



# The 5 Pillars of Transparent Complaint Resolution

The Office of the Australian Information Commissioner has made explicit that its enforcement-focused approach prioritises organisations that handle complaints with transparency, accountability and genuine commitment to resolution.

For boards and senior leaders, this is a strategic imperative, because handling a privacy complaint poorly is more than a customer service failure. It is evidence of systemic risk. It attracts regulatory scrutiny, reputational damage and potential civil penalties.

To reduce these risks, organisations can establish five key pillars to uphold best practices in complaint resolution.

## Pillar 1: Clarity

Explain what happened, why it happened and what you are doing to prevent recurrence. Avoid jargon and defensiveness.

- Acknowledge the complaint within 24 hours
- Provide a clear explanation of what happened (in plain language)
- Explain why it happened (root cause analysis)
- Outline the steps you are taking to resolve it
- Provide a timeline for resolution
- Identify a single point of contact for the complainant
- Avoid jargon, legal language and defensive tone
- Provide written confirmation of all communications

### Common pitfalls to avoid:

- X** Delayed acknowledgment (more than 24 hours)
- X** Vague explanations ("a system error occurred")
- X** Defensive language ("we followed our procedures")
- X** Shifting blame to customers or circumstances
- X** Using legal jargon or complex terminology

## Pillar 2: Timeliness

Respond quickly. Delays signal that the complaint is not important. The OAIC expects resolution within reasonable timeframes.

- Establish clear response timeframes (e.g., 24 hours for acknowledgment, 7 days for initial response)
- Track complaint receipt and response dates
- Escalate complaints that exceed timeframes
- Provide regular updates (at least weekly)
- Explain any delays and provide revised timelines
- Prioritise complaints based on severity and impact
- Allocate sufficient resources to meet timeframes
- Monitor compliance with timeframes

### Common pitfalls to avoid:

- Slow initial response (more than 48 hours)
- Long gaps between communications
- No explanation for delays
- Insufficient resources to handle complaints
- No escalation process for overdue complaints

## Pillar 3: Accountability

Take responsibility for failures. Do not blame systems, staff or circumstances. Own the problem and the solution.

- Acknowledge the breach or failure without qualification
- Take responsibility (avoid "if" statements or conditions)
- Explain what should have been done differently

Outline the process improvements being implemented

- Acknowledge the impact
- Avoid blame
- Commit to preventing recurrence
- Document the complaint and resolution for learning

### Common Pitfalls to Avoid:

- Conditional acknowledgment ("if we did breach your privacy...")
- Blaming staff ("a staff member made an error")
- Blaming systems ("our system failed")
- Defensive tone ("we followed our procedures")
- No commitment to prevention

## Pillar 4: Genuine remedy

Offer meaningful resolution.

- Correct inaccurate or unauthorised data
- Delete data that should not have been collected
- Implement process changes to prevent recurrence
- Offer additional support (credit monitoring, identity protection, etc.)
- Provide written confirmation of all remedial actions
- Follow up to ensure remedy was effective
- Offer further assistance if needed

### Common pitfalls to avoid:

- Token gestures
- No process changes
- Compensation that does not reflect the harm
- No follow-up to verify remedy
- Offering remedy only if requested

## Pillar 5: Learning

Use complaints as signals of systemic issues. Track complaint patterns, investigate root causes and implement preventive measures.

- Document all complaints in a central system
- Categorise complaints by type, cause and severity
- Analyse complaint patterns (are there systemic issues?)
- Investigate root causes (why did this happen?)
- Implement preventive measures (how do we prevent recurrence?)
- Share learnings across the organisation
- Report complaint trends to the board
- Measure effectiveness of preventive measures

### Common Pitfalls to Avoid:

- X** Treating complaints as isolated incidents
- X** No analysis of complaint patterns
- X** No investigation of root causes
- X** No preventive measures
- X** No board reporting on complaint trends
- X** No measurement of effectiveness

### An Example of Effective Complaint Handling:

- 1. Receipt**
- 2. Acknowledgment** (within 24 hours)
- 3. Investigation** (7-14 days)
- 4. Assessment** (is this a valid complaint?)
- 5. Resolution** (offer remedy)
- 6. Follow-Up** (verify remedy was effective)
- 7. Learning** (analyse pattern, implement prevention)

### Common Complaint Scenarios

<p><b>Data breach</b></p> <ul style="list-style-type: none"> <li>– Acknowledge the breach</li> <li>– Explain what data was affected</li> <li>– Outline steps to secure the data</li> <li>– Offer appropriate remedy</li> <li>– Provide regular updates</li> <li>– Implement security improvements</li> </ul>	<p><b>Inaccurate data</b></p> <ul style="list-style-type: none"> <li>– Acknowledge the inaccuracy</li> <li>– Correct the data</li> <li>– Notify third parties if data was shared</li> <li>– Offer to correct records with other organisations</li> <li>– Implement data quality improvements</li> <li>– Provide written confirmation</li> </ul>
<p><b>Unauthorised use of data</b></p> <ul style="list-style-type: none"> <li>– Acknowledge the unauthorised use</li> <li>– Explain how it happened</li> <li>– Delete the data</li> <li>– Offer appropriate remedy</li> <li>– Implement access controls</li> <li>– Report to regulators if required</li> </ul>	<p><b>Lack of transparency</b></p> <ul style="list-style-type: none"> <li>– Acknowledge the lack of clarity</li> <li>– Provide clear explanation of data practices</li> <li>– Update privacy policy if needed</li> <li>– Offer remedy</li> <li>– Implement transparency improvements</li> <li>– Provide regular updates</li> </ul>

<b>Next Steps</b>	<input type="checkbox"/> Review current complaint handling processes	<input type="checkbox"/> Implement KPI tracking
	<input type="checkbox"/> Identify gaps against the five pillars	<input type="checkbox"/> Schedule quarterly process reviews
	<input type="checkbox"/> Develop an action plan to address gaps	<input type="checkbox"/> Report to the board monthly
	<input type="checkbox"/> Train staff on best-practice complaint handling	

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