



1 POLICY PURPOSE

This policy outlines how Pormpuraaw Aged Care Clients utilising services and accommodation paid via Centrepay and how Pormpuraaw Aboriginal Shire Council ("**Council**"), will manage, investigate and resolve those complaints.

This policy is designed to comply with the Centrepay Terms of Use and Policy for Businesses to maintain a clear, fair, and accessible complaints management process. It ensures Council's alignment with federal requirements for the protection of residents' financial interest and the transparent handling of all Centrepay-related grievances.

2 POLICY OBJECTIVE

The object of this policy is to set out Council's compliance with the law, internal procedures, responsibilities and processes that have been established to give effect to the policy guideline.

3 POLICY SCOPE

This policy applies to all residents and customers who use Centrepay to make rental or other approved payments to Council.

This policy also applies to all Council staff, officers, managers, contractors and volunteers who are involved in administering, processing, or advising on Centrepay arrangements. All such personnel are required to be familiar with this policy and to act in accordance with it when handling Centrepay-related matters.

This policy covers complaints about any act, decision, practice, or issue involving the Council's use of Centrepay, including but not limited to:

- Starting, changing, or stopping a deduction
- Incorrect deduction amounts or frequencies
- Deductions without resident consent
- Overpayments or underpayments
- Application of charges, fees, or penalties related to Centrepay
- Privacy or information-handling concerns
- Misleading or unclear information about Centrepay
- Any dissatisfaction relating to Centrepay processes.

4 POLICY STATEMENT

Council is committed to the highest standards of conduct as well as complying with relevant legal requirements, and requires that all its Council members, officers (including its Chief Executive Officer), managers, employees, volunteers and contractors acting on its behalf meet those same high standards.

A customer must not experience any detriment merely for making a complaint.

5 WHAT IS A COMPLAINT

A complaint includes any expression of dissatisfaction, whether written, verbal, or made by a representative, about how Centrepay is administered by the Council. Residents and clients do not need to identify their concerns as a "Centrepay complaint" for this policy to apply.

6 MAKING A COMPLAINT

There are several ways you can lodge a complaint:

In Person:	Pormpuraaw Aboriginal Shire Council, 24 Thinraathin Street, Pormpuraaw
By Phone:	07 4060 4600
By Mail:	Chief Executive Officer Pormpuraaw Aboriginal Shire Council C/- Post Office, PORMPURA AW QLD 4892
By Email:	admin@pormpuraaw.qld.gov.au
Through a Representative:	Clients and residents may nominate a support person, advocate, family member, or authorised representative to lodge a complaint on their behalf.
Accessibility	If the client or resident requires an interpreter, support service, or alternative communication method, the Council will facilitate this wherever possible.

Individuals experiencing issues regarding Centrepay deductions, payments, or associated administrative matters are advised to clearly identify their grievances as "Centrepay-related" to ensure streamlined processing.

Detailed information regarding Centrepay services is available via the Services Australia website.

Complainants may also contact their specific Centrelink payment line (including but not limited to: Indigenous Call Centre, JobSeeker, or Disability, Sickness and Carers) or call the dedicated Services Australia feedback line.

7 THE COUNCIL WILL

Upon receiving a Centrepay-related complaint, Council will manage the matter in accordance with the following commitments, namely:

- **Acknowledgement:** Council will acknowledge receipt of all Centrepay-related complaints within two (2) business days.

- **Investigation:** Complaints will be investigated by an authorised officer with appropriate knowledge of Centrepay processes. Council reserves the right to request additional documentation from the complainant to facilitate a thorough review.
- **Resolution:** Council aims to resolve Centrepay grievances within twenty (20) business days. Where complex matters require further time, the complainant will be notified of the progress and provided with an updated timeframe for resolution.
- **Outcome and Feedback:** Upon conclusion, Council will provide a formal written explanation of the findings, including any corrective actions taken or adjustments made to Centrepay arrangements.
- **Review and Escalation:** If the complainant is dissatisfied with the initial outcome, they may request Internal Review by a Senior Manager of Council. Should the matter remain unresolved, Council will provide information on how to escalate the dispute to Services Australia or the relevant external oversight body for External Review (per clause 10.2).
- **Notification to Services Australia:** Where a complaint reveals or constitutes a breach of Council's obligations under section 16 of the Centrepay Terms of Use, Council will notify Services Australia within five (5) business days of becoming aware of the breach.

8 COMPLAINT HANDLING PROCESS

8.1 INITIAL ASSESSMENT

Upon receipt, each complaint will undergo an internal assessment to determine the nature of the grievance. This assessment will identify whether the matter can be resolved through Early ("First Contact") Resolution (clause 8.2) or if it necessitates a Formal Investigation (clause 8.3) due to its complexity or risk.

8.2 EARLY ("FIRST-CONTACT") RESOLUTION

Where a complaint relates to a straightforward administrative matter (e.g., minor data entry errors or easily rectifiable deduction amounts), Council staff will aim for an immediate resolution. The complainant will be notified of the corrective action taken at the point of contact or shortly thereafter.

8.3 FORMAL INVESTIGATION

A formal investigation will be initiated for matters that cannot be resolved at the first point of contact. This includes, but is not limited to, grievances that:

- Are technically or legally complex;
- Involve allegations of unauthorised deductions;
- Raise potential privacy or data breaches;
- Indicate a systemic failure or a breach of Centrepay Program Obligations;
- Require a detailed review of historical records; or
- Concern some other challenge or complexity requiring further consideration by the complaints officer.

The investigation process may involve:

- Auditing deduction authorities and internal payment histories;
- Conducting interviews with the complainant and relevant Council officers;
- Reviewing internal policies, correspondence, and supporting evidence; or
- Assessing Council's compliance with the Centrepay Terms of Use.

8.4 OUTCOME AND NOTIFICATION

Following the conclusion of an investigation, Council will provide the complainant with a formal written response detailing:

- **Findings:** A summary of the investigation's results and whether the complaint was substantiated.
- **Corrective Action:** Any remedial steps to rectify the issue or prevent recurrence.
- **Timeframes:** Expected dates for the completion of any outstanding actions.
- **Review Options:** Clear instruction on how to request an internal review or escalate the matter to an external oversight body for external review if the resident remains dissatisfied.

9 BREACHES, REMEDIES, AND CORRECTIVE ACTION

9.1 DEFINITION OF A BREACH

A breach occurs when Council fails to meet its obligations under the Centrepay Terms of Use or internal Council policy. For the purposes of this policy, a breach includes, but is not limited to:

- **Privacy and Confidentiality Violations:** Any unauthorised access, use, disclosure of a resident's Centrepay information or personal data;
- **Systemic or Repeated Issues:** Multiple failures of the same nature that indicate a flaw in Council's internal administrative process or software;
- **Unauthorised deductions:** Commencing, amending, or continuing a deduction without a valid, signed Deduction Authority from the resident;
- **Failure to Action Requests:** Not cancelling or amending a deduction within the required timeframe after being notified by the resident or Services Australia;
- **Non-Compliance with Timeframes:** Repeated failure to acknowledge or resolve complaints within the two (2) day and twenty (20) day windows established in this policy;
- **Unresolved Grievances:** Instances where a complaint remains unresolved due to a failure to follow the established handling process;
- **Post-Service Deductions:** Continuing to take money after a client or resident has moved out or a service has been finalised; or
- **Statutory Limit Breaches:** As required under Schedule 1 of the Centrepay Terms of Use or Council's Centrepay approval letter.

9.2 REMEDIES AND CORRECTIVE ACTION

If an investigation substantiates a complaint or identifies a breach, Council is committed to providing a fair and timely remedy. Depending on the nature of the findings, Council may take the following actions:

- **Financial Rectification:** Immediate correction or cancellation of the deduction, and the processing of refunds for overpayments or adjustment of credit balances.
- **Process Improvement:** Amending internal workflows and administrative controls to prevent a recurrence of the issue.
- **Personnel Development:** Providing mandatory training or refresher courses for the staff members involved in the Centrepay process.

- **Formal Acknowledgement:** Council will issue a written apology to the complainant acknowledging the error.
- **Regulatory Reporting:** In instances of serious or systemic breaches, Council will proactively report the matter to the Services Australia Centrepay Team as required by the Terms of Use.

9.3 REPORTING AND RETENTION

Council must provide a copy of this Complaints Policy to Services Australia or any customer within five (5) business days of receiving a request to do so. A breach occurs if this timeframe is not met.

Council must notify Services Australia of any serious or repeated complaint about Council's use of Centrepay within five (5) business days of the date the complaint is made. This obligation is triggered by the date the complaint is received, not the date it is resolved or investigated. A breach occurs if this notification is not made within the required timeframe.

Where Council becomes aware that a customer is not satisfied with the outcome of a complaint, Council must notify Services Australia within five (5) business days of becoming aware of that dissatisfaction.

Council must securely retain all documentation associated with a Centrepay complaint, including the original lodgement, investigation notes, evidence, records of staff involved, and the written outcome, for a minimum of seven (7) years from the date the matter is finalised. A breach occurs if records are not retained for the full period or are stored in a manner that is not secure or accessible for audit.

All complaint records must include, at a minimum, the following information:

- The date the complaint was made;
- The details of the customer making the complaint;
- All actions taken in response to the complaint, including any remedies, determinations and results;
- The outcome requested by the complainant and the actual outcome provided;
- The names of staff who assisted with or were consulted during the complaint;
- The timeframes for acknowledging, responding to and finalising the complaint; and
- Any referrals or reports made to Services Australia or other regulatory bodies, including any referral to a dispute resolution scheme.

10 ESCALATION OPTIONS FOR COMPLAINANTS

If a complainant is dissatisfied with the initial resolution or the handling of their grievance, the following escalation pathways are available:

10.1 INTERNAL REVIEW

Complainants may request a formal Internal Review. This process involves a secondary assessment conducted by a Senior manager or Executive Officer who was not involved in the original investigation. The reviewing officer will evaluate:

- Whether the internal investigation was thorough and fair;
- Whether Council policies and Centrepay Terms of Use were correctly applied;
- Whether the proposed remedy was appropriate for the identified issue.

10.2 EXTERNAL REVIEW

Should the matter remain unresolved following an Internal Review, or if the complainant chooses to seek independent advice, they may refer the matter to the following external bodies:

- **Services Australia (Centrepay):** specifically for concerns regarding Council's non-compliance with the Centrepay Program's regulatory framework, transaction fee rules, or deduction authority requirements
- **The Queensland Ombudsman:** As the oversight body for local government administration's actions, residents may contact the Ombudsman to investigate claims of unfair treatment or procedural failure by Council
- **Specialised Advocacy Services:** Residents may also seek assistance from:
 - Tenancy Advice and Advocacy Services for rent-related deductions
 - Indigenous Legal Services or advocacy organisations
 - Office of Fair Trading (Queensland) for consumer-related grievances

11 CONFIDENTIALITY

All complaints will be managed in accordance with Council's Privacy Policy and the *Information Privacy Act 2009 (Qld)*. Personal information collected during the grievance process will be handled with the highest level of confidentiality.

Disclosure of personal details will only occur under the following circumstances:

- **Resolution Necessity:** Where disclosure is essential to the investigation or to achieve a resolution (e.g. verifying a deduction with Services Australia)
- **Legal Requirement:** Where Council is compelled by law to release information to a regulatory or law enforcement body
- **Consent:** Where the complainant has provided explicit permission for their details to be shared with a third-party advocate or representative

11.1 ANONYMOUS COMPLAINTS

Council recognises the right of individuals to lodge complaints anonymously. While Council will accept and assess all anonymous grievances, complainants should be aware of the following:

- **Investigative Limitations:** The ability to conduct a thorough investigation may be limited if Council cannot seek further clarification or evidence from the complainant
- **Reporting Constraints:** Council will be unable to provide a direct response or formal notification of the outcome to an anonymous party
- **Substantiation:** Anonymous complaints regarding specific Centrepay deductions are difficult to resolve without the ability to verify the specific account and indemnity linked to a deduction

12 ACCESSIBILITY AND PUBLICATION

Council is committed to ensuring that all residents are aware of their rights and the processes available for resolving grievances. This policy and procedure will be made publicly available through the following channels:

- A copy of the Centrepay Complaints Policy and Procedure will be provided to all new residents and clients at the commencement of any service or deduction authority, when there are modifications or

variations made to existing deductions, and during any consultation where Centrepay is discussed as a payment option or during review of a resident's deduction history

- The current version of the policy will be accessible on the official Council website
- Hard copies will be made available to any member of the public upon request

13 GOVERNANCE, ACCOUNTABILITY AND RECORD KEEPING

13.1 CONTINUOUS IMPROVEMENT

Council is committed to the proactive monitoring of all grievances, including those specifically related to Centrepay. Complaints data will be recorded and analysed regularly to identify systemic trends, operational gaps, and opportunities for service improvement. This data serves as a key performance indicator for Council's administrative effectiveness.

13.2 STATUTORY RECORD RETENTION

All documentation associated with a Centrepay related complaint – including the original lodgement, investigation notes, evidence, and final written outcome - must be securely stored for a minimum of seven (7) years from the date the matter is finalised.

13.3 STAFF TRAINING AND COMPETENCY

Council will provide regular training to all staff involved in Centrepay complaints handling to ensure they:

- Are familiar with the current Centrepay terms of use, Centrepay Policy for Business, and this complaints policy;
- Can assist customers to access the complaints process, including those who need support;
- Can work towards early resolution of Centrepay-related problems;
- Can identify serious or complex complaints and escalate appropriately to a senior officer;
- Handle all complaints respectfully, confidentially and impartially;
- Can identify and respond appropriately to customers experiencing vulnerability, disability, or cultural needs, including in a manner that is culturally safe for Aboriginal and Torres Strait Islander customers; and
- Can recognise systemic issues within individual complaints and report these to a senior level within Council.

Training will be provided at induction and regularly thereafter, and whenever this policy or the Centrepay Terms of Use are materially updated. Records of training completed will be maintained by Council.

13.4 AUDITS COMPETENCY

Council acknowledges that Services Australia may conduct compliance audits at any time to assess Council's compliance with its obligations under this policy, including its complaints handling and privacy obligations. Council will cooperate fully with any such audit and provide access to all relevant records upon request. Council acknowledges that failure to comply with its complaints handling obligations under the Centrepay Terms of Use is a breach of the Centrepay contract and may result in suspension, restriction of access, or termination of Council's Centrepay approval.

14 HUMAN RIGHTS COMPATIBILITY STATEMENT

This policy guideline has been assessed as compatible with Human Rights protected under *the Human Rights Act 2019* (Qld).

15 PRIVACY

Council will handle all privacy-related complaints and personal information requests in connection with Centrepay in accordance with the *Privacy Act 1988* (Cth) and the *Information Privacy Act 2009* (Qld).

This includes complaints about:

- Any alleged breach by Council of a customer's privacy in connection with Centrepay; and
- Requests by a customer for access to, or correction of, personal information held by Council relating to their Centrepay arrangements.

Customers may make a privacy complaint or information request through any of the contact methods listed in this policy. Council will investigate and respond to all such complaints and requests in accordance with the complaints handling process set out above.

Where Council becomes aware of any serious or repeated privacy complaint, including complaints relating to the giving or withholding of access to, or the correction or non-correction of, a customer's personal information, Council must notify Services Australia within five (5) business days of the date of the complaint.

Where Services Australia considers that Council has breached or may have breached its privacy obligations under this policy, Services Australia may refer the matter to the Australian Information Commissioner or issue Council with a written direction to remediate the breach. Council will comply with any such direction.

16 ACRONYMS

Term	Definition
CEO	Chief Executive Officer
Council	Porpuraaw Aboriginal Shire Council

17 RELATED POLICIES AND OTHER DOCUMENTS

Policies:

Administration Action Complaints Policy

18 MONITORING AND REVIEW

This policy will be reviewed when any of the following occur:

- The related information is amended or replaced; or
- Other circumstances as determined from time to time by the Chief Executive Officer.

Notwithstanding the above, this policy is to be reviewed annually for relevance and to ensure that its effectiveness is maintained.

19 VERSION CONTROL

Version	Details	Resolution No	Date
V1	Created and adopted	2026/33	05/05/2026