

2024-09-26



Complaint Management Policy and Procedure



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Drafted by	Mary Connelly-Gale	Approved by Board on	2024-09-26
Responsible person	Board Chair	Scheduled review date	August 2026

1. Introduction

Days for Girls Australia Ltd (DFGAL) is committed to maintaining and enhancing DfGAL's reputation of providing sustainable menstrual health solutions and education. DfGAL value complaints insofar as they assist the organisation in continuous improvement.

2. Purpose

This policy is intended to ensure that DfGAL handle complaints fairly, efficiently, and effectively. It provides guidance to DfGAL personnel, volunteers and people who wish to make a complaint on the key principles and concepts of DfGAL complaint management system.

3. Scope

This policy applies to all personnel, volunteers, contractors and DfGAL Board, receiving or managing complaints from the public and clients made to or about us, regarding DfGA products, services and personnel, or DfGA complaint handling process. Care will be taken that the complaint handling policy and procedure fits with other requirements that might be in the Constitution or legislation.

4. Organisational Commitment

This organisation expects personnel and volunteers to be committed to fair, effective and efficient complaint handling. The following outlines the nature of the commitment expected from personnel and volunteers, and the way that commitment should be implemented.

Who	Commitment	How
COO/Board Chair	Be aware of DfGAL complaint handling policies and procedures	<ol style="list-style-type: none"> 1. Report to the Board on complaint handling. 2. Provide adequate support and direction to key personnel responsible for handling complaints. 3. Regularly review reports about complaint trends and issues arising from complaints. 4. Encourage all personnel to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. 5. Encourage personnel to make recommendations for system improvements. 6. Support recommendations for service, personnel and complaint handling improvements arising from the analysis of complaint data. 7. Personnel and volunteers whose duties include complaint handling (may include COO or Board Chair) demonstrate exemplary complaint handling practices. 8. Treat all people with respect, including people who make complaints. 9. Assist people to make a complaint, if needed.
Personnel and Volunteers	Be aware of DfGAL complaint handling policies and procedures	<ol style="list-style-type: none"> 1. Comply with DfGAL policy and complaint handling policies and associated procedures. 2. Provide regular feedback to COO and/or the Board on issues arising from complaints. 3. Provide suggestions to COO/Board on ways to improve DfGAL complaints management system. 4. Implement changes arising from individual complaints and from the analysis of complaint data as directed by management. 5. Treat all people with respect, including people who make complaints.

		<ol style="list-style-type: none"> 6. Assist people who wish to make complaints access DfGAL complaints process. 7. Be alert to complaints and assist personnel handling complaints resolve matters promptly.
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8. Terms and Definitions

Complaint

An expression of dissatisfaction made to or about us, DfGAL services, personnel 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 DfGAL, some complaints (or at least negative comments) may be made on social media.

Complaint handling/management system

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

Dispute

An unresolved complaint escalated either within or outside of DfGAL.

Feedback

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

Formal complaint

A written statement of complaint by an individual about another person in the organisation or a DfGAL related problem.

Policy

A statement of instruction that sets out how DfGAL should fulfil its vision, mission and goals.

Procedure

A statement or instruction that sets out how DfGAL policies will be implemented and by whom.

9. Guiding Principles

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

9.1. Facilitate Complaints

People Focus

DfGAL is committed to seeking and receiving feedback and complaints about its 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 DfGAL complaint handling process and how to access it
- listened to, treated with respect and actively involved in the complaint process where possible and appropriate
- provided with reasons for its decision/s and any options for redress or review.

No detriment to people making complaints

DfGAL 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

DfGAL will 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

DfGAL will ensure that information about how and where complaints may be made to or about us is well publicised on DfGAL website. DfGAL will ensure that its 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, DfGAL

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

Making a complaint to DfGAL is free.

9.2. Making a Complaint

Complaints should be made to the COO (australia@daysforgirls.org) or the Board Chair (chairau@daysforgirls.org) or to your Team or Chapter Leader (if applicable). Complaints that cannot be settled satisfactorily at the Team or Chapter level, or require a formal response from the management should be referred to the COO or Board Chair.

10. Acknowledge and Respond to Complaints

10.1. Early resolution

Where possible, complaints will be resolved at first contact with us.

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

10.2. Responsiveness

DfGAL will promptly acknowledge receipt of complaints. DfGAL 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.

DfGAL 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 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.

DfGAL will advise people as soon as possible when DfGAL 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). DfGAL will also advise people as soon as possible when DfGAL are unable to meet time frames for responding to their complaint and the reason for the delay.

10.3. Objectivity and fairness

DfGAL will address each complaint with integrity and in an equitable, objective and unbiased manner. DfGAL will ensure that the person handling a complaint is different from the person 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.

10.4. Responding flexibly

DfGAL personnel are empowered to resolve complaints promptly and with as little formality as possible. DfGAL will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives. DfGAL will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

10.5. Confidentiality

DfGAL 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.

11. Manage the Parties to a Complaint

11.1. Complaints involving multiple agencies

Where a complaint involves multiple organisations, DfGAL 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 DfGAL, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated. Where services are contracted out, DfGAL expects contracted service providers to have an accessible and comprehensive complaint management system. DfGAL takes complaints not only about the actions of personnel and volunteers but also the actions of service providers.

11.2. Empowerment of personnel

Personnel managing complaints are empowered to implement the DfGAL complaint management system as relevant to their role and responsibilities.

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

11.3. Managing unreasonable conduct by people making complaints

DfGAL are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time DfGAL's success depends on:

- its ability to do its work and perform its functions in the most effective and efficient way possible
- the health, safety and security of DfGAL personnel and volunteers, and
- DfGAL ability to allocate its resources fairly across all the complaints DfGAL receive.

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

11.4. Alternative avenues for dealing with complaints

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

11.5. The three levels of complaint handling

Level 1

DfGAL aims to resolve complaints at the first level, the frontline.

Level 2

Where this is not possible, DfGAL may decide to escalate the complaint to a more senior person within the 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 DfGAL's review of their complaint, they may seek an external review of the decision (by the Australian Charities and Not-for-Profits Commission for example).

12. Accountability and Learning

12.1. Analysis and evaluation of complaints

DfGAL 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 governing Board.

DfGAL 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 DfGAL receive for internal and/or external review of DfGAL complaint handling.

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

Both reports and the analysis will be provided to DfGAL COO, and the Board for review, at least annually.

12.2. Monitoring of the complaint management system

DfGAL will continually monitor its 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, complain satisfaction surveys and online listening tools and alerters.

12.3. Continuous Improvement

DfGAL are committed to improving the way it organisation operates, including the management of the effectiveness and efficiency of its complaint management system. To this end, DfGAL will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by personnel

- regularly review the complaint management system and complaint data, and
- implement appropriate system changes arising out of the analysis of complaints data and continual monitoring of the system.

Procedure for Complaints Handling

I. Introduction

When responding to complaints, personnel and volunteers act in accordance with the complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Personnel should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in DfGAL complaint management system are set out below. They are:

1. Receive
2. Acknowledge
3. Assess and investigate
4. Determine outcome and provide reasons for decision
5. Close the complaint - document and analyse data.

This Policy and Procedure will be available through links on the Australian Team and Chapters Leaders Handbook, the Board Handbook and the DfGAL website.

2. Complaint Management System

2.1. Receive

Unless the complaint has been resolved at the outset, DfGAL will record the complaint and its supporting information. DfGAL will also assign a unique identifier/number to the complaint file.

The record of the complaint will document:

- Contact information of the person making a complaint and the date received
- Issues raised by the person making a complaint and the outcome/s they want
- Any other relevant information, and
- Any additional support the person making a complaint requires.

2.2. Acknowledge

DfGAL will acknowledge receipt of each complaint promptly, and preferably within 10 working days. When appropriate DfGAL may offer an explanation or apology. Consideration will be given to the most appropriate medium (e.g., email, letter) for communicating with the person making a complaint.

2.3. Assess and Investigate

Initial assessment

After acknowledging receipt of the complaint, DfGAL will confirm whether the issue/s raised in the complaint is/are within its control. DfGAL will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed. When determining how a complaint will be managed, DfGAL will consider:

- how serious, complicated, or urgent the complaint is
- whether the complaint raises concerns about people's health and safety
- how the person making the complaint is being affected
- the risks involved if resolution of the complaint is delayed, and
- whether a resolution requires the involvement of other organisations.

Investigating the complaint

After assessing the complaint, DfGAL will consider how to manage it.

DfGAL may:

- give the person making a complaint information or an explanation
- gather information about the issue, person, or area that the complaint is about, or
- investigate the claims made in the complaint. DfGAL will keep the person making the complaint up to date on the progress, particularly if there are any delays.

DfGAL will also communicate the outcome of the complaint using the most appropriate medium. Which actions DfGAL decide to take will be tailored to each case and consider any statutory requirements.

2.4. Determine Outcome and Provide Reasons for Decision

Following consideration of the complaint and any investigation into the issues raised, DfGAL will contact the person making the complaint and advise them:

- the outcome of the complaint and any action DfGAL took
- the reason/s for the decision
- the remedy or resolution/s that DfGAL have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

2.5. Close the Complaint and Analyse Data

Document

DfGAL will keep records about:

- how DfGAL managed the complaint
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations), and
- any outstanding actions to be followed up, including analysing any underlying or root causes.

Analyse data

DfGAL will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager, COO or the Board Chair.

This policies and procedures document has been informed by the following:

- Australian and New Zealand Standard Guidelines for complaint handling in organisations AS/NZS 10002:2014
- 'Handling Privacy Complaints' Office of the Australian Information Commissioner (October 2016)
- NSW Ombudsman Complaint Handling Model Policy 2015
- 'Building Better Relationships through complaints' The Society for Consumer Affairs Professionals Australia (SOCAP) and The Australian Centre for Justice Innovation (ACJ), Monash University

3. How to Make a Complaint

Complaints should be made to the COO (australia@daysforgirls.org) or the Board Chair (Chairau@daysforgirls.org) or to DfGAL Team or Chapter Leader (if applicable). Complaints that cannot be settled satisfactorily at the Team or Chapter level or require a formal response from the management should be referred to the COO or Board Chair.

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Approved by: Days for Girls Australia Ltd Board on 2024-09-26

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