

Complaint Handling 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
- boost member confidence in our administrative process, and
- provide information that can be used by us to deliver quality improvements in our services, systems and complaint handling.

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

1.2 Scope

This policy applies to all staff/volunteers receiving or managing complaints from the members of our clubs, committees and/or teams. Complaints that relate to or about us, regarding our services, staff, Carlile Swimming members and complaint handling.

1.3 Carlile Swimming’s commitment

Carlile Swimming expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
Head of Carlile Swimming	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> • Report to the Board on Carlile Swimming’s complaint handling. • Provide adequate support and direction to key staff responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. • Encourage staff to make recommendations for system improvements. • Recognise and reward good complaint handling by staff. • Support recommendations for service, staff and complaint handling improvements arising from analysis of complaint data.
Manager(s) responsible for complaint handling	Establish and manage our complaint management system	<ul style="list-style-type: none"> • Provide regular reports to Carlile Swimming Executive on issues arising from complaint handling work. • Recruit, train and empower staff to resolve complaints promptly and in accordance with Carlile Swimming’s policies and procedures. • Encourage staff managing complaints to provide suggestions on ways to improve the organisation’s complaint management system. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. • Recognise and reward good complaint handling by staff

Who	Commitment	How
Staff whose duties include complaint handling (Head Coaching Staff, Senior Coaching Staff & Club Presidents at centres/clubs)	Demonstrate excellent complaint handling practices	<ul style="list-style-type: none"> • Treat all people with respect, including people who make complaints. • Assist people make a complaint, if needed. • Comply with this policy and its associated procedures. • Keep informed about best practice in complaint handling. • Provide feedback to management on issues arising from complaints. • Provide suggestions to management on ways to improve the organisation's complaints management system. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.
All staff/volunteers (Coaches, Members, Club Committee Members, Administrative Staff & Volunteers)	Understand and comply with Carlile Swimming's complaint handling practices.	<ul style="list-style-type: none"> • Treat all people with respect, including people who make complaints. • Be aware of Carlile Swimming's complaint handling policies and procedures. • Assist people who wish to make complaints access the Carlile Swimming's complaints process. • Be alert to complaints and assist staff handling complaints resolve matters promptly. • Provide feedback to management on issues arising from complaints. • Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.

2. Terms and definitions

Complaint

Expression of dissatisfaction made to or about us, our services, staff, volunteers, Carlile Swimming members or the handling of a complaint where a response or resolution is expected or legally required. A complaint covered by this Policy can be distinguished from:

- staff grievances (see our grievance policy)
- 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 (see our access to information policy).

Complaint management system

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

Dispute

An unresolved complaint escalated either within or outside of our organisation.

Examples may include (but are not limited to) when a member believes the outcome of a complaint is unclear, unfair, biased, and/or unresolved and is subsequently escalated to either Swimming Australia or an independent service for review.

Feedback

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

Examples may include (but are not limited to) when a member is concerned or aggrieved by the actions of a member however Carlile Swimming reserves the right to take no further action. An extension of this could include Carlile Swimming assessing the feedback and implementing various actions including monitoring the situation, seeking further information from the parties and/or seeking independent advice without furthering the matter to investigation etc.

Service request

The definition of a service request will vary depending on the differing areas of Carlile Swimming's core business. However, it is likely to include:

- requests for action (e.g. inclusion in Carlile Swimming programs)
- routine inquiries about the organisation's business (e.g. seeking information about the way Carlile Swimming operates including compliance, risk management and/or welfare of members)
- requests for the provision of services and assistance (e.g. adaptation of existing services to include all members)
- reports of failure to comply with laws regulating Carlile Swimming (e.g. Working with Children Checks, Workplace Health & Safety, Duty of Care)
- requests for explanation of policies, procedures and decisions. (e.g. often when incidents or issues arise in relation to conduct of members and stakeholder groups)

Grievance

A clear, formal written statement (hard copy or electronic) by an individual member about another member or Carlile Swimming staff/volunteers.

Examples may include (but are not limited to) when a member reports alleged misconduct and/or alleged breach of policies, codes or standards.

Policy

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

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom. In this instance, Complaints will be handled via the *Carlile Swimming – Complaints Handling Procedures as per Part 4 of Swimming Australia's Safe Sport Framework (see appendix)*

3. Guiding principles

People focused

We are 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 staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s 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. The *Swimming Australia Safe Sports Framework - section 1.6 'Whistle blower statement'* identifies that all members involved in any complaint or grievance matters will not be subject to victimisation.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided. *Carlile Swimming reserves the right to not investigate matters deemed to be insufficient in evidence however will monitor the ongoing situation closely.*

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. 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 (e.g. advocate, family member, legal or community representative).

No charge

Complaining to us is free.

*Please note Swimming Australia reserves the right to charge fees for any review of complaints/decisions handed down by Carlile Swimming.

3.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with Carlile Swimming.

Responsiveness

We will promptly acknowledge receipt of complaints. *In most circumstances this will be within three business days of receiving information about a complaint.*

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. *Examples include when Carlile Swimming identifies that potential criminal act(s) have taken place and/or a child or young person is in danger, NSW Police will be notified immediately. Carlile Swimming members (including the executive) actively monitor any potential significant risk of harm to members and will report concerns for the safety of children and young people to statutory agencies without hesitation.*

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.

The person handling the complaint will be different from any staff member (or volunteer member) whose service or conduct is being complained about. Conflicts of interests, whether actual or perceived, will be managed responsibly.

Responding flexibly

Our staff 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.

Transparency and openness

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 Carlile Swimming as permitted under the relevant privacy laws and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Empowerment of staff

All staff/volunteers managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff/volunteers are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff/volunteers and members, and
- our ability to allocate our resources.

When people behave 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 staff/volunteers and members to do the same in accordance with this policy.

4. Complaint management system

4.1 Introduction

When responding to complaints, staff should act in accordance with our *complaint handling procedures* as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback. 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. 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 information, 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 three 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 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 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 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 and consider any statutory requirements.

4.5 Notification of our decision(s)

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 remedy or resolution/s that we have proposed or put in place, and

- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

We are aware of and operate within strict privacy frameworks. Throughout the complaint management process, we will ensure privacy and confidentiality obligations are adhered to.

4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- how we managed the complaint
- the outcome/s 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 complaint handling manager and/or senior management.

4.7 Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant governing bodies e.g. Swimming Australia).

4.8 The three levels of complaint handling

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

Where this is not possible, we may decide to escalate the complaint to a more senior staff member within Carlile Swimming. 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, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of Carlile Swimming review of their complaint, they may seek an external review of our decision (by Swimming Australia for example).

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.

Regular reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to Carlile Swimming's Board and senior management for review.

5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure effectiveness in responding to and resolving complaints, and

- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

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
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaints data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

to swim well is an asset for life

