

Complaints Policy

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Drafted by	CEO	Approved by CEO on	15 April 2023
Responsible person	CEO	Scheduled review date	15 April 2025

Introduction

All employees, volunteers, contractors, members of Playgroup Australia and stakeholders or members of the public have a right to have their concerns regarding Playgroup Australia and its activities heard and addressed in ways that ensure access and equity, fairness, accountability and transparency. They also have a right to receive information about progress and actions taken upon request.

The Playgroup Australia complaints process is an avenue for encouraging stakeholders and members of the public to express concerns and to offer views about different aspects of Playgroup Australia's activities. In this way the consumer complaints process contributes to quality improvement and risk management.

Purpose/Rationale

This policy provides guidance for Playgroup Australia on the key principles and concepts of complaints management to ensure that Playgroup Australia staff are equipped to manage complaints fairly, efficiently and effectively and meet good complaints management practices in accordance with international standards.

Principles

Playgroup Australia will be actively committed to providing a complaints management policy and procedure that:

- Is easily accessible and culturally inclusive to all complainants
- resolves complaints in an open, respectful, responsive, and timely manner.
- is transparently and effectively communicated to all clients and stakeholders
- is accurate and relies on data that is relevant, correct, complete, meaningful, and useful
- is free of charge to the complainant
- ensures complaints or appeals are fairly assessed and responded to promptly
- is procedurally fair and follows principles of natural justice
- complies with the National Principles for Child Safe Organisations
- complies with legislative requirements.
- Complaints are managed with transparency and focus on addressing the concerns of complainants. No differentiation is made between perceived and actual issues of concern, as the philosophy of complaints management is based upon the complainant's perception of an issue or event.

The complaints process may also support Playgroup Australia to meet its risk management, quality improvement and organisational objectives, provided these goals do not conflict with Playgroup Australia's primary responsibility to the complainant.

Scope

This policy applies to all Playgroup Australia employees, contractors, volunteers, members, stakeholders and customers and relates to all of Playgroup Australia's business and advocacy

activities. Employees, contractors, volunteers, members, stakeholders and customers can make a complaint about Playgroup Australia’s business and advocacy activities.

- This policy does not apply to employee grievances or complaints, which are specific to workplace health and safety. Please refer to the Grievance, Conflict and Dispute Resolution Policy.
- This policy does not apply to Whistleblowing, please refer to the Whistleblower Policy.
- This policy does not apply to critical incidents. If a complaint deals with a workplace accident, injury or death, or is a dangerous occurrence or “near miss” or involves child safety, a complaint may be better classified as a critical incident. Please refer to the Critical Incident Reporting Policy.

Relevant delegations

- The Board is ultimately responsible for ensuring that Playgroup Australia implements this Policy. The CEO manages and administers the complaints handling process, and ensures that it is planned, designed, developed, effectively operated and maintained in accordance with the complaints-handling policy of the organisation.
- Playgroup Australia employees and board members are responsible for ensuring a rapid and effective notification of significant complaints to the CEO or, in the case of a complaint made about the CEO’s decisions, behaviour or performance, to the Board Chair.
- The Playgroup Australia Board will be responsible for the regular review of the complaints handling process to ensure its effectiveness and efficiency.
- The CEO will ensure relevant employees and volunteers are aware of and fully understand the extent of their responsibilities and authority towards complaints handling management.
- Playgroup Australia will ensure that information about the complaint handling process is communicated to complainants, and where applicable to other parties directly concerned.

Policy Statement

Playgroup Australia is committed to following good complaints management practices in accordance with AS ISO 10002-2018 *Quality management – Customer Satisfaction – Guidelines for Complaints Handling in Organisations*.

Playgroup Australia will:

- Consider all complaints it receives, ensuring that all complaints are promptly assessed, and any incidents or grievances are directed through the appropriate policy and processes.
- Ensure that if any complaints are identified that involve service delivery partners, written permission is sought from the complainant to forward the complaint to the appropriate service delivery partner with clear instructions and advice on the organisational responsibility for resolving the complaint. Ensure that all relevant stakeholders involved in the complaint are aware of the existence of the complaints policy and the procedures for addressing the complaint.
- Approach the resolution of complaints in a consistent, systematic, and responsive manner, to the satisfaction of all parties where possible.
- Provide a secure and supportive, trauma-informed space for complainants in which confidentiality and private information for those involved in the complaint will be maintained.
- Ensure a transparent process by keeping parties involved in the complaint informed of the progress of the complaint at each stage.
- Resolve complaints, where possible, to the satisfaction of all parties.

- Maintain records of complaints that enhance the ability of the organisation to identify trends, eliminate causes of complaints and improve the organisation's operations.
- Create a customer-focused approach to resolving complaints and ensure that Playgroup Australia staff, board members and volunteers are aware of, and trained in, the complaints policy.
- Ensure a complainant is not prevented from engaging with Playgroup Australia in their current capacity (such as member or delivery partner) during the complaint process, unless there is legal impediment to providing a service, such as a conflict of interest.
- Provide a basis for continual review and analysis of the complaints handling process, the resolution of complaints, and process improvements made. Playgroup Australia will ensure that complaints data is considered in organisational reviews and in planning service improvements.
- Complaints will be dealt with and resolved at the level at which they are raised by the complainant. If a satisfactory outcome is not able to be achieved then the complaint will be escalated to the next level within the complaint handling process, until such time as all reasonable options for resolution have been exhausted.

Complaints and the effectiveness of the complaints handling process are continually monitored at an operational level and formally reviewed by the Board annually.

Complaints regarding member organisations.

As a Federated Body, Playgroup Australia's member organisations include state and territory playgroup organisations (STO). Each of these organisations has their own complaints policy and procedures. A complainant with a concern about an action of an STO or their staff member is encouraged to use the complaints processes of that organisation.

Playgroup Australia is not an oversight body and cannot compel members to undertake or not undertake any action. However, if Playgroup Australia and an STO staff member or organisation are both involved in complaints involving the same event, Playgroup Australia will work with the complainant and the STO to achieve a satisfactory resolution which, depending upon the circumstances, might include:

- Acknowledgement and clarification of individual organisational responsibilities in a complaint involving multiple parties.
- Use of the procedures outlined in this policy to investigate a matter and seek resolution.
- Employing a mediator to enable the complainant and the STO to design a process for resolution.
- Acting in a support role to implement a process for resolution.

Definitions

Complaint – Expression of dissatisfaction made to Playgroup Australia or its representatives, related to Playgroup Australia's activities and services or the complaints-handling process itself, where a response or resolution is implicitly or explicitly expected.

Complainant – A person, organisation or its representative making a complaint regarding Playgroup Australia.

Feedback – opinions, comments, and expressions of interest in Playgroup Australia's services, activities, or the complaint handling process.

Stakeholder - Person or organisation that can affect or be affected by, or perceive itself to be affected by, a decision or activity of Playgroup Australia.

Organisation - Person or group of people that has its own functions with responsibilities, authorities, and relationships to achieve its objectives.

Member - Member organisation of Playgroup Australia, usually referred to as a State or Territory Organisation (STO).

Volunteer - An individual that provides unpaid or volunteer support for Playgroup Australia. Volunteers may act in different capacities and participate in different tasks, such as board positions or fundraising. Volunteers may also provide volunteer support for STOs through convening or facilitating playgroups.

Delivery Partner or Contractor - An individual or organisation whose primary relationship with Playgroup Australia is via contracted services.

Complaints Procedures

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Playgroup Australia’s complaints policy and procedure is published on Playgroup Australia’s website and will be made available upon request.

Making a complaint

Playgroup Australia encourages and welcomes complaints.

A person wishing to make a complaint may do so in writing or verbally. In the case of individuals with support needs (for example, an interpreter or communication or physical support), assistance to make a complaint will be provided or facilitated by Playgroup Australia.

The complaint can be reported through the following mechanisms:

- Written complaints may be addressed to Playgroup Australia’s CEO and sent to 490 Northbourne Ave Dickson ACT 2602 or info@playgroupaustralia.com.au . Playgroup Australia’s CEO will be responsible for receiving this correspondence and directing it to the appropriate person.
- Verbal and written complaints may also be made by contacting the following people via email or telephone:
 - the staff member the complainant usually engages with, or
 - the Supervisor of that staff member, or
 - the Playgroup Australia CEO at ceo@playgroupaustralia.com.au , or
 - the Playgroup Australia Board Chair chair@playgroupaustralia.com.au

The CEO (or Board Chair, if the Board Chair receives the complaint directly) will assess all complaints received according to the following criteria:

- **Jurisdiction:** Any complaints pertaining to external parties (such as member, delivery partner or supplier) will be directed to the relevant organisation, with the complainant’s permission. If PA is also the subject of the complaint, the complaint will be shared with the relevant organisation, and principles and directions outlined in the policy pertaining to member organisations applied.
- **Classification:** If the complaint is better managed under a different policy, such as Grievance, Conflict and Dispute Resolution Policy, Whistleblowers Policy, or Critical Incident Policy, the complaint will be directed through the appropriate pathway.
- **Delegation:** The CEO or Board Chair will appoint the appropriate person to manage the complaint process (which may be themselves). If the complaint is about:
 - A staff member—the Supervisor has delegated responsibility for trying to resolve in the first instance, complaints or disputes involving staff members. The complaint may be escalated to the CEO by the staff member or the complainant.
 - A senior staff member—the complaint will be managed by the CEO and may be escalated to the Board by the CEO or the complainant.
 - The CEO—the complaint will be managed by the Board Chair.

- A volunteer, such as a Board Member – the complaint will be managed by the Board Chair. If the complaint involves the Board Chair, the Board will appoint a Board member or an external third party to deal with the complaint.
- Where a complaint is about (or includes) an external party that works with Playgroup Australia - a member, supplier, delivery partner or related organisation - the complaint will be directed (with the complainant's permission) to the external party.

Following the assessment, an acknowledgement or Receipt of Complaint is provided to the complainant, which includes confirmation the complaint has been received, a copy of this policy and procedures and information regarding the next steps.

The CEO or Board Chair registers and records the complaint in the Complaints register.

Complaints Management

The person managing the complaint will be responsible for managing the complaint and implementing the procedures:

1. Assessment:

Once the complaint has been registered, the person managing the complaint will assess the complaint against appropriate criteria, such as severity, safety implications, complexity, and the need and possibility of immediate action. Complaints should be addressed based on their urgency, with urgent matters prioritised and addressed more immediately than the mandated time frames outlined below.

The person managing the complaint will contact the complainant within 7 days of the complaint being received, to inform that their complaint has been received and provide them with information about the process and expected timeframe. An appropriate channel to communicate with complainants should be utilised, to ensure this information is effectively received.

2. Investigation:

Playgroup Australia will make all reasonable efforts to investigate all relevant circumstances and information surrounding the complaint within a reasonable time, usually within 14 days of receipt of the complaint.

This may include notifying any parties involved, investigation and review of documentation, and interviews allowing parties involved to respond to issues raised. If applicable, it may also include external appointment of appropriate expertise to support or complete the investigation.

At all times, the principles outlined in the Complaints Policy apply, as well as all other Playgroup Australia policies, such as Privacy Policy. The investigation must follow fair procedure and principles of natural justice.

3. Resolution:

Complaints will be resolved within 30 days of being received. If this timeframe cannot be met, then the complaint should be dealt in a manner intended to lead to its effective resolution as soon as possible. The complainant will be informed of the reasons for any delay and will receive a proposed new timeframe.

Achieving resolution may include mediation of any disputes, or specific actions necessary to resolve the complaint. All reasonable attempts to resolve the matter to the satisfaction of the complainant should be exercised.

The possible outcomes of the investigation include that the complaint is:

- upheld (and if so, what will be done to resolve it)

- resolved (and how this has been achieved); or
- if no further action can be taken, the reasons for this.

Any disciplinary action against a staff member or volunteer arising from a complaint will be taken in accordance with the procedures contained in Playgroup Australia's Grievance and Disputes policy.

4. Communication:

The person responsible for managing the complaint will manage communication, which will include:

- notifying any parties involved or subject of the complaint (for example, a responsible staff member or volunteer) of the complaint and its nature
- investigating the complaint and providing the parties involved with an opportunity to respond to any issues raised
- mediating the dispute (if appropriate) and attempting to resolve the matter to the satisfaction of the complainant
- communicating with the complainant regarding investigative findings, proposed actions and outcomes
- taking any other action necessary to resolve the issue
- notifying the complainant when the complaint is closed.

The complainant will be kept informed of any decisions or actions taken regarding the complaint which are relevant to the complainant. Any personnel involved in the complaint will also be kept informed of any decisions or actions taken regarding the complaint which are relevant to the personnel. At all times the Playgroup Australia Privacy Policy applies.

4. Complaints Review

If the complainant is satisfied with the resolution, this information will be recorded in the register and the complaint closed. If the complainant is not satisfied with the investigation and proposed resolution of their complaint, the complaint should remain open. This should be recorded, and the complainant is informed of alternative forms of recourse available, or further attempts at resolution are undertaken. Playgroup Australia will continue to monitor the progress of the complaint until all forms of recourse are exhausted or the complaint is satisfied.

5. Complaints Evaluation (satisfaction with the complaints-handling process)

Playgroup Australia will record and report to the Board complaints status and resolution, including unresolved complaints. Upon closure of a complaint, complainants will be asked for feedback on the complaints handling process, which will be recorded and used to improve the complaints handling process.

Record keeping

Playgroup Australia will record the activities and performance of its complaints handling process. A register of complaints will be kept electronically and will ensure the protection of any personal information, respecting the confidentiality of complainants. The information collected and recorded must be relevant, accurate, complete, meaningful, and useful.

Upon reporting of the initial complaint, the register will be maintained by the CEO and the complaint should be recorded with a unique identifier code. This record will contain:

- Details of the complainant and the nature of the complaint
- The requested remedy (if any)
- Date lodged
- Due date for response

- Data on individuals involved in the matter
- Date of resolution, actions taken and decision-making reasoning
- Indication of complainant being notified of outcome
- Complainant response/feedback and any further action.

Copies of all correspondence will be kept with the register. The complaints register and files will be confidential, and access is restricted to senior staff and the Board.

The CEO will be responsible for preparing a report on all complaints received as required. Results from this report will be reviewed by the CEO and Board and used to:

- improve Playgroup Australia activities, work practices and processes by including a review of complaints in all engagement, monitoring and evaluation activities
- inform decision-making, by including a report on complaints as a standard item on Board and staff management meeting agendas.

Related Policies/ Documents

Privacy Policy

Code of Conduct

Grievance, Conflict and Dispute Resolution Policy.

Whistleblower Policy

Critical Incident Policy

The flow chart on the following page outlines this process:

