

Complaints Policy

Purpose

This policy outlines the process for our stakeholders who wish to make a complaint or raise a concern and the process for managing complaints received by CoAct. The process is designed to ensure that concerns raised are treated seriously, addressed promptly and fairly and that any learnings contribute to our continuous improvement.

Scope

This policy applies to complaints or concerns received by CoAct from its customers (job seekers and apprentices), member organisations, service partners, employers, suppliers and other related third parties.

The policy covers complaints in relation to the following:

- Actions or behaviours of CoAct
- Actions or behaviours of individual directors, officers, employees, contractors and volunteers
- Actions or behaviours of CoAct's Service Partner organisations and/or staff in relation to service delivery of contracts held through CoAct.

This policy does not apply to:

- Complaints made by employees of CoAct, which are covered by the Grievance and Investigation Policy
- Reports of suspected misconduct made under the Whistleblower Policy.

Policy

CoAct values all those we work with and the contribution that they make to our success.

It is recognised that, from time to time, stakeholders may be dissatisfied with CoAct's services or actions and may wish to express their concern and seek a resolution. CoAct aims to address each concern respectfully and to work towards a resolution within the parameters of any relevant contract between the parties.

All complaints and concerns will be accepted by CoAct and dealt with in a respectful and timely manner.

It is expected that complaints are made in good faith and not motivated by personal gain or malicious intent.

In an environment of collaboration in most situations, it is expected that efforts will be made to resolve the matter informally at an operational level,

Where the matter cannot be resolved at an operational level, the affected party/parties may choose to submit a formal, written complaint under this Policy.

1. Customer Complaints in relation to Service Delivery of Contracts Delivered through or by CoAct

1.1. Making a Complaint

Each program has a customer feedback/complaints guide and supporting process in line with the relevant contract Deed.

Upon commencement into a program, customers are provided with the funder's complaint form and CoAct's feedback form. In addition to this, feedback posters are displayed in all offices. Customers should refer to these in the first instance with respect to the process for raising complaints or making feedback to ensure efficient processing and effective management.

1.2. Programs delivered by CoAct Service Partners – Management of Complaints

CoAct Service Partners delivering programs on behalf of CoAct are required to record compliments, observations, complaints and incidents in CoAct's Online Feedback Register with feedback managed and escalated in accordance with the processes outlined in CoAct's Service Delivery Process 'Customer Feedback'. The service delivery processes are supported by CoAct Way guides, which assist staff to ensure feedback is captured, managed and escalated in accordance with CoAct's policies and the obligations under the relevant Deed.

Service Partners should refer to the CoAct Customer Feedback Process and supporting CoAct Way Guides for further information:

- Customer Feedback Procedure
- Compliments & Complaints - The CoAct Way
- Incident Management - The CoAct Way
- Transfers and Service Restrictions - The CoAct Way.

1.3. Australian Apprenticeships Support Network (AASN) – Management of Complaints

Complaints received in relations to the AASN program are recorded on a Complaints Form and notified to BUSY At Work who, as the head contractor, maintain the Contract Complaints Register. Complaints are assessed, managed and escalated in accordance with the BUSY At Work Complaints Handling Process. Per the process, copies of all complaints assessed as urgent are also provided to CoAct's Chief Operations Officer.

Refer to the BUSY At Work Complaints Handling Process for further information.

2. Complaints from Service Partners, Employers, Suppliers and Other Related Third Parties

2.1. Making a Complaint

- a. Complaints about CoAct**
-

Complaints Policy

CoAct encourages persons at first instance to try to contact and resolve the complaint or concern directly with the person/s concerned.

At any time, however, a complaint or concern may be submitted in writing to the CEO at the following address:

Chief Executive Officer
CoAct
PO Box K43
Haymarket, NSW, 1240

Or via email at integrity@coact.org.au.

If the complaint relates to the CEO, or the complainant considers the CEO is not an appropriate person to report to, the complaint should be addressed to the Chair of the Board.

If your complaint or concern relates to **possible misconduct** by CoAct or any person employed by CoAct, you may wish to report your concern in accordance with CoAct's Whistleblower Policy, which provides additional protections to whistleblowers. A copy of the policy is available on both Turning Point and the CoAct website.

b. Complaints about CoAct's Service Partner organisations and/or staff in relation to service delivery of contracts held through CoAct.

Complaints which relate to the delivery of services contracted through CoAct including suspected misconduct by a Service Partner or their employees, should be raised under the policies and reporting channels provided by the Service Partner.

If the Service Partner channels are considered inappropriate, for whatever reason, CoAct will accept the concern/complaint as per processes outlined in this Policy.

You can choose to submit a complaint under 2.1.a or 2.1.b anonymously or under a pseudonym, however, the investigation process in such circumstances may be limited as CoAct cannot establish contact to obtain further information. Anonymous complaints will be investigated; however, if the initial investigation of the complaint does not support the claims made, the complaint will be considered resolved.

2.2. Managing Complaints

The complaints management process will be guided by the following principles:

- The person making the complaint will be treated fairly and without fear of recrimination
 - The complaint will be acknowledged within 5 business days of receipt
 - Where an investigation is required, it will be objective, impartial, clearly documented and managed in accordance with CoAct's Privacy Policy and any relevant contract between the parties
 - CoAct will attempt to provide a written response to all complaints within 14 days. More complex complaints may require more time to investigate and, in such circumstances, CoAct will communicate the revised timeframe expectations.
-

3. CoAct Member Complaints

3.1. Making a Complaint

CoAct encourages member organisations at first instance to try to contact and resolve the complaint directly with the person/s concerned.

At any time, however, a formal complaint may be submitted in writing to the CEO where a member organisation considers that CoAct has:

- Failed to meet its obligations under the relevant subcontractor agreement; or
- Failed to operate consistently with the reasonable expectations of the Company's core documents.

The CoAct CEO will acknowledge the complaint within 2 business days of receipt.

If the complaint relates to the CEO, the complaint should be addressed to the Chair of the Board.

The CEO (or Chair if the complaint relates to the CEO) will arrange an investigation of the issues to attempt to resolve the matter.

As noted in section 2.1, if you are a Service Partner and your complaint or concern relates to possible misconduct by CoAct or any person employed by CoAct, you may wish to report your concern in accordance with CoAct's Whistleblower Policy, which provides additional protections to whistleblowers. A copy of the policy is available on both Turning Point and the CoAct website.

3.2. Consideration by the Board

If after 14 days the matter has not been resolved (or within such further period as the parties agree) or the member making the complaint is dissatisfied with the CEO's response, the member can advise the CEO that they wish the matter to be considered by the Board. Details of the complaint must be provided in writing for consideration by the Board.

The CEO will place the complaint on the next Board agenda and ensure that any supporting documents are circulated with the Board papers.

At the discretion of the Chair, it may be decided to call a special Board meeting to consider the matter.

The member will be advised as to when the matter will be considered by the Board.

The Board will consider the complaint in accordance with the Constitution, Membership Charter, relevant contract, and policies of the Company.

The Board's response will be communicated to the member by the CEO or the Chair within 5 days of the Board's consideration.

3.3. Dispute Resolution

Where it has not been possible to reach an acceptable solution, as per the Constitution and Service Partner Master Subcontract Agreement, the parties may agree to activate the Dispute Resolution process through the Australian Disputes Centre.

4. Complaints Registers

Complaints received from **customers** are recorded within the relevant register and in accordance with the applicable requirements for each program.

The Quality Assurance Team conducts periodic feedback analysis to determine trends and identify areas for improvement.

An annual summary report of customer complaints will be reviewed by the Board.

Formal, written complaints from **members, service partners, employers, suppliers or other third parties** are recorded in CoAct's Corporate Complaints Register.

The Corporate Complaints Register will be reviewed by the Governance Committee on a periodic basis as part of its responsibility for membership and compliance issues.

5. Continuous Improvement

Learnings from complaints received from all areas of the business will, wherever relevant, inform the continuous improvement of CoAct's policies, procedures and practices.

Periodically, the Executive Management Group will review recommendations for improvement, to consider any changes to practice or improvements to processes arising from the investigation and resolution of a complaint.

Definitions

- **Complaint:** a complaint is any expression of dissatisfaction or concern regarding CoAct, its employees, staff of service partners delivering CoAct contracts, Board members, business contractors, partners and anyone else acting on CoAct's behalf, where a formal response and/or resolution is required.
 - **Dispute:** a dispute arises where the two parties (CoAct and its member/s) disagree on a matter and it has not been possible to reach a resolution acceptable to both parties.
-