



COMPLAINTS POLICY

APRIL 2025



COMPLAINTS POLICY

Purpose

This policy is intended to ensure that Adsafes handles complaints fairly, efficiently and effectively.

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

Scope

This policy applies to all Adsafes staff and the Adsafes Board, receiving or managing complaints from stakeholders, Seventh-day Adventist Church members, clients and the public made to or about Adsafes, regarding our services, staff and decisions made by Adsafes.

It does not apply to complaints about decisions made as result of investigations co-ordinated by Adsafes into allegations of investigable conduct of employees and volunteers of Church Entities or local churches which are dealt with by the Risk Management and Investigations Policy.

Definitions

Term	Definition
Complaint	An expression of dissatisfaction made to or about Adsafes, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. (AS/NZ 10002:2014). In this context, Adsafes means Adsafes itself or a body acting on behalf of Adsafes.
Complaint handling/management system	All policies, procedures, practices, staff, hardware and software used by Adsafes in the management of complaints.
Dispute	An unresolved complaint escalated either within or outside of our organisation.
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Adsafes, about our services or complaint handling system 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 staff member or a work-related problem.

Policy

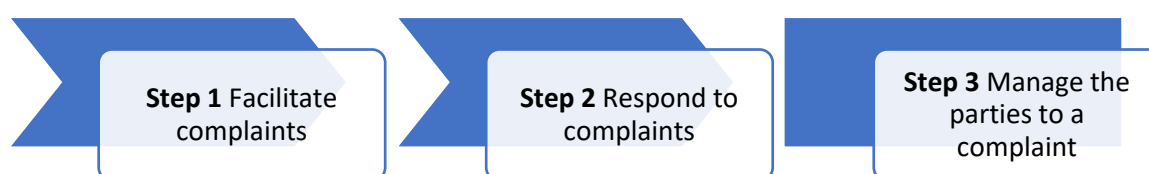
Commitment

Adsafe 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
General Manager, Adsafes	Promote a culture that values complaints and their effective resolution	<p>Report to Adsafes's Board on Adsafes's complaint handling.</p> <p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Recognise and reward good complaint handling by staff.</p> <p>Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.</p>
Staff whose duties include complaint handling (General Manager, Operations Manager, Team Leaders)	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people 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 management on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the organisation's complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
All staff	Understand and comply with Adsafes's complaint handling practices.	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of Adsafes's complaint handling policies and procedures.</p>

		<p>Assist people who wish to make complaints access Adsafe's complaint handling process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Provide feedback to management 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 management.</p>
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Guiding Principles



Facilitate complaints

Child and vulnerable person focus

Adsafe is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling from any person. However, Adsafe has been established for the protection of children and vulnerable persons. Central to Adsafe's response to abuse is the care of children and vulnerable persons and to provide them with a voice.

We are committed to processes that are child and vulnerable person focused and endeavour to create a culture that communicates the value that Adsafe places on the opinions and concerns of children and vulnerable persons by providing age-appropriate support such as:

- (a) Communication aids;
- (b) Safeguarding;
- (c) Active listening;
- (d) Appropriately trained staff.

While support for the child or vulnerable person is an imperative, it is important to ensure that a child or vulnerable person is heard rather than just allowing significant adults to speak in their place thus pushing outcomes that are decided by the significant adults rather than the child or vulnerable person.

Making a complaint

In order to encourage any person with a complaint or grievance to report it, Adsafe will:

- (a) Provide the complainant with information about our complaint handling process and ways to make complaints.
- (b) Listen to and treat the complainant with respect and actively involve them in the complaint process where possible and appropriate.

- (c) 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.
- (d) Accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.
- (e) Ensure that information about how and where complaints may be made to or about us is well publicised, easily understood and accessible to everyone, particularly people who may require assistance.

Respond to complaints

In responding to a person making a complaint Adsafestaff should ensure that the person:

- (a) is reassured that they have done the right thing in raising the concern.
- (b) understands that it is important to Adsafestaff to address their concern.
- (c) knows that Adsafestaff will get someone to help them throughout the process.
- (d) has an opportunity to suggest their desired solution.

Early resolution

Any person, including Adsafestaff, who has concerns around Adsafestaff's work is encouraged to seek further information about these concerns in the form of an enquiry to the staff member involved. Enquiries can be made by phone, email, by letter or in person.

Informal complaints

Any person, including Adsafestaff, who has concerns around Adsafestaff's work including staff conduct and wishes to raise it as an informal complaint may do so by phone, email, by letter or in person to the staff member involved.

Formal complaint

Any person, excluding Adsafestaff, who has concerns around Adsafestaff's work including staff conduct and wishes to raise it as a formal complaint may do so by phone, email, by letter or in person and should lodge the complaint with the General Manager. If the concern is about the General Manager, it should be lodged using the above methods with the Adsafestaff Board Chairperson.

Objectivity and fairness

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

The General Manager and Adsafestaff Board Chairperson will decide on the appropriate course of action in handling any formal complaint and appoint a senior staff member or other appropriately trained person to investigate.

Conflicts of interests, whether actual or perceived, will be managed responsibly.

Responding flexibly

All attempts will be made to resolve complaints promptly and efficiently.

Confidentiality

Adsafestaff 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 Adsafestaff as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, Adsafe will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

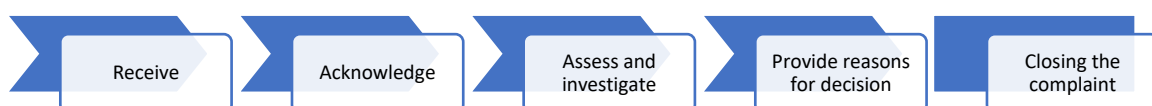
Managing unreasonable conduct by people making complaints

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; and
- our ability to allocate our resources fairly across all the complaints we receive.

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 to do the same.

Complaint management system



Receipt of complaints

The Adsafe General Manager will record all formal complaints for Adsafe showing the date received, complainant name, person subject of complaint (PSOC) name, description of the complaint, the assigned investigators name, final finding, and the date completed. No official records will be kept for enquiries and informal complaints.

Acknowledgement of complaints

Adsafe will send confirmation of the receipt of an informal complaint, formal complaint or enquiry within one (1) working day and indicate when a response can be expected.

Initial assessment addressing of complaints

After acknowledging receipt of the complaint, Adsafe 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 formal complaint will be managed, the Adsafes General manager 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;
- Whether a resolution requires the involvement of other organisations e.g. law enforcement or child protection services; and
- Who will investigate the complaint.

Addressing complaints

After assessing the formal complaint, the General Manager 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.

Providing reasons for decisions

A letter outlining the final finding and any related recommendations for adjustments to Adsafes guidelines and procedures should be drafted and sent to the complainant.

If the complainant is a child or vulnerable person ensure, in an age-appropriate way that:

- Within the constraints of confidentiality is told the result of the complaint.
- They are told about the investigation recommendations; and
- They are told what Adsafes will do to implement these recommendations.

Closing the complaint

In relation to record keeping:

- (a) No official records will be kept for enquiries and informal complaints.
- (b) The Adsafes General Manager will establish an electronic complaints log for all formal complaints for Adsafes showing the date received, complainant name, person of concern name, description of the complaint, the person assigned to handle the complaint, final finding, and the date completed.
- (c) The complaints log will remain confidential with access given only to complaints handling staff.
- (d) The Adsafes General Manager will ensure that a secure and confidential location will be set-up to store the records of all investigations into complaints about employee conduct. These will be kept for at least 30 years.
- (e) At the conclusion of the complaints handling process, the report, all evidence gathered and any relevant correspondence related to the investigation will be securely filed. The Adsafes General Manager will ensure that only authorised persons will have access to these records.
- (f) If Adsafes ceases to exist, the investigation records will be transferred to a location designated by the Adsafes Board.

Appeals process

Adsafe recognises the right of any individual with a material interest in a decision to appeal against that decision.

A decision made by the Adsafes can be appealed on two grounds.

1. The process of making the decision was not procedurally fair.
2. The decision itself was not fair in that it is counter to the Adsafes's philosophy, policies, guidelines or processes.

The process is as follows:

1. Members of a church or wider community with a material interest in a decision who has concerns about a decision has the right to appeal the decision.
2. An appeal can be made by phone, email, by letter or in person and be addressed to the Adsafes General Manager and state the original decision and the grounds on which the appellant wishes to appeal.
3. The Adsafes General Manager will send confirmation of the receipt of an appeal within 1-3 working days and indicate when a response can be expected.
4. Work on appeals should commence within 5 working days and the decision on the appeal should generally not take more than a further 5 working days.
5. The decision on an Appeal will be made by a review panel consisting of a group or individual as outlined in the following table:

For decisions originally made by...	The Appeal will be reviewed by...
	The Review Panel
An Adsafes employee	The employee's supervisor
An Adsafes supervisor	The Adsafes General Manager
The Adsafes General Manager or Adsafes Administration Committee	The Adsafes Board
The Adsafes Board	SPD Officers

If the appellant is still not happy with the decision there are external bodies who provide oversight to Adsafes to which they may appeal. These bodies include:

1. Fair Work Commission for matters relating to staff remuneration, workplace bullying and dispute resolution.
2. The Australian Human Rights Commission for matters relating to discrimination, harassment and bullying.
3. Office of the Australian Information Commissioner for matters relating to privacy and the use of personal and sensitive information.
4. Consumer Affairs and Fair Trading for matters related to disputes about fee payments.

It should be noted that most of these agencies will expect that an appellant would have first used the internal Adsafes complaints and appeals process prior to seeking the external agencies' assistance.

Accountability and learning

Monitoring of the complaint management system

Adsafe is committed to developing and maintaining a continuous improvement culture in the organisation. Adsafes 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.

Related legislation, policy and procedure

Privacy Act 1988 (Cth)

Corporations Act 2001

Adsafe's Whistleblower Policy

Adsafe's Complaints and Appeals Guidelines

Document Control and Version History

Document Title:	Complaints Handling Policy
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Version Control

Version	Date	Author/Editor	Summary of Changes	Approved By
1.0	April 2025	Michael Worker	Initial version created and approved for implementation	Adsafe Board