



Queensland Fire Department – Complaints System Review

Implementation Status of Recommendations

February 2026

Kristen
Hilton
Advisory

Background and Context

This is the second assurance Report by Kristen Hilton Advisory (KHA / the Assurers) of Queensland Fire Department's progress in implementing the Complaint Management Review Implementation Program (CMRI). The first assurance report was provided by KHA in July 2025 covering the period January–June 2025. This reporting period covers the six-month period from July 2025 to December 2025.

In 2023, Queensland Fire Department (QFD) commissioned an independent review of its complaints management process by Prominence Consulting (the Prominence Review). The Prominence Review was published in September 2024, and provided 34 recommendations across six themes: Leadership, Management, and Culture; Governance and Performance; Policy and Process; People; Training and Education; and Technology, Data and Reporting.

In November 2024, KHA was appointed as independent assurers to assess and report on the implementation of the recommendations by QFD over a two-year period. Under the assurance process, QFD has committed to publishing three 6 monthly progress reports with a final report in December 2026.

KHA is an independent consultancy specialising in human rights, equality and organisational change. It's role on this project encompasses:

- providing guidance on best practice prevention and response strategies
- bringing an independent perspective to QFD and its progress
- ensuring reporting is rigorous and transparent
- encouraging genuine change and impact.

Executive Summary

For the second audit, QFD has delivered a significant amount of work, and is making steady progress toward implementing the recommended changes to the complaints management system. Key progress areas and matters that require ongoing focus are set out below.

Uplifting management and leadership skills to build a culture of respect, safety and inclusion (R8, R10)

QFD has made significant progress in setting clearer expectations and additional support for improving management and leadership skills. This has been achieved by introducing a comprehensive new performance policy and process for employees, which provides a vehicle for assessing performance against public sector competencies and addressing management and leadership skills gaps through performance planning and professional development. In parallel, QFD has invested in leadership training and resources through two innovative new programs – the *Business Skills for Leaders Program* and the *Courageous Respect Everyday Program*. QFD is to be commended for the focus and investment on building the skills of managers to create a culture of respect, inclusion and psychological safety as well as to address harmful behaviours and resolve conflict.

QFD's next step will be to ensure the new programs are embedded and completed efficiently and effectively. The Assurers commend the Commissioner for setting a clear expectation that 1200 leaders will complete the *Courageous Respect Everyday Program* by 2027, and that the *Business Skills for Leaders Program* will be embedded in performance development plans within the same timeframe. The Assurers encourage the Executive Leadership Team (ELT) to become early adopters of these programs and should complete the *Courageous Respect Everyday Program* as soon as possible. Early and visible participation by the ELT will demonstrate leadership commitment, model the behaviours expected of others, and enable senior leaders to coach and support managers as the programs roll out.

Finally, we suggest that these new programs are evaluated for impact as part of embedding this recommendation over time, to ensure they have the intended impact of uplifting management and leadership skills.

Improving the governance and oversight of the complaints process (R11, R12)

QFD has made significant progress in improving the governance of the complaints process and ensuring executive leaders are responsible and accountable for uplifting performance. This has been achieved by introducing key performance indicators, targets and monthly reporting. The monthly reports provide greater transparency and comparison between service areas and regions / directorates, that should enable leaders to identify capacity, capability and resourcing concerns, escalate delays and issues, address the complaints backlog, and drive a better performing complaints service.

The Assurers recommend that as the monthly reports evolve, QFD should ensure that insights can be provided to leaders in relation to recurring allegation types to inform prevention strategies specific to service areas and regions.

The Assurers also recommend that QFD consider whether a backlog strategy with appropriate resourcing is necessary if complaints that are older than 6 months remain high.

Reform of complaints policies, procedures and support services (R2, R7, R18, R20, R21, R22, R25)

In Assurance Report 1, KHA recommended that QFD prioritise an end-to-end review of complaints processes and the redesign of policies and procedures with a person-centred, trauma-informed lens. This work is yet to commence but should be accelerated to avoid a piecemeal approach to policy reform and the redesign of complaints processes.

There are five areas where QFD has made comprehensive and considered changes to the complaints process:

- Improving executive oversight (described above).
- Strengthening warnings about reprisals in the context of public interest disclosures (R2).
- Updating the Sexual and Gender-based Harassment – Prevention and Response Policy (R20).
- Reforms to the triage process (R21).
- Improvements to the Senior Advisor Workplace Standards role (R25).

There is still a significant amount of work to do on the review and redesign of complaints policies, procedures, guides, fact sheets, checklists, templates and other collateral. While QFD has revised some complaints policies to update terminology to describe the workforce (see R22), the Assurers do not find these policies or procedures to be person-centred, accessible or streamlined at this stage. We note that QFD has developed a useful checklist called *Doctrine and Resource Uplift Matrix*, which will support this policy and guidance reform or development. It would be helpful for the Assurers to see a list of all complaint management documents that have been identified for review and the status of that review for the next audit.

KHA also draws QFD's attention to the following recommendations:

→ **Managing mental health issues related to complaints (R7)**

In Assurance Report 1, KHA advised that to fully implement this recommendation, QFD must ensure its complaint-handling processes are safe for participants. This includes providing tailored and trauma-informed support services during and after the complaints process (R7). We have assessed this recommendation as still 'In planning and development'. For the next audit, we recommend QFD provides supporting material to demonstrate how its support services have been improved to address the mental health needs of participants and workers in the complaints process.

→ **Embedding guiding principles for complaints management throughout the entire system (R18)**

KHA commends QFD for drafting guiding principles, which are awaiting SLT approval. However, the work for this recommendation includes reviewing policy, procedure and drafting guides, fact sheets, checklists, templates and other collateral to reflect the guiding principles. We recommend QFD streamline their complaints processes and prioritise accessibility. This includes considering visual guidance such as flowcharts and infographics.

Implementation of training and change for the workforce (R17, R27, R28)

The Assurers note that there are a significant number of recommendations in the Prominence Review that require training to be designed and implemented for the workforce and acknowledge QFD's work to address those recommendations. In particular, KHA acknowledges the significant work undertaken to roll out the mandatory training program, the positive completion rate and commends QFD for introducing the QFD Inclusion Curriculum.

The Assurers have identified a gap in training for all QFD employees and volunteers relating to the prevention of sexual harassment, bullying and discrimination (R27). We recommend that QFD consider including these in its suite of mandatory training over time as well as a program of refreshers.

KHA is aware that QFD is considering a range of training in relation to preventing and responding to sexual harassment and gender-based harassment (for example, for new starters, first responders and complaint handlers). We recommend that QFD develops a roadmap for this training in order to ensure a strategic approach and manageable implementation.

Finally, the sequencing and implementation of the reforms in the CMRI Program are significant, and to be fully effective, will require a comprehensive plan for change management. We encourage QFD to prioritise a sophisticated approach to the change process. We note, a change manager will be recruited in early 2026 to assist with this process.

Summary of KHA audit assessment

A summary of our assessment is set out below.

| Progress | Recommendations | Summary | Improvement since last report |
|--|---|---|--|
| ● Not yet commenced | R3, R5, R6, R13, R16, R19, R30, R32, R33, R34 | 10 recommendations not yet commenced | In the last report, 17 recommendations had not yet commenced. |
| ● In planning and development | R7, R29, R31 | 3 recommendations in planning and development | This is an improvement on the last report, where there were 9 recommendations in planning and development. |
| ● Implemented to a moderate extent | R1, R2, R9, R10, R14, R17, R18, R20, R24, R26, R27, R28 | 12 recommendations implemented to a moderate extent | This is an improvement on the last report, where only 6 recommendations were implemented to a moderate extent. |
| ● Implemented to a significant extent | R11, R12, R21, R22, R25 | 5 recommendations implemented to a significant extent | In the last report, only 1 recommendation was implemented to a significant extent. |
| ● Implemented and embedding | R4, R8, R15 | 3 recommendations are implemented and embedding | In the last report, there were no recommendations that were implemented. |

Status of overarching recommendations from last report

In Assurance Report 1, KHA made five overarching recommendations framed as opportunities to accelerate change. There has been reasonable progress in accelerating these matters as summarised below.

| Previous overarching recommendations | Action / Response |
|--|---|
| Ensuring there is a comprehensive plan for change management, communication and consultation with the workforce in relation to the redesign of complaint processes and procedures. | While not complete, QDF will run a recruitment process in January 2026 for a temporary, 12-month change manager to create a comprehensive plan for change. |
| Engaging with the volunteer base of the Rural Fire Services about the reforms to the complaints management system and ensuring volunteers benefit from the reforms. | <p>All communications regarding the complaint management reforms have been circulated to the volunteer workforce via the Commissioner's Update or the Chief Officer's update. Both are distributed via email.</p> <p>A RFSQ working group is being established to ensure effective engagement with volunteers on the complaints management process.</p> |
| Fully resourcing the Complaints Management Review Implementation Program to accelerate change and funding ongoing roles identified in the Investment Brief to embed change. | Temporary resourcing has been approved for a 12-month period, but funding for ongoing new roles has not yet been implemented. |
| Using the Assurance Framework and relevant legislation to draft overarching guiding principles for the complaints management system. | The guiding principles have been drafted and are awaiting senior leadership team approval. |
| Prioritizing the end-to-end review of the complaints processes and the redesign of policies and procedures with a person-centred, trauma-informed lens | An end-to-end process review is planned to commence early 2026. |

Achievements during this reporting period

- Embedding the Positive Performance Management Policy (which applies to all QFD employees except for senior executive roles) and associated Achievement and Development Planning (which includes guidance and templates for performance plans and conversations).
- Developing two innovative new programs to improve management and leadership skills, namely the Business Skills for Leaders Program and Portal and the Courageous Respect Everyday Program in December 2025.
- Signalling an expectation to 1200 leaders, including at Station Officer rank, that the Commissioner expects the Courageous Respect Everyday Program to be complete by 2027, and Business Skills for Leaders to be embedded in performance development plans by 2027.
- Significantly improving the governance and oversight of complaint management by introducing key performance indicators and targets for complaint management and monthly reporting to executive and senior leaders.

Challenges & Opportunities to accelerate change

- Ensuring that QFD is progressing a comprehensive, not piecemeal review of policy and procedure reforms for complaints management.
- Addressing the challenges to implementing and evaluating the range of training programs required by the Complaints Management Implementation Review.

Assurance Framework

The Assurance Framework, including indicators of good practice is set out in detail at Appendix 1. A summary of the outcomes that QFD are working toward are summarised below.

| | |
|------------------------------------|---|
| Safe and Supportive | People feel safe to report and participants can access end-to-end support, information, advice and counselling |
| Fair and Consistent | QFD ensures a fair approach to managing complaints, and outcomes are seen to be impartial, proportionate, and consistent |
| Flexible and Proactive | There are a range of resolution pathways, with a focus on early intervention, flexible approaches, and timely communication and responses. |
| Accountable and Transparent | Organisational leaders are held accountable for preventing and responding to harmful and unlawful behaviours. QFD holds perpetrators of harmful and unlawful behaviour accountable, with all parties having a clear understanding of the reasons for decisions and outcomes. |
| Measured and Preventative | QFD uses data, reporting and evaluation to measure the performance of complaint processes, drive improvements, manage risk, and take preventative action to address systemic issues |
| Capable and Efficient | Complaints are managed by highly capable and skilled individuals and leaders who are adequately resourced and equipped with an effective and efficient information technology system. |

Implementation Status of Recommendations

KEY

● Not yet commenced


● In planning and development

● Implemented to a moderate extent

● Implemented to a significant extent




● Implemented and embedding

| RECOMMENDATION | ASSESSMENT |
|---|---|
| <p>1 / Restoring trust in QFD complaints management Implement organisational initiatives to restore trust in the CMS, including leaders and managers communicating regularly with the workforce on the outcomes of this Review and other proactive preventative measures being taken. This will cultivate a “speak up” culture.</p> <p>STATUS ● ASSURANCE FRAMEWORK Measured and Preventative</p> | <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R1 as ‘Implemented to a moderate extent.’ In Assurance Report 1, this recommendation had also been ‘Implemented to a moderate extent.’</p> <p>In Assurance Report 1, we said that building trust in QFD’s complaints management will take time and that QFD had laid foundations by establishing a program of reform and communicating outcomes to the workforce and community.</p> <p>During this reporting period, QFD is to be commended for continuing to transparently communicate outcomes and progress to the workforce and community. QFD undertook the following initiatives.</p> <ul style="list-style-type: none"> → Promoted the outcomes of the first Assurance Report from KHA. The promotional activities included a Commissioner update email to the workforce in October 2025, a Chief Human Resources Officer email to all staff, RFSQ Chief Officer update, QFR Station Briefs and a Gateway banner. The Assurance Report was also published on the external QFD website. → Launched a dashboard to track the implementation of recommendations from the Prominence Review. The dashboard was promoted by the Commissioner via his update to all staff in August as well as October 2025. The dashboard traffic at the time of this report is 399 views, 312 sessions and 171 users. → Launched a Pulse Survey of all staff and volunteers, intended to set baseline for how QFD measures improvements to complaints management. The intention is to follow up on this survey every 6 months. In total, 586 responses were received, including 98 from volunteers. → Continued the Quarterly Complaints Report, this time for Quarter 3 (July, August, September 2025). <p>QFD’s Next Steps</p> <p>In QFD’s Implementation Plan, the next key step is the development of a change plan to restore trust in the complaints management system.</p> |

| | |
|---|--|
| | <p>KHA Guidance</p> <p>In Assurance Report 1, we provided five overarching opportunities to QFD to accelerate progress. The first was to ensure there is a comprehensive plan for change management, communication and consultation with the workforce in relation to the redesign of its complaint processes and procedures.</p> <p>QFD is yet to design and deliver an overarching change program, which we consider will help to restore trust in the complaints management system. It is intended that step will commence in January 2026 with the recruitment of a Change Manager.</p> <p>A change program to restore trust is needed to ensure this recommendation is ‘Implemented to a significant extent.’</p> |
| <p>RECOMMENDATION</p> <p>2 / Strengthening warnings about victimisation and reprisals Implement changes to policy, procedure and process with a view to strengthening warnings about victimisation and reprisals in letters, correspondence, training, programs and at meetings, etc.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Safe and Supportive</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>In Assurance Report 1, this recommendation was still at a stage of – ‘In planning and development.’ It is now assessed as ‘Implemented to a moderate extent.’</p> <p>The key developments during this reporting period relate to strengthening warnings about reprisal in the context of Public Interest Disclosures. This has involved the following initiatives.</p> <ul style="list-style-type: none"> → The development or uplift of a comprehensive suite of work instructions and fact sheets concerning Public Interest Disclosures. These resources include warnings and information about protection against reprisal for a discloser or a witness. They also include information for support officers and investigators about how to assess and prevent reprisal. → The development of a suite of training materials on public interest disclosures. These resources include protections in the <i>Public Interest Disclosure Act 2010</i> relating to reprisal; how to monitor and mitigate the risk of reprisal; insights on the kinds of detriment ‘whistleblowers’ experience; how to support staff who report wrongdoing; the role of a PID Support Officer; as well as practical case studies. → In July 2025, RSB team members attended 4 additional PID management training sessions, which focused on building skills in assessing PIDs, identifying reprisal and risk, and supporting people in a PID process. <p>In terms of the broader range of policies and training, QFD has:</p> <ul style="list-style-type: none"> → Created a useful checklist called <i>Doctrine and Resource Uplift Matrix</i>, designed to ensure policy changes are leading practice. → Commenced a review of all complaints management documents to ensure that warnings about victimisation and reprisal are included; and |

| | |
|--|--|
| | <p>→ Completed a gap analysis of all current training and identified the following training in need of uplift to meet the requirements of R2 (and other recommendations): <i>Acceptable Workplace Behaviours, Effective Complaints Management, and Onboarding and Induction Project.</i></p> <p>The Assurers found the checklist for updating complaint management documents a particularly useful resource for those staff involved in updating policies, procedures and correspondence.</p> <p>QFD's Next Steps</p> <p>QFD flag the following initiatives as next steps in its progress report:</p> <p>→ Update Case Manager resources</p> <p>→ Uplift training concerning victimisation and reprisals for staff and volunteers, including <i>Acceptable Workplace Behaviours, Effective Complaints Management, Onboarding and Induction Project.</i></p> <p>KHA Guidance</p> <p>While the policy and training materials for Public Interest Disclosures are comprehensive and useful, the Assurers recommend the following improvements:</p> <p>→ In the Fact Sheet for Disclosers, consider including the definition of detriment from the Act.</p> <p>→ In the Fact Sheet for Support Officers and Investigators, consider including some examples of commonly reported reprisals. These could be taken from the Training pack entitled 'Public Interest Disclosures – Case Studies.'</p> <p>It would be helpful for the Assurers to see a list of all complaint management documents that have been identified for review and the status of that review.</p> <p>QFD's Implementation Plan also includes strengthening warnings about victimisation and reprisals in letters and correspondence. These kinds of documents have not yet been provided to the Assurers for review and may still be a work in progress.</p> <p>Further, at this point, no updated documents have been published on the Gateway page. This is an action in QFD's Implementation Plan. As flagged in Assurance Report 1, communicating the importance of 'no victimisation' to the workforce will be important to encourage speaking up and reporting.</p> |
| <p>RECOMMENDATION</p> <p>3 / Providing regular updates on complaint progress and outcomes</p> <p>Ensure dedicated and separate case managers (adopting a single point</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |

| | |
|--|---|
| <p>of contact model) are appointed for both complainants and subject officers. These case managers should provide regular updates on progress, timeframes and outcomes, etc.</p> <p>STATUS ● ASSURANCE FRAMEWORK Flexible and Proactive</p> | |
| <p>RECOMMENDATION</p> <p>4 / Reporting quarterly on total complaints and disciplinary actions Provide a deidentified (and brief and very high-level) update once a quarter on total complaints and disciplinary actions taken so that all believe that there is “perpetrator accountability” and that employees and volunteers understand that behaviours (good and bad) have consequences.</p> <p>STATUS ● ASSURANCE FRAMEWORK Accountable and Transparent</p> | <p>ASSESSMENT</p> <p>Progress – Implemented and embedding</p> <p>The Assurers assess the implementation of R4 as ‘Implemented and embedding.’ In Assurance Report 1, this recommendation had been ‘Implemented to a significant extent.’</p> <p>In Assurance Report 1, we highlighted the QFD quarterly report as an achievement. It provides important transparency to the workforce on complaints data, insights and perpetrator accountability. We consider that this is an example of leading practice and encourage QFD to continue to promote access to the report.</p> <p>The quarterly report to staff contains information on new complaints, closed complaints, top allegation types, number of allegations substantiated, and the type of management and disciplinary action taken.</p> <p>QFD has continued to embed regular quarterly reporting with the July – September 2025 report released to all staff in October 2025, via the Gateway banner and promoted in the October Commissioner’s update.</p> <p>In terms of QFD’s Implementation Plan, QFD has confirmed with the Assurers that the current communication channels are the most effective way to communicate complaints information to the rural contingent within QFD. Further, QFD has said it is committed to automating quarterly reporting when the systems allow.</p> |
| <p>RECOMMENDATION</p> <p>5 / Creating a single point of contact for customer complaints Create a “customer care” manager or concierge role for customer complaints, so customers have a</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |

| | |
|--|---|
| <p>single point of contact for any complaints.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Capable and Efficient</p> | |
| <p>RECOMMENDATION</p> <p>6 / Identifying customer complaint themes and trends</p> <p>Review and monitor customer complaints for trends/themes that might inform future prevention plans.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Measured and Preventative</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |
| <p>RECOMMENDATION</p> <p>7 / Managing mental health issues related to complaints</p> <p>Develop greater awareness and management of mental health issues related to the complaint process and complaints themselves, focusing on what is required for all stakeholders including fact finders.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Safe and Supportive and Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – In planning and development</p> <p>The Assurers assess the implementation of R7 as ‘In planning and development’. In Assurance Report 1, this recommendation was also assessed as ‘In planning and development’.</p> <p>In this reporting period, QFD has advised the Assurers of the following progress to implement R7:</p> <ul style="list-style-type: none"> → Initiated a program of work following recommendations from a KPMG review of QFD’s Service Support Model. This is intended to uplift the Fire and Emergency Services Support Network for consistency and clarity of service, and would mean improved services if complainants, subject officers and responsible officers were referred. → Completed consultation on a Psycho-Social Framework. This is intended to help managers measure and respond to risks, for example when they are managing complaints that impact their teams. → Commenced updating the 2025 QFD Mental Health Strategy. <p>However, at this stage, the Assurers have not seen any supporting documentation to verify this progress or its relevance to R7.</p> <p>QFD’s Next Steps</p> <p>In QFD’s Implementation Plan, the actions planned are:</p> |

| | |
|---|---|
| | <p>→ Continue to assess the current state of mental health support services and identify gaps in support available for all roles in the complaint management process; and</p> <p>→ Promote mental health support services for all staff and volunteers that are parties to a complaint.</p> <p>KHA Guidance</p> <p>In Assurance Report 1, KHA said that to fully implement R7, QFD needs to ensure that its complaint-handling processes are safe for participants. This includes providing accessible, tailored and trauma-informed support services during and after the complaints process.</p> <p>KHA requests that QFD provide supporting material to demonstrate how its support services have been improved to address the mental health needs of participants and workers in the complaint process.</p> |
| <p>RECOMMENDATION</p> <p>8 / Uplifting management and leadership skills</p> <p>Identify management and leadership skills gaps (and develop a plan to address as part of the performance management system).</p> <p>STATUS ●</p> <p>ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Implemented and embedding</p> <p>The Assurers assess the implementation of R8 as ‘Implemented and embedding.’ In the previous reporting period, we assessed this recommendation as ‘Implemented to a moderate extent.’</p> <p>Previously, we reviewed QFD’s comprehensive new performance policy and process as well as the Qld public sector leadership competencies. The roll out and embedding of the new performance process has progressed further since our last report, including for QFR’s frontline, Station Officers and Firefighters as well as Firecom.</p> <p>In Assurance Report 1, we concluded the new performance process appeared to be an effective vehicle for identifying management and leadership skills gaps and addressing those gaps through performance planning and professional development.</p> <p><u>New Leadership Programs</u></p> <p>In this reporting period, we focus on two new programs designed to improve management and leadership skills, namely the launch of:</p> <p>→ Business Skills for Leaders in October 2025; and</p> <p>→ Courageous Respect Everyday in December 2025.</p> <p><i>Business Skills for Leaders</i> is designed to equip leaders with technical skills covering ten areas. The Human Resources skill area contains the topics recruitment and onboarding, performance management, diversity, equity and inclusion, and workforce management. The learning experience is designed for emerging leaders, team leaders, program leaders and executive leaders (SLT / ELT). Leaders are asked to self-report their level of proficiency in each of the 10 business skills with a self-assessment tool. The learning is then integrated within their performance and development planning. Accessed via a</p> |

portal, this program combines in-person and online formal training, learning through peers and on-the-job learning experiences.

Courageous Respect Everyday is a five-week inclusive leadership capability and development program. It is designed to build an enhanced culture of respect in QFD. The program is intended to enable leaders to understand the mindset and skillset required to role model respect everyday, and to embody the courage to act when it comes to navigating and addressing disrespect from others. The program consists of a full day immersive and self-reflection session, including the leadership shadow, understanding and managing bias, and having courageous conversations. This is followed by on-the-job application and homework. The program then concludes with a facilitated peer reflection and momentum session, which centers on an experiment that participants have undertaken with new behaviours and new ways of leading.

The Assurers have reviewed relevant content for these new programs and commend QFD on the program design and resources available to build management and leadership skills as well as the focus and investment on respect, inclusion and courageously addressing harmful behaviours. The *Courageous Respect Everyday* program represents a significant investment of time and money.

We also want to acknowledge that these new programs sit alongside a significant existing program at QFD – the *Leadership Foundation Program*, designed to reinforce the Queensland public sector leadership competencies and develop emotional competence. This is a series or continuum, building skills at the following leadership levels – Leading Self (Emerging leaders), Leading Others (Team Leaders), Leading Leaders (Program Leaders), and Leading Organisations (Executive Leaders – SLT / ELT).

Implementation challenges with new programs

We understand that there are 1200 leaders at QFD, including from Station Officer rank. There is an expectation from the Commissioner that all leaders will complete the *Courageous Respect Everyday* program by 2027. With the pilot phase finalised, QFD has now commenced the rollout of the program. The *Business Skills for Leaders Program* was launched in October 2025, and the Commissioner expects that program to be embedded throughout performance development plans within 2 years.


Ensuring completion rates will involve navigating various challenges. For the *Business Skills for Leaders Program*, these challenges include ensuring that the online components of the program are accessible to the front line and that there is sufficient time to prioritise learning. For the *Courageous Respect Everyday Program*, these challenges include ensuring that the SLT and ELT champion the program, model the new behaviours and leadership styles, and coach and support emerging leaders to practice and develop their skills back in the workplace.

| | |
|---|---|
| | <p>QFD's Next Steps</p> <p>QFD flag the following initiatives as next steps in its progress report:</p> <ul style="list-style-type: none"> → Roll out the new performance policy and process to QFD's frontline causal workforce and auxiliary firefighters. → Embed the use of the Business Skills for Leaders portal across the organisation. → Develop and implement a face-to-face workshop series for the Business Skills for Leaders Program. → Deliver the Courageous Respect Everyday Program. → Identify how volunteers are supported to uplift leadership and management capabilities. <p>KHA acknowledges these next steps are part of QFD's program going forward to continue to uplift management and leadership skills.</p> <p>KHA Guidance</p> <p>The Assurers provide the following guidance as part of embedding of this recommendation:</p> <ul style="list-style-type: none"> → Ensure the ELT are early adopters of the Courageous Respect Everyday Program and have completed the training as soon as possible. This is to ensure there is early and visible adoption of the lessons in the training and to enable the ELT to demonstrate their commitment and provide coaching to other leaders. → Ensure that these new leadership programs are evaluated over time. This is to ensure they are having the intended uplift of management and leadership skills. |
| <p>RECOMMENDATION</p> <p>9 / Managing unreasonable complainant behaviour</p> <p>Relevant personnel and mid- to-executive management to undergo training and education on identifying and managing unreasonable complainant behaviour and conduct.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p>Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R9 as 'Implemented to a moderate extent.' In Assurance Report 1, this recommendation was still at a stage of – 'Not yet commenced.'</p> <p>The key change that has taken place during the reporting period is that QFD has drafted an Unreasonable Complainant Conduct Policy. It is currently in the internal consultation phase.</p> <p>This policy sets out the processes and responsibilities for managing any unreasonable complainant conduct during the course of a complaint. The Assessors consider that the policy is clear, fair and balanced and supports R9.</p> <p>In its progress report, QFD has listed a range of leadership programs as relevant to R9, namely:</p> <ul style="list-style-type: none"> → aXcelerate courses – 'Everyday coaching skills for better conversations' and 'Everyday conversations for health minds.' |

| | |
|---|--|
| | <p>→ Leadership programs - Courageous Respect Everyday, Business Skills for Leaders and Leadership Foundation.</p> <p>The Assurers view these programs as relevant to R8 and R10. However, we consider more specific training is required to acquit this recommendation.</p> <p>QFD's Next Steps</p> <p>QFD reports that:</p> <p>→ The Unreasonable Complainant Conduct Policy needs to go through final approval processes.</p> <p>→ External training to upskill regional and remote leaders to enhance behavioural conversations is being scoped.</p> <p>KHA Guidance</p> <p>We recommend that QFD consider specific training and resources for complaint handlers and leaders in dealing with complex and challenging behaviour. For example:</p> <p>→ The Victorian Ombudsman offers an online workshop on dealing with complex behaviour (Session Details)</p> <p>→ The Queensland Ombudsman offers resources (Managing unreasonable complainant conduct - Queensland Ombudsman)</p> <p>The NSW Ombudsman offers an online session on managing unreasonable conduct by a complainant (NSW Ombudsman Managing unreasonable conduct by a complainant).</p> |
| <p>RECOMMENDATION</p> <p>10 / Training frontline managers in psychological safety and conflict resolution</p> <p>Ensure frontline managers receive training in business skills including 'Having Difficult Conversations', conflict resolution and psychological safety awareness and management incorporating psychological first aid training.</p> <p>STATUS ●</p> <p>ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R10 as 'Implemented to a moderate extent.' In Assurance Report 1, this recommendation was still at a stage of – 'Not yet commenced.'</p> <p>In this reporting period, QFD has undertaken a training gap analysis and identified the following existing and new programs as relevant to implementing R10.</p> <p>→ Leadership Foundation Program</p> <p>→ Courageous Respect Everyday Program</p> <p>→ Alternative Dispute Resolution Service</p> <p>→ Business Skills for Leaders Program</p> <p>The intent of this recommendation in the Prominence Review is to ensure that frontline managers:</p> <p>→ embrace the 'people management' side of their role</p> |

| | |
|---|---|
| | <p>→ have the skills to address difficult conversations, manage conflicts and create psychologically safe work environments</p> <p>→ can manage complaints.</p> <p>Having reviewed the materials provided, the training listed above covers topics such as interpersonal skills, psychological safety, having meaningful conversations and coaching tips for supporting a team to work productively with conflict. These are all highly relevant to R10.</p> <p>We did not see any ‘first responder’ training or materials that would support a leader to manage or escalate a complaint or resolve a dispute within a team themselves. We anticipate that ‘first responder’ skills will be covered in the ‘Conduct and Complaints’ workshop identified in QFD’s report on progress.</p> <p>We understand there are also Alternative Dispute Resolution Services available for employees to access conflict coaching as well as mediation and facilitation services via a network of trained coaches and mediators.</p> <p>QFD’s Next Steps</p> <p>QFD report that psychological first aid training is not readily available to the workforce and this gap will be investigated in the next reporting period.</p> <p>QFD are also developing a ‘Conduct and Complaints’ workshop for the Business Skills for Leaders Program. This will replace the previous RSB Positive Performance Management and Acceptable Workplace Behaviour training programs.</p> <p>QFD are embedding the use of the Business Skills for Leaders portal across the organisation.</p> <p>KHA Guidance</p> <p>QFD ensure the ‘Conduct and Complaints’ workshop for frontline managers is face-to-face and contains realistic scenarios for leaders to practice conflict resolution and first responder skills for complaints.</p> <p>QFD consider producing a ‘Leaders Guide’ for resolving conflict and grievances through facilitated conversations. This could be downloaded from the Business Skills for Leaders portal.</p> <p>QFD report on the number of managers that have completed ‘Everyday Coaching Skills for Better Conversations’, ‘Everyday Conversations for Healthy Minds’ and ‘Conduct and Complaints’ training.</p> |
| <p>RECOMMENDATION</p> <p>11 / Introducing refreshed complaints management governance</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a significant extent</p> |

Establish a refreshed governance framework for the complaint management system with an emphasis on high-level oversight and monitoring at the executive level or a steering committee with an emphasis on prevention and management.

STATUS ASSURANCE FRAMEWORK
 Measured and Preventative

The Assurers assess the implementation of R11 as ‘Implemented to a significant extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’

In this reporting period, QFD has:

- Commenced drafting a Complaints Management Framework.
- Continued to issue quarterly reports to the workforce.
- Commenced issuing monthly reports to the ELT.

The Assurers note that the Complaints Management Framework will be a useful document but is still a work in progress. It aims to bring together the following elements: approach to complaint handling; guiding principles, types of complaints; resolution options; oversight and accountability; roles and responsibilities; links to policy and procedures.

In Assurance Report 1, we highlighted the quarterly report to the workforce as one of the achievements of QFD. Three quarterly reports have now been published and in total have been viewed 984 times across the year. There is further information on this initiative under Recommendation 4.

We have reviewed the initiative of monthly reporting to the ELT in relation to Recommendation 12, including the opportunity for a greater emphasis over time on prevention.

QFD’s Next Steps

- Executive approval and release of the Complaints Management Framework.

RECOMMENDATION

12 / Implementing monthly case management reviews

Implement a monthly case management meeting between various key stakeholders in the CMS process (such as People and Culture Division, Safety, Injury Management, Legal) to provide updates on each case, timeframes and matters of risk. Meeting should be chaired by Director, Relations and Standards.

STATUS ASSURANCE FRAMEWORK

ASSESSMENT

Progress – Implemented to a significant extent

The Assurers assess the implementation of R12 as ‘Implemented to a significant extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’

In this reporting period, QFD has:

- Introduced *key performance indicators* for complaints management, including clearance rates and backlogs. These metrics show how quickly complaints are being actioned; how well any backlog is being managed; and whether complaints are being resolved in line with timeframes.
- Introduced *targets*. The clearance rate is the number of allegations closed per month as a percentage of allegations opened per month. The target is 100%. The backlog is the number of matters open for longer than 6 months as a percentage of total open matters. The target is 5%. There are also targets relating to public sector timeframes for resolving different kinds of complaints.

| | |
|---|---|
| <p>● Flexible and Proactive</p> | <p>→ Developed <i>monthly reporting</i> to executive and senior leaders on the status of complaints to support the timely and efficient resolution of complaints. This includes a traffic light system and visual graph of open complaints by type. There are three reports that will be produced, namely:</p> <ul style="list-style-type: none"> – A report detailing open complaints specific to each region / directorate provided to the relevant member of the SLT <i>for action</i>. – A report for each service area to the responsible member of the ELT <i>for monitoring</i>. – A QFD-wide overview of complaint management performance (including discipline matters) provided to the Commissioner and whole ELT <i>for governance and assurance</i>. <p>→ Accountability & Guidance: Produced an accompanying guide to support leaders to understand the reporting process and their responsibilities.</p> <p>The Assurers commend QFD for introducing targeted monthly reporting to improve the governance and oversight of complaint management, following a period of consultation with leaders. It is a significant achievement, particularly given the process is currently manual. The reports provide greater transparency and comparison between services areas and regions / directorates, that should enable leaders to identify capacity, capability and resourcing concerns, escalate delays and issues, address the complaints backlog, and drive a better performing complaints service. As long as leaders act on the data and reporting, we believe this reform will have a significant impact in restoring trust in the complaint management system.</p> <p>QFD’s Next Steps</p> <p>→ Launch of monthly reporting in January 2026.</p> <p>→ Work is also underway to automate the generation of data for the report in BI.</p> <p>KHA Guidance</p> <p>The Assurers provide the following guidance:</p> <p>→ QFD could consider whether a backlog strategy with appropriate resourcing is necessary if complaints that are older than 6 months remain high.</p> |
| <p>RECOMMENDATION</p> <p>13 / Streamlining oversight of complex and serious investigations For consistency, timeliness and</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |

streamlining of processes, ensure that only one responsible Senior Executive with the appropriate delegation is appointed for oversight for complex and serious investigation outcomes.

STATUS ● ASSURANCE FRAMEWORK
Flexible and Proactive

RECOMMENDATION

14/ Continuously overseeing complaints for serious matters

No serious matters should be managed with a single point of failure in the event of an officer or delegate being on extended leave. It is noted, however, that discipline cases are often voluminous and any replacement has to fully appraise themselves of the entire case. Therefore, responsible Executives (delegates) must ensure active oversight on these matters at all times

STATUS ● ASSURANCE FRAMEWORK
Safe and Supportive

ASSESSMENT

Progress – Implemented to a moderate extent

The Assurers assess the implementation of R14 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’

Under current arrangements the QFD HR Delegations Framework assigns decisions on disciplinary outcomes to the Executive Leadership. The delegation is assigned to a position not an individual. In the instance an Executive Leader is on extended or other leave, the interim replacement also holds the appropriate delegated authority as outlined in the QFD HR Delegations Framework.

During this reporting period, QFD has commenced drafting a Complaints Management Framework, which will provide an overview of roles and responsibilities. This should be completed by the next reporting period.

The Assurers have a concern that acting arrangements can result in leaders not having the information, commitment or experience needed to oversee serious complaints. This can be addressed through effective handovers, the monthly reporting process, the escalation of matters and additional support and advice.

Next steps

QFD intends to uplift case manager resources and training to clarify delegations for complaints management and step through the responsibilities of case managers and decision makers.

KHA Guidance

The Assurers provide the following guidance:

- QFD embed effective handover processes for complex complaints, including briefings;
- QFD use the monthly reporting process to ensure acting leaders are supported and accountable.

RECOMMENDATION

15 / Assessing QFD legislation changes for volunteers

Undertake a detailed impact analysis of the new QFD Legislation including the development of an implementation and resourcing plan which contains “how and who” is responsible for the provision of procedural fairness and natural justice and how QFD commitments to the volunteer community and stakeholder groups will be met.

STATUS



ASSURANCE FRAMEWORK

Fair and Consistent

ASSESSMENT

Progress – Implemented and embedding

The Assurers assess the implementation of R15 as ‘Implemented and embedding.’ In the previous reporting period, we assessed this recommendation as ‘Not yet commenced.’

The intent of this recommendation is to assess the impact of changes to QFD legislation pertaining to volunteers and develop a plan to ensure natural justice and procedural fairness considerations are met when it comes to volunteer discipline or removal.

The relevant legislation changes concern the *Disaster Management and Other Legislation Amendment Act 2024*. Among other things, this Act provides the Commissioner with the power to appoint members to rural fire brigades. By virtue of the *Acts Interpretation Act 1954*, the Commissioner also has the authority to suspend or remove rural fire brigade members.

Disciplinary action for volunteers differs to paid staff and centers on the power to dismiss, disqualify, suspend and remove rural brigade members in instances of serious diminished performance or conduct as well as alternative management action (counselling, training) to address less serious matters. Other disciplinary actions that apply to paid staff, such as a reduction in salary or classification level, are not appropriate due to brigade members being volunteers.

QFD has reported that it will afford procedural fairness to brigade holders and members by ensuring that members subject to decisions have the opportunity to be heard and make submissions as well as an initial internal review process of any decision available prior to proceeding to judicial review.

During the reporting period, QDF has taken the following steps:

- Undertook a human rights impact analysis of the legislation (see Statement of Compatibility for the Disaster Management and Other Legislation Amendment Bill).
- Developed a subordinate procedure *PR3153 Suspension or Removal of Brigade Member* to confirm who is responsible for observing natural justice / procedural fairness and how it is applied.
- Undertook a consultation and education program to communicate changes in legislation and Brigade Model Rules to RSFQ staff and volunteer members. This included a fact sheet, townhall meeting, and an e-learning module. These resources remain on the Gateway.

The Assurers have reviewed a range of documents relating to this recommendation, including human rights impacts, procedural fairness processes, decision making processes and delegations, consultation and education materials. We understand that the

| | |
|--|---|
| | <p>procedure <i>PR3153 Suspension or Removal of Brigade Member</i> still requires consultation with a wider stakeholder group.</p> |
| <p>RECOMMENDATION</p> <p>16 / Liaising with First Nations Strategy and Partnership Branch</p> <p>Where a person engaging with the CMS in any capacity, identifies as Indigenous, liaise with the new First Nations Strategy and Partnership Branch within QFD on cultural capability and awareness matters and obligations to ensure compliance with the new Public Sector Act 2022 and relevant Directives.</p> <p>STATUS ● ASSURANCE FRAMEWORK Safe and Supportive</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |
| <p>RECOMMENDATION</p> <p>17 / Training managers to support culturally diverse peoples</p> <p>Develop training for all levels of management to employ and support culturally diverse peoples, starting with the ability to identify cultural differences and handle them appropriately.</p> <p>STATUS ● ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R17 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘Not yet commenced.’</p> <p>During the reporting period, QFD has taken the following steps:</p> <ul style="list-style-type: none"> → Developed an Everyday Respect Framework, comprising of two components: <ul style="list-style-type: none"> – The Everyday Respect Council – The Courageous Respect Everyday Program → Developed the QFD Inclusion Curriculum, which is a renamed version of the SBS Inclusion Program. <p>We commend QFD for establishing the Everyday Respect Council and communities of inclusion, which are designed to empower diverse voices within QFD to contribute directly to cultural reform initiatives. There are four communities focused on gender, First Nations, regional and remote and people with disability. We understand that LGBTQIA+ and CALD communities of inclusion are planned to be established in 2027.</p> <p>The Courageous Respect Everyday Program has been discussed in relation to Recommendation 5. While highly relevant to setting the</p> |

| | |
|--|--|
| | <p>foundations for inclusive leadership, the content of that program does not specifically provide training in cultural awareness and competency.</p> <p>The <u>QFD Inclusion Curriculum</u> is an online inclusion training course that deals directly with cultural diversity. The training is available to all QFD employees, not just leaders and managers and was released on the QFD training platform, aXcerlerate, in November 2025. The curriculum is geared toward providing QFD employees with an understanding of, and respect for cultural diversity. The course is approximately 2 hours and provides practical skills for employees to navigate cultural differences. Topics include the definition and impact of culture, cross-cultural communication styles, how a person adapts to new cultural environments, and demographic trends and changing values in Australia.</p> <p>QFD Next Steps</p> <ul style="list-style-type: none"> → Promoting the QFD Inclusion Curriculum → Deploying the QFD Inclusion Curriculum for volunteers. <p>KHA Guidance</p> <p>QFD should consider which parts of its Inclusion Curriculum should be mandatory training topics for volunteers, employees and leaders.</p> <p>QFD should ensure that the roll out of the new training is incorporated into the plan for change management, communication and consultation.</p> <p>QFD should consider how the Everyday Respect Council can provide ongoing feedback on the curriculum and the most effective way to deliver the training.</p> <p>To embed this recommendation over time, QFD should track the number of managers that have completed the Cultural Diversity online course.</p> |
| <p>RECOMMENDATION</p> <p>18 / Developing guiding principles for complaints management</p> <p>Develop overarching guiding principles for the CMS such that these principles are embedded throughout the entire system and publicly available. These principles should also reflect the requirements of the QFD Commissioner as per Section 32 of the Public Sector Act 2022 to</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R18 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘Not yet commenced.’</p> <p>In this reporting period, QFD has developed draft guiding principles, drawing from the outcomes in the Assurance Framework. A detailed version of the principles was provided to KHA as an infographic. The guiding principles have been approved by the Board responsible for the CMRI project and provided to union representatives for comment and are with the SLT for approval.</p> <p>An important part of embedding the principles will be ensuring they are reflected in key policies, procedures, guidance, templates and other collateral and delivered in training and in practice. QFD has developed a checklist called <i>Doctrine and Resource Uplift Matrix</i>,</p> |

develop and promote a workplace culture of respect and inclusion.

STATUS ● ASSURANCE FRAMEWORK
Measured and Preventative

designed to ensure policy changes are leading practice (see R2). At this stage, the policies provided to the Assurers for this audit (see R22) do not appear to have been substantially revised beyond inserting the principles and updating terminology to describe the workforce. In particular, the Assurers do not find the policies or procedures to be very accessible or streamlined. The exception to this is the Sexual and Gender-Based Harassment – Prevention and Response Policy (R20) and the triage process (see R21).

QFD Next Steps

- Review, develop and update policy and complaint management frameworks to reflect the application of guiding principles.
- Change activities to embed, publish and increase awareness of the complaint management guiding principles and associated policy changes.

KHA Guidance

The Assurers found the checklist for updating complaint management documents a particularly useful resource for those staff involved in updating policies, procedures and drafting guidance and other collateral. We would recommend QFD consider including the following requirements to the checklist to ensure QFD embeds a person-centred approach and prevention lens:

- 'Document ensures complainants are involved in the decision about resolution options as far as possible.
- Document incorporates a preventative approach where relevant.'

It would be helpful for the Assurers to see a list of all complaint management documents that have been identified for review and the status of that review.

QFD should ensure its complaint handling policies, procedures, guides, fact sheets, checklists, templates and other collateral are streamlined and accessible for the workforce. The Assurers suggest including visual guidance, such as flowcharts and infographics.

RECOMMENDATION
19 / Developing a prevention plan and activities
Develop a three-year prevention plan to rebalance priorities with a greater focus on prevention rather than management of complaints.

STATUS ASSURANCE FRAMEWORK

ASSESSMENT
Progress – Not yet commenced
We note that QFD has developed a sexual harassment prevention plan (R 20). The Assurers expect that this will form a part of more comprehensive prevention plan for all complaints which is yet to be commenced.

| | |
|--|---|
| <p>● Measured and Preventative</p> | |
| <p>RECOMMENDATION</p> <p>20 / Implement a person centric, trauma informed and gender informed approach for complaints Develop and implement a person centric, trauma and gender informed approach for sexual harassment complaints including ensuring multiple pathways (such as informal complaints) to make a complaint or report sexual harassment and conducting training for relevant personnel who are involved in coordinating, managing and deciding sexual harassment (or sexual harassment like) complaints.</p> <p>STATUS</p> <p>● ASSURANCE FRAMEWORK Safe and Supportive and Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R20 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’</p> <p>In the last report, we said the launch of QFD’s sexual harassment contact officer network was a highlight. We strongly suggested increasing the network and ensuring it is adequately resourced. QFD’s progress report states that planning is underway to run a recruitment drive for the network.</p> <p>During this reporting period, QFD has finalised its Sexual and Gender-Based Harassment – Prevention and Response Policy and Sexual Harassment Prevention Plan, following consultation and workshops. QFD has addressed the feedback provided by the Assurers in Report 1. This includes aligning the policy to the seven standards published by the Australian Human Rights Commission, providing examples of victimisation, addressing the role of upstanders, and taking an intersectional approach.</p> <p>QFD has developed a communication plan and collateral material to promote the updated policy and new prevention plan, including a leadership briefing slide pack and information posters for the workforce.</p> <p>QFD Next Steps</p> <ul style="list-style-type: none"> → Undertake a recruitment drive for additional sexual harassment contact officers → Make training available on aXcelerate to support the workforce to recognise and respond to inappropriate behaviour and monitor completion rates. → Uplift the Effective Complaints Management training to support a person centric, trauma and gender informed approach; → Incorporate sexual harassment training into induction and onboarding. → Change activities to promote how to report a complaint. <p>KHA Guidance</p> <p>The Assurers request that QFD provide a roadmap for the training of different cohorts in preventing and responding to sexual harassment in the workplace for the next report.</p> |

RECOMMENDATION

21 / Refreshing processes for categorising complaints

Develop and implement a revised and refreshed process for the categorisation of complaints using the CAPE model, with greater input from the SAWS roles and operational roles (where applicable).

STATUS



ASSURANCE FRAMEWORK

Flexible and Proactive

ASSESSMENT

Progress – Implemented to a significant extent

The Assurers assess the implementation of R21 as ‘Implemented to a significant extent.’ In the previous reporting period, we assessed this recommendation as ‘Implemented to a moderate extent.’

In the reporting period, QFD has undertaken the following steps:

- The Relations and Standards Branch (RSB) has completed improvements to the assessment and triaging of complaints. In summary, the Workforce Liaising Unit’s role has been clarified as responsible for receiving, triaging and preparing complaints for assessment. These matters are then presented to the Complaints Assessment Team, whose membership has been broadened.
- The new processes and responsibilities have been documented in the form of a Work Instruction – Complaint Assessment Procedure and Terms of Reference – Complaint Assessment Panel. These have been reviewed by the Assurers.
- All RSB staff involved in categorising complaints have been trained internally in the new processes and provided with work instructions for reference.
- QFD has resolved all assessment backlogs.

QFD Next Steps

- Updating further assessment processes.
- Support for an ongoing AO7 Principal Advisor role in the Workforce Unit.


KHA Guidance

The QFD Implementation Plan identifies an AO7 Principal Advisor role for the Workforce Unit, which at this stage has only been placed temporarily. The ELT has approved this role as an ongoing resource. However, this has yet to be realised.


The Assurers encourage QFD to ensure the Workforce Unit has the appropriate long-term resources necessary for the efficient assessment and triaging of complaints, which is a critical part of an effective complaints management system.

The Assurers note that the Work Instruction – Complaint Assessment Procedure flags the early resolution of complaints, stating: “Early resolution is not generally suitable for complaints involving serious or complex matters. Early resolution generally involves informal early intervention activities addressing minor issues.”

The Assurers would appreciate more information in the next audit on the criteria and decision-making processes for resolving matters early and at the local level.

| | |
|---|---|
| <p>RECOMMENDATION</p> <p>22 / Updating terminology to describe the workforce</p> <p>Update the QFD Management Action Guide so it reflects current terminology and practice and ensure QFD policies and procedures use consistent terminology to describe its workforce.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Fair and Consistent</p> | <p>ASSESSMENT</p> <p>Progress – Implemented to a significant extent</p> <p>The Assurers assess the implementation of R22 as ‘Implemented to a significant extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’</p> <p>In relation to updating terminology, we have been told that the correct terminology to describe the QFD workforce is staff, volunteer members and contractors.</p> <p>Steps undertaken to progress this recommendation are as follows.</p> <p>→ All complaints documents have been updated to reflect the correct terminology to describe the workforce. This includes whether the relevant policy or procedure applies to volunteers. These documents are undergoing consultation prior to approval and finalisation.</p> |
| <p>RECOMMENDATION</p> <p>23 / ‘Stop the clock’ for matters outside of QFD control</p> <p>Have a “stop the clock” concept built into the QFD policy and procedures for both complaints and disciplinary matters so that circumstances that occur outside of QFD management control are recognised and factored into compliance within statutory timeframes.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p>n/a n/a</p> | <p>ASSESSMENT</p> <p>This recommendation was not accepted by QFD due to legislative constraints.</p> |
| <p>RECOMMENDATION</p> <p>24 / Follow up matters raised during exit interviews</p> <p>Report all exit interview data and statements to the Relations and Standards Branch (where applicable) for analysis and consideration as to whether follow</p> | <p>ASSESSMENT</p> <p>Progress - Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R24 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’</p> <p>Since the last reporting period, a policy has been drafted to address the handling and escalation of conduct issues identified through exit interviews between the Workforce Culture, Engagement and Development Branch and Relations and Standards Branch.</p> |

| | |
|--|---|
| <p>up action is required with a particular focus on the reporting of sexual harassment and/or discrimination matters.</p> <p>STATUS ● ASSURANCE FRAMEWORK Measured and Preventative</p> | <p>QFD's Next Steps</p> <p>In Assurance Report 1, we noted the importance of capturing data from volunteers who leave the organization particularly where the exit has been triggered by poor conduct. We are pleased to see that RFSQ is developing a fit for purpose survey for both employees and volunteers.</p> <p>KHA Guidance</p> <p>The Assurers have reviewed the draft policy entitled Work Instruction – Exit Surveys & Interviews. For new alleged conduct matters where there is no preexisting case history, the Assurers recommend the policy provide further clarity on how the Relations and Standards Branch should determine if a complaint needs to be opened.</p> |
| <p>RECOMMENDATION</p> <p>25 / Reviewing SAW role descriptions and skill sets</p> <p>Review the SAWS role description, including undertaking a job analysis with evaluation and review of the role classification level – ensuring it is pitched at the right level to attract and retain the right people with the right skills.</p> <p>STATUS ● ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress - Implemented to a significant extent</p> <p>The Assurers assess the implementation of R25 as 'Implemented to a significant extent.' In the previous reporting period, we assessed this recommendation as 'Implemented to a moderate extent.'</p> <p>In the last period, QFD reported that following a restructure, Senior Advisor and Principal Adviser Workplace Standards roles (SAWs and PAWs) now report centrally to the Relations and Standards Branch, instead of regionally. This is intended to ensure consistent service delivery, balanced workload and improved collaboration for the SAWs and PAWs.</p> <p>In this reporting period, QFD is to be commended for undertaking a comprehensive review of the SAWs function as part of the Corporate Hub review. QFD's report evaluated the SAWS function within the Corporate Hubs, focusing on workload distribution, role clarity, operational efficiency, and stakeholder engagement. The findings aim to ensure workloads are balanced, service delivery is improved, and the SAWS functions align with QFD goals. The review relied on data collected from a work insight survey, work measurement study, stakeholder feedback, and a thematic analysis of inputs. To further support the SAWS functions and consistency in service delivery across the state, QFD has appointed a temporary second PAWS role to support improved oversight and leadership to the SAWS network. This additional leadership is intended to enable the attraction and retention of suitably qualified staff and ensure the key accountabilities of the SAWS AO 6 role are fulfilled.</p> <p>KHA Guidance</p> <p>The Assurers understand that the second PAWs role has been approved for permanent but is currently a temporary placement for 12 months. The Assurers encourage the ELT to ensure that the second PAWs role is embedded as a permanent role.</p> |

| | |
|---|---|
| | <p>To finalise this recommendation, the Assurers would like to see the role description for the SAWs position, which we understand is at AO 6 level.</p> |
| <p>RECOMMENDATION</p> <p>26 / Reviewing Relations and Standards Branch resourcing Undertake a resourcing review of the Relations and Standards Branch based on workload and not just a Full Time Equivalent (FTE) allocation. Specific acknowledgement should be given to the management of a large number of growing issues and complexity due to a large volunteer base (approximately 27,000) across a geographically dispersed state.</p> <p>STATUS ASSURANCE FRAMEWORK  Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress - Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R26 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘Implemented to a moderate extent.’</p> <p>There has been no significant change in this recommendation since the last review period, except that temporary resourcing has been approved for a 12-month period. In summary, QFD has taken the following key steps to implement R 26:</p> <ul style="list-style-type: none"> → QFD has supported the implementation of a temporary addition of 5 roles across both RSB and I&ER (Discipline team). These roles include a temporary AO7 Principal Investigator, AO7 Principal Advisor (PID Coordinator), AO7 Principal Project Officer (Prevention/projects), AO7 Principal Advisor Workforce Support (PAWS Regional) and AO6 Senior Advisor Discipline. → An investment brief was progressed by RSB to ELT for approval to establish the temporary resources permanently. This request was approved, however it has not been realised to date. The temporary resources are in place for 12 months. <p>KHA Guidance</p> <p>The Assurers reiterate their previous commentary, that the success of this program of work and the ongoing transformation of the complaints management system require adequate resourcing, including ensuring that work is driven in a timely way. We strongly recommend that QFD remain committed to and implement the investment brief.</p> |
| <p>RECOMMENDATION</p> <p>27 / Establishing two yearly refreshers for conduct related training Establish two yearly (Biennial) refreshers for all QFD employee and volunteers on Understanding and Prevention of Sexual Harassment, Workplace Bullying and Discrimination and Code of Conduct training.</p> | <p>ASSESSMENT</p> <p>Progress –Implemented to a moderate extent</p> <p>The Assurers assess the implementation of R27 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’</p> <p>In the reporting period, QFD has undertaken the following step:</p> <ul style="list-style-type: none"> → Finalised and commenced implementing a one-hour mandatory online awareness training program for all staff and volunteers in October 2025. <p>The training is expected to be completed by the entire workforce within 2 years. As at 9 December 2025, 50% of QFD paid employees had completed the training.</p> |

| | | |
|------------------------|---|---|
| <p>STATUS</p> <p>●</p> | <p>ASSURANCE FRAMEWORK</p> <p>Accountable and Transparent</p> | <p>The training covers: Code of Conduct, Workforce Behaviour, Work Health Safety, Cyber Security, Information Privacy, Conflict of Interest, and Human Rights.</p> <p>The Assurers acknowledge the significant work undertaken to roll out the mandatory training program and the strong completion rate. QFD is to be commended for this initiative.</p> <p>It is important to note that while the training covers the Code of Conduct, including expectations about behaviour aligning with QFD's values as well as human rights, the training does not specifically cover sexual harassment, discrimination or bullying. Accordingly, it only goes part way to addressing this recommendation.</p> <p>The QFD report states that training relating to workplace sexual harassment, bullying and discrimination is being scoped for inclusion in an onboarding and induction project, which appears to foreshadow providing new starters with a pack of information.</p> <p>Having reviewed the QFD report and material, there appears to be a gap in scheduled mandatory training and refreshers for the entire QFD workforce when it comes to sexual harassment, discrimination and bullying. We believe this is the intent behind this recommendation.</p> <p>KHA Guidance</p> <ul style="list-style-type: none"> → QFD consider including the prevention of sexual harassment, bullying and discrimination as part of its suite of mandatory training and include a program of refreshers. → As noted above in relation to R20, the Assurers request that QFD provide a roadmap for the training of different cohorts (leaders, employees, volunteers) in preventing and responding to sexual harassment in the workplace for the next report. |
|------------------------|---|---|

RECOMMENDATION

28 / Raising awareness and respect for Indigenous Cultures

Implement an on-line cultural capability and awareness and anti-racism short course for all employees and volunteers on First Nations issues to provide foundational knowledge and genuine awareness with respect to Indigenous Cultures.

STATUS



ASSURANCE FRAMEWORK

Safe and Supportive

ASSESSMENT

Progress – Implemented to a moderate extent

The Assurers assess the implementation of R28 as ‘Implemented to a moderate extent.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’

In the reporting period, QFD has taken the following key steps to implement R28:

- Identified an existing aXcelerate course that is available to the workforce, called ‘Starting the Journey’. This online course is offered to Queensland Government employees to develop cultural capability to provide better service outcomes for Aboriginal and Torres Strait Islanders.
- Introduced a new course into aXcelerate under the QFD Inclusion Curriculum that specifically addresses First Nations.

The Assurers note that the new First Nations course from SBS covers a range of foundational learning highly relevant to this recommendation. The course is designed to improve knowledge and understanding of Aboriginal and Torres Strait Islander cultures as they apply to the workplace. This includes recognising the importance of spirituality, family and kinship.

The course also covers understanding stereotypes, the impact of colonization, and trauma experienced by the Stolen Generations.

QFD has also established a First Nations Community of Inclusion as part of its Everyday Respect Council. For the next reporting period, the Assurers would like to speak to the Chair of that Community as well as the First Nations Strategy and Partnerships Branch in relation to the acquittal of this and other relevant recommendations.

KHA Guidance

QFD should ensure that the communication and roll out of these programs are part of its plan for change management, communication and consultation with the workforce.

QFD are encouraged to report on how the First Nations inclusion curriculum will be rolled out and embedded within the workforce, including for volunteers.

RECOMMENDATION

29 / Training frontline managers to manage workplace issues involving First Nations peoples

Frontline managers need to be trained in specific cultural awareness and capability in terms


ASSESSMENT

Progress – In planning and development

The Assurers assess the implementation of R29 as ‘In planning and development.’ In the previous reporting period, we assessed this recommendation as ‘Not yet commenced.’

For this recommendation, QFD repeats the initiatives provided for R28. However, in its training gap analysis, QFD states that there is no specific training for leaders in First Nations cultural capability.

| | |
|---|---|
| <p>of managing workplace issues involving First Nations peoples</p> <p>STATUS ● ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>In our view, the Inclusion Curriculum delivers to a broad audience and meets a foundational level of cultural awareness, which is relevant for R28. The intention behind R29 is to provide additional training for frontline managers, to support them to move from cultural awareness to a greater level of cultural competency given their leadership role.</p> <p>KHA Guidance</p> <p>QFD consider piloting targeted face-to-face training in First Nations cultural competency for a cohort of frontline managers.</p> |
| <p>RECOMMENDATION</p> <p>30 / Providing training and materials for case managers</p> <p>Provide Fact Finders with training on standards of proof, evidence gathering, note- taking and key legal concepts relevant to the role.</p> <p>STATUS ● ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |
| <p>RECOMMENDATION</p> <p>31 / Relacing the complainant management system</p> <p>Replace the Nexus software with a more fit-for-purpose system that supports end-to- end case management.</p> <p>STATUS ● ASSURANCE FRAMEWORK Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – In planning and development</p> <p>The Assurers assess the implementation of R31 as ‘In planning and development.’ In the previous reporting period, we assessed this recommendation as ‘In planning and development.’</p> <p>In Assurance Report 1, we commended QFD for the thought and rigour that went into its Service Now Platform Requirement Specification Document.</p> <p>In this reporting period, QFD has taken the following key steps to implement R 31:</p> <ul style="list-style-type: none"> → A CMS IT project has been initiated with engagement of a Project Manager this period and a Project Board being stood up. → The following activities have been undertaken: <ul style="list-style-type: none"> – Completion of the RFQ process to engage a ServiceNow Implementation and Delivery partner, with negotiations currently being finalised – Human Centred Design workshops conducted to inform new processes (stakeholder mapping, creation of internal and external personas, customer journey mapping) |

| | |
|---|---|
| | <p>– Assurance Health Check conducted and report issued.</p> <p>We were provided with a copy of the Assurance Health Check, which rated the delivery of the project as Amber. This means successful delivery of the project appears feasible, but significant issues already exist that require management action. The Assurers say these issues appear resolvable, if addressed promptly. A summary quote is provided below.</p> <p><i>“The Complaints Management System Project is on track to replace the outdated Nexus system, with strong alignment to government policy and strategic objectives. However, successful delivery depends on addressing key gaps in documentation, resource onboarding, risk management, and budget confirmation. Immediate action on these recommendations will help ensure the project achieves its intended outcomes within the required timeframe.”</i></p> <p>KHA Guidance</p> <p>KHA acknowledges the progress of R31 and encourages the ELT to address the recommendations of the Health Check promptly to ensure the project achieves its intended outcomes in a timely way.</p> |
| <p>RECOMMENDATION</p> <p>32 / Introducing a record retention framework</p> <p>Develop a records management framework to ensure compliance with the Public Records Act 2002 at a minimum, this policy will address retention, archiving and disposal of all complaints management records.</p> <p>STATUS ASSURANCE FRAMEWORK</p> <p> Capable and Efficient</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |
| <p>RECOMMENDATION</p> <p>33 / Dashboard reporting on complaints trends and insights</p> <p>Revise the reporting dashboards to meet Steering Committee or Senior Executive requirements for timely, accurate complaints information.</p> | <p>ASSESSMENT</p> <p>Progress – Not yet commenced</p> |

This should highlight trends as well as provide insights into discipline and stakeholder satisfaction.

STATUS



ASSURANCE FRAMEWORK

Measured and Preventative

RECOMMENDATION

34 / Analysing root causes of complaint trends and themes annually

Undertake a high-level root cause analysis of complaints each year to identify trends and themes over time and implement preventative strategies based on science, data and facts.

STATUS



ASSURANCE FRAMEWORK

Measured and Preventative

ASSESSMENT

Progress – Not yet commenced