

Complaints Handling Policy and Procedures

May 2017

This Policy and Procedures document details the management of complaints made to White Ribbon Australia.

This document is relevant to all White Ribbon stakeholders and members of the public.

1. Purpose

The purpose of this Policy is to:

- 1.1. promote clear, honest and open communication,
- 1.2. provide a timely and effective mechanism for lodging and responding to complaints,
- 1.3. define the complaints to be handled under this Policy,
- 1.4. ensure complaints are handled impartially, fairly, justly, confidentially and with the appropriate sensitivity,
- 1.5. define the responsibilities and rights of complainants and the individuals subject to complaints,
- 1.6. outline the complaints handling process.

2. Scope

This Policy applies to all White Ribbon staff, representatives, stakeholders and members of the public.

For the purposes of this document, 'parties to a complaint' can include: White Ribbon Australia; the Complaints Handling Officer; program participants; other complainants; the complainant and the subject of a complaint.

3. Definition of a Complaint

For the purposes of this document a complaint is an oral or written expression of concern or dissatisfaction with White Ribbon programs and activities and/or individuals associated with these programs and activities that addresses the questions on the White Ribbon Australia Complaint Form found on the White Ribbon website.

4. Responsibilities

- 4.1. White Ribbon Australia complaints handling staff are responsible for:

- 4.1.1. Behaving professionally when dealing with complainants.
 - 4.1.2. Complying with the Complaints Handling Policy and Procedures.
 - 4.1.3. Keeping informed about the work of White Ribbon Australia and developments in programs and services.
 - 4.1.4. Reporting to the CEO on complaints received and their resolution, including identifying and reporting complaint trends that indicate possible systemic issues.
- 4.2. The White Ribbon Australia CEO is responsible for:
- 4.2.1. Assisting in the consideration, investigation and resolution of a complaint as appropriate.
 - 4.2.2. Using complaint information in program reviews and service delivery.
 - 4.2.3. Reporting on complaint trends to the White Ribbon Australia Board of Directors.
 - 4.2.4. Notifying the Chair of the Board of Directors, where appropriate, of the outcome of any investigation and resolution of a complaint.
 - 4.2.5. Notifying the Chair of the Board of Directors of any systemic issues arising from the investigation and adjudication of complaints.
 - 4.2.6. Reviewing requests by complaint handling staff and their supervisors for a complainant's access to White Ribbon Australia to be modified or restricted (see section 12.4).
- 4.3. The Chair of the White Ribbon Australia Board of Directors is responsible for:
- 4.3.1. Providing leadership in demonstrating a commitment to the resolution of complaints made to White Ribbon Australia.
 - 4.3.2. Ensuring there is an effective, timely, impartial, and just system for dealing with complaints.
 - 4.3.3. Assisting in the consideration, investigation and resolution of a complaint as appropriate.
 - 4.3.4. Nominating one or more Directors of the Board of White Ribbon Australia to assist in investigating and resolving a complaint as appropriate.
 - 4.3.5. Notifying the Board of Directors of White Ribbon Australia where appropriate of the outcome of any investigation and resolution of a complaint.
 - 4.3.6. Notifying the Board of Directors of White Ribbon Australia of any systemic issues arising from the investigation and resolution of complaints.
- 4.4. Complainants are responsible for:
- 4.4.1. Providing a clear and honest written account of their concerns and expectations for the outcome of their complaint, including providing all relevant information and documents to assist in the investigation and resolution of the matter.
 - 4.4.2. Engaging openly in the complaint handling process, including participating in discussion with other parties to resolve the concerns when considered appropriate.
 - 4.4.3. Responding to requests for information from White Ribbon Australia complaints handling staff in a timely manner.

4.4.4. Behaving respectfully in interactions with White Ribbon Australia staff (see Section 12 'Unreasonable complainant conduct'.)

4.5. Respondents are responsible for:

4.5.1. Providing a clear and honest response to the complaint, including providing all relevant information and documents to assist in the investigation and resolution of the matter.

4.5.2. Engaging openly in the complaint handling process.

4.5.3. Responding to requests for information from White Ribbon Australia complaints handling staff in a timely manner.

5. Complaint Handling Principles

5.1. Access

5.1.1. This White Ribbon Complaints Handling Policy and Procedures document should be easily accessible, easy to understand and well-publicised to ensure ease of implementation.

5.1.2. All White Ribbon staff should understand the Complaints Handling Policy and Procedures.

5.1.3. All complaints are received and processed by White Ribbon Australia complaints handling staff, who may refer the complaint to the CEO and Chair if necessary.

5.1.4. Anonymous complaints are accepted, but may be difficult to investigate and resolve in a manner that satisfies the complainant. See Section 7 'Anonymous complaints'.

5.2. Procedural Fairness to all parties to a complaint

5.2.1. White Ribbon Australia complaints handling staff will provide the particulars of any complaint to the person about whom the complaint is made, commonly by providing a copy of the complaint to the respondent. The complainant will be informed of this process.

5.2.2. White Ribbon Australia complaints handling staff will carry out the complaint handling process in a transparent manner.

5.2.3. All parties to a complaint will have equal opportunity to participate in the complaint handling process.

5.2.4. White Ribbon Australia complaints handling staff will treat all parties in a respectful manner.

5.2.5. White Ribbon Australia complaints handling staff will inform the complainant and respondent about the outcome of the investigation and provide reasons for decisions made.

5.3. Equity

- 5.3.1. Actions and decisions in relation to complaints will be made having regard to the known additional needs and vulnerabilities of the parties.
- 5.3.2. Complainants and respondents are entitled to be assisted by a support person who may be a member of the person's family, a friend, carer, advisor or other person including a counsellor, solicitor, barrister or other legally trained or qualified person.
- 5.3.3. Complaints handling staff must explain the complaints process to people who have difficulty understanding written information.
- 5.3.4. White Ribbon Australia will support people from a non-English speaking background to access complaints handling information and processes in their language and access to an interpreter if required.
- 5.3.5. White Ribbon Australia will support people with a disability to access additional or modified resources e.g. large print or TTY facilities.
- 5.4. Responsiveness: White Ribbon Australia complaints handling staff shall assess and investigate the complaint in a timely manner.
- 5.5. Confidentiality: the privacy and confidentiality of parties will be respected. See Section 6 'Confidentiality' and Section 9 'Records'.
- 5.6. Avoiding conflict of interest: White Ribbon Australia staff and Board members involved in the handling of a complaint, or investigation or resolution of a complaint, must not act in any complaint in which they have a conflict of interest.

6. Confidentiality

- 6.1. Personal details of the complainant may need to be disclosed to the person being complained about for the matter to be fully investigated, but will remain confidential in other situations, for example in a report on complaint incidents and trends.

White Ribbon Australia complaints handling staff will take all reasonable steps to prevent adverse repercussions for a complainant in disclosing their identity or other particulars to the subject of a complaint.
- 6.2. As far as possible, a complainant's identity and personal details will not be disclosed to staff other than complaints handling staff.
- 6.3. A copy of the complaint form, without complainant contact details, will be made available to the respondent with the consent of the complainant. Complaints handling staff, with the consent of the complainant, may also make additional materials (e.g. statements or other evidence) available to the respondent when required for completeness and proper understanding of the complaint made.
- 6.4. Complaint information will be stored securely and access to it restricted to ensure the privacy of the complainant. See Section 9 'Records'.

7. Anonymous complaints

- 7.1. White Ribbon Australia accepts anonymous complaints, however it may be difficult to fully investigate anonymous complaints and report on the outcome of the investigation. This can result in an unsatisfying result for the complainant. The complainant should be made aware

of this when making the complaint and asked how they would like to be informed about the outcome of the investigation.

8. Whistleblower complaints

- 8.1. White Ribbon Australia is committed to protecting internal and external whistleblowers. A whistleblower should not be subject to reprisals due to allegations they make in good faith.
- 8.2. Whistleblower complaints will be received and handled in confidence, and all information relating to the complaint stored securely. Whistleblower complaints will only be disclosed to persons not connected to the matters of the complaint.
- 8.3. If desired, whistleblowers will be given a guarantee of anonymity. However, should legal proceedings result, the identity of the complainant may need to be disclosed.
- 8.4. In the case of internal whistleblowers, the complainant will not be personally disadvantaged for making a complaint by:
 - Dismissal
 - Demotion
 - Any form of harassment
 - Discrimination
 - Current or future bias.

9. Records

- 9.1. Accurate written records must be kept of all communications that form part of the complaint process. This includes notes taken of conversations between the parties which relate to management of the complaint and all decisions made in relation to the complaint. All records must be marked "Confidential" and maintained in a secure location.
- 9.2. Only the people who are directly involved in the complaint, or in helping to resolve it, are to have access to information about the complaint.
- 9.3. All documentation of complaints managed under this Policy will be held by White Ribbon Australia for a minimum period of one year and a maximum period of three years from the date of the complaint or otherwise for a period to be determined by the Chair in his absolute discretion.

10. Time Limits

- 10.1. Steps must be taken to ensure that the process is completed within a reasonable time. When an investigation is taking longer than reasonably expected to complete, complaints handling staff will contact the complainant and respondent with an interim report.

11. Decision-Making

- 11.1. Complaints handling staff will inform the complainant and respondent of the outcome of the investigation and any decisions made.

11.2. Complaints handling staff shall dismiss a case if the complaint is determined to be unfounded, vexatious, unreasonable or not supported by adequate information.

12. Unreasonable complainant conduct

12.1. White Ribbon Australia is committed to treating all complainants with fairness and respect. Unreasonable complainant conduct is behaviour by current or former complainants which, due to its nature or frequency, raises significant health, safety, resource and/or equity issues for a party to a complaint.

12.2. While some complainants may feel anger and frustration, White Ribbon Australia will not accept written, oral and/or physical aggression or violence. The wellbeing and safety of White Ribbon Australia staff are paramount.

12.3. Chronic or overly persistent complainants can have a disruptive effect on an organisation's operations, productivity and the safety and wellbeing of staff. These complainants may have their access to the complaints handling process modified or restricted, see Section 12.4.

12.4. When a complainant has repeatedly displayed unreasonable conduct, their access to White Ribbon Australia can be modified or restricted in terms of:

- Who the complainant can contact within White Ribbon Australia.
- The type of complaints White Ribbon Australia will respond to.
- Setting specific times, or lengths of times, that a person can contact White Ribbon Australia.
- Limiting the locations where face-to-face contact occurs e.g. meeting at a local Police station or community centre.
- Restricting how a complainant can contact White Ribbon Australia e.g. in writing only, only allowing contact through a representative.

The decision to modify or restrict a complainant's ability to access services is a decision made by the White Ribbon Senior Executive, with approval from the CEO.

12.5. Complaints handling staff will keep a record of all unreasonable complainant conduct and report the conduct to their supervisor. Should they require additional support, complaints handling staff have access to an Employee Assistance Program.

13. Complaints handling procedure

13.1. A complaint must be lodged by completing the White Ribbon Australia Complaint Form either online or in a hard copy returned to the White Ribbon office by email or post. If an oral complaint is received, and the complaint cannot be resolved immediately, complaints handling staff will request the complainant to complete and submit a Complaint Form. Complaints handling staff will assist people with literacy issues to complete the Complaint Form over the phone or in person.

- 13.2. White Ribbon Australia complaints handling staff will acknowledge receipt of a complaint within 5 working days and advise complainants on the complaint handling process and provide an estimate of the time required to investigate the complaint.
- 13.3. Complaints handling staff may also contact the complainant to request additional information about the matter.
- 13.4. Following assessment and investigation, complaints handling staff will inform the complainant and the respondent of the outcome of the investigation and of any decisions made.
- 13.5. If a complainant is dissatisfied with the outcome of an investigation, he or she may, within 10 working days of notification of the outcome, submit a written request for reinvestigation. Any reinvestigation will be carried out by White Ribbon Australia staff not involved in the original matter.