

# Policy for Handling Complaints about the PTO

**Board Reviewed and Approved December 2025**

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## Purpose

This policy establishes the procedures for receiving, evaluating, and addressing complaints about the PTO. It sets out how the PTO manages complaints about its decisions, services or conduct in a fair, transparent, and accountable manner.

The PTO has adopted the *Benchmarks for Industry-Based Customer Dispute Resolution Schemes 2015*, which require effective procedures for managing complaints from consumers and members about the PTO.

## Scope

The PTO takes all complaints about the PTO seriously. This policy applies to all complaints submitted by consumers or members about the PTO and its staff. Complaints regarding personal information and privacy are not managed under this policy and are addressed under the *Privacy Policy*.

## Complaints about the PTO

A complaint about the PTO refers to any expression of dissatisfaction by a consumer or member about the actions, decisions, or service quality of the PTO. It may include but is not limited to a complaint about the case handling of a complaint, the actions or non-actions of a staff member, a decision to accept or close a complaint, or the quality or operation of a PTO process.

## Serious complaints

A serious complaint is a complaint that raises concerns about any alleged misconduct, corruption, discrimination or other behaviour by a PTO staff member that could compromise the integrity, impartiality, or effective functioning of the PTO. Serious Complaints must be referred directly by PTO staff members to the Ombudsman for investigation.

## Who can make a complaint?

Anyone who has accessed or been refused access to the PTO's services can make a complaint about the PTO. This includes consumers, their authorised representatives, and members. PTO staff will refer consumers to this policy and provide it upon request at the time of the complaint submission. All complaints about the PTO are treated confidentially by the PTO and no disclosures are made to a third party, unless a disclosure is required by law.

Complaints about the PTO may be submitted orally or in writing. Complaints should include the relevant particulars of the circumstances being complained about, and any resolutions sought.

Consumers or members will not be disadvantaged or treated differently because of making a complaint about the PTO.

## Record keeping and reporting

All complaints received about the PTO must be recorded in the PTO's case management system, including relevant details, correspondence, decisions, and outcomes. A Complaint Register is maintained by the PTO for recording deidentified summaries of complaints about the PTO managed under this Policy.

Reports will be provided every six (6) months to the Board detailing the number of these complaints, the issues raised, time to resolution, outcomes and any lessons learnt for the PTO.

## Timeframes for handling complaints

The PTO will manage all complaints about the PTO within a reasonable timeframe. All complaints should be acknowledged within one business day and finalised within the timeframes set out in this policy. Some complaints may exceed these timeframes when complex in nature, where multiple complaint processes have been utilised, or due to unavoidable delays, or delays that support the interests or wellbeing of the complaint parties. Where a longer timeframe is required, the PTO will keep parties informed and updated about any delays and the expected resolution timeframes.

## Acknowledgement of errors, omissions or deficiencies

The PTO is committed to acknowledging, rectifying and learning from complaints made about the PTO. Where an error, omission, or deficiency is identified through a complaint process, the PTO will acknowledge it promptly, take appropriate corrective action, and use the complaint information to inform its practices, policies, or systems.

## Informal resolution

Where appropriate, the PTO will first attempt to resolve complaints about the PTO informally. This may be by the staff member who receives the complaint, or via referral to a PTO Senior Officer.

## Escalation to a PTO Senior Officer

A complaint about the PTO must be escalated to a PTO Senior Officer where a consumer or member:

- a) requests that their concerns be raised with a more senior staff member.
- b) submits a complaint about the conduct or actions of a PTO Officer.
- c) disputes a decision about whether the PTO can or cannot handle a case under the Charter.
- d) disputes a case closure decision.
- e) any other circumstances where it is appropriate for the complaint to be escalated.

Where a complaint is escalated, the PTO Senior Officer will review the complaint information, and any other relevant information (i.e. a case file) to determine the most appropriate course of action. The PTO Senior Officer may decide to resolve the complaint concerns via informal discussion, clarification, or remedial action, or alternatively may decide to undertake a formal investigation. In deciding whether an informal resolution is appropriate, the PTO Senior officer will consider the seriousness, complexity, and potential impact of the concerns raised.

Where informal resolution is unsuccessful the PTO Senior officer may decide to formally investigate the concerns, or where appropriate refer the complaint to the Ombudsman.

## Senior Officer investigations (10 business days)

Where a PTO Senior Officer decides to formally investigate a complaint about the PTO, they must review and consider any relevant information, including:

- a) the PTO Charter;
- b) PTO policy and procedure documents;
- c) PTO case files and records;

- d) the consumer or member's view about the complaint circumstances and management, including any supporting information provided;
- e) the PTO Officer's account of issues raised, actions taken and interactions with the consumer or member;
- f) any new or additional information which the consumer or member has provided that may be relevant to the investigation; and
- g) what is fair and reasonable in the circumstances.

Outcomes of an investigation may include, but are not limited to:

- a) providing the consumer or member with a summary of the findings of the review, either verbally or in writing.
- b) upholding, amending or overturning a previous decision to accept or close a complaint.
- c) reallocation of a case to another PTO Officer.
- d) providing the consumer or member with an apology.
- e) providing the consumer or member with details about how PTO policies, procedures and training will be improved to prevent a recurrence in the future.

At the conclusion of the investigation, the PTO Senior Officer will provide the consumer with the findings of their investigation, including the supporting reasons for their findings, and any outcomes or next steps. If the consumer or member is satisfied, the investigation will be finalised and no further action taken. If the consumer or member remains dissatisfied with the outcome, they may request an Ombudsman Review.

## **Ombudsman investigations**

All serious complaints must be referred to the Ombudsman for investigation. The Ombudsman may also decide to investigate a complaint about the PTO in the first instance, including broad complaints about the operation or processes of the PTO.

## **Ombudsman review (28 calendar days)**

A consumer or member may request an Ombudsman Review within 28 days of a PTO Senior Officer's finalisation of an escalation.

Review requests must be in writing and include the reasons why the Senior Officer's processes, actions or decisions were wrong, and any supporting information. Failure to provide detailed reasons will generally limit the grounds of review to:

- a) whether there was bias;
- b) whether there was an error or omission; and/or
- c) whether there is new information, not previously available, which would materially affect the outcome of the complaint.

When conducting a review, the Ombudsman will consider all relevant information in making their review decision. Where necessary, further information may be requested from the consumer, member, or another party, including the production of documents or evidence. The Ombudsman may also seek independent legal advice as part of the review process or to inform their decisions.

At the conclusion of the review process, the Ombudsman will advise the relevant parties about the outcome of the review in writing, including the scope of the review process, the findings of the review and supporting reasons, and any actions to be undertaken in response to the review outcome.

Possible outcomes from an Ombudsman's review include but are not limited to:

- a) providing the consumer or member with a summary of the findings of the review.
- b) upholding, amending or overturning a previous decision of the PTO.
- c) providing a formal apology.
- d) outlining how PTO policies, procedures and training will be improved to prevent a recurrence of similar circumstances in the future.
- e) any other outcome in accordance with the Ombudsman's powers under the PTO charter.

## **Complaints about the Ombudsman**

The PTO Board cannot review complaints about decisions made in individual cases.

Complaints alleging misconduct by the Ombudsman or about the Ombudsman's capacity to perform their role satisfactorily or independently will be referred to the Chair of the PTO Board for investigation and response. The PTO Chair will inform the Board of the receipt of any such complaint and will keep the Board informed about the progress and outcome of the investigation.