

## POLICY: COMPLAINTS MANAGEMENT

### PREAMBLE

The St Vincent de Paul Society National Council of Australia is united in its spirituality and management through the International Confederation of the St Vincent de Paul Society (*The Rule*, Part II, Art. 1.1). National Council is instituted by the International Council General (Part III, Art. 15) and follows the international and Australian statutes outlined in *The Rule*.

The St Vincent de Paul Society in Australia ('the Society in Australia') is governed by *The Rule* which embraces the principle of subsidiarity such that decisions are made as close as possible to the level where activities are performed ensuring local circumstances are taken into consideration (Part I, At 3.9).

The Society in Australia consists of the National Council and six State Councils and two Territory Councils that together assist the Society's members carry out good works.

Under *The Rule*, the National Council is the Society's superior council in Australia (Part II, Art. 1.6). National Council authorises the legal entities that operate in Australia in the name of the St Vincent de Paul Society. Each of the Society's nine councils in Australia is registered as a charity with the Australian Charities and Not-for-profit Commission (ACNC).

Each of the nine councils has established a civil incorporated entity as the vehicle to deliver charitable works within their jurisdiction. National Council has established a legal entity to assist it to implement the mission of National Council in the civil environment. This entity is St Vincent de Paul Society National Council of Australia Inc. (the Association) which is registered to operate in every state in Australia. In this document the Association is referred to as 'National Council'.

National Council and some of the state and territory councils have established and control separate subsidiary legal entities to assist in the delivery of the Society's good works. Each subsidiary entity is registered with the ACNC.

This policy integrates *The Rule* with the Constitution of St Vincent de Paul Society National Council of Australia Inc.

### PURPOSE

The purpose of National Council's Complaints Management Policy is to provide guidance to directors, officers, employees and volunteers regarding receiving and managing complaints about us and aspects of our work and to outline National Council's complaint handling process.

National Council provides a complaints and appeals management procedure that:

- allows any person to make a complaint or provide feedback;
- facilitates complaints by cultivating a supportive environment in which they can be made;
- is simple, accessible and easy to use;
- is effectively communicated and promoted within and external to the Society;
- is proportionate to the size of the Society and the services we provide;
- ensures complaints or appeals are fairly assessed and responded to promptly;
- is procedurally fair and follows principles of natural justice;
- complies with legislative requirements; and
- takes a zero-tolerance approach to discrimination and promotes respect for diversity and cultural support needs.

## DEFINITIONS

Within this policy and all related governance documents, the following definitions apply:

**Association** means St Vincent de Paul Society National Council of Australia Inc. which is the incorporated association under the *Incorporated Associations Act 1991* (ACT). The Association is the civil embodiment of National Council.

**Complaint** means 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. Complaints include any allegation, suspicion, concern or report of a breach of National Council's Code of Conduct.

**Complaint handling/management system** means all policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

**Feedback** means 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.

**Policy** means a statement of instruction that sets out how we should fulfil our vision, mission and goals.

**Procedure** means a statement or instruction that sets out how our policies will be implemented and by whom.

## PRINCIPLES UNDERPINNING THIS COMPLAINTS MANAGEMENT POLICY

### 1. PEOPLE FOCUS

National Council 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;
- provided with appropriate support for making a complaint;
- provided with reasons for our decision/s and any options for redress or review, including external review options; and
- supported with appropriate pastoral care when sought.

### 2. NO DETRIMENT TO PEOPLE MAKING COMPLAINTS

National Council 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.

### 3. ANONYMOUS COMPLAINTS

National Council accepts 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.

### 4. ACCESSIBILITY

National Council ensures that information about how and where complaints may be made to us is easily accessible on our website.

National Council ensures 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, we will communicate with them through their representative if this is their wish.

## RESPONDING TO COMPLAINTS

### 5. EARLY RESOLUTION

National Council will promptly acknowledge receipt of complaints. Where possible, complaints will be resolved at first contact with us and we may offer an explanation or apology to the person making the complaint.

If a matter concerns an immediate risk to safety or security, the response will be immediate and will be escalated appropriately.

National Council is 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.

National Council 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).

National Council 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.

### 6. OBJECTIVITY AND FAIRNESS

National Council will address each complaint with integrity and in an equitable, objective and unbiased manner.

National Council ensures that the person assessing or investigating a complaint is different from the person who is responsible for making decisions about a complaint, and any employee whose conduct or service is being complained about.

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.

### 7. RESPONDING FLEXIBLY

National Council's Chief Executive Officer is empowered to resolve complaints promptly and with as little formality as possible. The Society will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

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

### 8. CONFIDENTIALITY

National Council 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 us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## MANAGING THE PARTIES TO A COMPLAINT

### 9. COMPLAINTS INVOLVING MULTIPLE AREAS

Where a complaint involves multiple areas within National Council or across the Society in Australia, responsibility for communicating with the person making the complaint and/or their representative will be coordinated so that there is a single point of contact with National Council.

Where services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. National Council takes complaints not only about the actions of our staff but also the actions of our service providers.

### 10. EMPOWERMENT OF STAFF

All employees managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Employees are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

### 11. MANAGING UNREASONABLE CONDUCT BY PEOPLE MAKING COMPLAINTS

National Council 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 our members, employees, volunteers and contracted persons; and
- our ability to allocate our resources fairly across all the complaints we receive.

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

## SAFEGUARDING

National Council commits to prioritising the safety and wellbeing of all children and adults at risk who encounter the Society in Australia.

### REPORTING REQUIREMENTS

Any complaint or report regarding suspected, perceived, potential or actual incidents of abuse, neglect or exploitation of children and adults at risk will be reported to the Association's Chief Executive Officer in line with the National Council Safeguarding of children and adults at risk policy.

Reporting will be made in accordance with the relevant jurisdictions' laws and regulations and mandatory reporting obligations in the jurisdiction where the child or adult at risk resides.

When reporting concerns and complaints of child abuse or serious offences against adults, all personnel will cooperate with law enforcement.

## ACCOUNTABILITY AND LEARNING

### 12. ANALYSIS AND EVALUATION OF COMPLAINTS

National Council will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the National Council. National Council will run regular reports on:

- the number of complaints received;

- the outcome of complaints, including matters resolved at the frontline;
- issues arising from complaints;
- systemic issues identified; and
- the number of requests received for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided by our Chief Executive Officer to National Council's Audit, Risk and Finance Committee for review, at least annually.

### **13. MONITORING OF THE COMPLAINT MANAGEMENT SYSTEM**

National Council will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints; and
- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

### **14. CONTINUOUS IMPROVEMENT**

National Council is committed to improving the way our organisation operates, including the effectiveness and efficiency of our complaint management system. To this end, we 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.

## **RELATED POLICIES AND PROCEDURE**

- POL\_56 National Council Code of Conduct
- POL\_05 National Council Privacy Policy
- POL\_54 National Council Records Management Policy
- POL\_09 National Council Safeguarding of Children and Adults at Risk Policy
- POL\_02 Whistleblower Protection Policy

## DOCUMENT INFORMATION

<b>TITLE</b>	Complaints Management
<b>DOCUMENT TYPE</b>	Policy
<b>DOCUMENT NUMBER</b>	POL_22_NC
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<b>CATEGORY</b>	Governance Administration
<b>TOPIC</b>	Complaints Management
<b>SUBTOPIC</b>	Incident Management
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<b>RESPONSIBLE OFFICER</b>	National Council Chief Executive Officer
<b>APPROVER</b>	National Council
<b>ENQUIRIES</b>	<a href="mailto:admin@svdp.org.au">admin@svdp.org.au</a>

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***Board Resolution – Circular Motion #12/2024 endorsed on 9 July 2024***