

Feedback and Complaints Policy

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Version 3

Approval

Policy owner	Elyse Jeffress, Director Legal		
Approved by	Executive Leadership Team & State Council		
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Purpose

1. The Society of St Vincent de Paul (NSW) and the company titled the St Vincent de Paul Society NSW (together the Society) welcome feedback and complaints and are committed to responding fairly, efficiently, and effectively.
2. This policy and the appended procedures specify the processes for resolution of complaints made by people who come into contact with or use the Society's programs and services, including avenues for complaint resolution outside the Society.
3. This policy aims to inform and educate Society Personnel and the people they work with about:
 - the value of complaints
 - the Society's commitment to learning from complaints for the continuous improvement of its programs and services
 - the feedback and complaints processes
 - the process for documenting and reporting complaints in the Integrated Risk Management System (IRMS).

Scope

4. This policy applies to all Society Personnel (including members, volunteers, and employees).
5. This policy applies to the management of feedback and complaints about Society programs and services, Society Personnel, and Society governing bodies (Board, State Council, and Central Councils) by:
 - anyone receiving services or assistance from the Society, their advocate, or an authorised representative
 - a member of the public
 - customers of the Society's retail outlets
 - other service provider agencies
 - a government officer or agency
 - an organisation, supplier, or business partner supplying goods or services to the Society
 - anyone who donates money or services to the Society.
6. These complaints may concern but are not limited to:
 - member, volunteer, and employee conduct
 - provision of information
 - the way in which the Society conducts its activities
 - quality of service, communications, or treatment by the Society

- access to or promptness of a service.
7. Complaints may be received in any Society location. This policy outlines how complaints received in different locations should be managed.
 8. This policy does not apply to feedback, grievances, or complaints by Society Personnel, which are managed according to the relevant internal grievance policy.
 9. This policy does not apply to allegations of fraud and/or misconduct. Such issues are managed according to the Managing Fraud and Dishonest Behaviour Policy and/or Safeguarding Children and Young People Policy.
 10. This policy does not apply to eligible whistleblowers making qualified disclosures. Such issues are managed according to Whistleblower Policy.
 11. Complaints that **cannot** be investigated pursuant to this policy and procedures include:
 - matters relevant to the National Council or the Society operations in other States or Territories
 - internal grievances or other issues raised by members, volunteers, or employees about each other
 - requests for services or support which are not currently provided by the Society
 - contractual disputes between the Society and third parties
 - policy decisions made by the St Vincent de Paul Society NSW Board or the Trustees of the Society of St Vincent de Paul (NSW) (State Council)
 - any industrial relations matters between the Society and unions/staff associations
 - a criminal allegation or matters under criminal investigation or currently before a court or tribunal
 - reportable conduct investigations, including allegations involving risk of significant harm reported to the Child Protection Helpline (if clearance is provided by the Department of Communities and Justice, a matter may be investigated internally only under the Society's Safeguarding Children and Young People Policy)
 - any complaint that has been raised, investigated, and determined previously through the Society's complaints and review process
 - matters outside the control of the Society.

Related policies and procedures

12. Related policies and procedures include:
 - Client Charter of Rights and Responsibilities*
 - Client Charter Policy*
 - Code of Conduct*

Incident Management Policy

Internal Grievance Policy

Managing Fraud and Dishonesty Policy and Procedures

Managing Misconduct Policy

Members and Volunteers Grievance Policy and Procedures

Privacy Policy

Records Retention Policy

Trauma-Informed Care Policy

Whistleblower Policy and Procedures

Safeguarding Children and Young People Policy

Workplace Concerns (Employees) Policy

Workplace Concerns (Employees) Procedure

Policy principles

13. The Society encourages all forms of feedback (including complaints) about the way it works, its interactions with the community, the programs and services it provides, and its complaint handling processes.
14. The Society is committed to providing a transparent feedback and complaints management system that is accessible, responsive, efficient, fair, and integrated into the organisation's culture. Such a system provides accountability and supports the continuous improvement of services, processes, and systems.
15. If feedback or complaints are received at the local level (in person, phone, writing), as far as possible, and where appropriate, Society Personnel must endeavour to achieve an acceptable resolution without recourse to the formal complaints procedure.
16. Where a complaint cannot be resolved at the local level, within five working days, the complaint will be escalated to the Society's central complaints teams for assessment as to whether it should be processed through the formal complaints procedure. In serious matters, the complaint must be escalated immediately. These involve:
 - any complaint involving a child or young person or a child protection issue
 - a criminal, or serious misconduct matter
 - a notifiable incident or NDIS reportable incident
 - a complaint from a government agency
 - where the complaint is against the Chief Executive Officer, Board Chair, State Council President, Central Council President, Regional President, Executive Director, Chief Financial Officer, Regional Director, or Director.
17. The Society is committed to a transparent and robust review process. Complainants can access one internal review if the reasons for the review meet the Society's review guidelines.

Respectful and fair treatment

18. The Society will:

- take all feedback and complaints seriously
- treat all complaints in a fair, objective, unbiased and non-judgmental manner
- determine all complaints on their merits and facts, acknowledging any conflict of interest
- act fairly and transparently and treat both those who make and those who are the subject of complaints with dignity and respect
- adhere to all legal obligations in respect of and protecting the privacy and confidentiality of all parties
- ensure that no one is adversely affected because they have made a complaint or a complaint has been made on their behalf.

Accessibility

19. The Society will:

- actively promote opportunities to provide feedback
- ensure that information about providing feedback or making a complaint is easy to find and access at service sites and on the Society's website including:
 - areas covered by this policy
 - how to make a complaint
 - how to make an anonymous complaint
 - how to appeal against the outcome of a complaint
 - how to escalate a complaint to external authorities
- provide appropriate support and assistance to anyone wanting to provide feedback or make a complaint
- take steps to ensure that people experiencing particular vulnerabilities (for example, Aboriginal and Torres Strait Islander people, people from CALD backgrounds, children and young people, and older people) are supported to provide feedback or make a complaint
- respect the rights of people with disability and take reasonable steps to ensure that all individuals understand and can effectively exercise their right to complain. Where appropriate, information should be provided in easy read or another format that meets the needs of a person with a disability.
- communicate through a complainant's representative, where this is requested.

Good communication

20. The Society will:

- acknowledge receipt of a complaint or feedback
- let the complainant know who will be managing their complaint
- keep the complainant or their representative informed about the status and progress of their complaint, including any delays
- clearly communicate outcomes and decisions.

Accountability

21. The Society will:

- record, assess, and review feedback and complaints
- ensure each complaint is handled by trained and skilled staff.

Timeliness

22. The Society will:

- respond promptly and aim to resolve complaints quickly
- where possible, resolve complaints at the local level at the time the complaint is raised, so that a timely and responsive resolution is achieved
- provide an appropriate and timely remedy where appropriate.

Transparency

23. The Society will:

- provide a clear explanation of what actions have been undertaken and why, as a result of the feedback or complaint
- provide those making a complaint with access to the appeals procedure and/or external processes, should they be dissatisfied with the way the complaint process was handled by the Society
- record, review, and report on complaints handling data as part of our commitment to continuous improvement.

Roles and responsibilities

24. The Director, Legal is responsible for maintaining the currency of this policy.

25. Each Executive Director or the Chief Financial Officer is responsible for the management of complaint handling and resolution in their directorates and for promoting, monitoring, and upholding a positive compliance culture and identifying the need to engage support and/or train employees to implement the policy.

26. The Complaints Officer:

- receives and triages complaints
- assesses whether a complaint should be managed through the formal or local level procedure
- conduct a risk assessment of the complaint where appropriate
- investigates or assigns an investigator to conduct an investigation
- works with relevant personnel to resolve complaints under this policy
- liaises with the Regional Director who will consult with the appropriate Conference, Regional or Central Council President regarding the response to the complaint
- maintains records of the status of complaints
- provides reports as required on the status of complaints

- submits a report every three months to the Governance, Risk and Nominations Committee, and other Society committees as required, on complaints received, their resolution, and actions recommended and implemented to address systemic issues
- provides feedback and complaints regional data to Regional Directors, Executive Directors/Chief Financial Officer and other committees for continuous improvement
- prepares and/or receives investigation reports for provision to the appropriate decision-maker
- manages the investigations to facilitate the conclusion of the complaints handling process within 25 working days, wherever possible.

27. The roles and responsibilities of other individuals set out in **Appendix 4**.

Review

28. This policy and its implementation will be reviewed every two years, or on a needs basis as required to align with legislative or practice changes.

Further assistance

29. Society Personnel must speak with their manager regarding any questions about the implementation of this policy. They may also contact the Director, Legal to provide feedback on this policy.

30. Individuals who have any queries, concerns, or feedback about this policy, may contact the Society's Complaints Officer as follows:

Phone: 13 18 12

Email: Complaints@vinnies.org.au

Post: PO Box 5 Petersham NSW 2049

References

31. Legislation, regulations, and guides relevant to this policy include:

Fair Work Act 2009 (Cth)

Age Discrimination Act 2004 (Cth)

Anti-Discrimination Act 1977 (NSW)

Australian Human Rights Commission Act 1986 (Cth)

Community Services Complaints, Reviews & Monitoring Act 1993

Corporations Act 2001 (Cth)

Child and Young person's Care and protection Act 1998 (NSW)

Child and Young Persons Care and Protection Regulation 2000

Children's Guardian Act 2019

Disability Discrimination Act 1992 (Cth)

Privacy Act 1988 (Cth)

Racial Discrimination Act 1975(Cth)

Sex Discrimination Act 1984 (Cth)

National Disability Insurance Scheme Act 2013 (Cth)

The NDIS Quality and Safeguarding Framework

National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 [F2018L00634]

National Disability Insurance Scheme (Procedural Fairness) Guidelines 2018

NSW Child Safe Standards

Approval and amendment history

Version	Approval authority	Date	Amendment summary
Doc 1	Board of Directors	14 February 2014	NA
Doc 2 PO2020-025	Executive Leadership Team and State Council	22 June 2020	Update policy to address legislative changes and NDIS compliance. Replaces Complaint Handling Policy and Procedures
PO2020-025 Version 2	Executive Director Corporate Services	27 July 2020	Updated policy owner and responsibilities to align with organisational structure changes
PO2020-025 Version 3	Executive Leadership Team	7 December 2021	Updated with Office of Children's Guardian's feedback to ensure compliance and new roles titles. Updated to ensure compliance with NDIS requirements, IRMS procedure changes and new role structure.

Appendix 1: Definitions

Relevant definitions include:

Advocate	An advocate is a person authorised or nominated by the complainant to act on behalf of the complainant.
Authority to Act	An authority to act is verbal or written authorisation by an individual for a friend, relative, community organisation, or advocate to act on their behalf when engaging with the Society.
Anonymous complainant	An anonymous complainant is any member of the public who chooses to remain anonymous when making a complaint through any means, including the Society's Integrity Hotline or email facility.
Children and Young Person	In this Policy document, 'Child' means persons between the ages 0-15, a 'young person' is any person between the ages 16-17. Children and young people may be people we assist, family members of people we assist, members (Mini Vinnies, High School Conferences), volunteers, employees, or members of the public (for example, customers of Society retail shops or activities where children and young people regularly or occasionally attend such as working bees with local schools or parish youth groups to pack Christmas hampers).
Client	A client is a person receiving Society services, whether those services are financial or non-financial, and whether those services are delivered in the client's home, a formal setting, or elsewhere. Client also includes a potential client seeking Society services.
Complainant	A complainant is any member of the public, not working on behalf of the Society in any capacity, making a complaint.
Complaint	Expression of dissatisfaction made to or about the Society relating to its services or service quality, decisions, policies, procedures, charges or fees, personnel, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected or legally required.
Complaints Officer	The person(s) responsible for complaints resolution in the State Support Office including the Complaint Resolution Officer.
Complaint management system	All policies, procedures, fact sheets, practices, staff, hardware, and software used by the Society in the management of complaints.
Delegated Person	A person authorised to act on behalf of the Society in dealing with a complaint, for example retail or service managers, Vinnies Services manager, or the relevant Conference or Council President.
Employee	An employee is a paid member of staff unless otherwise specified. This includes full-time, part-time, fixed-term, or casual staff,

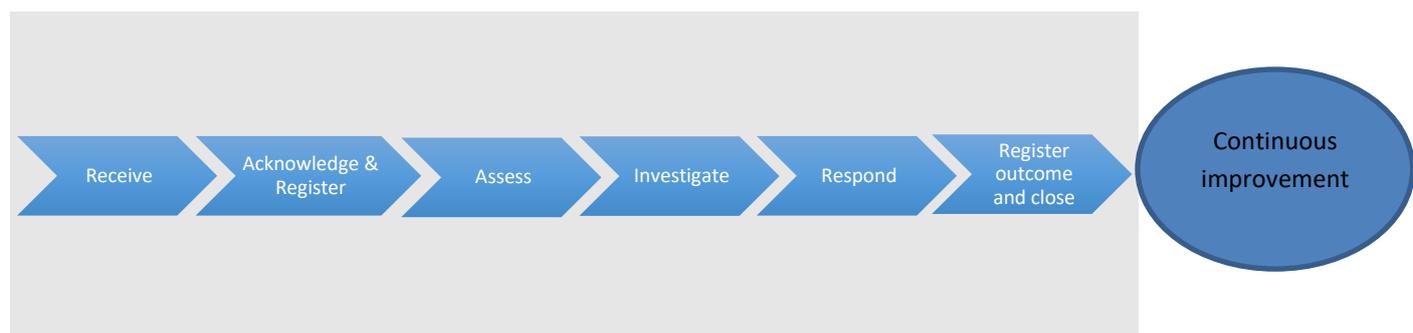
	contractors providing services to the Society, and those engaged in the performance of duties for the Society from a labour hire agency.
Feedback	Opinions, comments, compliments, and expressions of interest or concern made to, or about, the Society, its services or service quality, decisions, policies, procedures, charges or fees, personnel, or the complaint handling process itself, where a resolution is not explicitly or implicitly expected or legally required.
Fraud	For this policy, allegations of fraudulent or dishonest behaviour are not a complaint. Allegations of this nature are to be referred for action to the appropriate area under the Managing Fraud and Dishonest Behaviour Policy.
Integrated Risk Management System	The Integrated Risk Management System (IRMS) is the program used the by Society to record and manage complaints, incident, risk, WHS and safeguarding matters.
Investigator	An Investigator is an employee of the Society who has received formal investigation training, or a third party engaged externally by the Society, who is tasked with undertaking an investigation in relation to this policy.
Member	The term member includes Conference, Associate, and Volunteer members as per <i>The Rule, 7th Edition 2012, Australia</i> .
Misconduct	For the purposes of this policy, allegations of Employee/Personnel misconduct are not a complaint. Allegations of misconduct should be referred to the Managing Misconduct Policy.
Notifiable Incident	A 'notifiable incident' under the work health and safety legislation relates to <ul style="list-style-type: none"> • the death of a person • a serious injury or illness of a person • a potentially dangerous incident
NDIS Reportable Incident	Reportable incidents are serious incidents or alleged incidents which result in harm to an NDIS participant and occur in connection with NDIS supports and services. Specific types of reportable incidents include: <ul style="list-style-type: none"> • The death of a person with a disability. • Serious injury of a person with a disability. • Abuse or neglect of a person with a disability. • Unlawful sexual or physical contact with, or assault of, a person with a disability (excluding, in the case of unlawful physical assault, contact with, and impact on, the person that is negligible). • Sexual misconduct committed against, or in the presence of, a person with a disability, including grooming of the person for sexual activity. • The use of a restrictive practice in relation to a person with a disability, other than where the use is in accordance with

	<p>an authorisation (however described) of a State or Territory in</p> <ul style="list-style-type: none"> • relation to the person or a behaviour support plan for the person.
Society	Means the unincorporated association known as The St Vincent de Paul Society that works through local conferences and the related companies St Vincent de Paul NSW (ABN 91 161 127 340).
Society Personnel	Any person (or group of people) engaged by the Society to assist in its works. This includes members, volunteers, employees, contractors, and consultants.
Volunteer	A volunteer is any person who performs unpaid work for the Society.

Appendix 2: Complaint Handling Procedures

Introduction

1. When responding to feedback and complaints, Society Personnel must act under this Feedback and Complaint Policy and Procedure and must consider any relevant legislation and/or regulations.
2. The six key stages in the Society's complaint management system are set out below.



Receiving and managing feedback and complaints

3. Feedback or complaints can be provided to the Society in a number of ways including to:
 - local service level:
 - in person
 - in writing (which includes the Society's Feedback and Complaints Form at **Attachment A**)
 - by phone
 - State Support Office:
 - by email to complaints@vinnies.org.au
 - by phone 13 18 12
4. Where an individual requires assistance to provide feedback or a complaint, the Society will assist by:
 - arranging an interpreter through the Translating and Interpreting Service (TIS) on 13 14 50
 - communicating via the National Relay Service 1800 254 649 (relayservice.gov.au)
 - providing assistance in completing the Society's Feedback and Complaints Form (**Attachment A**)
 - providing the Easy Read and/or in a communication style that meets the needs of the person
 - providing information or referral to relevant advocacy services.
 - providing other reasonable and appropriate assistance

Authority to act or disclose

5. If a person makes a complaint on behalf of someone else when they don't already have a legal authority to act on their behalf, the Society will confirm that the person lodging the complaint has the complainant's authority to do so. This authority may be provided verbally, by completing the 'Authority to Act or Disclose' form (**Attachment B**) or in a communication style which meets the needs of the person effected.
6. The authority to act or disclose must be documented in the Society's complaints management system.

Anonymous complaints

7. The Society accepts anonymous complaints through any of the methods identified above. Where a complaint is made anonymously, the Society will action the complaint respecting the complainant's request for anonymity.
8. Where possible the Society will make an anonymous complainant aware of the limitations of investigating an anonymous complaint including that clarification, feedback, or individual resolution may not be possible.
9. Where an anonymous complaint involves allegations of corruption, fraud, theft, or serious waste of Society resources, the person receiving the complaint must immediately escalate it to the Complaints Officer who will assess the complaint and will either manage it, or refer it to the appropriate personnel to be actioned under the Society's *Managing Fraud Policy and Dishonest Behaviour Policy* and with reference to the *Whistleblower Policy*.
10. Anonymous complaints alleging criminal conduct must immediately be referred to the Complaints Officer who will inform the Director, Legal and NSW State President (in the case of an allegation against a member) and/or the Chief Executive Officer (in the case of an allegation against an employee or volunteer) who will ensure that it is addressed in accordance with the Society's legal obligations.
11. Anonymous allegations relating to matters of concern regarding children must immediately be dealt with following procedures set out in the *Safeguarding Children Policy and notified to the Safeguarding team at 1800 4 SUPPORT*.

Feedback and complaints at local level

12. A person who receives a complaint at a Society facility, program or service should endeavor to manage feedback or resolve minor complaints (for example, about pricing, timing, and the quality of services) by:
 - respectfully and responsively listening and acknowledging the issue raised
 - clarify whether the person is providing feedback or making a complaint
 - ask the person who has raised the issue what they are seeking as a resolution to the matter

- if the feedback is not a compliment, calmly provide an explanation about the issue raised (if the complaint recipient is aware of what happened and why)
 - provide the person with a copy of the Society's Feedback and Complaint Form (**Attachment A**) and offering to help complete it.
 - enter the relevant information into the IRMS
13. The **Delegated Person**, the senior Society representative at a facility, program or service, Conference or Council (for example retail manager, service manager or Conference President) who is authorised to resolve the complaint must:
- conduct a risk assessment of the complaint where appropriate
 - ask the person who has raised the issue what they are seeking as a resolution to the matter, if this information has not already been obtained
 - offer an apology, if appropriate
 - document and maintain a record of the complaint and any actions taken and refer this information to their manager or relevant Council President.
14. If the person receiving the complaint cannot resolve, or is not authorised to resolve, the complaint, they must forward the matter to their manager or relevant Council President.
15. When a matter is managed locally, the Delegated Person must:
- acknowledge the receipt of the complaint
 - conduct a risk assessment of the complaint where appropriate
 - ensure that file notes are kept that capture all discussions relating to the complaint, including contact with the complainant and other parties, decisions and the rationale for decisions
 - keep a record of all complaints and any actions in the IRMS
 - commence local enquiry procedures
 - ensure that the IRMS is updated and the Complaints Officer is notified where appropriate.
 - ensure the complainant is made aware of their right to lodge a complaint with an external agency where appropriate. For example, to the NDIS QSC if they are an NDIS participant.

Initial assessment

16. The Delegated Person must carry out an initial assessment to:
- ensure that the terms of the complaint are clear, and if not, clarify the complaint
 - identify the key concerns raised by the complainant and the complainant's desired outcome for resolution
 - determine if the complaint comes within the scope of this policy

- determine if the complaint includes an allegation of crime, notifiable incident, NDIS reportable incident, risk of significant harm or misconduct and if so, apply the relevant policy:
 - Code of Conduct
 - Safeguarding Children and Young People Policy
 - Managing Misconduct Policy
 - Incident Management Policy
- determine if the complaint needs to be referred to the Complaints Officer

Escalation and referral of complaints

17. The complaint must be immediately escalated to the Society's Complaints Officer where the complaint:

- Involves any complaint involving a child or a child protection issue
- Involves a notifiable incident or an NDIS reportable incident
- Is from an external complaints body or government agency
- involves a criminal or serious misconduct matter, or
- is against the Chief Executive Officer, Board Chair, State Council President, Central Council President, Regional President, Executive Director, Chief Financial Officer, Regional Director or Director.

18. Where the Delegated Person is unable to resolve the complaint to the satisfaction of the complainant within five business days from making contact with the complainant, they must:

- advise the complainant of the Society's formal complaints process
- provide the complainant with a copy of the Society's Feedback and Complaints Form and offer to help them fill out the form, if they have not already filled one out
- refer the matter to the Complaints Officer for assessment

Feedback and complaints handling by the Complaints Officer

19. Feedback and complaints may be made directly to the Complaints Officer by:

- phone to: 13 18 12
- by email to: complaints@vinnies.org.au
- mail to: Complaints Officer, State Support Office, PO Box 5, Petersham, NSW 2049

20. The Complaints Officer will determine if the information constitutes feedback or a complaint that falls within the scope of this policy.

21. Where the complaint has come to the Complaints Officer directly, and has not been escalated by Society Personnel, the Complaints Officer must determine if the matter is a local issue and would be better managed without recourse to the formal complaints procedure. The Complaints Officer will refer such matters to the relevant Delegated Person or if appropriate, resolve it themselves.

22. Where a complaint concerns the quality and pricing of merchandise in retail outlets, or the rejection of personal donations of goods, the Complaints Officer has the discretion to deal with the complaint more expeditiously through separate protocols negotiated with the Retail and Logistic team.
23. Where the complaint involves a Notifiable Incident, NDIS Reportable Incident, criminal, or serious misconduct matter, the Complaints Officer will inform the Director, Legal, who will ensure that it is addressed in accordance with the Society's legal obligations and notify the Chief Executive Officer and/or NSW State President where appropriate.
24. Where the complaint involves a child protection reportable conduct issue, the Complaints Officer will inform the Chief Executive Officer and/or NSW State President in addition to following the procedure set out in the Safeguarding Policy and notifying the Safeguarding team.

Initial assessment of complaints

25. The Complaints Officer must carry out an initial assessment and preliminary enquiries to:
 - ensure that the terms of the complaint are clear, and if not, seek further clarification
 - identify the key concerns raised by the complainant and the complainant's desired outcome for resolution.
 - identify how the complaint should be managed
 - conduct a risk assessment of the complaint where appropriate
26. The Complaints Officer must determine if the complaint should be:
 - managed by them
 - delegated to an internal or external investigator, or
 - referred for investigation/action to another Directorate of the organisation
27. The Complaints Officer will close the matter and inform the relevant parties if:
 - further clarification requested has not been provided which prevents the matter from being investigated, or
 - the complaint is vexatious or frivolous in nature.
28. Where a complaint is closed, the Complaints Officer will record the reasons for this decision, and update the IRMS.
29. If the complaint involves an alleged criminal offence, the Complaints Officer must discuss the complaint with the Director, Legal and where appropriate, the NSW State President and Chief Executive Officer, who have the responsibility for referring such matters to the Police.
30. If the alleged complaint involves a child or young person, as a party to the complaint or a witness, the Safeguarding Team will be notified, to ensure compliance with the Society's Safeguarding Children Policy.
31. Where complaints involve a Central Council President, State Council President, the Chief Executive Officer, Executive Director or the Chief Financial Officer, the Complaints Officer may

appoint an external Investigator and inform that person's direct report that a complaint has been made and an investigation is underway. For example in the case of a complaint against the State President, the National President will be advised, and in the case of the Chief Executive Officer, the Board Chair will be advised.

32. If an investigation is conducted into a complaint about a Society member, the relevant Council President should be informed prior to the investigation commencing.
33. Where the Complaints Officer determines that an independent investigator should be appointed, they must consult with the Director, Legal to assign an Investigator who has received formal investigations training.

Investigation

32. The Investigator or Complaints Officer must:
 - seek clarification from the complainant where necessary
 - seek information from the respondent where necessary
 - obtain all relevant information, including but not exclusive to, email correspondence, file notes, CCTV footage and interviews with witnesses and relevant Society personnel.
33. The Investigator or Complaints Officer must then determine:
 - what the facts are, and are not, in dispute between the parties
 - the relevance, reliability and consistency of the information collected
 - whether Society representatives have followed standard procedures
 - whether any systemic performance or management issues arise.
34. The Investigator or Complaints Officer, as appropriate, is responsible for ensuring that complaints are resolved within 25 working days of receiving the complaint.
35. In exceptional circumstances, additional time may be required to conduct a thorough investigation. If a complaint is not resolved within the 25 working day timeframe, the Society will contact the complainant and advise them of the expected date of conclusion.
36. Where the complaint is anonymous, the 25 working days begins from the date an Investigator is assigned to the complaint.

Complaint resolution

37. At the conclusion of the investigation, the Investigator or Complaints Officer must prepare a report and recommendations.
38. Where the Investigator is not the Complaints Officer, the Investigator must provide their report to the Complaints Officer for registration.
39. Once the investigation report has been received the Complaints Officer will:
 - where necessary, in consultation with the relevant Executive Director or Chief Financial Officer, or their delegate, or relevant Council President (decision-maker), determine the appropriate outcome resolution for the complaint

- communicate the outcome to the complainant, where possible in writing
 - communicate the outcome to the respondent, including any actions to be undertaken.
40. Where preliminary enquiries determined a matter can be resolved without an investigation, the Complaints Officer will still notify the relevant management personnel prior to providing an outcome to the complainant
41. Where the complaint is about a member, the Investigator or Complaints Officer will liaise with the Regional Director who will consult with the appropriate President, regarding how the complaint will be resolved.
42. The investigation report is the property of the Society and is not available to the complainant or the respondent.
43. Society Personnel must base any actions taken in response to a complaint on the evidence and information contained in the investigation report and must address any system or process issues that the report identifies.
44. Appropriate actions in response to a complaint may include:
- addressing the issues raised to resolve the complaint
 - offering a written apology
 - meeting with the complainant to acknowledge their experience
 - developing or amending policies and procedures if appropriate and/or applicable
 - training Society representatives if required or reasonable to do so
 - discussing the matter directly with the Society Personnel concerned (i.e. those named in the complaint)
 - ensuring there are measures put in place to prevent the issue from recurring.

Confidentiality

45. The Investigator will keep all records of the investigation secure under the Privacy Policy.
46. The Society may provide details of a complaint (excluding contact details) to the person or organisation subject to the complaint and, if necessary, others who have relevant information about the complaint. This excludes the identity of the complainant, where the complainant has requested anonymity.
47. The Society will otherwise take steps to ensure that confidentiality is maintained while a complaint is being investigated, unless disclosure is required by law.

Scope for further review of the complaint

48. If a complainant remains dissatisfied following the Society's response after an investigation has occurred, they may seek a review of the decision on the following grounds:
- if the response failed to respond to a ground of the complaint
 - if the response failed to take into account material facts raised or evidenced provided by the complainant

- if the response took into account irrelevant facts or evidence
 - if the response was unreasonable on another ground.
49. Before a request for review can be assessed, a complainant must clearly identify why they believe the original decision was wrong or unreasonable, and provide any relevant supporting information or evidence.
50. The review must be conducted by a person who is independent of the original investigation or decision-making regarding outcome, or is senior to the original decision-maker.
51. A complainant may request a review of a decision within 25 working days of receiving the Society's advice regarding the investigation outcome(s).
52. If a complainant seeks a review of a decision, the reviewer will consider:
- the request for review
 - the investigation report and the original decision
 - the material before the original decision-maker.
53. The possible outcomes from a review are:
- referral of the complaint for further investigation
 - confirmation of the original decision.
54. The Reviewer must advise the complainant of the review outcome within 25 working days a request for review being received and, where appropriate, provide information on further external avenues of redress. These can be found at **Appendix 3**.

Record keeping

55. The Complaints Officer must keep complete records of complaint management and investigations under the *Records Retention Policy* and the *Privacy Policy*.
56. Records include the complaint, the acknowledgement letter, any notes taken, the investigation report, and the resolution letter. File notes of all conversations must be made and retained.
57. Complaint records must be retained for a period of not less than seven (7) years. The Complaints Officer is also required to maintain records of all complaints received and their current status.

Continuous improvement and preventative action

58. Investigations of complaints may indicate that improvement in current practices, procedures, capabilities, and training might be required. The Complaints Officer must ensure that systemic issues identified are forwarded to the relevant Executive Director or Chief Financial Officer to address.
59. The relevant Executive Director or Chief Financial Officer are responsible for reviewing the investigator's report and advising the Complaints Officer of whether they will implement the recommendations, and if not, provide reasons for why.

60. The Complaints Officer will submit quarterly reports to the Governance, Risk and Nominations Committee detailing the number and type of complaints received and information about their resolution, including information (if any) that they have received from Executive Directors or the Chief Financial Officer regarding any process improvements, preventive action taken or challenges to implementation.
61. Where requested, the Complaints Officer will provide Regional Directors quarterly data updates on feedback and complaints for their region. Regional Directors will share this information with Central Council Presidents to identify systemic issues and areas for improvement.

Appendix 3: External Complaints

Aged Care Quality and Safety Commission

- 1800 951 822
- <https://www.agedcarequality.gov.au/>
- info@agedcarequality.gov.au

Anti-Discrimination Board of NSW

- (02) 9268 5544
- 1800 670 812 (Toll-free for regional NSW only)
- <http://www.antidiscrimination.justice.nsw.gov.au>
- complaintsabd@justice.nsw.gov.au

Australian Charities and Not-for-profits Commission

- 13 22 62
- <https://www.acnc.gov.au>
- online complaint form

Australian Human Rights Commission

- 1300 656 419
- <https://www.humanrights.gov.au>
- infoservice@humanrights.gov.au

Department of Communities and Justice (DCJ) (Complaints about DCJ funded services)

- (02) 9377 6000
- facs@yourfeedback.nsw.gov.au
- <https://www.facs.nsw.gov.au/about/contact/complaints>

Department of Social Services

- 1800 634 035
- [online complaint form](#)
- complaints@dss.gov.au

National Disability Insurance Agency (Complaints about the NDIS)

- 1800 800 110
- <https://www.ndis.gov.au>
- [online complaint form](#)
- feedback@ndis.gov.au

NDIS Quality and Safeguards Commission (Complaints about NDIS providers)

- 1800 035 544
- www.ndiscommission.gov.au
- [complaint contact form](#)
- contactcentre@ndiscommission.gov.au

Office of Children’s Guardian (Complaints about the Society’s investigation of reportable conduct matters)

- (02) 8219 3600
- ocg@yourfeedback.nsw.gov.au

NSW Ombudsman (Complaints about NSW government-funded services)

- 02 9286 1000
- 1800 451 524
- <http://www.ombo.nsw.gov.au>
- [Online complaint form](#)
- nswombo@ombo.nsw.gov.au

Appendix 4: Roles and Responsibilities

Roles	Responsibilities
Central Council Presidents	<ul style="list-style-type: none"> • receive reports of investigations into any allegations against members in their area relating to this policy
Chief Executive Officer	<ul style="list-style-type: none"> • receive requests for a review of any investigations into a complaint by the complainant •
Complaints Officer	<ul style="list-style-type: none"> • receives and triages complaints • investigates or assigns an investigator to conduct an investigation • works with relevant personnel to resolve complaints under this policy • maintains records of the status of complaints • provides reports as required on the status of complaints • submits a report every three months to the Governance, Risk, and Nomination Committee on complaints received, their resolution, and actions recommended and implemented to address systemic issues • prepares and/or receives investigation reports for provision to the appropriate decision-maker • manages the investigations to facilitate the conclusion of the complaints handling process within 25 working days, wherever possible
Chief Financial Officer, Executive Directors, Chief Financial Officer, Directors	<ul style="list-style-type: none"> • receive reports of investigations into any allegations against employees or volunteers in their service area • write an appropriate response to the complainant at the conclusion of the investigation • ensure the IRMS is maintained and updated regularly • identify areas of improvement in current policies, procedures or processes to be introduced to reduce the likelihood of a similar situation/event occurring again and to address any systemic issues
Regional Directors	<ul style="list-style-type: none"> • receive reports of investigations into any allegations against members in their region • write an appropriate response to the complainant at the conclusion of the investigation • ensure the IRMS is maintained and updated regularly • identify areas of improvement in current policies, procedures or processes to be introduced to reduce the likelihood of a

	similar situation/event occurring again and to address any systemic issues
Governance, Risk and Nominations Committee	<ul style="list-style-type: none"> • receive reports every three months on the number and type of complaints received and their resolution • consider the complaints and any patterns that may emerge requiring further consideration
Investigator	<ul style="list-style-type: none"> • undertakes an investigation at the request of the Complaints Officer • collects and analyse information and facts about the matter • presents a report with a recommended course of action to the Complaints Officer within the negotiated timeframe • maintains adequate records and a file for each complaint investigated and pass this file to the Complaints Officer at the conclusion of the investigation
NSW State President and Central Council Presidents	<ul style="list-style-type: none"> • receive reports of investigations into any complaints against members in relation to this policy •
Managers/Program Managers	<ul style="list-style-type: none"> • receive and acknowledge complaints escalated from Society Personnel • attempt to resolve any complaints locally • record all feedback and complaints in the IRMS • maintain required documentation • escalate complaints as required by the Procedure • ensure senior managers and SSO Complaints Officer are informed of all complaints • assist with investigations, as required • action continuous improvement recommendations resulting from complaints
Society Personnel	<ul style="list-style-type: none"> • participate in complaint handling training, as required • after attempting an informal resolution with the complainant if possible, promptly forward any complaint received to Managers • take complaints received seriously and cooperate and assist with investigations into complaints received from anyone outside the Society or being assisted by the Society

Attachment A: Feedback and Complaint Form

Feedback and Complaint Form

[Insert Service Name]

This form is to be completed by the person, or on behalf of the person, who is giving feedback or making a complaint.

We welcome your feedback and complaints. We like to know when we get something right but we need to know when we could do better.

You can provide feedback to any of our personnel after you have completed it and they will ensure it is actioned appropriately. If you would like help completing this form, please ask a staff member, family, or friend to assist.

It is your right to make a complaint. You will not be treated adversely for making a complaint.

Feedback <input type="checkbox"/>		Complaint <input type="checkbox"/>		Date
PERSONAL INFORMATION: By providing personal information to the Society, you consent to the use, storage, and disclosure of that information as described in the Society's <i>Privacy Policy</i> [available on Vinnies' website] for the purposes of registering your feedback and/or investigating and responding to your complaint. We do accept anonymous complaints, however, by providing your name we will be able to investigate more thoroughly and we will be able to provide you feedback.				
Name:				
Advocate's Name (if applicable):				
Phone/Mobile:				
Email/Address:				
Address				
Preferred method of contact	Phone <input type="checkbox"/>	Email <input type="checkbox"/>	Mail <input type="checkbox"/>	
Preferred language:		Interpreter required: <input type="checkbox"/> Yes <input type="checkbox"/> No		
FEEDBACK/COMPLAINT DETAILS: Please provide a summary of your feedback/complaint below.				
Date/s and time incident occurred:				
Location/s where the incident occurred:				
Description - Tell us what happened, who was involved, where it happened, and your main concern(s). Attach another page if you need more space and include copies of any documents that support your complaint:				

Complaints Procedure

The St Vincent de Paul Society welcomes feedback and complaints. We are committed to handling feedback and complaints fairly, efficiently, and effectively.

Despite our best intentions, we know that sometimes things do not go how we would like them to. We would like to hear from you if this happens. If you have a concern or complaint about any of the services we provide, the standard of the service, or the actions of our staff or volunteers, please let us know.

You can submit this form by:

- Handing it in to any Vinnies staff member
- Post: PO Box 5 Petersham NSW 2049
- Email: complaints@vinnies.org.au or the Vinnies' service or store's direct email

What happens once I provide Feedback/Complaint?

- If you have given us your contact details we will acknowledge receipt within five working days of receiving your feedback/complaint. If you have not received an acknowledgement after five days, please contact us directly as we may not have received it.
- We will enter your complaint details onto our secure complaints register.
- Our intention is to resolve all complaints within 25 working days. If this is not possible, we will inform you of the anticipated timeframe.

Need further help?

- If you are a non-English speaking person, call Translating and Interpreter Service (TIS) on 131 450.
- If you have a hearing or speech impairment, contact us through the [National Relay Service](#): 1800 555 677
 - TTY users phone 133 677.
 - Speak and Listen users phone 1300 555 727 then ask for 02 9568 0273.
- If you need someone to assist you to fill in the form, ask any Vinnies volunteer or staff member

Is there a Review or Appeal process?

Yes, if your complaint is assessed as a matter which needs to be investigated and you are not satisfied with the outcome of the complaint investigation, please contact the Complaints Officer within 25 working days of receiving the outcome of your initial complaint on:

- Post: Complaints Officer, St Vincent de Paul Society NSW, PO Box 5, Petersham NSW 2049
- Email: complaints@vinnies.org.au
- Phone: 13 18 12

Need more information?

St Vincent de Paul Society has a Complaints Policy and Procedure, which is available on our website

NDIS

If your complaint is about a Vinnies services which is also an NDIS provider, you are also able to contact the NDIS Quality and Safeguard Commission on 1800 035 544. Or complete an online form <https://www.ndis.gov.au/contact/feedback-and-complaints>

Attachment B: Authority to Act and Disclose

AUTHORITY TO ACT

I, _____ (*name of complainant*)

authorise _____ (*name of authorised person/s*)

to act on my behalf in relation to the complaint I have made to the Society.

I understand that the Society will deal directly with
_____ (*name of authorised person/s*)

in relation to this complaint.

AND/OR

AUTHORITY TO DISCLOSE

I authorise _____ (*name of authorised person/s*)
to:

Provide information and documents to the Society in connection with the Society's assessment, investigation, and conciliation of my complaint.

Receive information and documents from the Society about my complaint including responses provided by the respondent/s and correspondence from the Society.

Discuss my complaint with the Society.

I understand that I can withdraw my authority to act or disclose at any time by contacting the Society.

I understand that the Society will use and store my personal information under the *Privacy Act 1988* (Cth).

Signed: _____

Name: _____
(*name of complainant*)

Date: _____