

COMPLAINTS POLICY AND PROCEDURE

Policy context	This policy and procedure provides the framework for clients and stakeholders to submit formal complaints
Standards or other external requirements	NACLC Accreditation 2 Planning, evaluation and quality management 17 Assessing client satisfaction and managing complaints
Legislation or other requirements	Australian Privacy Principles
Contractual obligations	Various funding contracts

POLICY

1. Purpose

This policy is intended to ensure that Circle Green handles complaints fairly, efficiently and effectively. This policy provides guidance to our workers (staff and volunteers) and people who wish to make a complaint about any practice or personnel.

2. Applicability

Circle Green Community Legal (Circle Green) is committed to ensuring that any person or organisation using Circle Green's services has the right to lodge a complaint and to have their concerns addressed in ways that ensure access and equity, fairness, accountability and transparency.

This policy applies to clients, stakeholders, contractors and Circle Green workers (paid staff and volunteers). It applies to the receipt or management of complaints made to or about Circle Green, regarding our services, staff, or our complaint handling process.

Circle Green 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 and leadership team	Promote a culture that values complaints and their effective resolution	<p>Report to the governing body 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.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.</p> <p><i>Ensure feedback is provided to complainant.</i></p>
Workers whose duties include complaint handling (may include CEO and Chair of the Board)	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Comply with the policy and associated procedures.</p> <p>Provide regular feedback to management and/or the Board on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p> <p>Ensure feedback is provided to complainant.</p>
All workers (staff and volunteers)	Understand and comply with the complaint handling policy and procedure	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of the complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access the complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p>

3. Definitions

Complaint - An expression of dissatisfaction made to or about Circle Green, our services, workers (staff and volunteers) or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

Complainant - A person who makes a formal complaint.

Complaint handling/management system - All policies, procedures, practices, staff, hardware and software used by Circle Green in the management of complaints.

Dispute - An unresolved complaint escalated either within or outside of the organisation.

Feedback - Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Circle Green, 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.

4. Principles

Circle Green will provide a complaints management procedure that:

- Is simple and easy to use
- *Respects the sensitivity and confidentiality of all complaints*
- Is available to all clients and stakeholders via the Circle Green website
- Ensures complaints are fairly assessed and responded to promptly
- Is procedurally fair and follows principles of natural justice
- Complies with legislative requirements.

People making complaints will be:

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

No detriment to people making complaints

All reasonable steps will be taken to ensure that complainants are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

Anonymous complaints will be accepted if there is a compelling reason to do so and a confidential investigation of the issues raised will be carried out where there is enough information provided. A response is not required to be provided to the complainant due to the anonymity of the complaint.

Accessibility

Information about how and where complaints may be made will be publicised on the Circle Green website. The complaint management system will be easily understood and accessible.

Analysis and evaluation of complaints

Complaints will be recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the Board.

We will run regular reports on:

- the number of complaints received
- the outcome of complaints
- issues arising from complaints
- systemic issues identified, and
- requests received for internal and/or external review of our complaint handling
- acknowledge provision of feedback to complainant.

Report analysis will be undertaken to monitor trends, measure the quality of our service delivery and make improvements. Both reports and their analysis will be provided to the CEO, leadership team and the Board, at least annually.

Monitoring of the complaint management system

We will 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.

5. Continuous Improvement

Feedback and complaints present an opportunity to support continuous improvement. This ongoing cycle enhances organisational practices and processes.

Analysis of the issues raised helps to identify systemic, policy or process issues and address these alongside the development of training material to support staff.

COMPLAINT PROCEDURE

Circle Green is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures and complaint handling.

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

Our commitment

If you make a complaint to Circle Green you can expect that we will:

- Manage the complaint with sensitivity and confidentiality
- Treat you with respect
- Carry out the complaint handling process in a fair and open way
- Provide reasons for decisions that are made
- *Provide prompt and clear feedback*
- Protect your privacy

Process

A person wishing to make a complaint may do so in writing to:

- The staff member they were dealing with at the time, unless you are making a complaint about this person
- The Manager
- The Chief Executive Officer

If the complaint is about:

- a service delivered by Circle Green, the complaint will normally be dealt with by the relevant manager
- a staff member, the complaint will normally be dealt with by the relevant manager
- a senior staff member, the complaint will normally be dealt with by the Chief Executive Officer
- the Chief Executive Officer, the complaint will normally be dealt with by the Chair of the Circle Green Board

Internal complaints (*defined as a Grievance*) will be dealt with in accordance with the Grievance Policy and Procedure.

Written complaints may be made:

- Online www.circlegreen.org.au/making-a-complaint/
- Via email to complaints@circlegreen.org.au
- By post to PO Box 3114 East Perth WA 6892.

The Manager or Director responsible for receiving this correspondence will action or direct it to the appropriate person.

Procedure for complaints management

The four key stages in the complaint management procedure are set out below.

The person managing the complaint will be responsible for:

1. Registering the details of the complainant and the complaint:
 - Recording the complaint in the Circle Green Complaints Register
 - Unless the complaint is anonymous, informing the complainant within 5 working days that their complaint has been received and providing them with information about the process and timeframe

2. Investigating the complaint:
 - Investigating the complaint within 10 working days of the complaint being received
 - Unless the complaint is anonymous, informing the complainant by letter or email, within 30 working days of the complaint being received, of what is being done to investigate and resolve it, and the expected time frame for resolution.

As far as possible, complaints or appeals will be investigated and resolved within 60 working days of being received. If this time frame cannot be met, the complainant will be informed of the reasons why and of the alternative timeframe for resolution.

3. Resolving the complaint:
 - Making a decision or referring to the appropriate people for a decision within 60 working days of the complaint being received
 - Unless the complaint is anonymous, informing the complainant by letter or email of the outcome and any actions taken, and any options for further action if required

4. Review
 - If the complainant is not happy with the outcome of a complaint, they may seek a further review of the matter by the CEO within 30 working days of receiving notification of the outcome.
 - They may also seek a further review of the matter by lodging a complaint with the:
 - Legal Practice Complaints Committee in relation to the provision of legal services
 - Migrant Agents Registration Authority in relation to the provision of migration services

Record maintenance

The complaints register will be kept by the Chief Executive Officer, Circle Green. The Complaints Register will record the following for each complaint:

- Details of the complainant and the nature of the complaint
- Date lodged
- Action taken
- Date of resolution and reason for decision
- Date complainant was notified of outcome
- Complainant response and any further action where applicable

The complaints register and files will be confidential with access restricted to the Chief Executive Officer, Director Business Operations, Director of Services and the Chair of Circle Green Board.

Approved by	Circle Green Board
Date	24 June 2024