

# Complaints Handling Policy

## DOCUMENT CONTROL INFORMATION

<b>Document Name:</b>	Complaints Handling Policy		
<b>ID:</b>	O.PO.14-2		
<b>Related Documents:</b> (This Policy should be read in conjunction with the following internal documents)	<ul style="list-style-type: none"> <li>• Confidentiality Policy</li> <li>• Staff Code of Conduct Policy</li> <li>• Grievance Policy</li> <li>• Respectful Workplace Behaviours Policy</li> <li>• Cybersecurity Policy</li> <li>• Social Media Policy</li> <li>• Whistle-blower Policy</li> <li>• Psychosocial Health at Work</li> <li>• Privacy Policy</li> </ul>		
<b>Category:</b>	Operations		
<b>Board Adoption Date:</b>	29 August 2019		
<b>Version:</b>	2		
<b>Policy Owner:</b>	CEO		
<b>Author:</b>	Chief Operating Officer		
<b>Scope:</b>	Staff (employees and contractors)	Officers (including Board Directors and Committee members)	When member-based organisations are addressing complaints by their members, care needs to be taken that the complaint handling policy and procedure fits with other requirements that might be in the constitution or legislation like incorporated associations
<b>Review:</b>	Biennial, as and when required		
<b>Available to Public</b>	Yes		
<b>Internal</b>	Staff	Program Leaders	Board

### 1. Context

The CRC HPS will provide a safe and effective service to those who wish to make a complaint to or about the CRC HPS, whether regarding mismanagement of people’s information and data, use of funding and cash contributions, costs of activities or activity methods, the provision of services or the quality of the service.

Many complaints happen because of alleged services failures, relevant information is not readily available, is difficult to understand, incomplete or misleading, does not appropriately address

common concerns or frequently asked questions, is not provided or made available within a reasonable period of time.

Complaints and compliments are best viewed as a positive interaction with the people, participants and communities which the CRC HPS serve.

## 2. Purpose

This policy is intended to ensure that CRC HPS handle complaints fairly, efficiently and effectively.

This policy provides guidance to CRC HPS staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

## 3. Scope

This Policy is applicable to the following person(s):

- CRC HPS staff (employees and contractors)
- CRC HPS officers (including Board Directors and Committee members)

receiving or managing complaints from staff, officers, the public and clients made to or about us, regarding our products services and staff, or our complaint handling process.

When member-based organisations are addressing complaints by their members, care needs to be taken that the complaint handling policy and procedure fits with other requirements that might be in the constitution or legislation like incorporated associations.

## 4. Responsibility for Policy

The CRC HPS's Board, through its Audit and Risk Management Committee (ARMC), is responsible for developing, adopting and reviewing this Policy.

The CRC HPS's CEO is responsible for the implementation of this Policy, for monitoring changes in related legislation, and for advising on the need to review or revise this Policy as and when the need arises.

## 5. Policy

### 5.1 Introduction - Organisational commitment

The CRC HPS expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
CEO	Promote a culture that values complaints and their effective resolution	Report to the board on our complaint handling. Provide adequate support and direction to key staff responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Encourage staff to make recommendations for system improvements. Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.

Who	Commitment	How
Staff whose duties include complaint handling (may include CEO or Chair)	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people to make a complaint, if needed.</p> <p>Comply with our policy and associated procedures.</p> <p>Provide regular feedback to management and/or the governing body on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve our complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
All staff	Understand and comply with our complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of our complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access our complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p>

## 5.2 Reference to CRC HPS Agreements

Publications produced from CRC HPS activities is governed by the following Agreements in place:

- Commonwealth Agreement: Department of Industry, Innovation and Science, CRC Funding Agreement #20160024 - clause 23.3 Obligations (b) (iv) and (ix).

## 5.3 Definitions

### Complaint

An expression of dissatisfaction made to or about us, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. (AS/NZ 10002:2014)

As well as complaints being made directly to our organisation, some complaints (or at least negative comments) may be made on social media.

### Complaint handling/management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

### Dispute

An unresolved complaint escalated either within or outside of our organisation.

### Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.

## Grievance

A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

### 5.4 Guiding principles

*An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.*



#### 5.4.1 Facilitate complaints

##### *People focus*

The CRC HPS is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

##### *No detriment to people making complaints*

The CRC HPS will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

##### *Anonymous complaints*

The CRC HPS accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

##### *Accessibility*

The CRC HPS will ensure that information about how and where complaints may be made to or about the CRC HPS is available upon request. The CRC HPS will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, the CRC HPS will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

##### *No charge*

Complaining to the CRC HPS is free.

## **5.4.2 Respond to complaints**

### *Early resolution*

Where possible, complaints will be resolved at first contact with the CRC HPS.

When appropriate the CRC HPS may offer an explanation or apology to the person making the complaint.

### *Responsiveness*

The CRC HPS will promptly acknowledge receipt of complaints.

The CRC HPS will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security, the response will be immediate and will be escalated appropriately.

The CRC HPS are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

The CRC HPS will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

The CRC HPS will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### *Objectivity and fairness*

The CRC HPS will address each complaint with integrity and in an equitable, objective and unbiased manner.

The CRC HPS will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about. If required, the complaint management will be outsourced to an external party to resolve.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

### *Responding flexibly*

The CRC HPS staff are empowered to resolve complaints promptly and with as little formality as possible. The CRC HPS will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

The CRC HPS will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

### *Confidentiality*

The CRC HPS will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by the CRC HPS as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

### **5.4.3 Manage the parties to a complaint**

#### *Complaints involving multiple agencies*

Where a complaint involves multiple organisations, the CRC HPS will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within the CRC HPS, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where the CRC HPS services are contracted out, the CRC HPS expect contracted service providers to have an accessible and comprehensive complaint management system. The CRC HPS take complaints not only about the actions of our staff but also the actions of our service providers.

#### *Empowerment of staff*

All staff managing complaints are empowered to implement the CRC HPS complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of the CRC HPS complaint management system.

#### *Managing unreasonable conduct by people making complaints*

The CRC HPS is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

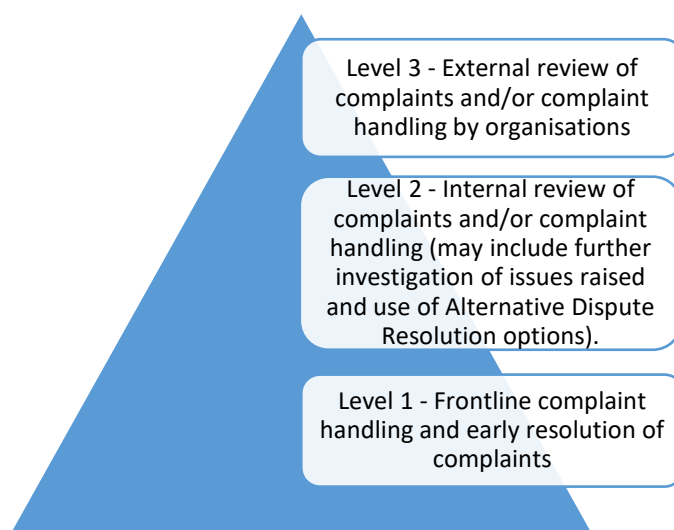
- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of CRC HPS staff, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with the CRC HPS, their conduct can significantly affect the progress and efficiency of our work. As a result, the CRC HPS will take proactive and decisive action to manage any conduct that negatively and unreasonably affects the CRC HPS and will support our staff to do the same in accordance with this policy.

#### *Alternative avenues for dealing with complaints*

The CRC HPS will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

## The three levels of complaint handling



### Level 1

The CRC HPS aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

### Level 2

Where this is not possible, the CRC HPS may decide to escalate the complaint to a more senior officer within our organisation. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

### Level 3

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of the CRC HPS decision.

#### 5.4.4 Accountability and learning

##### *Monitoring of the complaint management system*

The CRC HPS will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system, and
- monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

#### 5.4.5 Continuous improvement

The CRC HPS are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, the CRC HPS will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling

- recognise and reward exemplary complaint handling by staff
- regularly review the complaint management system and complaint data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

## 6. Policy Breaches

All Policy breaches should be reported to a CRC HPS supervisory person who is independent of the breach.

## 7. Policy Review

The Policy is to be periodically reviewed as and when required, but at least biennially by the CRC HPS Management Committee (MC) and the Audit & Risk Management Committee (ARMC), ensuring that it remains consistent with the responsibilities and objectives of the CRC HPS.

## 8. Publication of the Policy

Upon request, this Policy is to be made available on the CRC HPS stakeholders.

## 9. Policy Owner

The Policy owner is the CEO. Questions regarding this Policy should be directed to the Policy owner.

## 10. Variances

This document consolidates and replaces O.PO.O14-1 Complaints Handling Policy.

## 11. Related Legislation and Documents

- Competition and Consumer Act 2010 (CCA)
- Anti-Discrimination and Human Rights Legislation Amendment (Respect at Work) Act 2022 (Cth) that makes important amendments to the Sex Discrimination Act 1984 (Cth) and Australian Human Rights Commission Act 1986 (Cth).
- Sex Discrimination and Fair Work (Respect at Work) Amendment Act 2021 (Cth)
- Ombudsman Act 1976
- Ombudsman Regulations 2017
- Freedom of Information Act 1982
- Australian Federal Police Act 1979
- Telecommunications (Interception and Access) Act 1979
- Public Interest Disclosure Act 2013
- Australian Standard 10002:2022 Guidelines for complaint management in organizations (ISO 10002:2018, NEQ)
- Cooperative Research Centres – Program Guidelines Complaint Handling Mechanism

## 12. Appendices

None.

## 13. Approvals and Revision Details

Approval and Review	Details
Approval Authority	CRC HPS Board of Directors (BoD)
Advisory Committee to Approval Authority	Audit and Risk management Committee (ARMC)
Administrator	Chief Executive Officer



Approval and Review	Details
Original Approval Authority and Date	CRC HPS BoD 29 August 2019
Next Review Date	30 August 2026
Notes	This document consolidates and replaces O.PO.014-1 Complaints Handling Policy.

**Approval and Amendment History Details**

Revision Date	Version No.	Reason	Amendment Authority	Review Date
Not Applicable	1	Original issue approved by Board	CRC HPS Board	29 August 2019
pending	2	Review as scheduled biennially. Includes feedback from HumanKapital. This document consolidates and replaces O.PO.014-1 Complaints Handling Policy.	ARMC	15 August 2024