Introduction
This factsheet provides information relevant to issues framing and explains how complaints officers can frame issues for the best possible outcome when dealing with a complaint. You will find examples of well-framed issues at the end of this factsheet.

What is issue framing?
Each complaint that we handle is made up of one or more issues. These are discrete areas of concern that collectively make up the complaint. When someone first contacts us, they don’t usually explain their complaint neatly in individual areas. They have a story to tell us and sometimes the story is muddled because the complainant is angry or upset.

Issues framing is the ability to turn a complainant’s story into a set of clear, concise, discrete areas of concern. Or, more simply, the questions to be answered or resolved through the complaint process. The framing of issues directly impacts the outcome of the resolution process, and is an essential skill in the role of a complaints officer. Having well-framed issues means we can clearly explain a complainant’s concern to a provider and facilitate a meaningful resolution.

Remember, if we don’t get the issues right:
- people might think we haven’t listened and really heard what the problem is
- we end up wasting time looking at the wrong things
- the provider might be confused about what is wrong
- this can reflect poorly on us if a complainant seeks a reconsideration and we haven’t captured the issue/s correctly.

How do I start the process of framing issues?
An officer’s diligence during intake is vital in effectively framing an issue. Officers need to build a workable rapport with complainants, using skills like active listening, showing empathy and questioning. Remember that the first contact may be stressful and emotionally charged for some complainants and won’t always be the best time to confirm issues. If a complainant is emotionally distressed, allow them time to vent and calm down before attempting to move to gathering the information that will allow you to clarify their issues.
Often it is helpful at this opening stage to explain to the complainant what the Commission can and can’t do when managing complaints. This will help manage people’s expectations throughout the process and help them decide if making a complaint is the best course of action.

What should I consider when gathering information?

- Accept that the first contact with the complainant may be an ‘information dump’ fuelled by emotion, so it is not necessarily the best time to confirm the issues.
- Consider whether the concern the complainant is describing is in-scope. To be in-scope means that the concern has to relate to a provider’s responsibilities either under the Aged Care Act 1997 (Aged Care Act) or as specified in their funding agreement.
- Seek information from the complainant as to how the concern is affecting the care and services provided to the care recipient. This will assist you in determining if the issue is in-scope. Considering the breadth of provider responsibilities, it is fine to explain to a complainant that you will need to confirm whether a specific matter is in-scope. Speak with your manager, and seek support from the Guidance Portal where necessary.
- Help the complainant refine their concerns by asking for specific details (such as times, dates and people involved). Asking about the effect or consequence of the concern can also help in this process.
- Use questioning techniques to unpack the information the complainant provides to ensure you understand whether they are describing multiple issues connected to a single incident, or if there are multiple incidents about the same thing which could be one issue. This will affect whether you then frame one single issue or multiple issues.
- You will often find after explaining to a complainant what we can and can’t do for them and giving the complainant some time to think, their issues may shift and change from the first contact. By delaying the confirmation of issues until after the first contact you may find the complainant describes their concerns more clearly, and the issues are captured more accurately.
- Ensure that you talk with a complainant about the outcomes that they are seeking. This will help inform any reality testing you need to do to ensure that a complainant understands what is achievable through our process (for example that we can’t have a service closed or staff member sacked).

How do I write well framed issues?

- Be specific - ideally use one sentence that says what happened, when it happened, who did it happen to, who was involved and what was the impact.
- Don’t name staff members in complaint issues as this may have privacy implications. It is also worth noting that investigating a named staff member is outside of our scope and raises questions relating to procedural fairness and natural justice. This does not mean that you cannot include a staff member’s
name within the body of evidence that you receive from the complainant and relay to the provider.

- Use the complainant's words or language style to capture the essence of the concern as they see it. However you do need to make sure the issue is written clearly, ideally in plain language, and relates to the care and services the care recipient is receiving.

- Ensure the issue has a clear link to the provider's responsibility. This doesn't mean using legalistic language or referencing legislation. It means that the reason why an issue is in-scope has to be clear from how it is written.

How do I make sure I am using the complainant's words?

We sometimes talk about 'using the complainant's words' when framing issues. This doesn't mean that we need to record what the complainant has said verbatim. It means that the complaint issues need to reflect what the complainant is concerned about and be described in a way that they can understand – they have to capture the essence of their concerns. As an officer you will influence this process – from explaining what is in and out of scope, to helping the complainant refine their actual concern. You just need to be careful that you don't influence the complainant to make a completely different complaint.

Take note that the complainant may also use legal language that is outside of his or her understanding, and the actual issue may not be what they expect. Take time to ask a complainant what they mean by a particular phrase or legal reference so that you can ensure you have a shared understanding.

How do I confirm the issues I have drafted?

Although not essential unless you are a new officer, it is good practice to seek peer-review on your work. A second pair of eyes can be valuable, so when in doubt, ask a supervisor or colleague to read the issues you have drafted.

The next step is to verbally confirm the issues with the complainant. Make sure that the complainant is happy with the wording and agrees it reflects their concerns. Once issues have been confirmed orally, depending on the stage of the complaint and how it is being managed, officers may email or write to the complainant to acknowledge the complaint and to confirm the issues. This provides the complainant with another opportunity to indicate whether or not their issue has been correctly identified and appropriately framed.

How do I enter issues correctly in NCCIMS?

Refer to the "Guide to NCCIMS Issue Keywords" on the NCCIMS resource page of SharePoint to assist you in recording issues correctly.

Summary
We aim to resolve complaints as quickly as possible to the satisfaction of the complainant. This may occur in the intake/assessment team or through a more detailed resolution process completed by the resolution team. Accurately interpreting a complainant’s information has a major bearing on achieving positive outcomes, either in early resolution or in the detailed resolution phase.

After accurately framing the complainant’s issues you might find ‘Chapter 4 - Intake and Early Resolution Phase’ and ‘Chapter 5 – Risk Assessment’ of the Guidelines useful to direct you in the next steps of handling the complaint.

If you require further information on the complaints process or how to effectively frame issues, email the Guidance Portal or talk to your complaints manager.

**Additional resources**

[Click here](#) to view our ‘top tips for framing complainant issues’ animation.
Attachment

Example Issues
Below you will find example issues which have initially been poorly framed, and then converted into well-framed issues.

Example One

Draft issue
Issue 1: Concern that Mr Smith fell twice, his falls were not handled appropriately by the care provider and his representative was not contacted.

Refining the issues in resolution phase
As you can see this issue lacks specific information to inform when Mr Smith fell, what is meant by “handled appropriately”, and who is Mr Smith’s representative? By asking further questions of the complainant and seeking further information specific to their concerns, this single issue may actually become two separate issues.

If presented with such an example, as a complaints officer you need to explore and actively seek out further information to help develop the issue further. This may include asking further questions such as:

- When did the falls occur? (dates/times)
- Are you his nominated representative?
- How did you become aware of the falls?
- Have you observed anything to suggest the service provider has put strategies in place to minimise the risk of Mr Smith falling?

Remember try to ask one question at a time and allow the complainant to tell their story. The issues should capture the concern of the complainant and how it relates to the care recipient and the provider’s legislative responsibilities.

Final issues
Issue 1: Following Mr Smith’s fall on 10 December 2016 the service failed to implement strategies to minimise the reoccurrence, resulting in a second fall on 20 December 2016.

Issue 2: Mr Smith’s daughter and nominated representative Ms Jenny Smith was not contacted following his falls on 10 and 20 December 2016, despite being told by the service she would be contacted following events of this type.

Example Two
Draft issue
Issue 1: Concern that equipment was not removed from use after it was reported that there was noticeable egregious issues. Concern that Ms Jones wheel chair was not used appropriately.

Refining the issues in resolution phase
The above issue lacks specific information that will ultimately assist us in addressing the complainant’s concerns through a resolution process. What equipment was not removed, what were the issues, how was Ms Jones’ wheel chair being used, and why wasn’t it appropriate?

As in the previous example it would be advantageous to seek further information from the complainant and to separate each concern into their own specific issues. This will mean that the complaint is easier to manage and resolve and clear feedback provided to the complainant.

Well framed issues

Issue 1: Concern that a recliner chair was not removed from use immediately after Ms Jones said it had fallen on top of her on 15 August 2015.

Issue 2: Concern that staff are transporting Ms Jones unsafely in her wheel chair as she needs footplates and her wheelchair does not have any.

As you can see in both of these example issues they are now more clearly defined and will be easier for us to address. Importantly though, they reflect the complainant’s actual concerns.