



MANAGING COMPLAINTS POLICY

Applies to: All Board members, staff, volunteers, and contractors of Djirra	Version: 5
Specific responsibility: Chief Executive Officer	Date approved 21 March 2025
	Next review date: 2029

1. POLICY STATEMENT

Djirra¹ is committed to ensuring that any person or organisation using Djirra services or affected by its operations has the right to lodge a complaint or to appeal a decision of the organisation and to have their concerns addressed in ways that ensure access and equity, transparency, objectivity and fairness, accountability and confidentiality. Any person or organisation using Djirra services or affected by its operations may also provide feedback, either positive, general or negative.

The organisation will provide a complaints and appeals management procedure that:

- is simple and easy to use;
- is effectively communicated and promoted to all clients and stakeholders;
- ensures complaints or appeals are fairly assessed and responded to promptly;
- is procedurally fair and follows principles of natural justice;
- complies with legislative requirements.

2. PRINCIPLES

Djirra values feedback and complaints as a valuable opportunity to continually improve its services.

Djirra will:

- ensure that all clients, and their families, carers and advocates are encouraged and supported to raise any concerns they have about the organisation;
- consider all complaints it receives regardless of whether or not the complainant is a client of the organisation;
- treat all complainants with respect, recognising that the issue of complaint is important to the complainant;
- consider risks to Djirra clients when the person who makes a complaint is a person who uses violence, and ensure Djirra responds in ways that minimise the risk of further harm to the client;

¹ Aboriginal and Torres Strait Islander Corporation Family Violence Prevention and Legal Service Victoria operates as Djirra

- maintain confidentiality of parties involved, keeping any information private to those directly involved in the complaint and its resolution unless required to be disclosed by law;
- ensure support and advocacy is available to clients who make a complaint and require support;
- resolve complaints in a timely manner, and where possible, to the satisfaction of the complainant, and provide the complainant with a formal response of the outcome;
- keep parties to the complaint appropriately informed of the progress of the complaint;
- ensure that Board members and staff are given information about the complaints procedure as part of their induction and are aware of procedures for managing client feedback and complaints;
- ensure all service users are aware of the complaints policy and procedures;
- ensure that all complainants are aware of and understand how to escalate their complaint to external bodies where necessary;
- ensure that a complainant is not penalised in any way or prevented from use of services during the progress of an issue;
- ensure that feedback data (both positive and negative) is considered in organisational reviews and in planning service improvements to ensure continuous improvement;
- review and evaluate the accessibility and effectiveness of the complaints management system and continually improve its processes.

3. DEFINITIONS

A **complaint** is any written or verbal statement outlining a problem or concern involving Djirra, including its staff, the service they provide or the terms of engagement or contract with Djirra which implies a response or resolution.

Feedback can be positive or negative and includes compliments, suggestions, concerns and issues you wish to raise with Djirra such as what we are doing well. Feedback, even if negative, does not imply a response or resolution. For example, someone informs you they don't like the design of a brochure. While this may lead to reviewing the brochure, there is no requirement to inform the person who gave the feedback.

4. PROCEDURES

4.1 Information for clients and stakeholders

Djirra's complaints and appeals procedure will be documented for clients and stakeholders, including in Djirra's service-specific clients' rights brochures and welcome packs. This information will be accessible on the Djirra website.

All clients will be informed of their rights and responsibilities with regard to complaints and appeals at the earliest possible stage of their involvement with the organisation, which will include:

- how to make a complaint or lodge an appeal
- contact person for lodging a complaint or appeal
- how the organisation will deal with the complaint or appeal, the steps involved and the timelines
- the rights of the complainant to an advocate, support person or interpreter
- how the person will be informed about the outcome of their complaint or appeal
- how to make a complaint to an external body including contact details.

4.2 Making a complaint

Complaints may be made by:

- speaking to a Djirra staff member via telephone or in person
- submitting a feedback form via the Djirra website djirra.org.au/feedback/. This form can be used for feedback, suggestions and complaints
- providing a written complaint which may be sent to Djirra's head office at 292 Hoddle Street, Abbotsford Vic 3067 or to complaints@djirra.org.au
- social media direct messaging via [Facebook](#), [X](#) or [Instagram](#).

A person wishing to make a complaint may do so in writing or verbally to:

- Any staff member, including the staff member they were dealing with at the time. A person wishing to make a complaint may prefer to do so to an Aboriginal staff member if the staff member they are dealing with at the time is not an Aboriginal staff member
- the manager of the staff member they were dealing with at the time
- a member of the management team
- the Chairperson
- or external bodies which relate to Djirra's services and programs, such as the Legal Services Commissioner for complaints about legal services, Victims of Crime Commissioner for clients who are victims of crime, Victorian Information Commissioner for complaints about use of client information; Health Services Commissioner and Victorian Homelessness Advocacy Service for complaints about health and homelessness services, Australian Health Practitioner Regulation Agency for counselling services provided by a psychologist.

4.3 Djirra's complaints officer

The Director, Legal Services (or their delegate) is Djirra's complaints officer. The email account complaints@djirra.org.au is managed by this officer who must acknowledge complaints and forward complaints to the appropriate manager for investigation, action and recording in the appropriate Complaints Register.

4.5 Responding to a complaint

Stakeholder complaints

Complaints from stakeholders who are not clients or staff are referred to the Deputy CEO.

Frontline complaint resolution

Where possible, complaints will be resolved at first contact with Djirra. Djirra staff are empowered to resolve complaints promptly and with as little formality as possible. Djirra will listen to the complainant, acknowledge the concern raised, and adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives. Complaints that have been resolved at first contact should be recorded on the appropriate Complaints Register.

If the complaint cannot be resolved promptly, staff will refer the matter to their relevant manager to progress.

Acknowledgement

Where a complaint has not been resolved at first contact and has been referred to a staff member's manager, the relevant manager will ensure that the complaint will be formally acknowledged within **two business days**, and the complainant will be provided with details of next steps, including the expected timeframes and responses to the complaint (see section below).

Djirra will confirm whether the issue/s raised is/are within its control. Djirra 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 separately addressed.

For urgent matters, Djirra will acknowledge this urgency and indicate to the complainant how the complaint will be handled within a specified period.

Investigating and resolving complaints

As far as possible, complaints or appeals will be investigated and resolved within **15 working days (three [3] weeks)** of being received. If this timeframe cannot be met, the complainant will be informed of the reasons why and of the alternative timeframe for resolution.

In determining how a complaint will be managed, Djirra 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
- whether the person making the complaint is a person who uses violence, and any potential related risk of harm to a Djirra client
- the risks involved if resolution of the complaint is delayed
- whether a resolution requires the involvement of other organisations.

If the complaint is about

- a staff member, the complaint will normally be initially dealt with by the staff member's manager
- a manager, the complaint will normally be dealt with by the relevant director
- a director, the complaint will normally be dealt with by the Deputy CEO
- the Deputy CEO, the complaint will normally be dealt with by the Chief Executive Officer
- the Chief Executive Officer, the complaint will normally be dealt with by Chairperson.

Timeframes for responding to complaints

- **Acknowledgement of complaint:** Within **two** business days (social media – within **one** business day)
 - **For urgent matters,** Djirra will acknowledge the urgency and indicate how the complaint will be handled within a specified period.
- **Investigation and resolution of complaint:** Within **15** business days of complaint being received
- **If complaint is not resolved within 15 business day timeframe:** complainant will be advised of revised timeframe, and reasons for delay.

Complaints made via social media

If Djirra receives a complaint via social media, where possible, the staff member managing or moderating Djirra's social media platforms should quickly advise the relevant program manager. The program manager should manage the reply **within one business day** by acknowledging the issue and endeavouring to take the conversation off-line and seek to resolve the matter with a personal response. The complainant should be advised of a response timeframe if it is not able to be resolved at this point of contact.

Reviewing the complaint

If the complainant is not satisfied with the investigation and proposed resolution of their complaint or appeal, they can seek a further review of the matter by the Chief Executive Officer within 15 business days of being notified of the outcome or proposed resolution.

Referral to external bodies

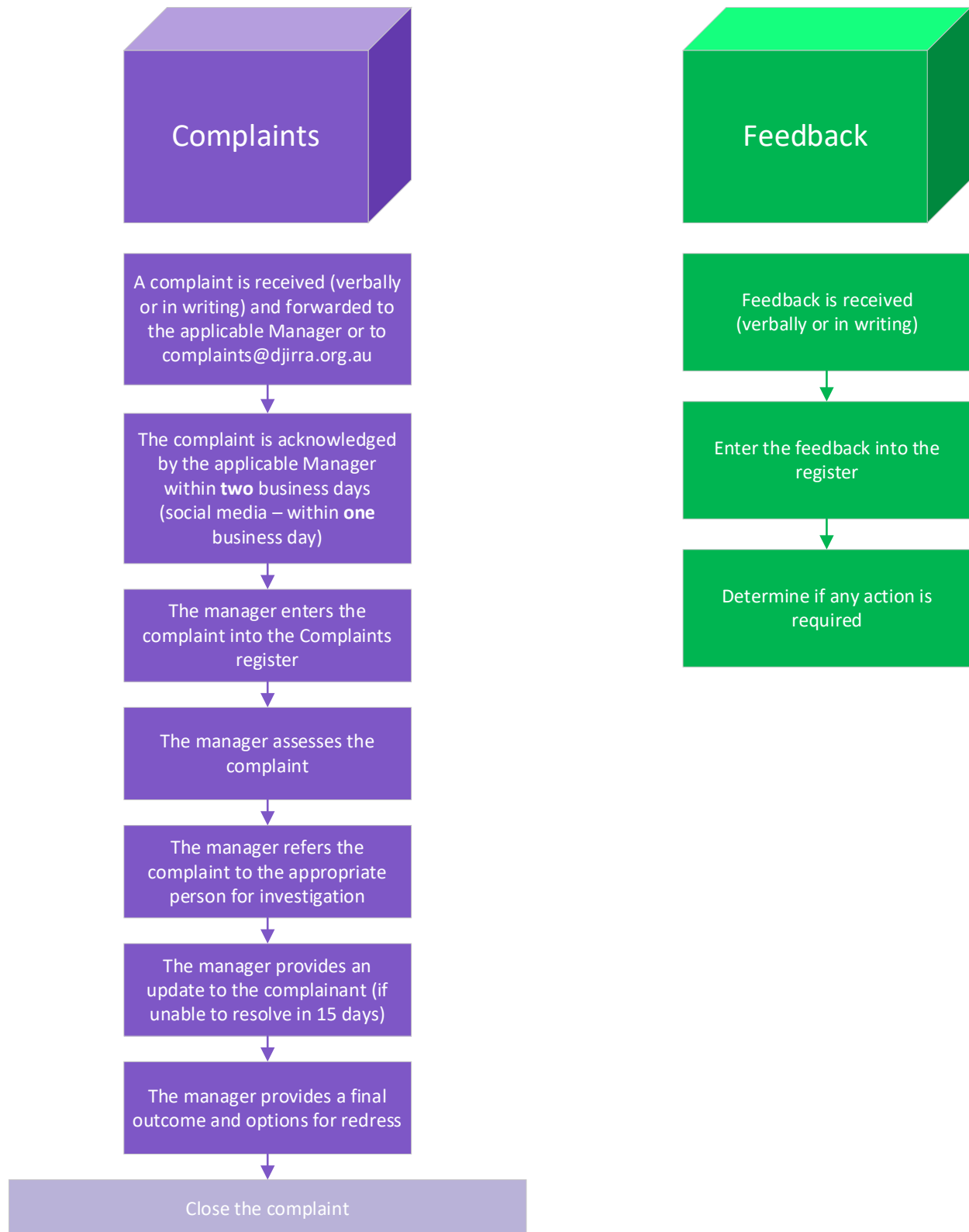
A formal external complaints procedure may follow if the complainant is still not satisfied with the outcome and other avenues exist, including (where relevant) the Legal Services Commissioner, Victims of Crime Commissioner, Australian Health Practitioner Regulation Agency.

4.6 Manager's responsibility

The relevant program manager will be responsible for processing the complaint or appeal by:

- ensuring the complaint has been registered in the appropriate Complaint Register;
- ensuring the matter has been referred to the appropriate person for investigation and action;
- making a decision or referring to the appropriate people for a decision to meet the timeframes outlined above;
- informing the complainant of the outcome:
 - 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
- informing the complainant of any options for further action if required.

Chart 1 Procedures for complaints and feedback



5. RECORDING, MONITORING AND REPORTING INFORMATION ABOUT COMPLAINTS

Recording complaints

The Djirra staff member receiving the complaint (including complaints resolved at first contact) will record the following information for each complaint using the *Djirra Complaint Form (electronic or hard copy)*:

- details of the complainant and the nature of the complaint
- how the complaint was received
- date lodged
- the complainant's desired outcome (if known)
- action taken
- date of resolution and reason for decision
- indication of complainant being notified of outcome
- complainant response and any further action.

Registering complaints

A separate complaint register will be maintained for each Djirra program.

The relevant manager will record the complaint in the appropriate register and ensure it is investigated within the expected time frame.

The Complaints Registers, copies of all correspondence and the relevant files will be confidential and access, in the first instance, is restricted to their respective program managers. De-identified complaints data will be collated by the Governance Risk and Compliance Team at the direction of the Chief Executive Officer who will review results to inform operational planning and decision-making and for the preparation of Board reports.

The records on the Complaints Registers, copies of all correspondence and the relevant files must be kept for a minimum of seven years after the complaint has been made.

Complaints are broadly classified as below:

- Service access – ease of, availability, timeliness, eligibility, location
- Service quality – culturally safe, reliable, responsive, as described, premises/resources
- Service outcomes – choices and informed decisions respected, goals achieved
- Information – sharing of, sufficient, clear
- Staff conduct – respectful, courteous, culturally safe/sensitive/competent.

Recording feedback

The Djirra staff member receiving feedback (positive or negative) will record it in the program's feedback register.

Continuous improvement

The relevant program manager is responsible for ensuring that any service or process improvements identified in processing the complaint are implemented.

A quarterly summary of complaints is prepared by the Governance, Risk and Compliance Team, discussed at a meeting of program managers to identify themes and improvement opportunities, and reviewed by the Senior Executive Team to monitor complaint handling and continuous improvement.

Themes within complaints would include where similar complaints are raised

- in more than one program area, and/or
- on at least three occasions in a twelve-month period.

Board reporting

Collated information regarding complaints is provided to the Board of Directors quarterly, unless the Chief Executive Officer considers that there is a complaint to be communicated to the Board urgently. Board reports will show where complaints have led to service or process improvements.

6. INTERNAL COMPLAINTS INVOLVING SPECIFIC STAFF MEMBERS

Internal complaints, where a staff member makes a complaint concerning another staff member, will be dealt with in accordance with the Grievance Policy as documented in Djirra's HR Policies Manual.

External complaints by clients or stakeholders made against a staff member will be managed by the relevant member of the management team who will:

- notify the staff member of the complaint and its nature
- investigate the complaint and provide the staff member with an opportunity to respond to any issues raised
- attempt to mediate the dispute (if appropriate) and/or attempt to resolve the matter to the satisfaction of the outside party
- take any other action necessary to resolve the issue
- inform the staff member who the complaint was about of the outcome.

Any disciplinary action against a staff member arising from a complaint will be taken in accordance with the procedures contained in the disciplinary procedures as documented in Djirra's HR Policies Manual. Complaints involving the Chief Executive Officer will be managed by the Chairperson.

7. INTERNAL COMPLAINTS INVOLVING ORGANISATION MEMBERS OR BOARD MEMBERS

Djirra's Constitution outlines the procedures to resolve any disagreement or dispute about the affairs of the corporation, or how the Corporations (Aboriginal and Torres Strait Islander) Act 2006 or the corporation's constitution applies, which arises between members, members and Board directors or Board directors.

8. STAFF TRAINING IN COMPLAINTS HANDLING

Djirra will provide and ensure all staff, management and volunteers receive information and training as part of their induction on complaints handling and management procedures. Ongoing refresher training will also be provided.

9. CONTINUOUS IMPROVEMENT OF THE COMPLAINTS MANAGEMENT SYSTEM

The complaints management system will be reviewed and evaluated every three years. This will include:

- review of all complaint and feedback policies and procedures
- client and staff feedback about the accessibility and effectiveness of the complaints management system
- implementation of a continuous improvement plan based on the review and feedback received.

10. RELATED DOCUMENTS

- Djirra Rule Book
- HR Policies Manual
- Complaint Registers
- Privacy Policy
- Social Media Management and Moderation Policy
- Crisis Response Procedure.

REVIEWING AND APPROVING THIS POLICY		
Frequency	Person responsible	Approval
Three years	Chief Executive Officer	Board of Directors

POLICY REVIEW AND VERSION TRACKING			
Review	Date Approved	Approved by	Next Review Due
1	25/10/2011	Board	2013
2	23/3/2015	Board	2017
3	22/3/2016	Board	2019
4	5/3/2021	Board	2024
4.1	23/5/2023	Board	2024
5	21/3/2025	Board	2029