



Complaints Policy

1. Introduction

1.1 Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- enable us to respond to issues raised by people making complaints in a timely and cost-effective way
- maintain public confidence in our administrative processes, and
- inform us about the best ways to improve our services, complaint handling and our dealings with the public.

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

For the purposes of this Policy document, “Board” means the elected Directors and the Executive General Manager.

1.2 Scope

This policy applies to any Board member receiving or managing complaints from the public made to or about us, regarding our services, people and complaint handling.

1.3 Organisational commitment

Blue Mountains Regional Business Chamber Inc. (“the Chamber”) expects our Board members to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from Board members and the way that commitment should be implemented.

Who	Commitment	How
President	Promote a culture that values complaints and their effective resolution	<p>Report publicly on the Chamber's complaint handling.</p> <p>Provide adequate support and direction to Board members responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all Board members to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</p> <p>Encourage Board members to make recommendations for system improvements.</p> <p>Support recommendations for service and complaint handling improvements arising from the analysis of complaint data.</p>
Persons responsible for complaint handling (e.g. the Secretary)	Establish and manage our complaint management system.	<p>Provide regular reports to the Board on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with the President or the Board (as appropriate) and implemented.</p> <p>Resolve complaints promptly and in accordance with the Chamber's policies and procedures.</p> <p>Provide suggestions on ways to improve the organisation's complaint management system.</p> <p>Encourage all Board members to be alert to complaints and to assist those responsible for handling complaints to resolve them promptly.</p>

<p>Persons whose duties include complaint handling</p>	<p>Demonstrate exemplary complaint handling practices</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people to make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide feedback to the Board on issues arising from complaints.</p> <p>Provide suggestions to the Board on ways to improve the Chamber's complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by the Board.</p>
<p>All Board members</p>	<p>Understand and comply with the Chamber's complaint handling practices.</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of the Chamber's complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints to access the Chamber's complaints process.</p> <p>Be alert to complaints and assist persons handling complaints to resolve matters promptly.</p> <p>Provide feedback to the Board on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by the Board.</p>

2. Terms and Definitions

Complaint

Expression of dissatisfaction made to or about us, our services, our people or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy does not include:

- Board member grievances
- code of conduct complaints [see our Code of Conduct]
- responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback']
- service requests [see definition of 'service request' below], and
- requests for information.

Complaint management system

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

Dispute

An unresolved complaint escalated either within or outside of the Chamber.

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 where a response is not explicitly or implicitly expected or legally required.

Service request

This includes:

- requests for action
- routine inquiries about the Chamber's business
- requests for the provision of services and assistance
- requests for explanation of policies, procedures and decisions.

Grievance

A clear, formal written statement by an individual Board member about another Board member or a Board matter.

Policy

A statement of instruction that sets out how we should fulfill our vision, mission and goals.

Procedure

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

3. Guiding principles



3.1 Facilitate complaints

People focus

The Chamber is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiple and accessible ways to make complaints
- listened to, treated with respect by Board members and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decisions and any options for redress or review.

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 and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

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

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent

3.2 Respond to complaints

Early resolution

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

Recording the Complaint

All complaints received will be recorded in a Complaints Register. Among other relevant details, the Register will record the date of the complaint, the nature of the complaint, the complainant's name (if provided), the date of resolution and how it was resolved.

Responsiveness

We will promptly acknowledge receipt of complaints.

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

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

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate). We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any Board member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

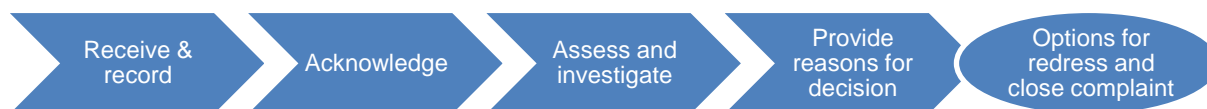
Our Board members are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to problem solving to enhance accessibility for people making complaints and/or their representatives. We will assess each complaint on its merits and involve people 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 practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by the Chamber as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

4. Complaint management system



4.1 Introduction

When responding to complaints, Board members should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

The five key stages in our complaint management system are set out below.

4.2 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information in a Complaints Register. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant data, and
- any additional support the person making a complaint requires.

4.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 5 working days.

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

4.4 Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issues raised in the complaint are within our control. We will also consider the outcomes sought by the complainant and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected

- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

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

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case.

4.5 Providing reasons for decisions

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

- the outcome of the complaint and any action we took
- the reasons for our decision
- the remedy or resolutions that we have proposed or put in place, and
- options for review that may be available to the complainant.

4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- How we managed the complaint
- The outcomes of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations), and
- Any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the Governance Committee and the Board.

5. Accountability and learning

5.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

The standard agenda for Board meetings will include Complaints as a permanent item so that new complaints are brought to the Board's attention, as well as the resolution of ongoing matters.

5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.

5.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system.

To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- encourage exemplary complaint handling by Board members
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising from our analysis of complaints data.

Acknowledgements

The development of this policy has been informed by the following:

- Australian and New Zealand Standard Guidelines for complaint handling in organizations AS/NZS 10002:2014
- NSW Ombudsman Effective complaint handling guidelines, 2nd Edition, December 2010
- Victorian Ombudsman Councils and complaints - a good practice guide, February 2015
- Joint publication of the NSW Ombudsman and Department of Local Government Complaints Management in Councils Practice note no. 9, revised July 2009
- Ombudsman Western Australia Guidelines on complaint handling, November 2010
- Commonwealth Ombudsman Better Practice Guide to Complaint handling 1, April 2009
- NESTA Grumbles Gripes and Grievances The Role of Complaints in Transforming Public Services, April 2013
- Scottish Public Services Ombudsman SPSO Statement of Complaint handling Principles, 2011
- The British and Irish Ombudsman Association Guide to Principles of good complaint handling, 2007
- NSW Ombudsman Managing Unreasonable Complaint Conduct – a Model Policy and Procedure 2012
- Victorian Ombudsman Good Practice Guide, November 2007
- Disability Services Commissioner Victoria Good Practice Guide and Self Audit Tool, 2nd Ed. 2013.