

EXTERNAL FEEDBACK AND COMPLAINTS POLICY

1. PURPOSE

This policy explains how Tribal Warrior Aboriginal Corporation (TWAC) receives, records, responds to, and learns from external feedback and complaints. We are committed to handling concerns respectfully, fairly, promptly, and confidentially, and to using feedback to improve services.

2. OBJECTIVE

Tribal Warrior Aboriginal Corporation (TWAC) aims to ensure external feedback and complaints are received, recorded, assessed and resolved in a respectful, fair, timely and confidential manner, and that outcomes are used to improve our services.

3. SCOPE

This policy applies to feedback and complaints from external stakeholders, including:

- Clients, participants, families and carers
- Community members and Elders
- Service providers, partners and contractors
- Funding bodies and government agencies
- Members of the public interacting with our services
- Out of scope (handled under separate processes):
- Staff grievances, bullying/harassment reports, internal disputes (HR processes)
- Critical incidents and emergencies requiring immediate response (incident management)
- Media enquiries (communications process)

Note: If a matter starts as a complaint but includes serious risk (e.g., violence, threats, safeguarding concerns, fraud), it must be escalated immediately under relevant safety/incident procedures.

4. PRINCIPLES

Tribal Warrior will:

- Listen respectfully and acknowledge people's experiences
- Provide accessible ways to give feedback (verbal or written)
- Handle matters confidentially and in line with privacy requirements
- Respond promptly with clear timeframes
- Apply procedural fairness (all relevant parties heard, decisions based on evidence)
- Avoid victimisation (no adverse treatment for making a complaint)
- Use outcomes to support continuous improvement

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5. DEFINITIONS

- Feedback: Any comment about our service (positive, suggestions, concerns).
- Complaint: An expression of dissatisfaction about our services, staff conduct, communication, decisions, or processes where a response or resolution is expected.
- Complainant: The person raising the matter.
- Action Officer: Person assigned to investigate and/or implement actions.
- Approving Officer: Manager/Project Manager who reviews and signs off outcomes and closure.

6. HOW EXTERNAL STAKEHOLDERS CAN PROVIDE FEEDBACK/COMPLAINTS

Tribal Warrior accepts complaints and feedback via:

- In person / verbal
- Phone
- Email / letter
- Online (where available)
- Through a representative or advocate

6.1 Written vs verbal

We accept verbal complaints and will not refuse to act because a complaint is not in writing.

If the complaint is made verbally, the receiving staff member/manager will:

- write a clear summary of the complaint, and
- read it back (or confirm key points) with the complainant where possible.

6.2 Anonymous complaints

Anonymous complaints will be recorded and assessed. Our ability to investigate may be limited, but we will take reasonable steps to review the issue.

7. CONFIDENTIALITY, PRIVACY AND RECORDS

All complaints/feedback are handled confidentially and only shared with those who need to know to manage the matter.

Records must be stored in Monday.com (Feedback Register), including:

- date received, channel, complainant details (if provided)
- summary and category/type
- risk rating / urgency
- actions, contacts, evidence, outcome, and closure date
- attachments (emails/letters/photos) where relevant

8. ROLES AND RESPONSIBILITIES

8.1 All staff (receiving feedback)

- Treat all feedback respectfully and seriously.
- Escalate immediately if safety risks are identified.
- Notify the relevant Team Leader/Manager as soon as practicable.

8.2 Team Leader / Direct Manager

- Ensure the matter is recorded promptly in the Feedback Register.
- Acknowledge receipt (or arrange acknowledgement) within required timeframes.
- Manage low risk matters where appropriate or escalate to the HR & Compliance Manager.

8.3 HR & Compliance Manager

- Oversee complaints and feedback handling and ensure compliance with this policy (including confidentiality and procedural fairness).
- Ensure the complaint/feedback is correctly recorded in the Feedback Register and that supporting documents are uploaded.
- Allocate an Action Officer and determine the investigation/response approach.
- Monitor progress to ensure documentation is complete and timeframes are met.
- Identify and record any corrective or preventive actions in the Continual Improvement Register (as applicable).
- Escalate matters to the CEO/Board where required (e.g., high risk, safeguarding concerns, alleged criminal conduct, serious misconduct, fraud/corruption, or significant reputational/legal exposure).
- Where a conflict of interest exists, ensure the matter is allocated to an alternate investigator/Action Officer.

9. 8.4 CEO / Delegate

- Review escalations where the complainant is not satisfied, or where the matter is high risk or involves reputational/legal exposure.

10. 8.5 Board of Directors

- Must be notified where the complaint concerns the CEO (or where governance-level oversight is required).

8. PROCEDURE

This procedure applies to all external feedback and complaints received verbally or in writing from clients, community members, customers, supporters, partners, service providers and funding bodies.

8.1 Receiving feedback or a complaint

When feedback or a complaint is received, staff must:

- listen respectfully and remain professional.
- record key details (who, what, when, where).
- identify and escalate immediately if there is any safety risk or serious concern (see 9.3);
- notify the relevant Team Leader/Direct Manager as soon as practicable.

Note: Verbal complaints are accepted. Staff must not require a complaint to be in writing before action is taken.

8.2 Recording in the Feedback Register (Monday.com)

The Team Leader/Direct Manager must ensure the matter is recorded promptly in the Feedback Register in Monday.com (same day where practicable), including:

- date received and how it was received (verbal/email/letter/in person);
- complainant name and contact details (if provided);
- summary of the issue and desired outcome (if known);
- relevant program/service/location;
- any immediate actions taken;
- attachments (emails, letters, screenshots, photos, file notes).

All entries in the Feedback Register must be treated as confidential and handled in line with the Code of Conduct and privacy requirements.

8.3 Immediate escalation (high-risk or serious matters)

The Team Leader/Direct Manager must escalate to the HR & Compliance Manager immediately (and/or CEO where required) if the matter involves or alleges:

- immediate safety risk, threats or violence;
- safeguarding concerns (e.g., child safety);
- fraud, theft, corruption, serious misconduct;
- serious injury, reportable incident, or potential legal breach;
- significant reputational risk (e.g., media involvement).

Where required, the HR & Compliance Manager will escalate to the CEO/Delegate and/or Board of Directors.

8.4 Acknowledgement to the complainant

The Team Leader/Direct Manager will acknowledge receipt (or arrange acknowledgement) within required timeframes.

The HR & Compliance Manager is responsible for ensuring:

- acknowledgement is sent within 2 business days (unless resolved sooner);

- the complainant is advised:
 - the complaint has been received and logged,
 - the name/position of the person managing the matter,
 - expected timeframes and how updates will occur,
 - confidentiality and privacy limitations.

Acknowledgement may be provided by letter or email, depending on the complainant's preference.

8.5 Assessment and allocation

The HR & Compliance Manager will:

- confirm the complaint/feedback category and priority;
- assess complexity, risk and required response pathway;
- allocate an Action Officer (where investigation/action is required);
- determine the investigation approach and communication plan.

If a conflict of interest exists, the HR & Compliance Manager must allocate the matter to an alternate investigator/Action Officer and advise the CEO where appropriate.

8.6 Conflict of interest (complaint handling)

- Any person involved in receiving, assessing, investigating, deciding or approving a complaint must declare any real, potential, or perceived conflict of interest as soon as it is identified.
- Where a conflict exists, that person must not investigate, decide, or approve the matter, and the HR & Compliance Manager will allocate an alternate Action Officer/Approving Officer.
- If the conflict involves the HR & Compliance Manager, the matter must be escalated to the CEO/Delegate for allocation.
- If the conflict involves the CEO, the matter must be referred to the Board Chair/Board for allocation and oversight.

8.7 Investigation and actions

The Action Officer must:

- investigate proportionately to the issue (gather documents, records and other information);
- interview relevant parties separately where appropriate;
- document all discussions, findings and actions in the Feedback Register on the same day they occur;
- maintain confidentiality and procedural fairness.

The HR & Compliance Manager must oversee progress to ensure:

- actions are appropriate and timely;
- records are complete.
- risks and escalation needs are managed.

8.8 Providing an outcome and feedback to the complainant

Once the matter has been assessed and actions identified, the HR & Compliance Manager (or delegate) will ensure the complainant is advised of:

- the outcome (what was found/decided);
- what action Tribal Warrior will take (if any);
- expected timeframes for completion of actions (if ongoing);
- review/escalation options if they are not satisfied.

Note: Privacy may limit the level of detail that can be shared about individual staff or internal management action.

8.9 Timeframes and updates

Tribal Warrior will make every effort to resolve complaints within 30 business days.

If resolution will take longer than 30 business days, the HR & Compliance Manager will:

- provide an update to the complainant,
- explain the reason for the delay, and
- provide a revised expected timeframe.

8.10 Escalation when the complainant is not satisfied

If the complainant is not satisfied with the proposed outcome or actions:

- the matter must be escalated to the CEO/Delegate for review; and/or
- where governance oversight is required, the Board of Directors must be notified.

Where appropriate, the complainant may also be advised that they can seek external review through relevant external agencies (depending on complaint type).

8.11 Closure and record keeping

A matter can be closed when:

- the outcome has been communicated to the complainant (where contact details are available);
- agreed actions are completed, or a plan is documented and approved; and
- all records and attachments are stored in the Feedback Register.

The HR & Compliance Manager is responsible for confirming that closure notes are complete and that confidentiality settings are maintained.

8.12 Monitoring and continuous improvement

The HR & Compliance Manager will:

- monitor open items for timeframes and completeness.
- review complaints/feedback trends at least six-monthly to identify recurring issues and risks; and
- ensure corrective/preventive actions (where identified) are recorded in the Continual Improvement Register and tracked to completion.

10. POSITIVE FEEDBACK OR GENERAL

General/positive feedback will be:

- provided to the Team Leader/Direct Manager (or HR & Compliance Manager) within 1 business day where practicable.
- recorded in the Feedback Register with the correct feedback type (e.g., compliment, suggestion);
- acknowledged by the Team Leader/Manager to show appreciation (e.g., thank you call/email).

11. VERSION CONTROL

Version	Authorised by	Issue date
1.0	CEO	2023
1.1	CEO	2025
1.2	CEO	2026