

Policy Name: Feedback and Complaints (Products, Programs, Activities or Services) Policy

Approver: Board

Owner: Chief Operating Officer

Lead: Chief Legal Officer

Version	Date of Approval	Summary of changes made	Next review due
1.0	26 November 2021	New Complaints, Concerns and Feedback Policy.	
2.0	22 August 2025	Policy name updated to be 'Feedback and Complaints (Products, Programs, Activities or Services) Policy', policy aligned with current legislative requirements including the Aged Care Act, procedural elements moved to a new procedure, and the approach to Complaints handling updated to include a Level O Feedback. Products, Programs, Activities or Services included at request of Audit and Risk Committee.	2028

1 Purpose

- (a) This policy outlines the way in which Australian Red Cross manages Feedback and Complaints that Australian Red Cross receives from the public, clients, customers, beneficiaries, donors, external stakeholders and Australian Red Cross People.
- (b) This policy and its related procedures set out the expectations of Australian Red Cross People when receiving and responding to Feedback and Complaints to ensure Australian Red Cross is:
 - (i) Providing all individuals who wish to raise Feedback or a Complaint with a safe and secure way to do so, without fear of reprisal, victimisation or discrimination.
 - (ii) Managing and responding to matters in a transparent, accessible, culturally safe, timely and procedurally fair manner.
 - (iii) Learning from our mistakes and successes.
 - (iv) Complying with the requirements of our external obligations.
 - (v) Acting in accordance with the Movement's Fundamental Principles.

2 Scope and Audience

This policy:

- (a) Applies to all Feedback and Complaints about our products, programs, activities or services, the conduct of our people or those working on our behalf or the complaint handling process itself. Feedback and Complaints may relate to:
 - (i) The work that Australian Red Cross does in Australia and internationally
 - (ii) The work undertaken on Australian Red Cross' behalf by partner organisations implementing activities, services and programs.
 - (iii) Suppliers, contractors and sole traders providing goods and services on Australian Red Cross' behalf.
- (b) This policy does not relate to any personal work-related grievance of Australian Red Cross People. Similarly, this policy does not relate to any complaint or allegation related to member misconduct.

Note: Employees, volunteers and members should refer to the Grievance Policy for information on how to raise a personal work-related grievance.

Allegations or complaints related to member misconduct will be managed in accordance with the Governance Regulations.

- (c) This policy does not replace or remove the scope of any protections to people raising concerns under the Whistleblower Policy. However, individuals may choose to manage their concerns as Feedback or a Complaint under this policy without the protections that the Whistleblower Policy affords.

Note: Some complaints may also be managed in parallel with the relevant incident management process. Complaints relating to sexual exploitation, abuse, harassment, child and adult safeguarding matters and client reportable incidents may require additional specialist handling procedures and will be managed in accordance with the relevant policy.

- (d) As a Registered Training Organisation, we also make a provision for people to appeal the outcome of any First Aid and Mental Health training course provided by Australian Red Cross.

Note: To learn more about appeal conditions, appeal procedures or to register a training appeal please visit redcross.org.au/firstaid/first-aid-and-mental-health-legal-compliance/.

3 Policy

3.1 Standards

Australian Red Cross:

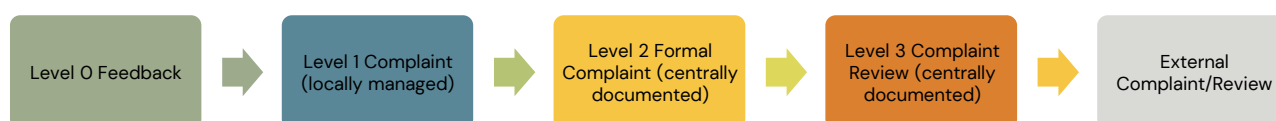
- (a) Is committed to ensuring its Feedback and Complaints handling process is transparent, fair, inclusive and accessible to everyone, including children.
- (b) Will treat anyone who submits Feedback or a Complaint with courtesy and respect.
- (c) Will make every reasonable effort to address Feedback and Complaints thoroughly, appropriately and in a timely manner, affording Procedural Fairness to all parties involved in the Feedback or Complaint.
- (d) Will take all reasonable steps to protect the safety and ensure the cultural safety of any individual involved in the Feedback and Complaints process by taking a person-centred approach and seeking informed consent as appropriate.
- (e) Will not tolerate reprisals by Australian Red Cross People against an individual who raises Feedback or a Complaint.

Note: An Australian Red Cross person who subjects another person to a detriment on the grounds that they have made, or propose to raise, Feedback or Complaints may face disciplinary action.

3.2 Process

We aim to make getting in touch with us as easy as possible. Feedback and Complaints can be submitted online at redcross.org.au/speakup/, by email to contactus@redcross.org.au, by phone to 1800 733 276, verbally or in writing to any Australian Red Cross Person, or by post to Level 5, 637 Flinders St, Docklands VIC 3008.

Australian Red Cross has a five-tiered approach to Feedback and Complaints handling, as follows:



Note: See Feedback and Complaints (Products, Programs, Activities or Services) Procedure, Appendix A: Feedback and Complaints Escalation Matrix for further detail.

- (a) **Level 0 Feedback:** Level 0 Feedback will generally be managed by frontline Australian Red Cross people, and can be positive, negative and/or neutral Feedback.

Note: *The difference between Feedback and a Complaint is that a formal response is not required or expected by the individual submitting the Feedback.*

- (b) **Level 1 Complaint:** Level 1 Complaints will generally be managed by frontline Australian Red Cross People. Some matters are not appropriate for frontline resolution and must be addressed as Level 2 Formal Complaints. If a Complainant is dissatisfied with the response they have received to a Level 1 Complaint, they may request to escalate this to a Level 2 Formal Complaint.

Note: *A response will be provided to the Complainant, and the complaint documented locally or in the central register.*

- (c) **Level 2 Formal Complaint:** A Level 2 Formal Complaint is a formal Complaint that will be recorded in the secure and confidential centralised register and will be managed by a designated employee within the relevant area (called a 'Complaint Owner').

Note: *There are instances in which a Complaint is required to be managed as a Level 2 Formal Complaint in the first instance as outlined in Feedback and Complaints Procedure.*

- (d) **Level 3 Complaint Review:** If a Complainant is dissatisfied with the response they have received to a Level 2 Formal Complaint, they may ask Australian Red Cross to review this decision. The Complainant should tell us why they believe the decision is wrong and provide any new information they have available to them.

An independent staff member will consider the review request and decide whether a review will be permitted. Factors that may be considered include:

- (i) Whether relevant policies, procedures and processes were followed.
- (ii) If there is new information available which may impact the complaint outcome.
- (iii) Whether there are other significant circumstances that may have impacted, or could impact, the complaint outcome.

If the review is permitted, this will be assigned to, and managed by, a more senior employee (called a 'Complaint Review Owner').

- (e) **External Complaint/Review:**

- (i) If a Complainant is still dissatisfied with the response that Australian Red Cross has provided, they may make a complaint to an external agency where available. Where possible Australian Red Cross will provide the details of an appropriate external body with whom a Complaint can be escalated.
- (ii) A Complainant may choose at any time to raise their Complaint with a government agency, law enforcement body or a regulator.

Note: *Government agencies, law enforcement bodies and regulators may include:*

- (A) Aged Care Quality and Safety Commission (ACQSC), who regulate aged care services: agedcarequality.gov.au
- (B) Australian Council for International Development (ACFID) (including for any alleged breach of the ACFID's code of conduct): acfid.asn.au
- (C) Australian Charities and Not for Profit Commission (ACNC): acnc.gov.au
- (D) Australian Competition and Consumer Commission (ACCC): accc.gov.au
- (E) Australian Human Rights Commission (AHRC): humanrights.gov.au
- (F) Australian Securities & Investments Commission (ASIC): asic.gov.au

- (G) Australian Skills Quality Authority (**ASQA**), which regulates vocational education and training (**VET**): asqa.gov.au
- (H) NDIS Quality and Safeguards Commission, which regulates NDIS services: ndiscommission.gov.au
- (I) Office for the Australian Information Commissioner (**OAIC**), which regulates privacy: oaic.gov.au
- (J) a Government Authority.
- (K) State or Territory human rights bodies.
- (L) State or Territory consumer ombudsman.

3.3 Timeframes

- (a) While there are no specific timeframes that must be met to lodge Feedback or a Complaint, Complaints can become more difficult to resolve the longer time goes on and there may be some instances in which Australian Red Cross determines that a Feedback or Complaint submission is too late to be considered.

- (b) Australian Red Cross aims to:

- (i) Acknowledge all Feedback and Complaints where contact details have been provided, and where the individual wishes to be contacted, within three working days of receipt of the Complaint.

Note: Feedback and Complaints received via phone call, in person or via the online Feedback and Complaints form will be acknowledged immediately.

- (ii) Resolve and respond to Level 1 Complaints within 5 days, or in accordance with local processes. If a matter is complex, it may not be possible to respond within this timeframe. In this instance, the Complainant will be informed, and an estimated timeframe will be provided.
- (iii) Resolve and respond to Level 2 Formal Complaints and L3 Complaint Review within 30 days. If a matter is complex, it may not be possible to respond within this timeframe. In this instance, the Complainant will be informed, and an estimated timeframe will be provided.
- (c) Factors that may contribute to the response timeframes outlined under 3.3(b) needing to be extended include:
 - (i) Multiple issues in the one complaint;
 - (ii) Where coordination with several internal stakeholders is required;
 - (iii) Where advice or assistance is required from an external stakeholder;
 - (iv) Where Australian Red Cross has external reporting obligations that may prevent or delay us from progressing a matter; and
 - (v) Where other internal processes are running in parallel with the complaint.

The above response timeframes may also be extended where the complainant has provided consent.

3.4 Anonymous Complaints

Feedback and Complaints can be submitted anonymously, however, Australian Red Cross may be limited in the actions it can undertake to resolve an anonymous Complaint.

3.5 Accessibility, reasonable adjustments and right to a support person

- (a) Australian Red Cross will:
 - (i) Provide all relevant stakeholders with support to understand this policy and its related procedures, including providing information in accessible formats and translations where possible.
 - (ii) When requested, provide reasonable adjustments including translation support to the Feedback and Complaints process where possible.
- (b) Any person participating in the Feedback and Complaints process has the right to be supported by a person of their choosing, provided they are not acting in a legal capacity. Any person may also ask a carer, advocate, another organisation or individual to liaise with Australian Red Cross on their behalf.

3.6 Confidentiality

- (a) Australian Red Cross will maintain the confidentiality of Feedback and Complaints and respect the privacy of individuals who submit a Feedback or Complaint. Australian Red Cross limits confidential information to people that need to know to progress any Feedback or Complaint.
- (b) Australian Red Cross will ensure that all parties to a Complaint are aware of their obligations to maintain confidentiality and are supported to understand the limits of confidentiality through the informed consent process.
- (c) There may be some instances in which Australian Red Cross are required to notify other bodies of the Complaint and/or outcome as part of fulfilling our legislative obligations.

3.7 Withdrawing Feedback or Complaints

Any person can choose to withdraw their Feedback or Complaint at any stage during the Feedback and Complaints process. We reserve the right to continue to pursue any concerns that may adversely impact Australian Red Cross and/or others.

3.8 Reasonableness

Australian Red Cross may not:

- (a) Be able to progress Complaints where people demonstrate Malicious or Vexatious abusive, aggressive or offensive behaviour whilst using the Feedback or Complaints process.
- (b) Progress Complaints that have been addressed previously via the Feedback or Complaints process if all reasonable steps have been taken to resolve the Complaint.

3.9 Alternative approach

- (a) Australian Red Cross may determine that an Assessment and/or Investigation should be conducted by an external third party. Where possible, the Complainant will be provided with an opportunity to raise any concerns they may have with this approach.
- (b) If an allegation relates to potential criminal conduct, Australian Red Cross may refer the matter to police or seek advice from relevant authorities before commencing, or continuing with, any internal Assessments and/or Investigations.

Note: In some instances, Australian Red Cross may be required, by law or in line with contractual obligations, to undertake prescribed actions in relation to Feedback or a Complaint.

3.10 Record keeping and Privacy

- (a) All Level 2 Formal Complaints and Level 3 Complaint Review will be recorded in Australian Red Cross' Complaints management system. Level 0 Feedback and Level 1 Complaints may also be recorded in Australian Red Cross' Complaints management system.
- (b) Information collected and stored in Australian Red Cross' Complaints management system may include details of the individual, a description of the Complaint or Feedback, any relevant

supporting documentation submitted with the Feedback or Complaint, documents and/or information that is collected as part of the Assessment and/or Investigation, staff notes, communications between parties and dates of submission and resolution.

Note: Australian Red Cross will ensure the privacy of records as outlined in its Privacy Policy. Records will be retained for a minimum of seven years unless legally required for a longer period.

3.11 Internal reporting

Australian Red Cross will utilise Feedback and Complaints reporting and data to identify any trends that can assist it to enhance processes and service delivery, including through deidentified and confidential reports to executives and governance teams on a regular basis, including quarterly reporting to the CEO, Board and relevant Board Committees.

Note: Where information needs to be shared within Australian Red Cross, steps will be taken to protect the identity and other identifying information of all parties to the Complaint.

3.12 External reporting

Australian Red Cross will report externally as required to fulfil our contractual, legislative and movement obligations. Australian Red Cross will take all reasonable steps to keep complainants informed where possible and maintain the confidentiality of complaints in line with our obligations.

3.13 Training and Continuous Improvement

Australian Red Cross will:

- (a) Train all relevant Australian Red Cross People in Feedback and Complaint handling, enabling them to respond in ways that support people to feel safe, ensure that Feedback and Complaints are adequately considered and there is an appropriate and timely response.
- (b) Identify and act on opportunities for improvement as an organisation.
- (c) Use deidentified Feedback and Complaints data and case studies to help Australian Red Cross learn and improve its activities, services and quality outcomes for customers, clients and the communities where it works.
- (d) Review the Feedback and Complaints system and processes at least annually to ensure they are meeting relevant internal and external requirements.

4 Other

4.1 Definitions

Term	Definition
Australian Red Cross	Australian Red Cross Society.
Australian Red Cross People	As the context requires, all employees, volunteers and members of Australian Red Cross.
Complaint	An expression of dissatisfaction made to Australian Red Cross, related to: <ul style="list-style-type: none">its products, programs, activities or services;the conduct of our people or those working on our behalf; orthe complaint handling process itself, where a response or resolution is explicitly or implicitly expected and where the concern does not fall within the scope of a work related grievance or an alternative Speak Up related incident or process.
Complainant	The party who raises a Complaint.

Term	Definition
Feedback	The collective term for comments, opinions or suggestions made by an individual or group of people where a formal response is not expected. Feedback can be positive, negative and/or neutral.
Fundamental Principles	The seven Fundamental Principles (Humanity, Impartiality, Neutrality, Independence, Voluntary Service, Unity and Universality) sum up the global Movement's ethics and are at the core of its approach to helping people in all its activities at all times.
Informed consent	A person's permission for something to happen, that is: <ul style="list-style-type: none"> • given voluntarily • informed, where the person is adequately aware of all relevant facts including the implications of giving or refusing consent • specific, in that it is clear exactly what the person is agreeing to and for how long • Current and sought often, where the person is informed of their right to change their mind and revoke their consent later should they choose, and • where the person has the capacity to understand the general nature and effect of what they are consenting to and can communicate their consent.
Investigation	Also referred to as an administrative investigation. An internal inquiry to formally examine alleged misconduct, breaches of rules, or other issues related to personnel or operational matters. It may include, as relevant, formal interviews with relevant parties to the matter.
Malicious or Vexatious Feedback or Complaints	Includes false allegations raised in bad faith, raising Complaints without any proper and reasonable basis to do so and/or raising an excessive number of Complaints or Feedback that are unfounded, false or not made in good faith.
Movement	The International Red Cross and Red Crescent Movement.
Procedural Fairness	The process followed by decision-makers to ensure decisions are impartial, just, equitable and non-discriminatory by providing all interested parties to a Complaint or a decision: <ul style="list-style-type: none"> • the right to be heard; • the right to be treated without bias; • the right to be informed of and respond to allegations, and • the right to information regarding the status of the Complaint.
Assessment	An initial desktop review of relevant material related to a Complaint, focussed on collating relevant information to help determine the process required to resolve a matter. It may include initial enquires with relevant parties but will not usually include formal interviews.
Third Party	Any person or organisation (other than a staff member, volunteer or member of Australian Red Cross) working with, on behalf of, or providing services to Australian Red Cross.

4.2 Related Documents

- (a) Feedback and Complaints Procedure.
- (b) Child Safety and Wellbeing Policy.
- (c) Client Practice Framework.
- (d) Client Reportable Incident Policy.
- (e) Client Service Charter.
- (f) Code of Conduct (Our Code).
- (g) FAMH – Complaints and Appeals Policy and Procedure.
- (h) FAMH – Feedback and Evaluation Policy and Procedure.
- (i) Fraud Prevention and Control Policy.
- (j) Grievance Policy.
- (k) Incident Management Policy (once approved).
- (l) Inclusion and Diversity Policy.
- (m) Interests, Conflicts, Gifts and Hospitality Policy.
- (n) Prevention of Sexual Exploitation, Abuse and Harassment Policy.
- (o) Privacy Policy.
- (p) Reconciliation Action Plan.
- (q) Respect (Bullying, Discrimination and Harassment Prevention) Policy.
- (r) Supplier Code of Conduct.
- (s) Whistleblower Policy.

4.3 Related legislation / standards

- (a) *Aged Care Act 2024* (Cth).
- (b) *Australian Council for International Development (ACFID) Code of Conduct (the Code)*.
- (c) *Human Rights and Equal Opportunity Commission Act 1986* (Cth).
- (d) *Privacy Act 1988* (Cth).
- (e) Standards for Registered Training Organisations (RTOs) 2015.
- (f) The National Principles for Child Safe Organisations and associated Child Safe Standards.
- (g) Movement-Wide Commitments for Community Engagement and Accountability (Council of Delegates).