

Complaints Policy

V2.0 November 2025



1. Purpose

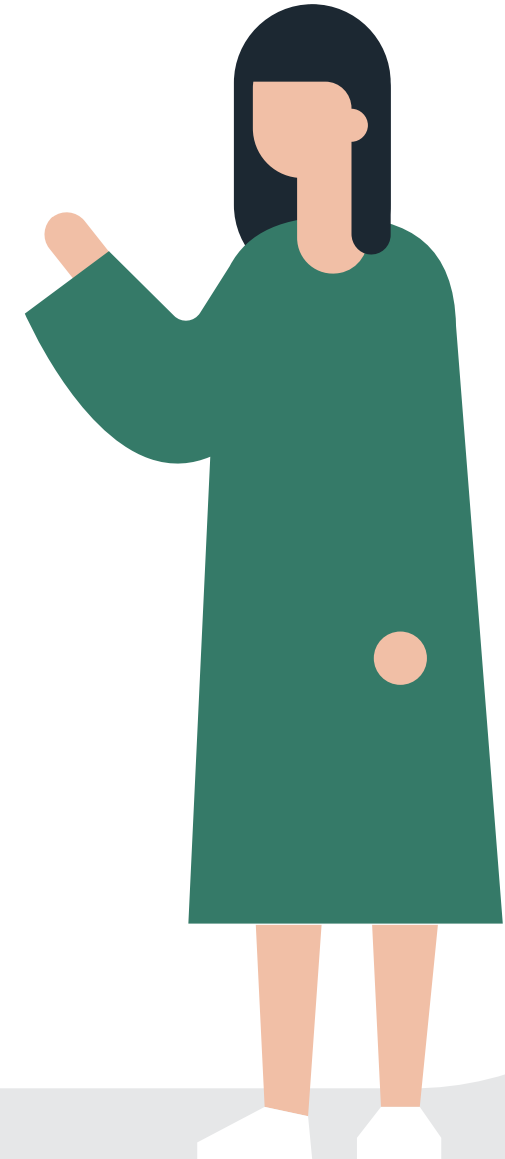
Our mission is to deliver quality insurance and care, affordability and sustainability in all our schemes. When those we serve are unhappy with any part of their experience with us, we encourage them to tell us so that we can work with them to provide value-based care, recovery and resolution.

When there is a complaint, we have an opportunity to build confidence and trust with the people we serve by treating them with dignity, empathy, and respect and providing them with a fair and reasonable outcome. It is also our opportunity to demonstrate our commitment to care for the people of NSW by learning from any issues and focussing on continuous improvement and operational excellence.

This Policy establishes the guiding principles and standards for coordinated and consistent complaints management across icare for complaints from those we serve and enables appropriate governance, oversight and risk management of complaints to be established and maintained. The Policy should be read in conjunction with the Complaints Guidelines which provide more detailed guidance to schemes and teams that manage complaints.

2. Scope

This policy covers complaints from those we serve and applies to all icare employees, consultants, contingent workers, secondments, volunteers and the Board. This Policy also applies to everyone working for organisations who provide services to those we serve on behalf of icare under contractual arrangements, including claims service providers.



3. Those we serve

We serve the people of NSW by protecting employers, builders and NSW Government Agencies and caring for injured workers and volunteers, home owners, people with sporting injuries and care participants and their families - called those we serve. More information about those we serve can be found in the Those We Serve Policy.

We adopt the definition of complaint from the Australian Standard for complaint management in organisations (AS 10002:2022).

What is a complaint?

A complaint is an expression of dissatisfaction made to or about icare, our products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A person does not need to say they are making a complaint, this may be inferred from their communication. Complaints may be made in any format, including via social media or customer satisfaction (CSAT) response

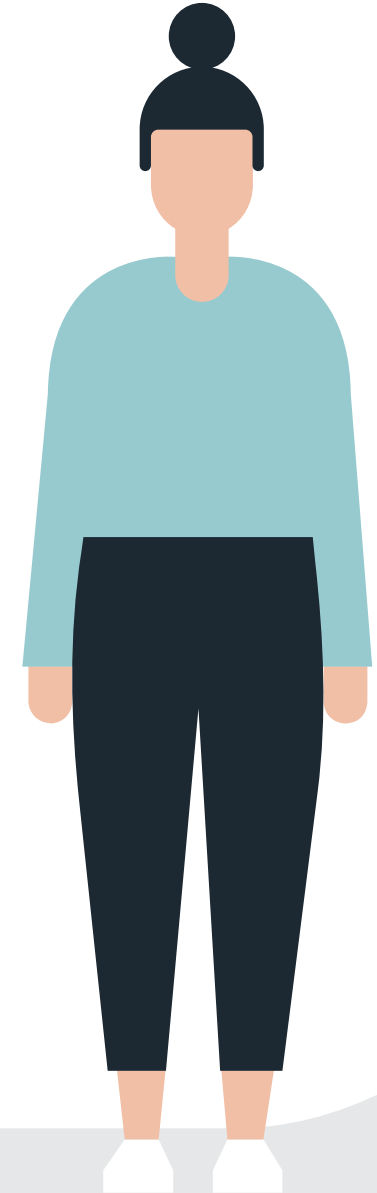
All complaints, even those resolved at first contact, must be recorded in the designated complaints management system to provide consistency in complaints data recording, reporting and analysis.

Enquiries, feedback and disputes are not complaints

An enquiry is a request for information or assistance which does not contain an expression of dissatisfaction, but which explicitly or implicitly requires a response.

Feedback is the expression or submission of a comment or opinion (including a compliment) which does not contain an expression of dissatisfaction which explicitly or implicitly requires a response.

A dispute is an issue, or part of an issue raised by those we serve, that is recognised as a 'dispute' or equivalent by relevant scheme legislation or regulation and has a prescribed process for resolution involving parties external to icare but does not include complaints escalated to SIRA or IRO.



4. Complaints Framework

The Complaints Framework operationalises the NSW Ombudsman *'Principles of Effective Complaint Handling'*. This enables complaints to be managed in a fair, empathetic, and effective way, and ensures that we learn from complaints in a way which identifies and addresses systemic risks, trends and root causes to drive continual improvement.

The standards of the Complaints Framework, together with the Complaint Management Requirements in the Complaints Guidelines, demonstrate our commitment to fair, empathetic, and effective complaints handling.

Readiness for complaints

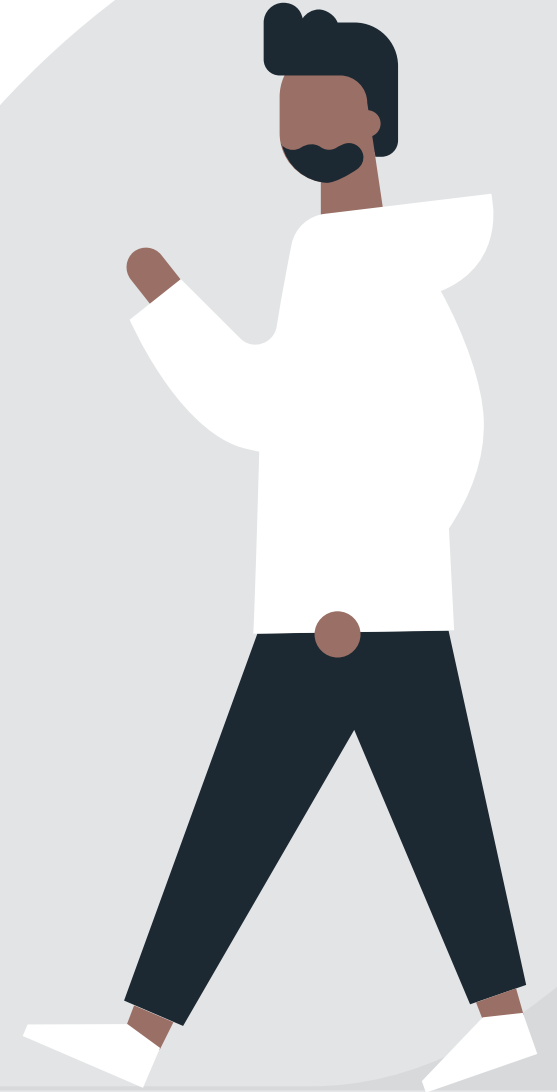
- Commitment
- Policies & Procedures
- Accountability
- Resourcing
- Awareness & Training

Responding to complaints

- Access for those we serve
- Focus on those we serve
- Fair Decision Making
- Systematic Approach
- Record & Manage

Learning from complaints

- Governance
- Monitoring
- Continuous Improvement
- Metrics & Reporting
- Closing the loop



5. Readiness for complaints

Commitment

We have an organisational commitment to the Complaints Framework which is focused on fair, empathetic and effective complaints experience, together with fair and reasonable outcomes, while valuing complaints to learn and improve.

Policies & Procedures

We maintain a clear and comprehensive enterprise complaints policy and guidelines. Schemes and teams that manage complaints also maintain complaints procedures aligned with those documents to enable a consistent approach to handling complaints.

Accountability

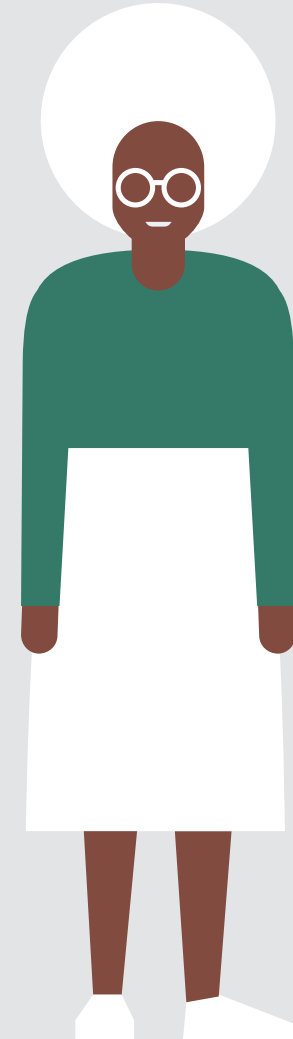
Accountability for the Complaints Framework is established and there are clear roles and responsibilities, together with appropriate delegations for complaints staff to provide a fair and reasonable outcome. All staff, including senior management, understand their roles and responsibilities

Resourcing

Appropriate resources (staff, tools and systems) are available to enable the efficient and effective operation of the Complaints Framework. This ensures that we address complaints with integrity and in an objective manner for effective and efficient complaint handling.

Awareness & Training

All staff are aware of our approach to complaints and their responsibilities. Specialist training is provided to ensure staff managing complaints have the authority, knowledge, skills, training and tools to effectively perform their roles.



6. Responding to complaints

Access for those we serve

It is easy for those we serve to voice their concerns and our approach to complaints is visible and accessible. We make available information about how and where complaints may be made on our website and provide multiple and accessible ways to make complaints, particularly for those who may require assistance.

We have procedures and processes that enable staff to provide additional assistance to those we serve experiencing vulnerability who raises a complaint. We also ensure there is no cost to raise a complaint and participate in the complaint process.

Focus on those we serve

Focus on those we serve is achieved through fair and empathetic treatment. We assess each complaint on its merits and involve those we serve and/or their representative in the process as far as possible. We recognise that, at times, those we serve may be experiencing complex circumstances and we endeavour to provide special care or additional assistance where needed. We are also committed to protecting the privacy and confidentiality of all personal information.

Fair Decision Making

Complaints are investigated in an objective manner to provide fair and reasonable outcomes to those we serve. We use the Fair Decision Making Principles set out in the Those We Serve Policy and seek to ensure that no person is treated differently due to raising a complaint.

Following the provision of a complaint outcome, complaints which are escalated for an internal or external review will be managed by staff independent of the original complaint management.

Systematic Approach

A consistent and systematic complaint management approach enabling efficient and effective complaints handling is embedded within the schemes and teams that manage complaints.

We adopt a consistent approach to complaint categorisation, procedures and processes, aligning to the key stages of complaint handling, empowering staff to effectively handle complaints and provide fair and reasonable outcomes to those we serve.

Record & Manage

Complaints are recorded and managed in a consistent and systematic way to enable analysis, reporting and oversight. Each complaint received will be recorded in our Salesforce CRM complaints system or other system designated for this purpose. Complaints are managed using a consistent process:

- **Receive & Acknowledge:** Complaints are received through multiple channels and are consistently identified, recorded and acknowledged.
- **Investigate:** Complaints are managed consistent with their complexity and are investigated in an objective and timely manner.
- **Resolve & Close:** Those we serve are advised of the outcome of their complaint, the reasons for the decision including any remedy. All internal actions are taken before a complaint is closed.
- **Review:** Consistent internal and external review and escalation pathways are made available in each scheme.

7. Learning from complaints

Governance

Appropriate complaints governance elevates the voice of those we serve in decision making, drives accountability for improved customer experience and appropriately manages related risk. The governance framework for complaints management is operationalised by schemes with enterprise governance and oversight.

Monitoring

Processes are implemented to monitor for compliance and quality and identify improvements to capability and processes.

We regularly review and analyse complaints data to monitor the efficiency, effectiveness and performance of complaints management and the quality of complaint outcomes.

We do this through appropriate controls which are routinely tested; routine evaluation and assurance practices to ensure the quality of our complaints management and outcomes; feedback and insight loops to ensure improvements to capability and processes.

Continuous Improvement

Robust processes are in place to analyse complaints data to identify improvements and insights are incorporated into enterprise and scheme continuous improvement activities.

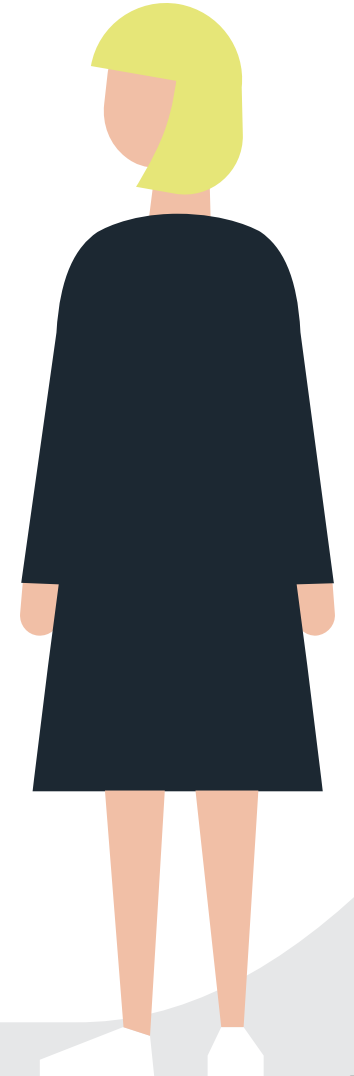
Senior management is accountable for establishing and maintaining appropriate processes to regularly review and analyse complaint data to identify themes, drivers and trends as well as possible Incidents and Issues; developing insights and recommendations for continuous improvement; prioritising and take action to address Issues, Incidents and continuous improvements identified through complaints, and for having processes for this action to be escalated internally, followed up and monitored.

Metrics & Reporting

Complaint metrics are identified and implemented enabling monitoring and oversight of the complaints experience, Complaints Framework and continuous improvement activities. Regular management, executive and board reporting rhythms are in place to enable monitoring and oversight of the complaints experience and the operation of the Complaints Framework.

Closing the loop

We close the loop by regularly communicating to stakeholders about complaints management and continuous improvement activities. Updates about the complaints experience, the operation of the Complaints Framework and continuous improvement activities are published for internal and external audiences, including via the annual report. Reporting to relevant regulators forms part of closing the loop.



8. Related documents

This Policy is supported by the Complaints Guidelines together with complaints management procedures and processes which are developed by schemes and teams that manage complaints. This Policy should also be read in conjunction with the Code of Conduct and Ethics, Those We Serve Policy, Privacy Policy, Incident and Issues Management and Reporting Policy and the Information and Records Management Policy.

9. Roles and responsibilities

Role	Responsibilities
GET and SLT	<ul style="list-style-type: none"> Establish and oversight this Policy. Report publicly on complaint management. Regularly review reports about the operation of this Policy and associated guidelines and procedures and the trends and issues arising from complaints. Support recommendations arising from the analysis of complaints data for addressing systemic risks, trends and root causes and making product, service, staff and complaint handling improvements.
Managers of complaint handling and reporting	<ul style="list-style-type: none"> Respond to complaints escalated by frontline staff. Provide regular reports to management on issues arising from complaints. Ensure recommendations arising out of complaint data analysis are canvassed with management and implemented where appropriate. Recruit, train and empower staff to provide a fair and reasonable complaint outcome promptly in accordance with this Policy, the Framework and associated guidelines and procedures. Recognise and reward excellent complaint handling by staff.

Role	Responsibilities
Staff who triage or handle complaints and frontline	<ul style="list-style-type: none"> Treat all people with dignity, empathy, and respect, including people who make complaints. Be able to identify a complaint and assist people make a complaint, if needed. Comply with this Policy and associated guidelines and procedures. Provide feedback to management on issues arising from complaints. Provide suggestions to management on ways to improve complaints handling practices.
All staff	<ul style="list-style-type: none"> Treat all people with dignity, empathy, and respect, including people who make complaints. Complete all applicable complaints training as required. Be able to identify a complaint and help people who wish to make complaints to access the relevant scheme complaints process. Be alert to complaints and assist staff handling complaints to provide a fair and reasonable complaint outcome promptly.

10. Contact

For any enquiries or advice in relation to this Policy, contact the Customer Advocate at customeradvocate@icare.nsw.gov.au

11. Version control and document history

Document Name & Version: Complaints Policy v2.0	
Document owner	Customer Advocate
Approving Authority	Chief Executive
Last Approval Date	13 November 2025
Review Frequency	Every two years

Version	Author	Change Summary	Date approved
V1.0	Customer Advocate	Approved Policy	November 2021
V2.0	Customer Advocate	Approved Policy	November 2025

