



BSC Complaint Handling System

The club's policy for complaint handling is described in this document. A short (one page) guide for members wishing to make a complaint is on the website. A short guide (one page) for club officers receiving a complaint is also on the website.

1. Introduction

The Club's complaint handling process has recently been comprehensively reviewed and will be regularly monitored and updated as appropriate. There are many models for effective complaint handling, and the model chosen must suit the work, structure and size of the organisation and the needs of clients. This document outlining the Brindabella Ski Club's complaint handling system draws on the *Better Practice Guide to Complaint Handling* (Commonwealth Ombudsman, 2009). While the *Guide* is targeted at Commonwealth agencies, it provides a useful foundation to build on for our club. Club members and the Committee were consulted prior to finalising the document.

The club's complaint handling process also needs to align with Section 65B "Dispute resolution procedure" of the *Associations Incorporation Act 1991* (attachment A).

The overarching approach needs to cover the possible wide range of types of complaints. A guiding principle is that complaints should be handled in a way that is proportionate and appropriate to the matter being complained about. For example, straightforward incidents at the lodge can be dealt with by the Lodge Leader or Lodge Manager soon after the incident occurs while other problems may need to be escalated.

Under the roles and responsibilities of the club's committee, the Membership Officer has overarching responsibility for complaint handling.

2. Culture

An effective complaint handling system will benefit the club's reputation and administration.

- Discover and address weaknesses in the club's policies, procedures or operation.
- Reassure members that the committee is committed to resolving problems and improving relations and members' enjoyment.
- Improve future decision making.
- Enhance the committee's accountability and transparency.

3. Principles

The *Guide* highlights a number of principles that underlie a complaint handling system, including fairness, accessibility, responsiveness, efficiency and integration.



3.1 Fairness

A complaint must be treated fairly. Fairness rests on three qualities – impartiality, confidentiality and transparency.

- **Impartiality** is vital to the credibility and success of a complaint handling system. A complaint should be treated on its merits. There should be a full and objective evaluation of the facts or evidence provided in support of a complaint. A complainant should not be victimised. To avoid any bias the relevant parties will not be identified, where possible, during the investigation and for the decision.
- **Confidentiality** and privacy should be respected. Personal details might need to be disclosed for one purpose (in consultation with the complainant, to improve the investigation) but might need protection in other situations (for example, public reporting on complaint incidents and trends). The *Guide* notes, “it is generally good practice to accept anonymous complaints, even though it can be difficult to conduct a full investigation without knowing the identity of a complainant. This should be explained to the complainant, and they should be asked how they want to be advised of the outcome of an investigation.”
- To promote **transparency**, complainants should be advised early about the steps in the process and the expected timeline for handling the complaint. If a complaint is not resolved promptly a progress update will be provided. The outcome of an investigation will be explained and, if applicable, reasons provided if the evidence presented by the complainant is not accepted. The complainant will be given an opportunity to respond or to seek an internal review if they are not satisfied with the decision made about their complaint.

3.2 Accessibility

The complaint handling system should be accessible to members and associates. To increase **awareness**, complaint handling documents should be prominently placed on the club’s website.

To ensure effective **access** a complaint can be made by various means such as a letter, email, phone call or face-to-face contact. A complaint can be made to the Lodge Leader, Lodge Manager, the lodge VP, Membership Officer or other committee members, the Administration Manager or Information Officer. If you wish to discuss your complaint with Membership Officer, email (membership.officer@brindabellaskiclub.org.au) to organise a phone call.

The *Guide* notes that although some complaints cannot be fully investigated without being put into writing or being supported by other documents, it is important not to make this a barrier to complaining.

3.3 Responsiveness

Any club officer receiving a complaint should be mindful to be responsive to the needs of complainants. Apart from timelines (mentioned earlier), examples of these issues could be a



complainant from a non-English speaking background or the emotional toll in making some types of complaints.

3.4 Efficiency

A complaint handling system should be efficient. Methods of dealing with a complaint will differ from one complaint to another. Simple complaints should usually be resolved quickly after the first interaction with a club contact. More complex or sensitive matters may take longer to resolve. Depending on the significance/complexity/sensitivity of the complaint, a sub-committee might be formed which would include the President.

As mentioned earlier, complaints should be handled in a way that is proportionate and appropriate to the matter being complained about.

3.5 Integration

The committee aims to integrate the complaint system with its other activities to identify weaknesses and lead to improvements. An on-going record of complaints will be kept by the committee, mindful of confidentiality and privacy. The Membership Officer will report on complaints and complaint trends as a regular agenda item at monthly committee meetings.

4. Process

In the *Guide*, the Ombudsman recommends seven steps to provide an effective complaint handling process – acknowledge, assess, plan, investigate, respond, follow up, and consider.

4.1 Acknowledgement

Acknowledge the complaint quickly so as to reassure the member (or associate) that their complaint is receiving attention. Outline the complaint process and (as appropriate) provide club contact details.

4.2 Assessment

The nature of complaints may differ widely. The subject of a complaint might be apparent from the information a complainant provides, or a lengthy investigation might be needed to clarify the facts. Some complaints can be resolved by means of an explanation or apology while others seek reconsideration of a decision or policy.

The *Guide* notes that “it is good practice to ask the client how they would like to see their complaint resolved – what outcome they are seeking. Sometimes an agency can meet the client’s expectations and sometimes not, but it is important to take account of those expectations. Often what the complainant is seeking will be straightforward – for example, an apology... In other cases the complainant might have an altruistic purpose, such as a desire to raise awareness of the problem or to ensure that other people will not find themselves in the same situation.”



4.3 Planning

As noted, complaints that are straightforward can often be resolved on first contact. If this is not the case and the complaint requires an investigation, a short written plan should be prepared. The plan should:

- define what is being investigated;
- list the steps involved and if further information is required and from who;
- identify the remedy the complainant is seeking, whether expectations are realistic or need management, and other possible remedies;
- note any special considerations such as identity withheld from others, sensitive or confidential information that needs to be safeguarded.

4.4 Investigation

The three principles of fair investigation are outlined in section 3.1. Each complaint should be approached with an open mind. A written record should be kept of evidence that is orally provided. A complainant may be asked to assist the investigation by providing documents they have or provide further explanation, clarification or information and if there are witnesses.

A complainant should be given the opportunity to comment on contrary information or claims from another source before a decision is made to dismiss the complaint.

4.5 Response

When the investigation of a complaint is completed the complainant should be told the particulars of the investigation, including any findings or decision reached. Whether the explanation should be given orally or in writing, or in both ways, will depend on the circumstances. If the complainant is not satisfied with the findings or decision their options should be explained in seeking an internal review.

It may not always be possible to resolve each disputed matter. The evidence to the investigator might be scant or inconclusive, and this should be explained to the complainant. Thought should be given on how to reach a settlement or understanding between the complainant and those being complained about.

The Club Rules (item 12) allow the committee to discipline members.

4.6 Following up

It is good practice to offer complainants the opportunity to comment on how their complaint was handled and resolved.

4.7 Systemic issues

The person's complaint might point to a systemic problem in the club which could be repeated. A related review of the club's procedures and policies may be required.



5. Analysis

Complaints can provide a source of information about how well the club is performing and what improvements might be made. The *Guide* notes that good records should be kept and the information regularly analysed. Reports on complaints should include: the number of complaints about a particular matter, any spikes in complaints, characteristics and frequency of a problem.

The *Guide* also notes that in relation to privacy legislation, access to the complaints database should be restricted to authorised staff. Except to the extent necessary, a complainant's identity or personal details should not be disclosed to other staff. For our club access could be limited to the President, Secretary and Membership Officer.

Numerous ongoing complaints about the same thing are usually a sign of a systemic or recurrent problem that requires further investigation and possible action by the committee. The Membership Officer will analyse records and report to the committee as appropriate or at least annually. A short report may be included in *Christie*.

Attachment A

Section 65B 'Dispute resolution procedure' of the Act

The rule of an incorporated association must set out a dispute resolution procedure for dealing with any dispute under the *Associations Incorporation Act 1991* or the rules between (a) a member and another member; or (b) a member and the association.

A member may appoint any person to act on behalf of the member in the dispute resolution procedure.

In applying the dispute resolution procedure, the association must ensure that —

- (a) each party to the dispute has been given an opportunity to be heard on the matter which is the subject of the dispute; and
- (b) the outcome of the dispute is determined by an unbiased decision-maker; and
- (c) the decision-maker notifies each party to the dispute, in writing, about the decision and gives reasons for the decision; and
- (d) to the extent that doing so is compatible with paragraphs (a) to (c), the dispute resolution procedure is completed as soon as is reasonably practicable; and
- (e) the dispute resolution procedure includes an appeal process.

If a member has initiated a dispute resolution procedure in relation to a dispute between a member and the association, the association must not take disciplinary action against any of the following people in relation to the matter which is the subject of the dispute resolution procedure until the dispute resolution procedure has been completed:

- (a) the member who initiated the dispute resolution procedure (complainant member);
- (b) a member of the association appointed by the complainant member under section (2) to act on behalf of the complainant member in the dispute resolution procedure.