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# COMPLAINTS HANDLING POLICY

Norths Collective believes that complaints and compliments are best viewed as a positive interaction with our members and the communities in which we serve.

This policy covers all Norths Collective venues across the group.

## Our Objective

Norths Collective's Complaints Handling Policy is intended to ensure that we handle complaints at all our venues fairly, efficiently and effectively.

This policy provides guidance on the key principles and concepts of our complaint management process to our employees and people who may wish to make a complaint.

Norths Collective seeks to provide a safe and effective service to those who wish to make a complaint on the provision of our services or the quality of our service. Many complaints occur because of alleged failure in our services, or where relevant information is not readily available, is difficult to understand, incomplete or misleading, is not provided or made available within a reasonable period of time.

At Norths Collective we believe that a good complaint handling process can provide us with knowledge which we can use to:

- Enhance our member and customer loyalty
- Improve our public reputation
- Improve our products and services
- Build better relationships with our members and others we serve
- Improve our efficiency and bottom line
- Empower out employees to resolve issues fairly and efficiently
- Reduce the stress and financial expenses related to a complaint.

## Scope

The principles outlined in this Complaints Handling Policy apply to all our members who receive or manage complaints from the public and members, regarding our products, services and employees, or our complaint handling process.

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# COMPLAINTS HANDLING POLICY

When we address complaints, care needs to be taken to ensure that the Complaints Handling Policy and process aligns with other Norths Collective policies.

## Definitions

**Complaint** – An expression of dissatisfaction made to or about us, our services, employees or the handling of a complaints where a response of resolution is explicitly or implicitly expected or legally required. (AS/NZ 10002:2014).

In addition to complaints being made directly to Norths Collective, some complaints (or negative comments) may be made on social media.

**Complaint handling/management process** – This encompasses all policies, procedures, practices, employees, hardware and software used by us in the management of complaints.

**Dispute** – An unresolved complaint escalated either within or outside Norths Collective.

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

**Grievance** – A clear, formal written statement by an individual staff member about another employee or a work-related problem.

**Behaviour –** Actions or conduct towards oneself or others. Bad behaviour may relate to conduct towards other employees that is inappropriate considering the particular situation.

## Our Policy

Norths Collective's Complaints Handling Policy and complaint handling process are modelled on the principles of fairness, accessibility, responsiveness, efficiency and alignment with our organisational culture.

Our Policy is designed to:

- Make it easy to provide feedback or to make a complaint by providing information about who to contact and providing feedback or complaint forms in print and electronic formats;
- Resolve a complaint informally by talking to the individual and providing an explanation or apology;
- Ensure regular reviews of the issues raised by complaints to or about Norths Collective.

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We expect our employees at all levels to be committed to handle complaints in a fair, effective and efficient manner. The following table outlines the steps that are expected to be undertaken by our employees and the commitment expected:




Each of these steps are discussed in details within this Policy.

## Facilitating Complaints

**We will maintain a People focus when facilitating complaints.**

We are committed to seeking and receiving feedback and complaints about our services, process, practices, procedure, products and complaint handling.

Any concerns raised through feedback or complaints will be dealt with promptly and within a reasonable time frame. People making complaints will be:

- Provided with information about our complaint handling process and how to access it
- Listened to, treated with respect by employees and actively involved in the complaint process where possible and appropriate
- Provided with reasons for our decision/s and any options for redress or review.

**There will be no detriment to people making complaints.**

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

**Anonymous complaints**

We accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is sufficient information provided.

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**Accessibility to information**

We will ensure that information about how and where complaints may be made to or about us is well publicised on our website. We will ensure that process to manage complaints is easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a formal complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament).

## Acknowledging and Responding to Complaints

At Norths Collective, we will endeavour to acknowledge and respond to any complaint promptly, objectively, confidentially and in an unbiased manner.

**Early resolution at first point of contact**

Where possible, complaints will be resolved at first contact with us and, when appropriate, we may offer an explanation or apology to the person making the complaint.

Norths Collective's intention is to record and resolve complaints at first point of contact. This record keeping discipline will add to the data we regularly analyse to identify process issues and to track trends in the complaint handling activities of our employees.

**Responsiveness to meet people's expectations**

We will promptly acknowledge the receipt of complaints.

We will assess and prioritise complaints according to the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the:

- Complaints process
- Expected time frames for our actions
- Progress of the complaint and reasons for any delay
- Likely involvement in the process
- Possible or likely outcome of their complaint

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We will advise people as soon as possible when we are unable to deal with any part of their complaint and will provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames or responding to their complaint and the reason for our delay.

**Objectivity and fairness in dealing with complaints**

To ensure objectivity and fairness we will:

- Address each complaint with integrity and in an equitable, objective and unbiased manner
- Ensure that the person handling the complaint is independent of any staff member whose conduct or service is being complained about
- Manage conflicts of interest, whether actual or perceived, responsibly. Independent internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

**Responding in a flexible approach**

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

**Confidentiality**

We will protect the identity of people making complaints where this is legal, practical and appropriate. Personal information that identifies individuals will only be disclosed or used by us as permitted under our Privacy Policy, the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## Managing and Resolving The Complaint

**Empowerment of employees**

We will empower all our employees who are required to manage complaints to implement our complaint management process as relevant to their role and responsibilities.

Our employees are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management process.

**Managing unreasonable conduct by people making complaints**

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We are committed to being accessible and responsive to all people who approach us with feedback or complaints. When people have behaved unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our employees to do the same in accordance with this Policy.

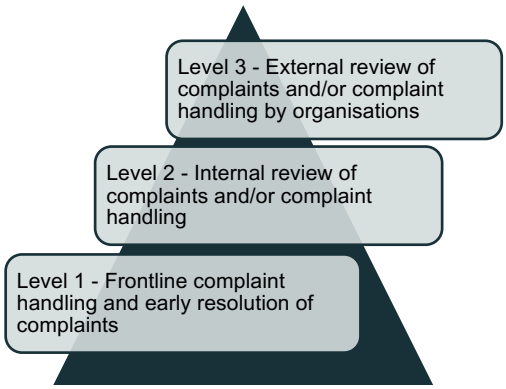
Our success in dealing with complaints depends upon:

- Our ability to do our work and performance our functions in the most effective and efficiency way possible
- Health, safety and security of our employees
- Our ability to allocate our resources fairly across all the complaints we receive.

**Alternative avenues for dealing with complaints**

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

**Our three levels of complaint handling**




***Level 1 – Frontline complaint handling and early resolution of complaints***

We aim to resolve complaints at the first, frontline level. Wherever possible employees will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

***Level 2 – Internal review of complaints and/or complaint handling***

Where resolution at the frontline level is not possible, we may decide to escalate the complaint to a more senior officer within Norths Collective. This second level of complaint handling will provide for the following internal mechanisms:

- Assessment and possible investigation of the complaint and decision/s already made

- Facilitated resolution (where an independent person who is not connected with the complaint reviews the matter and attempts to find an outcome that is accepted to the relevant parties).

***Level 3 – External review of complaints and/or complaint handling by organisations***

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of our decision.

## Our Responsibilities

Our roles and responsibilities in supporting, preventing, identifying and resolving complaints at Norths Collective include the following:

**Responsibilities of CEO and Board**

The CEO and members of the Norths Collective Board are responsible for encouraging and promoting a culture that values complaints and their effective resolution. We do this by:

- Requiring our complaint handling activities to be reported to the CEO and the Board
- Providing adequate support and direction to employees who are responsible for handling complaints
- Regularly reviewing reports about complaint trends and issues arising from complaints
- Encouraging all employees to be alert to complaints and assist those responsible for handling complaints to resolve them promptly
- Encouraging employees to make suggestions to improve the complaints handling process
- Supporting recommendations to improve our services and complaint handling process, arising from the analysis of complaint data.

**Employees whose duties include complaint handling**

All employees who may be involved in handling complaints (this may include the CEO or the Board) are required to demonstrate exemplary complaint handling behaviour and practices. We do this by:

- Treating all people with respect, including people who make complaints
- Assisting people to make a complaint, where required
- Complying with this Policy and associated process
- Providing regular feedback on issues arising from complaints
- Providing suggestions to management on ways to improve our complaints management process.

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**All employees**

Norths Collective expects that all its employees understand and comply with our complaint handling practices. All our employees are expected to:

- Be aware of our Complaint Handling Policy and process
- Treat all people with respect, including those who make complaints
- Assist people who wish to make complaints access our complaints process
- Be alert to complaints and assist employees handling complaints resolve matters promptly.

## Recording, Analysis and Evaluation of Complaints

We will ensure that complaints are recorded in a systematic way to enable information to be easily retrieved for reporting and analysis by North Collective's management and its Board.

Regular analysis will be undertaken to monitor trends, measure the quality of our customer service and to identify areas for improvements.

Both these analyses and related reports will be provided to our CEO, senior management and to our Board for review, at least six-monthly. The reports will provide information on the:

- Number of complaints received
- Outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified
- Number of requests received for internal and/or external review of our complaint handling processes.

## Monitoring Of Our Complaint Management Process

We will continually monitor our complaint management process, including the use of independent audits and complaint satisfaction surveys, to:

- Ensure its effectiveness in responding to and resolving complaints
- Identify and correct deficiencies in the operation of our complaint handling process.

## Continuous Improvement

At Norths Collective, we are committed to improving the way we operate, including our management of the effectiveness and efficiency of our complaint management process. To this end, we will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- Recognise and reward exemplary complaint handling by employees
- Regularly review the complaint management process and complaint data
- Implement appropriate process changes arising out of our analysis of complaints data and continual monitoring of the process.

## Our Complaint Management Process

When responding to complaints, our employees are required to act in accordance with Norths Collective's complaint handling process as well as this Policy to provide guidance on the management of complaints.

Employees should also consider any relevant legislation and/or regulations when responding to complaints and feedback. Norths Collective's complaint management process is summarised in the following five distinct stages:




**Step 1: We receive complaints**

Complaints may be received by a supervisor, manager, executive manager, People & Culture, CEO or the Board. We will record the complaint and its supporting information promptly when it is received. Such record keeping will add to the pool of data we collect and analyse to identify process issues and to track the

complaint handling activities of employees. We will also assign a unique identifier/number to the complaint file. The record of the complaint will document:

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

**Step 2: We acknowledge complaints**

We will acknowledge the receipt of each complaint promptly, and preferably within 5 working days. When appropriate we may offer an explanation or apology at this time.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

**Step 3: We assess and investigate complaints**

***Initial assessment***

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

- The seriousness, complexity and urgency of the complaint
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed
- Whether a resolution requires the involvement of an external party.

***Investigating the complaint***

Following an initial assessment of the complaint, we will consider how to manage it. We may:

- Give the person making a complaint information or an explanation
- Gather information about the issue, person or area concerning the complaint
- Investigate the claims made in the complaint.

We will keep the person making the complaint updated on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium.

The actions we decide to take will be tailored to each case and will consider any statutory requirements.

**Step 4: We determine outcomes and provide reasons for decisions**

After considering the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them on the:

- Outcome of the complaint and any action taken
- Reason/s for our decision
- Remedy or resolution/s that we have proposed or implemented
- Options for review that may be available to the complainant, such as an internal review, external review or an appeal.

**Step 5: We close the complaint: document and analyse data**

***Document information***

We will maintain records to document:

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

***Analyse information***

We will ensure that outcomes are properly implemented, monitored, analysed and reported to the complaint handling manager, senior management and the CEO.

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# COMPLAINTS HANDLING POLICY

## Document Control

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