



Australian Indigenous Governance Institute Ltd

Complaints Policy

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1. Our Vision

The AIGI vision is strong, safe, sustainable communities.

Our purpose is to develop, embed and celebrate Indigenous governance leadership.

2. Complaints Policy

This Complaints Policy is intended to ensure that AIGI handles complaints fairly, efficiently and effectively.

This policy provides guidance to people (such as clients, program participants, stakeholders, and other members of the public), who wish to make a complaint regarding AIGI's services, products, staff, personnel representing AIGI, contractors, AIGI associates or our complaint handling process itself.

This policy provides guidance to AIGI staff on the key principles and concepts of our complaint management system. The policy will be followed by any AIGI staff, contractors and our Board members who receive or manage complaints from the public and clients made to or about us.

Our complaints procedure is:

- **Impartial:** both sides have a chance to tell their side of the story.
- **Timely:** all complaints will be dealt with as quickly as possible.
- **Confidential:** information will only be shared with parties involved.
- **Fair:** you will not be victimised for making a complaint.

If an AIGI staff member has a complaint about another staff member or a work-related problem (a grievance), they should refer to the AIGI Discrimination, Harassment, Bullying and Grievance Policy.

2.1 Relevant Terms and Definitions

The following terms are used in this Complaints Policy.

- **Complaint:** An expression of dissatisfaction made to or about AIGI, our services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. As well as complaints being made directly to AIGI, some complaints (or negative comments) may be made on social media.
- **Complaint Handling/Management System:** All policies, procedures, practices, staff, hardware and software used by AIGI in the management of complaints.
- **Dispute:** An unresolved complaint escalated either within or outside of AIGI.
- **Feedback:** Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about AIGI, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.
- **Policy:** details of the position held by AIGI on a particular topic..
- **Procedure:** outlines how the policy is implemented on a day-to-day basis

3. Effective Complaints Handling

AIGI has an effective complaint handling system that is modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.



4. Facilitating Complaints

4.1 People Focus

AIGI is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products 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 and how to access it;
- 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.

4.2 No Detriment to People Making Complaints

AIGI 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.

AIGI does not tolerate any detriment inflicted on a person making a complaint. Examples of a detriment include:

- Bullying, harassment, threats or intimidation;
- Discrimination, subject to current or future bias, or derogatory treatment;
- Harm or injury;
- Damage or threats to your property, business, financial position or reputation; or
- Revealing the person making a complaint's identity without consent or contrary to law;
- Threatening to carry out any of the above actions.

Anyone engaging in detrimental conduct may be subject to serious consequences, including disciplinary action and/or termination of engagements or contracts, as applicable. They may also be subject to civil and criminal penalties.

4.3 Anonymous Complaints

A person making a complaint can choose to remain anonymous while making a report, over the course of the investigation and after the investigation is finalised. AIGI undertake to protect confidentiality to the greatest extent possible.

However, we encourage all individuals to disclose their identity when raising a concern. This will assist us in gathering further information on the report. If the person making a complaint chooses to disclose their identity, the details will be treated confidentially to the fullest extent possible in connection with the investigation.

4.4 Accessibility

AIGI will ensure that information about how and where complaints may be made to or about AIGI is published on our website. 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 (for example an advocate, family member, legal or community representative, member of Parliament, another organisation).

A person making a complaint is encouraged to do so via writing, however, both verbal and written complaints are accepted. Verbal complaints can be made via, telephone or virtual meeting.

4.5 No Cost

5. It is free to make a complaint to AIGI. Responding to Complaints

All complaints received by AIGI are taken seriously.

5.1 Early Resolution

Where possible, AIGI will aim to resolve complaints at first contact.

When appropriate, AIGI or an AIGI staff member may offer an explanation or apology to the person making the complaint.

5.2 Responsiveness

AIGI will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/ or seriousness of the issues raised.

AIGI is 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.

5.3 Objectivity and Fairness

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

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

5.4 Responding Flexibly

AIGI 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.

We will assess each complaint on its merits and involve people making complaints and/or their representatives in the process as far as possible.

5.5 Confidentiality

All AIGI staff, and Board, are to handle complaints to ensure that the confidentiality of the complainant is maintained.

All complaints are treated as confidential and will only be discussed with the person(s) involved and the relevant complaint handler. Once a complaint is received, all relevant correspondence (emails, letters) and notes will be stored in AIGI's confidential record-keeping system with limited staff access.

AIGI will work to protect the identity of people making complaints wherever practical. When complaints have to be handled by multiple points of contact within AIGI, AIGI staff will aim to ensure that the person making a complaint is aware of this process.

Personal information that identifies individuals will only be disclosed or used by AIGI if required and permitted under the relevant privacy laws and any relevant confidentiality obligations.

Unless required due to the nature of the complaint, details of the person making the complaint and/or the details of the complaint will not be shared outside of AIGI.

6. How to Make a Complaint

You can make a complaint via email, telephone or in person. If your complaint falls under whistleblower protection laws, please either request or refer to the Whistleblower Policy.

Phone	0498 880 025
Email	aigi@aigi.com.au
In Writing	PO Box 4788, Eight Mile Plains, QLD, 4113
In Person	Arrange via contact by phone or email
Partale (External HR)	Web: partale.com.au Email: info@partale.com.au Phone: (02) 8021 6369

7. Managing the Parties to a Complaint

7.1 Complaints Involving Multiple Organisations

Where a complaint involves multiple organisations, AIGI will work with the other organisation/s, where possible, to ensure coordinated and clear communication with the person making a complaint.

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 departments within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect our contractors to have an accessible and comprehensive complaint management system. AIGI also accepts complaints about the actions of our contracted service providers.

7.2 Empowerment of Staff

All AIGI staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities. To the best of their ability, AIGI staff aim to act in the following manner when receiving and responding to complaints:

- Openly listening to the complainant without judgment or defensiveness;
- Understanding that complaints are to be treated seriously and should be escalated/dealt with in accordance with this policy;

Understanding that abuse of staff and/or inappropriate personal comments are not tolerated. Staff are entitled to walk away or remove themselves from situations where staff safety and/or well-being is at risk.

- If a complaint is about the person receiving the complaint, understanding that it is not appropriate for them to formally receive the complaint and should be referred to a different staff member in accordance with this policy.

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

7.3 Managing Unreasonable Conduct by People Making Complaints

AIGI is 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, wellbeing 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 we will support our staff to do the same in accordance with this policy.

AIGI staff are not required to take abuse and/or inappropriate personal comments during the complaint process. AIGI staff are encouraged to ensure their safety during the incident and report the incident to their relevant manager or the CEO.

8. Avenues for Dealing with Complaints

When necessary, AIGI will inform people who make complaints to or about us about the internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies). The three levels of complaint handling are:

- **Level 1 – Frontline complaint handling and early resolution of complaints:** 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.
- **Level 2 – Internal review of complaints:** Where early resolution is not possible, we may decide to escalate the complaint to senior AIGI staff member. This second level provides for:
 - 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.
- **Level 3 – External review of complaints:** Where a person making a complaint is dissatisfied with the outcome, they may seek an external review of our decision (E.g. by the Australian Charities and Not-for-Profits Commission).

9. Accountability and Improvement

AIGI is committed to improving our operations, including the effectiveness and efficiency of our complaint management system. During the complaint resolution process all necessary systems improvements within AIGI will be actioned.

AIGI stores all complaints in a confidential record keeping system. Once a complaint is resolved, if the complaint can be de-identified then it will be stored in a systematic way so that information can be retrieved for reporting and analysis by AIGI Management and the AIGI Board.

If a complaint cannot be de-identified appropriately, then the file will remain secure, and excluded from this reporting and analysis.

If a person making a complaint wishes for their complaint to be destroyed after resolution of the complaint, they are able to request this at anytime during the process, or afterwards.

AIGI will monitor our complaint management system to ensure its effectiveness in responding to and resolving complaints and to identify and correct potential deficiencies in the operation of the system.

10. Complaint Handling Procedure

When responding to complaints, AIGI staff act in accordance with this Complaint Handling Procedure 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 AIGI's complaint management system are:

10.1 Receive

Unless the complaint has been resolved at the outset or the person making a complaint has specified that they did not want the complaint recorded, AIGI will record the complaint and its supporting information. The record of the complaint will document:

- Contact information of the person making a complaint and the date received;
- 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.

10.2 Acknowledge

The staff member who recorded or first received the complaint will send all information relating to the complaint to the CEO. In the event that the complaint is about or to the CEO, it should be escalated to the Board. AIGI's CEO, Board or the person delegated by the CEO to handle the complaint, will acknowledge receipt of each complaint promptly, preferably within 5 working days. When appropriate, they may offer an explanation or apology.

The most appropriate medium for communicating with the person making a complaint, having regard to the nature of the complaint, will be considered.

10.3 Assess and Investigate

Initial Assessment

After acknowledging receipt of the complaint, AIGI will determine the most suitable person in the organisation to be the complaint officer for the complaint. This officer will 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, the complaint officer will consider:

- How serious, complicated or urgent the complaint is;
- Whether the complaint raises concerns about people's health, safety and wellbeing;
- 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.

Investigating the Complaint

After assessing the complaint, we will consider how to manage it. We may:

- Give the person making a complaint information or an explanation;
- Gather information about the issue, person or area that the complaint is about; or
- Investigate the claims made in the complaint.

We will keep the person making the complaint updated 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 compliance or statutory requirements.

10.4 Determine Outcome and Provide Reasons for Decision

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 reason/s for our decision;
- 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.

Examples of possible outcomes of a complaint may include:

- No further action required;
- An apology;
- AIGI amends its systems in light of the information in the complaint; or
- Further investigations are required.

(This list is not exhaustive)

10.5 Close the Complaint: Document and Analyse Data

AIGI will document the complaint by keeping 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 to be followed up, including analysing any underlying or root causes.

We will ensure that outcomes are properly implemented, monitored and, if appropriate, deidentified and reported to AIGI Management and/ or the AIGI Board.

11. Special Arrangements

Wherever possible AIGI aims to resolve issues in-house (this includes with the assistance of AIGI's External HR Partners Partale; details below). Complainants can seek the assistance of an outside agency if they feel that their complaint has not been adequately addressed.

AIGI has a long-standing relationship with the BHP Foundation (BHPF) as a major funding partner. Staff may contact the BHPF Safeguarding email account with their concerns, if they do not wish to raise a matter directly with the AIGI: safeguarding@bhpfoundation.com

12. Related Policies

Please read this Complaints Policy in conjunction with the following AIGI policies:

- Code of Conduct
- Discrimination, Harassment, Bullying and Grievance Policy
- Workplace Health and Safety (WHS) Policy
- Partnerships Policy

13. Conclusion

If AIGI staff and people representing the AIGI brand are unable to comply with our Complaints Policy, AIGI may take disciplinary action as outlined in the Employee Development, Performance and Offboarding Policy. Please familiarise yourself with this policy, your responsibilities, and any supporting policies, procedures, and guidelines.

If you are unsure about how to comply with this policy, or any other policy, procedure or guideline, please speak with your manager or the CEO.

If there are any questions from the public in relation to this complaints policy, please contact aigi@aigi.com.au.

14. External HR Partners - Partale - Contact Details

While we always hope to be your first point of contact for any questions or concerns you may have, we understand there may be some circumstances where you wish to seek advice from a confidential third party. You are more than welcome to reach out to our external Human Resources team, Partale, if you have any concerns, questions, need to confidentially report something or simply need advice or support. These are their contact details.

Partale:

Web: partale.com.au

Email info@partale.com.au

Phone: (02) 8021 6369

AIGI HR Partners at Partale:

Breeana Kar: bkar@partale.com.au

Georgia Roberts: groberts@partale.com.au