and property, including threats of self-harm.
- Malicious complaints made to damage a person's career or reputation.
- Vexatious complaints made without substantive evidence.
- Unreasonable demands for action which fall outside of the scope and standards of this policy.
- Unreasonable persistence including refusal to accept an outcome, resolution and/or pursuing a closed complaint without any new information.

If satisfied that a client is acting unreasonably during the feedback process, the Department may take steps to minimise or control staff dealings with a client by:

- Placing restrictions on the type of contact the client can make (for example, only contact the Department in writing if a person is verbally aggressive or abusive).
- Withdrawing services from repeatedly threatening and/or abusive clients.
- Using authorised template responses to refuse to engage with the client for repeated feedback about closed matters.
- Other measures at the discretion of the Assistant Director and/or Manager of the GFU.

In the event that a client makes statements which indicates a credible and/or imminent risk of harm or violence, the GFU will report the client's statements and/or conduct to the appropriate state or federal authorities (such as state Police and/or the Australian Federal Police) as per Departmental security protocols. The GFU may also initiate welfare checks if it has concerns about a client's safety, as it deems appropriate.

3.9 Privacy

Feedback received by the Department is handled in accordance with the provisions of the *Freedom of Information Act 1982* (the FOI Act) and the *Privacy Act 1988*.

The Office of the Australian Information Commissioner (OAIC), established under the *Australian Information Commissioner Act 2010* as part of major changes to federal freedom of information law made during 2010, reviews decisions made under the FOI Act and investigates complaints made by people who believe that an Australian Government Department or agency has breached the *Privacy Act 1988*.

More information about the OAIC is available at: www.oaic.gov.au

The FOI and Privacy Policy Section is the Department's first point of contact for queries about FOI and privacy policy or procedures.

If you have questions about FOI and/or Privacy, please email: foi@homeaffairs.gov.au and/or privacy@homeaffairs.gov.au

Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

4 Accountabilities and Responsibilities

Role	Description
First Assistant Secretary, Immigration & Citizenship Services Division	Responsible for approving the Client Feedback Policy.
Director, Client Support & Feedback Services	Responsible for approving the Client Feedback Standard Operation Procedures and oversight of the <i>Client Feedback Policy</i> and the Global Feedback Unit.
Assistant Director, Global Feedback Unit	Responsible for administering the Client Feedback Policy and managing the Global Feedback Unit, including consultation with internal stakeholders and service providers.
Manager, Global Feedback Unit	Responsible for drafting policy and SOP updates.

5 Version Control

Version number	Date of issue	Author(s)	Brief description of change
1	07 Aug 2018	s. 22(1)(a)(ii)	Original document
1.1	07 Aug 2018	s. 22(1)(a)(ii)	Update document Contact and insert names, dates and TRIM References
1.2	08 Nov 2021	s. 22(1)(a)(ii)	Periodic review - Clarification of instructional material and definitions.
1.3	31/01/2025	s. 22(1)(a)(ii)	Periodic review – Hyperlink / Group and Divisional Name updates

 Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

Attachment A – Definitions

Term	Acronym	Definition
Australian Border Force	ABF	An operational arm of the Department responsible for border investigations, compliance, detention facilities, enforcement functions, and customs services.
Border Watch Allegations and Referral Team	BWART	A single collection point for community and industry information about suspicious or illegal immigration, customs or border-related activities.
Freedom of Information	FOI	Freedom of information laws allow access by the general public to data held by national governments, subject to some exceptions). Underpinned by the <i>Freedom of Information Act 1982</i> .
Global Feedback Unit	GFU	The section of the Department that receives, records and administers all client feedback about immigration, citizenship and border control related matters.
Global Service Centre	GSC	The Department's designated phone channel for information and general enquiries about visa and citizenship functions.
Immigration Detention Centre	IDC	The Department's network of onshore detention centres.
Office of the Migration Agents Registration Authority	OMARA	The industry regulator for Australian migration agent services.
Office of the Australian Information Commissioner	OAIC	The government agency which reviews decisions made under the FOI Act and investigates complaints made by people who believe government departments or agencies have breached the <i>Privacy Act 1988</i> .
TIS National	TIS National	The Department's Translating and Interpreting Service.
Tourist Refund Scheme	TRS	A tax scheme administered by the Department which allows tourists to claim a refund of taxes on goods bought in Australia and taken offshore (subject to conditions).
Regional Processing Centre	RPC	Offshore processing centre run by the Government of Nauru with the support of the Australian Government.
Responsible Business Area	RBA	The area within the Department or ABF which has responsibility for policy, service or product that client feedback concerns.

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive

Attachment B – Related Documents

- This Client Feedback – Policy Statement is supported by the Client Feedback – Standard Operating Procedure (VM-5430)

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive

Attachment C – Related guidance and legislation

- The Commonwealth Ombudsman's *Better Practice Guide to Complaint Handling* (2023). See [Better-Practice-Complaint-Handling-Guide-February-2023.pdf](#)
- The Commonwealth Ombudsman's Fact Sheet on *Unreasonable complainant conduct*. See [Unreasonable-complainant-conduct.pdf](#)
- Serco Immigration Services Complaints Management Policy and Procedures Manual (Version 3.2)
- The *Freedom of Information Act 1982* (the FOI Act)
- The *Privacy Act 1988*.

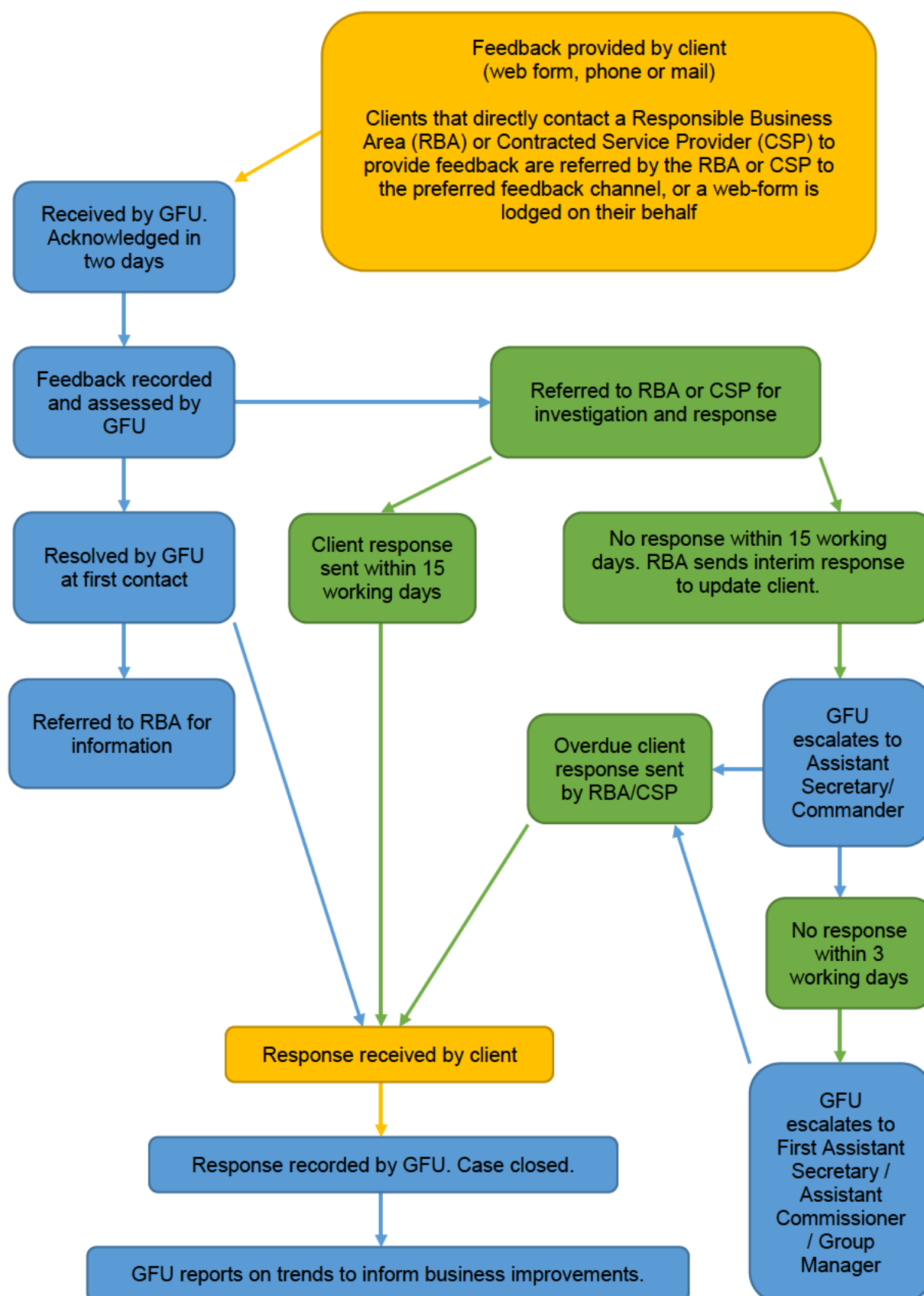
Attachment D – Consultation

1.1. Internal Consultation

The following areas were provided a copy of this Policy for review and given the opportunity to review and comment. External stakeholders were not consulted in the development of this document:

- Child Wellbeing Operations
- Health
- Integrity
- External Scrutiny
- Detention Support and Coordination Section
- RCU VIC/TAS operations
- RCU NSW
- RCU WA
- RCU SA
- RCU Qld
- RCU Operations North
- Travel Secure
- Ministerial Support

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive**Attachment E – Feedback Process Map**
 Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*



OFFICIAL: Sensitive

Client Feedback

Standard Operating Procedure

Document ID (PPN)	VM-5430
TRIM record number	ADD2024/102865331
BCS Function	Visa and Migration Management
Document owner	Director, Client Support and Feedback Services
Approval date	31/01/2025
Document Contact	Global Feedback Unit feedback@homeaffairs.gov.au

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive

OFFICIAL: Sensitive

Table of Contents

1. Purpose	4
2. Scope	4
2.1. In Scope	4
2.2. Out of Scope	4
2.3. Out of Jurisdiction	5
3. Standard Operating Procedure	5
3.1. Feedback Channels	5
3.2. Types of Feedback	6
3.2.1. Complaints	6
3.2.2. Compliments	6
3.2.3. Suggestions	7
3.2.4. Determination of feedback type	7
3.3. Roles and Responsibilities	7
3.3.1. The Global Feedback Unit (GFU)	7
3.3.2. Departmental and ABF employees	8
3.3.3. Contracted service providers	8
3.3.4. Home Affairs Portfolio agencies and partners	8
3.4. Other Client Contact	9
3.4.1. General enquiries	9
3.4.2. Decision related feedback	9
3.4.3. Claims for compensation	9
3.4.4. Cargo status enquiries	9
3.5. Service standards	10
3.6. Managing Feedback	10
3.6.1. GFU response	10
3.6.2. Referral of feedback to RBA	10
3.6.3. RBA response	10
3.6.4. Combined RBA responses	12
3.6.5. Escalation of feedback to SES	12
3.6.6. Interim responses	12
3.6.7. Requests to client for further information	13
3.6.8. Disagreement about RBA	13
3.7. Internal review	13
3.8. Sensitive cases	13
3.8.1. Feedback by or about children	13
3.8.2. Feedback regarding Integrity and Professional Standards	14
3.8.3. Out of scope requests for assistance	15
3.8.4. Significant media interest	15
3.8.5. Feedback campaigns	16
3.8.6. Unreasonable client conduct	16
3.9. Threats of serious harm	17
3.10. Anonymous feedback	18
3.11. Withdrawn complaints	18
3.12. Feedback reporting and analysis	18

Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

3.13. Quality assurance and monitoring	18
3.14. Freedom of information and privacy	19
3.14.1. Freedom of Information	19
3.14.2. Privacy	19
3.14.3. Notifiable data breaches scheme	19
3.15. External scrutiny	19
3.15.1. External scrutiny agencies	19
3.15.2. Commonwealth Ombudsman	20
3.15.3. External scrutiny section	20
4. Accountabilities and Responsibilities	20
5. Version Control	21
Attachment A – Definitions	22
Attachment B – Assurance and Control Matrix	22
1.1. Powers and Obligations	22
1.2. Controls and Assurance	23
Attachment C – Consultation	25
1.1. Internal Consultation	25
Attachment D – Feedback Process Map	26

OFFICIAL: Sensitive

1. Purpose

This Standard Operating Procedure (SOP) supports the Department of Home Affairs' Client Feedback – Policy Statement (VM-3001) and provides departmental and Australian Border Force (ABF) staff with direction for the handling of all forms of client feedback.

Both the Client Feedback – Policy Statement (VM-3001) and this SOP are built upon the Department's existing Feedback Policy, which was developed in line with the Commonwealth Ombudsman's Better Practice Guide to Complaint Handling.

The Client Feedback – Policy Statement (VM-3001) and this SOP are managed by the Global Feedback Unit (GFU), which sits within the Service Delivery Operations Branch of Immigration & Citizenship Services Division.

2. Scope

2.1. In Scope

Feedback which falls within the scope of the GFU includes:

- Visa and Citizenship applications and pathways
- Travel through Australian border controls
- Tourist Refund Scheme (TRS)
- Immigration and Australian Border Force (ABF) policy and procedures
- International movement of trade and goods
- Departmental service providers and partners
- Onshore Immigration Detention Centres (IDC)
- Translating and Interpreting Services (TIS National)
- Services provided by departmental and ABF employees
- Services provided by contractors on behalf of the Department or ABF, subject to the scope elsewhere defined in this document.
- Departmental fees and charges
- Immigration and border-control investigation and compliance activities.

This SOP provides guidance to all departmental employees and contracted providers as to how they should record and manage client feedback.

All feedback received from external departmental clients about their satisfaction or dissatisfaction with the Department's program or service delivery fall within the scope of this policy.

Feedback addressed to the Home Affairs Secretary and ABF Commissioner relating to in scope matters will be referred to the responsible business area by the GFU for investigation and response.

2.2. Out of Scope

Feedback that falls outside the scope of the GFU includes:

- General enquiries about departmental services and processes

Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

- Feedback about policy, services or client experiences provided by other departments or agencies within the Home Affairs Portfolio but outside of immigration, citizenship and border control functions.
- Allegations against an employee or representative of the Department suspected of corrupt or illegal behaviour. Such allegations must be referred to Border Watch Allegations and Referral Team (BWART) through the Border Watch Online Report form.
- Decisions where an external review or appeal mechanism already exists, such as the Administrative Review Tribunal.
- Applications for compensation related to departmental or ABF activities. Compensation can be claimed for loss suffered as a result of legal liability, defective administration and 'special' circumstances arising out of Commonwealth administration. More information on the compensation schemes and the procedure for making a claim is available: <https://www.homeaffairs.gov.au/help-and-support/claiming-compensation-from-us>
- Feedback about Regional Processing Centres (RPC). Feedback of this nature should be directed to the Home Affairs Minister's office through the Contact the Minister form.
- Comments made about the Department or ABF via social media platforms. Such platforms are not recognised channels for feedback under this policy
- Issues relating to the conduct and services provided by Migration Agents in Australia. Concerns relating to the behaviour of Migration Agents should be referred to the Migration Agents Registration Authority (MARA) via BWART.
- Information or requests relating to Human Resource matters or departmental employment issues and/or conditions.
- Feedback addressed directly to the Minister. This correspondence will be forwarded to Ministerial Support for investigation and response.
- Enquiries addressed to the Minister. Correspondence will be channel managed to the Minister.

2.3. Out of Jurisdiction

The GFU is unable to record and action feedback about matters beyond the jurisdiction of the Department and/or ABF. This includes:

- Feedback about the policies, services or practices of other Australian or state government departments or agencies
- Feedback about the conduct or practices of private or commercial organisations
- Feedback about the laws, practices and policies of third countries
- Other matters, as determined by the Assistant Director, GFU.

3. Standard Operating Procedure

3.1. Feedback Channels

Feedback can be provided by individuals, businesses and other organisations both inside and outside of Australia via one of three feedback channels.

OFFICIAL: Sensitive

The GFU's preferred method of receiving feedback is via an online feedback form which is accessible via the Department's website.

Online	www.homeaffairs.gov.au/help-and-support/departmental-forms/online-forms/complaints-compliments-and-suggestions
Phone	131 881 (within Australia only) Office hours are 9.00am to 5.00pm (AEST) Monday to Friday.
Mail	The Manager Global Feedback Unit GPO Box 241 Melbourne, Victoria, Australia 3001

The GFU Manager may offer alternate avenues for client feedback in cases where the client is unable to use the above channels. This deviation is supported by the Department's commitment to Access and Equity, and the right of all clients to lodge feedback about in-scope Departmental and ABF matters.

3.2. Types of Feedback

The Department receives three different types of feedback: complaints, compliments and suggestions.

3.2.1. Complaints

The definition of a complaint under the *Australian Standard AS/NZS 10002:2014* is:

"Any expression of dissatisfaction made directly or indirectly, explicitly or implicitly, to the Department, related to our products (including services), staff or the complaint handling system itself".

A complaint is **not**:

- a request for information,
- a request to review a decision,
- a request for an explanation of policies,
- or a disagreement with a decision that has a formal avenue of appeal or review.

The Department will record and respond to all in-scope complaints made to the GFU.

If the Department has made a decision which has an appeal or review process it will have informed the client of that process during its notification of the decision as part of its administrative law obligations. In cases where a client contacts the Department to complain about reviewable decisions, they will be directed to this information and their feedback will be forwarded to the responsible business area (RBA) for information only. If, however, the feedback includes a complaint about the service provided by the Department during its decision-making processes, that component of the complaint will be forwarded to the RBA for investigation and response.

3.2.2. Compliments

A compliment is any expression of praise, congratulation, encouragement, or respect for an individual staff member or team by an external source, such as a client, stakeholder or agent, for going out of their way to provide an exceptional level of service above and beyond what would normally be expected in the course of their duties.

Acknowledgments of gratitude or happiness resulting from the processing of applications, or the delivery of services that staff are expected to provide while carrying out their duties, while welcome, will not be recorded as compliments for reporting purposes..

OFFICIAL: Sensitive

Compliments about the Department's program delivery, services or performance will be acknowledged by the GFU and forwarded to the RBA for information.

Recognition of excellent client service by departmental employees about another employee or team, while welcome, does not fall under the scope of the GFU and is therefore not considered as a compliment for reporting purposes.

3.2.3. Suggestions

Suggestions are ideas that are put forward by members of the community to help the Department enhance its products and services.

Suggestions on how the Department can improve its policies, program delivery, services or performance are referred to RBAs for consideration. The RBA may exercise its discretion in contacting clients who have made suggestions.

3.2.4. Determination of feedback type

In the event that the nature of feedback (or other forms of client contact) is disputed, the GFU Manager will assess the case against the aforementioned criteria and make a final determination.

3.3. Roles and Responsibilities

3.3.1. The Global Feedback Unit (GFU)

The GFU is the Department's central point for receiving, tracking and responding to client feedback. The GFU records all feedback in a case management system which allows it to monitor each feedback case from receipt to resolution. Reporting and analysis is then undertaken by the GFU to support business improvement opportunities across the Department and ABF.

With the exception of feedback directed to IDC service providers, all client feedback should be directed to the GFU Feedback web form in the first instance.

A process map of how the GFU manages client feedback is shown at Appendix One.

The GFU acknowledges all client feedback, where possible, and attempts to resolve in-scope feedback at the first point of contact. If this is not possible, the GFU refers the feedback to the RBA for resolution. Where a RBA referral has occurred, the GFU monitors the outcome to ensure that service standards are achieved. Table 1 provides several examples of how the GFU can resolve feedback at first contact.

1. Examples of GFU direct response to clients

Types of feedback	GFU response
Complaint received about visa application processing times (within standard processing times)	Written acknowledgement, referred to RBA for information only.
Compliment received about policy, service or staff conduct	Written acknowledgement, and if in scope as per 3.2.2, referred to RBA for information only.
Feedback received by onshore IDC	Written acknowledgment only.
Feedback received due to community campaigns	Written acknowledgement, referred to RBA for information only.

OFFICIAL: Sensitive

The GFU regularly works with line areas to develop appropriate scripts for direct response. If you wish to discuss such a response for your area, please email feedback@homeaffairs.gov.au

3.3.2. Departmental and ABF employees

It is important that the Department and the ABF record as much feedback as possible in order to capture the full spectrum of what our clients are telling us about our program and service delivery. While the GFU is central to these procedures and processes, all departmental and ABF employees are equally responsible for managing and responding to feedback within service standards.

In line with the *Channel Strategy 2017 – 2020*, clients should be directed to lodge feedback via the Feedback web form on the Department's web site in the first instance. If it is not possible for the client to lodge a web form, clients can be given information about other Feedback Channels as stated in section 3.1 of this document.

Please note: Departmental employees have additional responsibilities when dealing with allegations or complaints by or about children. Please see Section 3.8.1 for information about how to manage such cases.

3.3.3. Contracted service providers

The Department often receives feedback from clients about its contracted service providers, particularly about the detention centre contractor, or Facilities and Detainee Service Provider (FDSP).

The FDSP lodges feedback and provides supporting documents via the GFU web form. The GFU processes the feedback through its normal systems and processes. The FDSP is responsible for responding directly to the client and notifying the GFU of the outcome.

The current FDSP (Serco) complaints handling procedures are outlined in Serco's *Complaints Management Policy & Procedure Manual*, which serves as a subordinate to the Client Feedback – Policy Statement.

3.3.4. Home Affairs Portfolio agencies and partners

If the GFU receives out-of-scope feedback about other Home Affairs Portfolio agencies, or one which has blended functions, it will re-direct the client to the appropriate feedback channel via the following contacts:

2. Referral points for Home Affairs Agencies for out-of-scope feedback

Portfolio member	Public feedback point
Australian Criminal Intelligence Commission	Web: www.acic.gov.au/contact
Australian Federal Police	Email: PRS-ComplaintsCoordinationTeam@afp.gov.au Web: www.afp.gov.au/contact-us/feedback-and-complaints
Australian Transaction Reports and Analysis Centre (AUSTRAC)	Email: contact@austrac.gov.au Phone: 1300 021 037
Attorney General's Department	Web: www.ag.gov.au/About/Pages/Contactus.aspx Phone 02 6141 6666 (8:30 – 5pm Mon – Fri)
Department of Infrastructure and Regional Development	Email: clientservice@infrastructure.gov.au

OFFICIAL: Sensitive**3.4. Other Client Contact****3.4.1. General enquiries**

A general enquiry is defined as a client seeking information in regards to the Department's services and program delivery. This includes pre-lodgement information, requests to obtain the status of an application or goods, and requests for technical support for Departmental IT systems such as ImmiAccount. The GFU cannot assist with general enquiries, unless they also contain a complaint, compliment or suggestion. General enquiries which do not contain these forms of feedback should be referred to information or public contact details available on the Department's website.

3.4.2. Decision related feedback

It is the role of the Department to make decisions within the legislative and policy framework; this includes refusing/declining applications/requests.

Some clients may be dissatisfied with the decisions made by the Department, however, this does not mean that the Department has failed to in its service provision.

When feedback is received that a client disagrees with a departmental decision, the client will be referred to the correct avenue of appeal and the complaint will be sent to the RBA for information only. If the complaint includes comments about the service provided by the Department or ABF during its decision-making process, the feedback will be managed according to this SOP.

3.4.3. Claims for compensation

If the Department has made an error that has caused a claimant a financial loss or some other detriment, the client may be able to make a claim for compensation. Compensation can be claimed for loss suffered as a result of legal liability, defective administration and 'special' circumstances arising out of Commonwealth administration.

The Department might assess a claim and pay compensation in accordance with the *Legal Services Directions 2017*, where there is a meaningful prospect of liability that the Department could be found liable to pay compensation if the matter was tested in court.

The Compensation for Detriment caused by Defective Administration (CDDA) scheme allows the Department to compensate claimants if they have been adversely affected by defective administration on the part of the Department and where no legal liability exists. Payments made under the CDDA scheme are discretionary and can be made where it is considered fair and reasonable to do so where there is no other redress available.

Act of Grace is administered by the Department of Finance. If the Finance Minister or delegate consider it appropriate to do so because of special circumstances, the Finance Minister or delegate may authorize an Act of Grace payment.

For further information about compensation under the CDDA scheme, clients should be referred to the Department's website at: www.homeaffairs.gov.au/help-and-support/claiming-compensation-from-us

The GFU refers all complaints involving claims for compensation to the RBA for assessment and response.

3.4.4. Cargo status enquiries

The Department receives feedback in relation to cargo (sea and air), in particular general enquiries as to Cargo Status.

Cargo Status is the product of a cumulative process within the Integrated Cargo System (ICS) that evaluates whether a consignment may be released from the Department's and the Department of Agriculture's control.

Cargo Status is determined by a set of conditions related to the cargo and associated documents.

Released by the Department of Home Affairs
under the Freedom of Information Act 1982

OFFICIAL: Sensitive

Cargo Status information is available via Customs Interactive and is also transmitted in electronic messages to relevant stakeholders. Detailed information about CARGO Status procedures is available at:

[www.abf.gov.au/help-and-support/ics/integrated-cargo-system-\(ics\)/using-the-ics/contact-cargo-systems-support](http://www.abf.gov.au/help-and-support/ics/integrated-cargo-system-(ics)/using-the-ics/contact-cargo-systems-support)

3.5. Service standards

The GFU has the following service standards:

3. Department complaint handling service standards

Acknowledge within	Respond within	Target for resolution
Two working days (from date of receipt by the GFU)	15 working days (from date of referral by the GFU)	90 per cent

If the feedback is referred to an RBA for response, the 15 day response period commences at the time of referral. The GFU refers feedback to an RBA at the EL1/EL2 level for resolution and response.

Note: the GFU is located in Melbourne, Victoria, and adheres to all state and national public holidays. Service standards may, accordingly, be extended by these prescribed dates.

3.6. Managing Feedback

3.6.1. GFU response

Where possible, the GFU will attempt to resolve client feedback at the first point of contact. When this occurs, the GFU responds directly to the client and sends the RBA the details of the feedback for information only.

3.6.2. Referral of feedback to RBA

If the GFU cannot resolve client feedback at first contact, it will refer the feedback to the person who is responsible for the delivery of the service that the feedback concerns. For operational or client-facing areas this is generally the EL1 and for National Office, EL2s. GFU referrals are made at this level because managers have the capacity to investigate, have the detailed knowledge of correct procedures, and can direct changes and/or allocate resources if needed.

In the event that the feedback received is about the person who is responsible for service delivery, the feedback will be referred to that person's direct manager for response.

The GFU staff must refer feedback cases to an individual, the 'primary recipient'. Feedback cases must not be referred to a mailbox or group email address as the primary recipient.

3.6.3. RBA response

Once the GFU has referred a feedback case to an RBA, that area is responsible for providing a response to the client.

It is important that RBA responses provide a full and accurate response which materially addresses all aspects of the client's feedback.

All RBA responses should:

- Refer to the feedback matter by the GFU reference (i.e. IMMI-19-XXXXX)

OFFICIAL: Sensitive

- Note the date the feedback was received
- Summarise the issue/s raised by the client feedback
- Address each issue in turn
- Be tailored to the client's individual feedback and concerns
- Include the first name and position number of the Departmental author.

Ideally, RBA responses should also

- Acknowledge the effort taken by the client to provide feedback and the value of that feedback
- Confirm whether the subject of the feedback did occur (i.e. I accept that your property was lost on XX date).
- Refer to any evidence used to investigate the case (i.e. I have reviewed your file / reviewed CCTV footage and note that)
- Apologise for any failure of service identified by that area
- Outline corrective action taken by the area (i.e. As a result of your feedback the staff member in question has been counselled; the policy has been updated; or the procedure has been reviewed)
- Reset unrealistic client expectations in line with the services provided by the Department, preferably with reference to published service standards or compliance with relevant legislation.
- Identify actions that the client can take to assist the Department (i.e. please continue to monitor your ImmiAccount for information requests and or case outcomes).

It is recommended that feedback responses be sent to the client on Department/ABF branded letterhead in PDF format to prevent alteration.

RBAs are not required to reply to the client in cases where:

- Providing requested information would result in a breach the *Privacy Act 1988*
- The client has engaged in unreasonable conduct (as per Section 3.8.6)
- The client has expressly stated that they do not want a response
- The feedback relates to a lack of a decision or action, which has since been resolved (i.e. the visa granted or cargo released). If this occurs, please notify the GFU by email and it will respond to the client on your behalf.

Once an RBA response has been approved, it should be sent by email to the client, with a courtesy copy (BCC) to the GFU at feedback@homeaffairs.gov.au

If a response is provided verbally to the client, please email the GFU at the above address advising the details (i.e. the method of delivery, date, time and a summary of the conversation).

All RBA responses should be completed within the 15 business day service standard (See Section 3.5).

The GFU will save a copy of the complaint resolution on its case management system; it is best practice for the RBA to also save a copy on its own local feedback management TRIM file.

Example of an RBA feedback response

Sample feedback from client:

I have emailed your office a dozen times now and never heard back. It has been over two years and my partner has still not got his visa to come here. This is well beyond even your processing times, which keep changing. This is causing a lot of stress and difficulty for me and my partner. And when you do send a letter, you spell my name wrong! How can I trust that anything else is correct?

Sample RBA Response:

Dear Ms Client,

Thank-you for your feedback of XX date (Reference IMMI-19-XXXXX). I appreciate the time you have taken to provide this feedback, which allows the Department to understand your experience of our services.

OFFICIAL: Sensitive

I acknowledge that being separated from your partner is a stressful situation and assure you that the Department is seeking to finalise all Partner (Provisional) Visa (subclass 309) applications as quickly as possible.

You have raised several points in your feedback, namely, the lack of responses to a dozen emails to our office, the time taken to process your partner's visa application, and an error in spelling your name.

I have reviewed the email correspondence sent by your email address to our mailbox. I have found three emails only, of which two have already received a detailed written response. The third email, your notification of a change of address, was actioned and a response sent to you on XX date.

Regarding your misspelled name in the request letter, I accept that the case officer did make a mistake and I apologise for this error. I have reviewed the letter and can confirm that the substance of the letter is correct.

I have spoken to the case officer about ensuring all details in future client correspondence are correct.

In regards to the processing time, I note that your application was lodged on 16 August 2018, following an earlier invalid application. Please note that last month the Department reported that it is currently taking 14 months to decide 75 percent of applications and 19 months to decide 90 per cent of applications. Your application is therefore currently within published processing times, which commences from when a valid application is made. Please note that these times are updated monthly to report on the current times taken by the department and therefore subject to change.

I trust this information addresses your concerns.

As previously stated, the Department is seeking to resolve partner visa applications as soon as possible. Please continue to monitor your ImmiAccount for further information requests relating to your case and/or notification of an outcome.

3.6.4. Combined RBA responses

Where a client has raised more than one feedback issue, and these issues are managed by different RBAs, the RBAs are encouraged to collaborate to provide a combined response to the feedback.

Combined response must clearly identify each issue being addressed, the RBA concerned, and its finding.

When sending a combined response, please notify the GFU that the response addresses all issues raised by the client, so that the GFU can appropriately close all aspects of the case on its systems.

3.6.5. Escalation of feedback to SES

Where an RBA fails to resolve feedback within the 15 day service standard, the GFU will escalate the matter to the appropriate Assistant Secretary/Commander.

When this occurs, the GFU officer must change the name of the primary recipient in Resolve to that of the Assistant Secretary/Commander.

If the matter is still not resolved within 3 days, the matter is further escalated to First Assistant Secretary/Assistant Commissioner/Group Manager level.

3.6.6. Interim responses

If the feedback received is complex it may take longer than 15 days to resolve, in which case an interim response must be provided to the client by the RBA. When this occurs, the RBA must notify the GFU so that it can monitor and document the feedback correspondence on its systems.

Cases in which an interim response has been sent will still be escalated to the SES 15 days after GFU referral, to ensure visibility of overdue cases.

Interim responses provided by the RBA should:

- make reference to the feedback issue
- state the status of the feedback response (i.e. it is being investigated)
- provide a date for completion of that action and final response to the client

OFFICIAL: Sensitive

- provide an RBA contact point for the client

If a feedback case is delayed more than 30 working days from the original RBA referral, a second interim response is required to explain the delay and provide an update to the client on the progress of the case. Further interim responses are to be provided every 15 days until the case is closed.

3.6.7. Requests to client for further information

Where further information is sought from a client to process feedback and the client either fails to provide the requested information or respond within a specified timeframe, the GFU will close the case without further action.

3.6.8. Disagreement about RBA

Where feedback is received that cannot be finalized by the GFU because an RBA cannot be established, the GFU Manager will refer the case to the relevant Assistant Secretary/Commander for determination.

3.7. Internal review

If the client is not satisfied with the response they have received to their feedback, they can request the GFU to initiate an internal review.

Requests for internal review must be submitted in writing to the GFU, stating reasons and quoting the Reference number (IMMI-XX-XXXXX) of the feedback case to be reviewed.

When an internal review is requested, the GFU will re-open the feedback case and refer it back to the Manager of the RBA for re-consideration. The RBA then has the opportunity to review the circumstances of the feedback case and the substance and quality of the response they have provided. Once the internal review has been completed, the RBA will advise the GFU of the outcome of their review. The RBA may provide a further response to the client, or decline to do so.

If a review is sought about the GFU's management of a feedback case, the GFU will record a new feedback item, which will be referred to the Assistant Director GFU for investigation and response.

The Assistant Director will consider:

- Whether the feedback was appropriately classified and reported by the GFU
- Whether the feedback was appropriately referred by the GFU
- Whether the feedback was actioned within service standards.

All internal reviews will be conducted within 15 working days of a written request for review. The GFU will notify the client of the outcome in writing when the case is completed.

If clients are not satisfied with the outcome of a feedback case and/or internal review, they should be directed to contact the Commonwealth Ombudsman or Australian Human Rights Commission to request further investigation of their concerns. See Section 3.15 for further information about External Scrutiny.

3.8. Sensitive cases

3.8.1. Feedback by or about children

The Department has a responsibility to ensure that children are protected from harm.

For this reason, all feedback provided to the GFU by or about children is to be handled in accordance with the *Child Safeguarding Framework*, the *Reporting Child-related incidents Policy*, the *Human Trafficking Standard Operating Procedures* and the findings of the *Royal Commission into Institutional Responses to Child Sexual Abuse*.

OFFICIAL: Sensitive

All feedback provided to the GFU by children *where a safety or welfare risk is indicated* will be referred to the GFU Manager and be added to the GFU's sensitive case register.

Where the GFU receives feedback which indicates a child safety or welfare issue, it will refer the matter to an appropriate RBA for immediate action. Table 4 provides guidance on how the GFU will manage cases involving children.

4. Referral process – Feedback regarding children at risk of harm

Case Type	Referral Section
Children in detention (allegation of harm by a service provider)	- FDSP (Serco) - Integrity and Professional Standards - Detention Centre Manager - Child Wellbeing Operations
Children in detention (allegation of harm by another detainee)	- FDSP (Serco) - Detention Centre Manager - Child Wellbeing Operations
Children in community (under care of a relative or guardian)	- Child Wellbeing Operations - RBA
Allegation of slavery or servitude Where suspected victims are determined to be at risk of immediate harm or are minors, staff should call 131 AFP (131 237) or State / Territory police (000) without delay.	- Border Watch - Child Wellbeing Operations - RBA - Human Trafficking Contact Officer (HTCO)
Unaccompanied Humanitarian Minors	Unaccompanied Humanitarian Minors Program
Student Visa Holders	- Child Wellbeing Operations - RBA
Children who are offshore	- Child Wellbeing Operations - Relevant Overseas Post
Other	Child Wellbeing Operations

3.8.2. Feedback regarding Integrity and Professional Standards

Any feedback that alludes to, or contains a claim of a possible Integrity and Professional Standards (I&PS) issue, will be taken seriously. Table 5 provides guidance on how the GFU will manage cases involving I&PS.

5. Referral process – Integrity and Professional Standards

Referral Section	Case Type
Referred to line areas only	- Officer was rude - Alleged theft - Inappropriate use of social media
Referred to line areas and I&PS alerted	- Misuse of official information - Alleged assault of detainees by Departmental or contracted officers - Denial of access to medical assistance

OFFICIAL: Sensitive

Referral Section	Case Type
Referred directly to I&PS only	• Allegation of serious misconduct • Corrupt conduct • Criminal activity involving Home Affairs staff or contractors

I&PS will provide guidance to the GFU on appropriate RBA involvement in directly referred cases on a case by case basis.

3.8.3. Out of scope requests for assistance

The GFU occasionally receives requests for assistance about a variety of issues which are out of scope of the *Client Feedback Policy*. In general, the GFU will advise the client that the matter is out of scope and refer the client to the Global Service Centre (GSC) or the Department's website for information. However, in cases where the GFU perceives a risk to the well-being of client, the GFU may take additional steps to refer the client to an appropriate contact or information point.

Examples of such requests and responses include:

6. GFU response – Out of scope requests for assistance

Example of request	GFU response
Request for humanitarian assistance from offshore client	• Refer client to GSC and/or website • Refer client to closest Post and/or UNHCR office
Request for travel assistance by Australian citizen	• Provide Department of Foreign Affairs and Trade (DFAT) 24-hour consular emergency helpline number • Refer client to closest Post
Request for visa help by travelling non-citizen	• Refer client to GSC or website • Notify relevant RBA of contact

3.8.4. Significant media interest

The GFU frequently receives feedback about issues reported in the media. Generally, these cases are processed according to procedures laid out in this document. However, at the discretion of the Assistant Director GFU, the GFU can adopt amended procedures where:

- a large volume of feedback is received about a single issue. In this case, the GFU will liaise with the RBA Ministerial Support and/or Media Operations to provide consistent wording for feedback response. This may include use of an approved script for client response consistent with talking points published on the Home Affairs or Minister's website
- a small volume of feedback is received about a single issue, but that feedback is aggressive or threatening. In this case, the GFU will refer the cases to the RBA in accordance with this SOP and alert Media Operations and/or departmental security (where a threat to staff or property is made or implied)
- a client threatens to go to the media. In this case, the GFU will refer the case to the RBA and provide a copy to Media Operations for information.

OFFICIAL: Sensitive

3.8.5. Feedback campaigns

Where it becomes apparent that the GFU is receiving a large volume of feedback about a single issue which appears to be organised or directed by a particular stakeholder group, the GFU Manager can invoke a 'campaign' response.

Campaign responses are appropriate in cases where:

- the GFU receives more than 25 calls or web forms within a 24 hour period about a single issue, or
- the GFU receives identical feedback, such as that copied from a template, from multiple individuals about a single issue.

In these situations, the GFU will liaise with the RBA and Media Operations to provide consistent wording for feedback response.

In cases where the GFU receives more than 50 feedback cases within a 24 hour period about a single issue, the GFU Manager may direct staff to alter standard operating procedures, such as:

- acknowledging the feedback and referring it collectively to the RBA for information only
- providing a tailored template response
- establishing a 'mail-merge' response
- other measures as required.

If departmental or ABF staff anticipate that a change in policy or procedure or operational action on a high profile or sensitive case may result in a feedback campaign, they should advise the GFU as soon as practicable by email or phone, to allow time for tailored responses to be created and approved in advance.

3.8.6. Unreasonable client conduct

There may be occasions when the Department has to deal with unreasonable demands from clients. Accordingly, the Department may take action to minimise or control its dealings with clients engaging in this kind of behaviour.

The Commonwealth Ombudsman provides guidance on what constitutes unreasonable client conduct in its Unreasonable complainant conduct factsheet.

For the purpose of this document, and in line with the Commonwealth Ombudsman's advice, unreasonable client conduct is defined as:

- Aggressive or abusive language, including insults, profanity, and/or language that offends, discriminates and/or vilifies on the basis of race, religion, gender, sexual orientation or other personal traits.
- Threats of violence and harm against individuals and property, including threats of self-harm.
- Malicious complaints made to damage a person's career or reputation.
- Vexatious complaints made without substantive evidence.
- Unreasonable demands for action which falls outside of the scope and service standards of this policy.
- Unreasonable persistence including refusing to accept an outcome, resolution and/or pursuing a closed complaint without any new information.

When determining if a client has acted unreasonably, the GFU manager will consider:

- The client's history with the GFU (and broader Department), including the number, nature and outcome of previous contacts
- The immediate conduct of the client, including any threats or abusive language or behaviour. (see also Threats of serious harm, below)
- Any current or future risk to staff or the Department as a result of the client's conduct.

OFFICIAL: Sensitive

If satisfied that a client is acting unreasonably, the Assistant Director GFU may authorise staff to take steps to minimise or control staff contact with the individual with a view to protecting staff from physical or psychological harm. Such measures may include:

- Placing restrictions on the type of contact a client can make, for example, only contact the Department in writing if a person is verbally aggressive or abusive).
- Withdrawing services from repeatedly unreasonable clients.
- Using authorised template responses to refuse to engage with a client in cases where a client is unreasonably persistent about closed matters.
- Other measures at the discretion of the Assistant Director / Manager GFU.

Where any of these strategies is implemented, the GFU Manager will document the decision and record it in an appropriate TRIM file. As appropriate, the GFU Manager may also make client notes on departmental systems, such as ICSE. The GFU Manager will then notify the client of the Department's decision, citing the reasons for the decision and the supporting advice of the Commonwealth Ombudsman.

3.9. Threats of serious harm

In the event that a client makes a threat of serious harm against self, others, departmental staff and/or property, the GFU Manager (or their delegate) will immediately:

- If the threat is imminent - contact Emergency Services on 000. This may be appropriate to report a significant threat and/or initiate a client welfare check where self-harm is threatened or indicated. The GFU will note the time and reference number of the call.
- Advise the departmental Regional Security Officer (RSO) in the relevant state or territory by phone.
- Lodge a Security Incident Report, identifying the client, and outlining the case background, nature of threat, timeline of events and actions taken.
- Alert the Director Client Support and Feedback Services, the Regional Director of the relevant state, and relevant RBA stakeholders by email. Attach a copy of the Security Incident Report.
- Record details of client/case in GFU Sensitive Case Register.
- Notify Channel Partners of the threat by email, including the GSC.
- If the threat is urgent (such as a bomb threat) or made against the Minister, the GFU will additionally contact the Security Duty Officer on S. 22(1)(a)(ii)
- Provide after-call care and support to the receiving GFU staff member
- Direct the GFU staff member to make a post-incident Work Health and Safety Report
- Add a Client of Interest Note on ICSE.

The Feedback Officer will be supported through these steps by their GFU Team Leader and/or the GFU Manager. Each of these steps must be documented in Global Feedback Unit – GFU – Threats to self and property file (ADF2018/24204).

In the event that the threat occurs outside of standard business hours (such as during overtime), the responsible staff officer will:

- If the threat is imminent - Contact Emergency Services on 000. This may be appropriate to initiate a client welfare check where self-harm is threatened.
- Contact the After Hours Duty Officer in the Victorian Office for advice and direction. If the threat is made against the Minister, the GFU will additionally contact the Security Duty Officer on S. 22(1)(a)(ii).

OFFICIAL: Sensitive

- Lodge a Security Incident Report, copying in the Director of Channel Strategy and GFU, the Assistant Director and Manager GFU, and any relevant RBA stakeholders.
- Make a post-incident Work Health and Safety Report.
- Add a Client of Interest Note on ICSE
- Advise the Assistant Director and/or GFU Manager as soon as practical.

3.10. Anonymous feedback

Complaints, compliments and suggestions can be made by members of the public anonymously.

However, clients should be encouraged to identify themselves when providing feedback, via name or other identifying reference numbers or codes, to assist with the investigation of their feedback

Where clients seek to provide feedback anonymously, they can be advised and reassured about the Department's adherence to the *Privacy Act 1988*.

Where anonymous feedback is received and a client cannot be identified, it will be recorded by the GFU as 'For Information Only'.

3.11. Withdrawn complaints

If a client decides to withdraw a complaint, they should provide the request to the GFU by email or phone, quoting their Feedback Reference number. The matter will then be immediately closed by the GFU Officer.

Where possible, Feedback Officers should ascertain why the client has withdrawn their feedback. For cases where a client approaches the RBA or service provider to withdraw a complaint, the RBA must provide written evidence and reasons for the withdrawal to the GFU within the original service standard period. This information and supporting documents should be emailed to feedback@homeaffairs.gov.au

These records will be attached to the case in GFU systems to ensure a complete record of the feedback is held on departmental systems.

3.12. Feedback reporting and analysis

Feedback reporting is integral to the Department's commitment to ongoing development of performance and evaluation capability within the Department.

As part of its commitment to quality assurance and monitoring, the GFU maintains multiple Tableau dashboards which allow the Department to analyse community views and values, global service standards and feedback trends, and identify business improvement opportunities. The dashboards detail whole of Department performance in resolving feedback within service standards, overdue feedback and escalated feedback.

These dashboards can be accessed via the GFU Confluence Space. The GFU also provides individual reports to support RBAs. Please contact the GFU on [S. 22\(1\)\(a\)\(ii\)](#) or [S. 22\(1\)\(a\)\(ii\)](#) to discuss your reporting needs.

3.13. Quality assurance and monitoring

Assurance activities provide confidence that the Department is operating effectively, efficiently and lawfully. Assurance activities can help to identify functions or controls that are not performing well, so that these

OFFICIAL: Sensitive

lessons can be used to inform continuous improvement across the Department. Further information is available at [Audit and Assurance](#)

The GFU supports assurance activities by providing feedback data which assists RBA to identify business improvements.

3.14. Freedom of information and privacy

3.14.1. Freedom of Information

Feedback received by the Department is handled in accordance with the provisions of the *Freedom of Information Act 1982* (the FOI Act) and the *Privacy Act 1988*.

Please contact the FOI and Privacy Policy Section for queries about FOI and privacy policy or procedures. Email contacts are encouraged via the section mailboxes: foi@homeaffairs.gov.au or privacy@homeaffairs.gov.au

3.14.2. Privacy

GFU officers have a mandatory requirement to uphold the Department's legislative privacy requirements.

Where privacy breaches are identified by GFU employees, they will respond according to the following departmental requirements.

- Immediately alert the GFU management
- Contain the breach (i.e. recall emails, request an email to be destroyed)
- Complete the Suspected Privacy Breach Statement Form online within 3 days of becoming aware of the breach
- Await further guidance from Privacy Operations Section.

3.14.3. Notifiable data breaches scheme

Part IIIC of the Privacy Act, Eligible Data Breaches, establishes a scheme, the Notifiable Data Breaches Scheme (NDBS), for the mandatory reporting of certain privacy breaches.

GFU Officers are required to adhere to the Notifiable Data Breaches Scheme in all cases where they have reasonable grounds to suspect that a privacy breach is likely to result in serious harm to any individuals whose personal information has been accessed or disclosed without authorisation.

3.15. External scrutiny

3.15.1. External scrutiny agencies

External scrutiny allows clients to seek review of their interactions with government departments and agencies.

The following agencies provide external scrutiny of Departmental and ABF decisions:

- Commonwealth Ombudsman (CO): The CO investigates complaints about the administrative actions and decisions of Australian Government Departments and agencies to see if they are wrong, unjust, unlawful, discriminatory or unfair.
- Australian Human Rights Commission (AHRC): The AHRC investigates complaints of discrimination and breaches of human rights.
- Office of the Australian Information Commissioner (OAIC): The OAIC reviews decisions made under Freedom of Information Act 1982 and investigates complaints made by people who believe that an Australian Government Department or agency has breached the Privacy Act 1988.

OFFICIAL: Sensitive

- The Administrative Review Tribunal (ART) provides merits review of various decisions made by the Department. Merits review is beyond the scope of this policy unless the feedback relates to the service provided by the Department during its decision-making processes.

3.15.2. Commonwealth Ombudsman

The GFU frequently provides information to the CO to enable it to investigate complaints against the Department and/or ABF. Generally, the CO will only investigate cases where the client has previously provided feedback to the Department about the feedback issue.

There are two types of CO cases managed by the GFU:

- Standard referral cases, in which cases are referred to the GFU by External Scrutiny section for investigation and response. In these case, the GFU typically provides a summary of the client's feedback history and copies of relevant correspondence.
- Direct transfer cases, in which the CO refers cases which are time-critical or where the client has vulnerabilities. In these cases, the GFU is required to acknowledge transfer of the case to the CO and client within two working days, and then liaise with the RBA to provide a response within 15 working days. Where direct transfer cases cannot be completed within 15 working days, the GFU is responsible for providing updates to the CO and client. Further information about this agreement can found in ADD2019/3026975 - *Commonwealth Ombudsman and Home Affairs – Relationship Protocols – FAS Approval 10 June 2019*.

Further information about active CO cases involving the GFU can be directed to the GFU Manager.

3.15.3. External scrutiny section

The External Scrutiny Section is the Department's contact point for all Ombudsman and AHRC complaints and investigations. The External Scrutiny Section coordinates and provides quality assurance for departmental responses to complaints and investigations.

All queries about standard CO and AHRC cases should be directed to external.scrutiny@homeaffairs.gov.au

4. Accountabilities and Responsibilities

Role	Description
First Assistant Secretary, Immigration and Citizenship Services Division	Responsible for approving the Client Feedback Policy.
Director, Client Support & Feedback Services	Responsible for approving the Client Feedback Standard Operation Procedures and oversight of the <i>Client Feedback Policy</i> and the Global Feedback Unit.
Assistant Director Global Feedback Unit	Responsible for administering the Client Feedback Policy and managing the Global Feedback Unit, including consultation with internal stakeholders and service providers.
Manager, Global Feedback Unit	Responsible for drafting policy and SOP updates.

Released by the Department of Home Affairs under the Freedom of Information Act 1982

OFFICIAL: Sensitive

5. Version Control

Version number	Date of issue	Author(s)	Brief description of change
1	20 July 2018	s. 22(1)(a)(ii)	Original document
1.1	16 August 2018	s. 22(1)(a)(ii)	Update contacts, names, dates and TRIM Ref
1.2	08 November 2021	s. 22(1)(a)(ii)	Periodic review – Clarification of instructional material and definitions
1.3	24 July 2023	s. 22(1)(a)(ii)	Review of clause 3.8.1 – Compliance assessment, Child Safeguarding Assurance Program 2022/23
1.4	31/01/2025	s. 22(1)(a)(ii)	Periodic review – Hyperlink / Group and Divisional Name updates

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive**Attachment A – Definitions**

Term	Abbreviation (if applicable)	Definition
Australian Border Force	ABF	An operational arm of the Department responsible for border investigations, compliance, detention facilities, enforcement functions, and customs services.
Border Watch Allegations and Referral Team	BWART	A single collection point for community and industry information about suspicious or illegal immigration, customs or border-related activities.
Freedom of Information	FOI	Freedom of information laws allow access by the general public to data held by national governments, subject to some exceptions). Underpinned by the Freedom of Information Act 1982.
Global Feedback Unit	GFU	The section of the Department that receives, records and manages all client feedback about immigration, citizenship and border control related matters.
Global Service Centre	GSC	The Department's predominant phone channel for information and general enquiries about visa and citizenship functions.
Immigration Detention Centre	IDC	The Department's network of onshore detention centres.
Migration Agent Registration Authority	MARA	The industry regulator for Australian migration agent services.
Office of the Australian Information Commissioner	OAIC	The government agency which reviews decisions made under the FOI Act and investigates complaints made by people who believe government departments or agencies have breached the Privacy Act 1988.
TIS National	TIS	The Department's Translating and Interpreting Service.
Tourist Refund Scheme	TRS	A tax scheme administered by the Department which allows tourists to claim a refund of goods brought in Australia and taken offshore (subject to conditions).
Regional Processing Centre	RPC	Offshore processing centre run by the Governments of Nauru with the support of the Australian Government.
Responsible Business Area	RBA	The area within the Department or ABF which has responsibility for policy, service or product that client feedback concerns.

Attachment B – Assurance and Control Matrix**1.1. Powers and Obligations**

Implementation of this SOP supports the requirements of the *Freedom of Information Act 1982* and the *Privacy Act 1988* but does not require any powers, delegations or authorisations.

OFFICIAL: Sensitive**1.2. Controls and Assurance**

Related Policy	- Client Feedback - Policy Statement (VM-3001) - Child Safeguarding Framework – Policy Statement (BE-916) - Reporting Child-related Incidents – Policy Statement (DM-928)
Procedures / Supporting Materials	- Global Feedback Unit Confluence Space s. 22(1)(a)(ii) - The Commonwealth Ombudsman's Better Practice Guide to Complaint Handling (Feb 2023). See Better-Practice-Complaint-Handling-Guide-February-2023.pdf - The Commonwealth Ombudsman's Fact Sheet on Unreasonable Complainant Conduct. See Unreasonable-complainant-conduct.pdf - Serco Immigration Services Complaints Management Policy and Procedures Manual (Version 3.2) - Human Trafficking at the border – PI (TT-2708) - Human Trafficking Contract Officer – SOP (VM-1031) - The findings of the Royal Commission into Institutional Responses to Child Sexual Abuse - Reporting Child-related Incidents – Procedural Instructions (DM-5858)
Training/Certification or Accreditation	No specialist training required
Other required job role requirements	Access to Resolve, Confluence and TRIM
Other support mechanisms (e.g. who can provide further assistance in relation to any aspects of this instruction)	Advice in relation to the procedures in this SOP may be obtained from the GFU at feedback@homeaffairs.gov.au
Escalation arrangements	Escalation of concerns should be directed to the GFU Manager (APS6) (feedback@homeaffairs.gov.au) in the first instance. The GFU manager will escalate matters to the Assistant Director, or to other relevant stakeholders as appropriate.
Recordkeeping (e.g. system based facilities to record decisions)	This SOP is stored in TRIM and available via the Policy and Procedure Control Register and the TIS National SOP and Operational Policy Register. All records created as a result of this procedure must be: - managed in accordance with the Records Management Policy Statement - saved in TRIM or an approved business system.

Released by the Department of Home Affairs under the Freedom of Information Act 1982

OFFICIAL: Sensitive

Program or Framework (i.e. overarching Policy Framework or Business Program)	The GFU provides oversight and monitoring of procedures outlined in this SOP, in accordance with the standards in the <i>Client Feedback - Policy Statement</i> .
Job Vocational Framework Role	Objections and Complaints Resolution under the Program Delivery Support /Program Implementation

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive

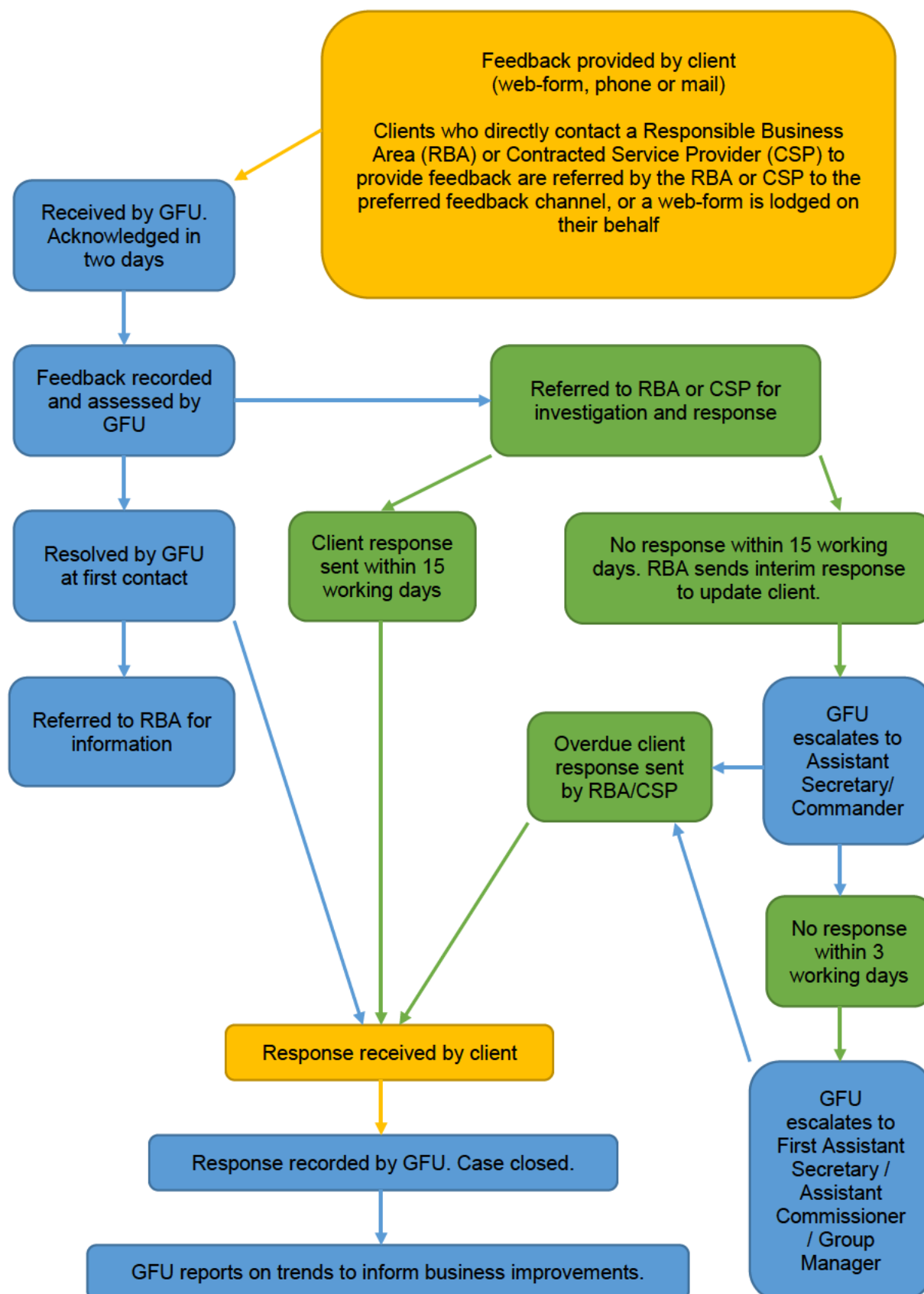
Attachment C – Consultation

1.1. Internal Consultation

The following areas were provided a copy of this SOP for review and given the opportunity to review and comment. External stakeholders were not consulted in the development of this document:

- Child Wellbeing Operations
- Health
- Integrity Awareness
- External Scrutiny
- Detention Support and Coordination Section
- RCU VIC/TAS operations
- RCU NSW
- RCU WA
- RCU SA
- RCU Qld
- RCU Operations North
- Travel Secure
- Ministerial Support

Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*

OFFICIAL: Sensitive**Attachment D – Feedback Process Map**
 Released by the Department of Home Affairs
under the *Freedom of Information Act 1982*