

AUSTRALIAN RED CROSS SOCIETY**POLICY STATEMENT– COMPLAINTS, CONCERNS AND FEEDBACK POLICY**

Date of Commencement: 26 November 2021

1. INTRODUCTION

Red Cross recognises the importance feedback plays in supporting continuous improvement and its relationship in ensuring that Red Cross continues to deliver its purpose and achieve its vision.

An effective complaint, concerns and feedback framework supports Red Cross to:

- reflect on our practice and identify opportunities for continuous improvement;
- understand what is working well;
- swiftly identify and remediate issues; and
- measure success in the achievement of objectives.

Red Cross is committed to maintaining a complaint, concerns and feedback system that is transparent, accessible and focused on resolution and improvement.

This policy sets out the principles that govern our response to complaints, concerns and feedback about our work, including the behaviour of our staff, volunteers or those working on our behalf. It further describes how we manage complaints, concerns or feedback, and how we learn from them.

2. SCOPE

The policy relates to complaints, concerns and feedback from both people external to Red Cross and also extends to Red Cross people in specific circumstances:

People External to Red Cross

This includes donors, stakeholders, clients, their advocates or carers, training students and members of the communities in which we work.

This policy applies to the work of Red Cross including the work undertaken on our behalf by partner organisations implementing activities, services and programs. Compliance with this policy by partner organisations is managed under both partnership agreements and informal agreements, both of which are monitored as part of operational management.

This policy should be read in conjunction with other relevant policies as outlined in Annexure 2. In particular, the Red Cross Client Service Charter sets out the rights and responsibilities of clients and communities and what to expect when they participate in any Red Cross program.

As a Registered Training Organisation, we also make a provision for people to appeal the outcome of any First Aid and Mental Health training course provided by Australian Red Cross. To learn more about appeal conditions, appeal procedures or to register a training appeal please visit [First Aid and Mental Health appeal form](#).

Red Cross People (staff, members and volunteers)

In line with our positive ‘speak up’ culture, we encourage our staff, members and volunteers, to first raise any complaints, concerns and feedback directly with their line manager, or in circumstances where that is not possible their manager’s manager. Where there are genuine reasons that prevent this from occurring, this Policy will apply for general, non-employment or volunteering related complaints, feedback or concerns.

Red Cross people must use the Red Cross Grievance Policy and Procedure for all employment and/or people and culture related matters (recognising that some grievance procedures for members are contained in the Divisional Regulations).

This policy and related procedure guides provides for a consistent approach to the management of complaints, concerns and feedback across all areas of Red Cross. Other Red Cross policies and procedures may apply as well as, or instead of, the Complaints, Concerns and Feedback policy. Matters relating to [Whistleblower](#), [Child Protection and other safeguarding](#) incidents such as Sexual Exploitation, Abuse and Harassment require additional specialist handling procedures, which take precedence over this policy. Red Cross people must ensure that relevant matters are managed through the relevant policy and procedures.

3. PRINCIPLES

Australian Red Cross has a commitment to safety, respect, confidentiality and non-discrimination. This means that any complaints or feedback received will be handled in line with the principles listed below:

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| Respect | <p>All actions taken are determined with consideration of the choices, wishes, rights and dignity of the person submitting the complaint, concern or feedback.</p> <p>Notwithstanding the above, Red Cross may be required by law to take prescribed actions in relation to some types of incidents.</p> |
| Safety | <p>The safety and security of all individuals is paramount. This includes the person submitting the complaint, concern or feedback; any respondent who may be the subject of an inquiry or investigation; and those Red Cross people involved with the management of a complaint, concern or feedback.</p> |
| Confidentiality | <p>We limit confidential information to people that will need to know to progress any complaint, concern or feedback</p> |
| Non-discrimination | <p>Australian Red Cross provides equal and fair treatment to anyone who provides a complaint, concern or feedback, taking all reasonable steps to ensure accessibility to people of all ages, identities, backgrounds and abilities.</p> |

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| Fairness | Investigations of complaints, concerns and feedback will be undertaken in a fair and unbiased manner and respect the rights of all parties involved. |
| Impartiality | All complaint investigation processes are impartial. No assumptions will be made, nor any action taken (other than safeguarding) until all relevant information has been collected and considered. Please refer to Child protection Policy and Prevention Sexual Exploitation, Abuse and Harassment |
| Natural Justice | A set of fair and proper procedures will be used when making a decision. The principle of natural justice is a common legal principle and alongside fairness, underpins most good complaints management processes. |
| Consequence free | <p>Anyone who raises a concern about the behaviour of someone or some people covered by the scope of this policy will be protected from any negative consequences or action by Red Cross.</p> <p>This does not apply in cases of malicious or vexatious reporting which, as outlined below, may result in disciplinary action.</p> <p>A Red Cross person who subjects another person to a detriment on the grounds that they have made, or propose to raise a complaint, concern or feedback may face disciplinary action (which may include, in the case of an employee, termination of employment).</p> <p>A detriment includes:</p> <ol style="list-style-type: none"> a. dismissal of an employee or volunteer; b. injury of an employee in their employment; c. alteration of an employee or volunteer 's position or duties to their disadvantage; d. discrimination between an employee and other employees of the same employer; e. discrimination between a volunteer and other volunteers of the same organisation; f. harassment or intimidation of a person; g. harm or injury to a person, including psychological harm; h. damage to a person's property; i. damage to a person's reputation; j. damage to a person's business or financial position; and k. any other damage to a person. |

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| Malicious or vexatious complaints | <p>Red Cross will not investigate malicious or vexatious complaints, determined as such through impartial assessment and triaging.</p> <p>Intentionally making a false disclosure or making a disclosure without a proper and reasonable basis, is a serious matter and, depending on the circumstances, may result in disciplinary action against the discloser (including potentially suspension or dismissal of a volunteer or an employee, termination of a contract or other legal action).</p> |
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4. POLICY STATEMENT

- 4.1 Red Cross welcomes feedback so we can learn from and improve what we do. Red Cross is committed to maintaining a positive 'speak up' environment that actively encourages and supports people to raise a complaint, concern or feedback, without fear of any adverse consequences.
- 4.2 We acknowledge that feedback can be positive, negative or neutral and can come to us in a range of ways including formally, informally, spontaneously or non-verbally.
- 4.3 We will aim to address any feedback about our people or the work that we do as quickly and effectively as possible.
- 4.4 We will ensure that all Red Cross understand their responsibilities to support people to raise a complaint, concern, or feedback. Red Cross will establish a common set of processes and guidelines to ensure a consistent, fair, robust and efficient response to all matters.
- 4.5 The implementation of this policy is supported by our operating procedures for complaints management and investigations.
- 4.6 All Red Cross people are responsible for ensuring they understand and support the complaints, concerns and feedback policy and supporting procedures.

Promoting our policy

- 4.7 We will ensure that information on client and community rights and information on feedback, complaints and response processes is actively promoted, easily accessible and prominently displayed.
- 4.8 Information on client and community rights and information on feedback, complaints and response processes will be available in plain language and a range of formats so that they can be read and understood, including culturally appropriate and inclusive methods and child friendly formats. We will assist people who need extra support to access this information for reasons such as disability, low literacy, language barriers, or limited access to a phone or internet etc. We will provide alternative formats of this information to beneficiaries who require them.

- 4.9 We will ensure all clients are provided with information about our complaints, concerns and feedback policy and how to contact us with a complaint or feedback when they begin receiving services, and receive our policy materials which are also downloadable from our website.
- 4.10 We welcome feedback if our materials have been difficult to access, read or understand, so we can improve this for the future.

Receiving complaints, concerns and feedback

- 4.11 We will actively provide opportunities for people to provide feedback on the activities, programs and services Red Cross undertakes.
- 4.12 We aim to make getting in touch with us as easy as possible. Ways we can be contacted include:
- Email: contactus@redcross.org.au
 - Post: **23-47 Villiers Street, North Melbourne VIC 3051**
 - Telephone: **1800 733 276**
 - Through our website: www.redcross.org.au
 - Verbally or in writing to a Red Cross person

People can also ask a carer, advocate, another organisation or individual to make this contact on their behalf. Some of these methods allow people to leave an anonymous complaint or feedback. It should be noted that we are not always able to fully investigate the circumstances associated with feedback or complaints made anonymously and we are also unable to provide feedback regarding resolution in relation to anonymous feedback or complaints

In addition to directly contacting Australian Red Cross you can also contact SafeCall, a whistle-blower hotline managed by the International Federation Red Cross available to all:

- SafeCall Hotline **+44 2076 965 952** offered by the
- 4.13 We will ensure clients and community members are aware of and supported in their right to have a support person or advocate represent them through a complaint's procedure.

Complaint handling procedure overview

- 4.14 We take a four-tiered approach to complaint handling, as follows:
1. frontline resolution: frontline staff receive the complaint, assess it, and resolve it immediately, if possible. For serious complaints or concerns (e.g., allegations of sexual harassment, child protection issues, frauds), these will be referred to and handled by dedicated specialist areas.
 2. investigation: if frontline staff cannot resolve the complaint, the matter will be referred through Red Cross' triage process to a manager for assessment. If an investigation is deemed appropriate, the manager will explain the investigation process to the complainant. Depending on the circumstances, investigation of some matters may be undertaken through an informal process.
 3. internal review: if the complainant is aggrieved with the process or outcome of the frontline resolution/investigation, they can request an internal review

4. access to external review: should the complainant be dissatisfied with the outcome of their complaint or the way in which we have managed the complaint, there are a number of independent bodies that can be contacted at any time during the complaint process, we include links on our website to the Australian Council for International Development and the Australian Charities and Not for Profit Commission.

What we do with complaints, concerns and feedback

- 4.14 When a client or community member complains, shares a concern or provides feedback, we expect our people to take it seriously and treat them with courtesy and respect. We will take steps to train our people in complaint, compliment and feedback handling enabling them to respond in ways that support people to feel safe, ensure that feedback is considered and there is an appropriate and timely response.
- 4.15 We will address all complaints, concerns and feedback in a confidential manner. Only the people directly involved in making, investigating or resolving a complaint will have access to information about it. Where the complainant is a client, no information will be documented in the individual's client file without his/her consent. However, in some cases, we may need to keep a record of the complaint in our incident report system. In those instances, we will ensure the privacy of the records as per privacy requirements. Please refer to the [Red Cross Privacy Statement](#) for more information
- 4.16 We aim to respond to complaints, concerns and feedback as quickly as possible. We will acknowledge all complaints within 3 working days.
- 4.17 We assess and where required, investigate, the complaint or feedback in line with the principles detailed in this policy and utilising Red Cross' triage processes. If the complaint, concern or feedback is assessed to be a reportable matter as prescribed within Red Cross [Whistleblower Policy](#), [Child Protection and/or other safeguarding](#) matter such as Sexual Exploitation, Abuse and Harassment, the matter must be directed to the specialist units appropriately trained in responding and the complainant will be updated. Some complaints of a serious nature may also need to be reported to external authorities.
- 4.18 We expect most complaints, concerns and feedback to be resolved and the outcome communicated within 28 days. Sometimes we may need to investigate complaints in more detail to ensure we take the right action. Depending on how complex the concern is, we may need some more time to investigate it. If that is the case, we will contact the complainant to keep them updated and informed during the investigation and once the complaint has been resolved.
- 4.19 We record and retain details of all complaints, concerns and feedback for a minimum of seven years. We analyse our complaint, compliment and feedback data and provide annual reports to Red Cross executive management on how we can reduce complaints and improve services. Executive management is responsible for acting on the recommendations in these reports.

How we use complaints, concerns and feedback to improve

- 4.20 We use all complaints, concerns and feedback anonymously to help us learn and improve our activities, services and quality outcomes for our customers, clients and the communities where we work. We may adjust our program design or approach and address systemic issues. Where justified, complaints may result in consequences for Red Cross people.
- 4.21 We will only use the information gathered from a complainant to the extent required to appropriately manage their complaint or concern, and to learn and improve through analysis of de-identified and aggregated information we collect. As mentioned above, Red Cross may have mandatory reporting to external authorities.
- 4.22 We will communicate what we have learned from complaints, concerns and feedback back to our clients and communities where we work.
- 4.23 We will aggregate complaint, compliment and feedback data and report it through our governance structures.

Client rights if unhappy with our response

- 4.24 Our four-tiered approach model outlined above provides options for both internal and external review of unresolved matters. In addition to this, clients and community members who are unsatisfied with our response to their complaint, can escalate their concerns by contacting the Office of the CEO: ceo@redcross.org.au or by mail at **23-47 Villiers Street, North Melbourne VIC 3051** . If the complaint relates to illegal or serious misconduct it can be escalated by using our confidential whistleblower service Stopline: **Phone: 1300 30 45 50** if within AUSTRALIA or **+61 3 9811 3275** if overseas, or by referring the complaint to an independent agency

Independent Complaint Processes

- 4.26 There are a number of other independent organisations that a complainant can speak to including:
- Aged Care Quality and Safety Commission, who regulate Aged Care services
 - Office for the Australian Information Commissioner
 - NDIS Quality and Safeguards Commission, who regulate NDIS services
 - Australian Council for International Development
 - Consumer Ombudsman
 - National Children’s Commissioner
 - Australian Charities and Not for Profit Commission
 - State or Territory human rights bodies
 - Australian Skills Quality Authority

5. HELPING TO APPLY THE POLICY

The attached *Annexures* provide further detail:

Annexure 1: Definitions – the glossary for use when reading the Policy and related procedure.

Annexure 2: Related Documents – includes reference to relevant Red Cross documents and key legislation.

6. REVIEW OF POLICY

Monitoring application of the policy is the responsibility of the Executive Team.

The policy and its related procedures will be reviewed every five years, at a minimum.

| Version | Authors | Approved | Planned Review |
|------------|---|------------------|----------------|
| Draft v0.1 | M Wolthuizen and M Vine | | |
| Draft v0.2 | Kylie Hay | | |
| Draft V0.3 | Melissa Goode, Sophie Mackey, Jacob Walsh and Alexandra Ruiszespinoza | | |
| Draft V0.4 | Organisational consultation review. Refer to review register for further detail | | |
| Draft V0.5 | Stuart Johnson, Sophie Mackey, Kylie Hay | | |
| Draft V0.6 | Risk, Legal and P&C | 26 November 2021 | Biannually |

Annexure 1: Definitions

| Term | Definition |
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| Advocate | A person who a client has nominated to represent their interests or expressed wishes. In the context of this policy, an advocate would have the authority to represent the complainant and act in the complainant's best interests. |
| Carer | An individual who provides personal care, support and assistance for their relative, partner, child or friend who requires care, who has a disability, is frail and aged, or who has a medical condition or mental illness. |
| Clients | Any person or family member/guardian receiving a service from Australian Red Cross. |
| Community | Community generally describes one of three things: <ul style="list-style-type: none"> · All people, organisations, and structures within a defined geographical area, having a common government · A group of people with a common interest, · People with a common affiliation, include connections relating to shared values, traditions and lifestyles. |
| Complaint | An expression of concern, dissatisfaction or frustration with, among other things, the quality or delivery of a service, a policy or procedure, a decision, or behaviour of another person. |
| Complainant | Any person who has made a complaint or provided feedback in the context of this policy, or had complaint/feedback made on their behalf by an advocate |
| Contractor | Any person or organisation (other than a staff member or volunteer of Red Cross or Red Cross Member) working with or providing services to Red Cross, including any individual or sole traders (such as consultants). |

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| Feedback | Information provided by a person on their experience of a Red Cross activity, service or program. It could be an opinion, reaction, comment, compliment, suggestion or remark. Feedback can be both positive and negative. |
| Partner organisation | An organisation chosen by Red Cross to collaborate or work with to provide services to or in connection with projects. |
| Red Cross | Australian Red Cross Society (ABN 50 169 561 394). |
| Red Cross People | Members of staff and volunteers engaged by Red Cross or a Red Cross Member. |
| Sub-contractor | a person or an organisation that is hired by a main contractor that is providing services for/to Red Cross to provide some or all of the obligations of the main contractor. |
| Red Cross Member | A person who is a member of Red Cross in accordance with the Rules of Red Cross. |
| Support person | Person selected by the complainant, respondent or witness to provide support during the complaints process. |
| Whistleblower | Refers to an individual who reports a suspicion, on reasonable grounds, of illegal or serious misconduct. |

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| Volunteer | <p>A person who is a volunteer in accordance with Rule 4 of the Rules of Red Cross or provides voluntary service with the agreement of Red Cross as defined and required by the Red Cross Volunteer Framework or provides voluntary service as a member of:</p> <ul style="list-style-type: none">• the Board of Red Cross• a Committee of the Board• a Divisional Advisory Board• a Committee of a Divisional Advisory Board. <p>A 'volunteer' does not include any person who is a blood or other donor, to Australian Red Cross Lifeblood.</p> |
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Annexure 2: Related Documents

Key internal policies

- Client Service Charter
- Code of Conduct
- Ethical Framework
- Client Critical incident Policy
- Disciplinary Action Policy
- Grievance Policy and Procedure
- WHS-305 Aggression Prevention and Management Policy
- Aggression Prevention and Management Procedure
- Charter of Commitment to Children and Young People
- Child Protection Policy
- Child Protection Code of Conduct
- Child Protection Handbook
- Inclusion and Diversity Policy
- Privacy Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Risk Management Framework
- Volunteer Framework
- Ways of working
- Whistleblower Policy

External legislation

- Privacy Act 1988
- Human Rights and Equal Opportunity Commission Act 1986
- Freedom of Information
- National Disability Insurance Scheme Act 2013
- National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (Cth)
- National Redress Scheme for Institutional Child Sexual Abuse Direct Personal Response Framework 2018 (Cth)
- Aged Care Act 1997 (Cth)
- Aged Care Quality and Safety Commission Act 2018 (Cth)