

1.8 Complaints handling policy

Background

Complaints and feedback form an important part of feedback, accountability and quality improvement for any organisation. St John Ambulance Australia Inc. (St John) is committed to ensuring that complaints from employees, volunteers, customers and the community are dealt with in a fair, responsive, efficient, effective, and transparent way. Complaints processes must also be accessible to all St John stakeholders.

St John believe that people have the right to make a complaint when they are dissatisfied with an action, inaction, decision or event, and we encourage such feedback. Complaints can be made about numerous issues, from our products to our services, or about our staff or volunteers. Complaints may be made in person, via telephone, in writing or in public forums such as social media (which may include negative comments).

Purpose

This Policy aims to:

- ensure that complaints are handled fairly, efficiently, effectively, responsively and transparently
- provide guidance to people who wish to make a complaint
- provide a framework for managers of complaints on the key principles and concepts of the National Office complaints management system.

Definitions

Complaint—an expression of dissatisfaction about St John, our services, employees or volunteers or the handling of a complaint. Complaints may be about our actions or inaction, a decision or event. They may be made directly to us, or anonymously.

Child—any person under the age of 18 years.

Dispute—an unresolved complaint that has been escalated either within or outside of the St John National Office.

Feedback—opinions, comments and expressions of interest or concern, made directly or indirectly to or about St John, our services, products or complaints handling system.

Natural justice—refers to the right of the parties to a complaint to receive a fair hearing and decision that is free from bias.

Procedural fairness—refers to the procedures used by a decision-maker party to a complaint and requires that fair and proper procedures are used when making a decision.

Responsibilities

All employees and volunteers are expected to be committed to a fair, responsive, efficient, effective, and transparent complaints process. Employees and volunteers will treat complainants with respect and provide assistance to people to make a complaint, where necessary. This policy applies to all employees or volunteers receiving or managing complaints from the public, customers or St John members made to or about St John.

The CEO is responsible for promoting a culture that values complaints and their effective resolution, including providing adequate support to employees and volunteers responsible for the handling of complaints. The CEO is also responsible for fostering a culture where staff, volunteers, St John

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members (including children) and the public feel able to raise concerns and give feedback. For any serious complaint, the CEO is responsible for reporting the matter to the Board. If the complaint is about the CEO, the complaint will be forwarded to the Chairperson of the Board, who will report the matter to the Board. The CEO will seek feedback and be open to the ideas of employees and volunteers regarding recommendations for improvements to the complaints handling system.

The National Manager—Policy and Community is responsible for ensuring that complaint handling practices are updated in line with scheduled updates and/or feedback or suggestions for improvements from employees or volunteers, customers, members of the public or in line with any review process following complaints made.

All members associated with the management of a complaint will maintain confidentiality, except in a circumstance where disclosure is required by law.

A. Policy

1. In resolving complaints, St John is committed to the following principles:

a. Having a people focus

St John is committed to receiving complaints and feedback about our services, systems, practices, procedures, products, people and complaint handling process.

For a complaint handling system to be effective, we believe that complaints should be dealt with in a reasonable time frame. It also is essential that people are:

- informed about the complaints handling process and how to access it
- listened to and treated with respect by all involved in managing the complaint, and
- provided with reasons for decisions
- provided with any options for redress (or to set it right)
- provided with an opportunity for their case to be reviewed or appealed if necessary.

St John will accept anonymous complaints where there is a compelling reason to do so. Anonymous complaints will be treated on their merits, as for any other complaint.

b. No repercussions for complainants

People should always be able to make a complaint without fear of reprisal, victimisation, retaliatory action or other adverse effect. St John will take all reasonable steps to ensure that complainants do not experience repercussions as a result of their complaint.

Where a complaint has been made that appears to be malicious, vexatious or frivolous, the matter should still be investigated in line with this Policy.

c. Accessibility

St John will ensure that information about how to make a complaint is made publicly available. Our complaints handling framework will appear in plain language and will be straight forward, and we will provide help in accessing and understanding our complaints framework to people that require it.

Complaints can be made in a range of formats, such as by using the National Office Complaints and Feedback Form, via phone, email, post, social media posts or messages. A child friendly version of the complaints and feedback form, using appropriate language, is also available.

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A person making a complaint can appoint a representative or support person of their choice in pursuing their complaint, and where the complainant wishes, St John will communicate with the complainant through their representative. If the person wishes to have a representative or support person, but does not have anyone to assist, they may also ask for St John to appoint an independent person for them.

Our complaints process is free.

d. Responsiveness

It is St John's goal to respond as quickly as possible to a complaint. In the first instance, this will be an acknowledgment that a complaint has been received. This will occur within two (2) business days of receiving the complaint. In this acknowledgment, we will tell the complainant about how the complaints process works and how to seek further information.

Following this, we will assess the complaint and prioritise it according to the nature of the complaint and/or the urgency of the issue(s) raised.

We will maintain contact with the complainant throughout the complaints process to:

- advise of progress
- how they will be involved
- the anticipated time frames for our actions
- any delays and the reason for the delay
- if we are unable to deal with any part of their complaint, and if this is the case, provide direction for how the complainant may direct their complaint (if known and appropriate).

e. Early resolution

St John aim for the early resolution of complaints in all cases. Where possible, a complaint will be resolved at first contact with us. We recognise that in some cases, this may not be possible, but are committed to resolving the matter at the earliest possible opportunity.

Where appropriate, we may offer an explanation or apology to the person making the complaint.

f. Objectivity and fairness

We aim for our complaints handling process to be objective, fair, equitable and unbiased. All complaints will be taken seriously. Managers dealing with complaints will act responsibly and with integrity at all times and will declare any conflict of interest (whether actual or perceived). Any internal review of how a complaint was managed will be conducted by a person other than the original decision-maker.

g. Flexibility

We will adopt a flexible approach to service delivery and problem solving.

h. Confidentiality

Complaints will be dealt with confidentially, except where we are required by law to disclose information about the complaint or where we believe that a child or vulnerable person is being harmed. We will protect the identity of people making complaints where this is practical or appropriate and will only disclose personal information that identifies an individual where permitted by law.

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i. Levels of complaint handling

St John will provide three levels for managing complaints:

Level 1

We aim to resolve all matters as quickly as possible, and preferably on first contact. Generally, the types of complaints resolved in Level 1 are considered to be informal and 'front line'. Despite the informal nature, all complaints should be documented by the complaint manager and every attempt should be made for early resolution.

Level 2

Where it is not possible to resolve the matter on first contact, we may decide to escalate the complaint to a Senior Manager (this person must not be connected to the complainant). This Manager will be responsible for making decisions around:

- the nature and severity of the complaint
- the need to investigate the complaint (taking into account any prior decisions)
- facilitating a resolution that is acceptable to the relevant parties.

Level 3

- The Senior Manager referred to in Level 2 may escalate the matter to the National CEO where the complainant is dissatisfied with the outcome of their complaint.
- The complainant may request an external review occur with the relevant governing body in relation to the outcome of the complaint or the manner in which the complaint has been handled by St John (for example, for complaints around charitable status, the Australian Charities and Not-for-Profits Commission, or for child safety related complaints, a suitably qualified investigator). Mediation is an optional alternative.*

* Where complaints relate to child safety or child abuse please see clause 2, *Complaints that relate to child safety*, below.

j. Accountability

All complaints will be thoroughly documented by any St John member involved and stored in a manner in which information can be easily retrieved where necessary.

Complaints will be analysed regularly view a view to:

- ascertaining the number of complaints received by the National Office
- the nature of the complaints (looking for common themes or trends)
- outcome of complaints
- the effectiveness of our complaints system
- level of escalation required (including any to external investigation)
- identify where improvements can be made to St John's systems, complaint handling system or customer service.

Any reports of this nature generated will be provided to the National CEO.

Complaints register

St John will establish and keep up to date a Complaints Register. The Complaints Register will include details about the following:

- date of complaint

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- parties involved
- details of the issue (including names)
- the investigation process
- actions taken
- location of the file in which full details are contained
- name of the member who received the complaint
- name of the member managing the complaint
- any related rules, standards, guidelines or policies or procedures (including version) that have been relied on in managing the complaint.

The Complaints Register will be stored on the Company Service (or S: Drive).

k. Quality improvement (learning)

St John is committed to continuously improving the way that we operate, including the effectiveness of our complaint handling system. We will:

- support people making complaints
- aim for the appropriate and timely resolution of complaints
- review our complaints management system and complaint data regularly
- implement change where change is identified as necessary or good practice
- recognise and reward exemplary complaint handling by staff.

l. Empowering our people

St John will empower its employees and volunteers to implement this complaint handling policy where relevant to their role and responsibility.

St John always aims to resolve complaints in a timely manner and ensure that we are accessible and responsive to all complaints. Our success in doing so however relies on:

- our ability to perform our roles and functions in the most effective way
- the health, safety, wellbeing and security of our members
- our ability to allocate resources fairly across all complaints received by us.

When the conduct of a complainant is unreasonable or threatens the health, safety, wellbeing or security of our members, St John will take a proactive approach in managing this conduct.

2. Complaints that relate to child safety

The safety and wellbeing of children and young people is paramount to St John. St John is committed to fostering a culture that encourages children and young people, employees and volunteers to raise concerns that they have. St John has zero tolerance for any conduct that places the health, safety and wellbeing of children and young people at risk or for any behaviour that harms a child or young person.

Complaints that relate to child safety may include those around conduct that breaches the:

- Code of Conduct
- Child Safety Code of Conduct

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- (iii) National Child and Vulnerable Persons’ Safety Rules, Standards and Guidelines, or
- (iv) National Office Child and Vulnerable Persons’ Safety Procedures.

Any complaint that involves a breach of (i)-(iv) above will be dealt with in accordance with the Complaint Handling Framework provided in Part B below.

A child and young person friendly version of the complaints form has been developed together with a child friendly Code of Conduct to assist children and young people in understanding their rights and in providing a complaint or feedback.

3. Complaints that relate to member grievances.
 - a. It is important to note that this policy *does not* cover grievances between national members—that is, complaints by and employee or volunteer about another employee or volunteer—except in a circumstance where an internal investigation is required. If this is the case, the investigation procedure detailed in Part B. ‘*Procedures*’ of this policy should be implemented.
 - b. All other grievances should be managed in accordance with the National Office *Grievances and Dispute Resolution Policy* (NOPOL: 7.10).
4. Complaints that relate to whistleblowing.
 - a. This policy does not specifically cover whistleblowing—that is, complaints that are related to perceived wrongdoings, serious malpractice or misconduct or corrupt, illegal or otherwise undesirable conduct in the workplace.
 - b. The management of whistleblowing should be managed in accordance with the National Office *Whistleblowing Policy* (NOPOL: 1.7).
5. Complaints of serious nature will be referred to St John’s insurer, where deemed necessary by the National CEO.

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B. Procedures

1. *Complaint handling framework*

There are 5 key areas to our complaint management framework, as depicted in the flow chart* below:



* A detailed flowchart of the framework is contained in Appendix

a. RECEIVE

Upon being notified of a complaint, St John will:

- receive details of the complaint and any supporting information
- determine contact information for the complainant (where possible)
- identify the issues raised by the complainant and the desired outcome, and
- identify any support issues that may be required for the complainant.

Anonymous complaints

St John will receive anonymous complaints, including where there is no indication of name or contact information, or where the complainant expresses a wish to not be identified. An anonymous complaint could be in writing (e.g. by letter, an email address that does not contain any identifiers, on one of our social media platforms or via phone call).

Upon receiving an anonymous complaint, St John will:

- encourage the complainant to give their name, where possible.
- identify the issues raised by the complainant and the desired outcome
- identify any support issues that may be required for the complainant.

b. ACKNOWLEDGE

St John will acknowledge all complaints within 5 working days (for an anonymous complaint, this may not be possible). Where appropriate, St John will offer an explanation or apology.

The acknowledgement may be offered in writing (e.g. letter, email, post on social media platform) or via phone (depending on the most appropriate medium to contact the complainant).

c. ASSESS AND INVESTIGATE

The complaint will be assessed to determine:

- if the issue(s) raised are within the control of the National Office (e.g. some complaints may relate to a state/territory St John entity)
- the severity or urgency of the complaint

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- whether the complaint relates to the health or safety of another person, particularly a child, young or vulnerable person
- whether there is a need to offer the complainant an explanation or apology
- the impact on the complainant
- a timeframe for resolving the complaint (including factoring in the impact on the complainant if there are delays in resolution)
- whether resolution requires the involvement of external organisations (e.g. police).

An investigation aims to determine the facts and matters relating to the complaint. Any investigation conducted will be conducted observing the principles of natural justice and procedural fairness as well as adhering to the principles of confidentiality and privacy. In investigating a complaint, St John may:

- determine if there is a need to seek any additional information or clarifying information from the complainant (where this is possible)
- gather any internal information about the issue from the respondent or area the complaint is about
- provide full details of the complaint to the respondent(s) (where applicable) so that they can respond accordingly
- consider if any St John member should be stood down while investigation occurs*
- determine any relevant policy or procedure that relates to the complaint that should be applied (e.g. Child and Vulnerable Persons' Safety, Whistleblowing etc.)
- determine if an external body or authority should be notified (e.g. police)
- undertake interviews of the parties and witnesses where warranted (or where any such interview would not jeopardise any police or statutory authority investigation)
- determine if appointing an external investigator is warranted
- determine the root cause of the incident or event.

* Regarding any complaint made against a member of St John in relation to child safety (such as a breach of the National Guidelines or Code of Conduct), the Police should be contacted immediately. No action that St John takes should interfere with any existing police investigation. Where St John advised by Police that it is okay to do so, the member should be stood down or their duties restricted until the investigation has concluded and a clear result obtained (in line with NOPOL: 3.2). The safety and wellbeing of the child/ren is considered paramount. Where a clear result is not obtained, the matter should be referred to the appropriate authority for investigation and/or the Counselling and Disciplinary Policy (NOPOL: 7.8) implemented, depending on the nature of the complaint.

d. DETERMINE THE OUTCOME

Following consideration of the complaint, St John will determine whether the complaint is:

- substantiated (there is sufficient evidence to support the complaint)
- inconclusive (there is insufficient evidence to support the complaint or form a conclusion)
- unsubstantiated (there is sufficient evidence to demonstrate that the complaint is unfounded)
- mischievous, vexatious, frivolous or knowingly untrue.

Once the outcome has been determined, St John will contact the complainant (where possible) to advise of:

- the decision and any action(s) St John has taken

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- the reasons for the decision and any action(s)
- the resolution(s) that we have proposed or put in place, and
- any options for review or appeal available to the complainant should they be unsatisfied with the outcome (such as internal or external review or appeal). CLOSE

St John will keep accurate and factual written records of all complaints including information about:

- how the complaint was managed
- the outcome of the complaint
- any outstanding actions to be implemented.

The St John member responsible for management of the complaint will record the complaint (even those resolved on the front line) in the Complaints Register.

Following resolution of the complaint, the complaint should be analysed to ensure:

- outcomes are correctly implemented, monitored or reported to the appropriate person(s)
- actions described in part A, clause 1(k) are implemented.

See Appendix 1 for case studies of the implementation of the Complaint Handling Framework.

2. Appeal

Where a complainant or respondent is unsatisfied with a decision or outcome, they may appeal the same. Where a party to a complaint wishes to appeal, the following procedure should be followed:

- (i) the party who wishes to appeal should notify St John in writing
- (ii) an investigator (who is not the investigator for part B, clause (c) above) will be appointed. This investigator may be internal or external depending on the nature of the complaint
- (iii) the investigator will review the all aspects of complaint, including all facts and matters and evidence relied on in making a determination
- (iv) the investigator will make a decision and inform all parties to the complaint.

Nothing in this policy will prevent any party to a complaint for engaging in any form of legal process, including making a complaint to a legal (e.g. police) or regulatory authority (e.g. the Australian Charities and Not-for-Profits Commission or ACNC).

Related policy

Code of Conduct (NOPOL: 1.1)

Anti-bullying, Harassment and Discrimination Policy (NOPOL: 1.4)

Whistleblowing Policy (NOPOL: 1.7)

Child and Vulnerable Persons' Safety Rules, Standards and Guidelines (NOPOL: 3.1)

National Office Child and Vulnerable Persons' Safety Procedures (NOPOL: 3.2)

Privacy Policy (NOPOL: 6.1)

Data Breach Policy (NOPOL: 6.5)

Counselling & Disciplinary Policy (NOPOL: 7.8)

Grievances & Dispute Resolution Policy (NOPOL: 7.10)

Child Safety Code of Conduct (under development).

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Related forms

Complaints and Feedback Form

Child Friendly Complaints and Feedback Form.

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Appendix 1—Case study examples of implementation of Complaint Handling Framework

Example 1

Background:

A complaint has been made regarding the conduct of a national member while they were attending a youth camp. It is alleged that the national member was in a room with the door closed with a young member, and the complainant believed that no other adult was present. The complaint has come from an Area Youth Manager from another state. They provided both email and phone contact details. The name of the young member in the room with the national member has also been supplied. The complainant says they want to ensure that the young member was not mistreated.

The complaint was received by the Manager—Policy and Community. On receiving the complaint, the Manager undertakes the following actions.

Receive:

- Determine the contact details of the complainant, which were supplied.
- Review the facts and matters pertaining to the complaint—that is, the complainant is concerned for the welfare of the young person in the room with the national member. In addition, a breach of the Child Safety Code of Conduct and Guidelines has potentially occurred.
- There are no support issues identified for the complainant.

Acknowledge:

- A response is provided to the complainant via return email within 24 hours of receipt. In this response, the complainant's concerns are acknowledged, and the complainant is reassured that the matter will be investigated. An approximate timeframe for investigating the same is provided.

Assess and investigate:

The Manager—Policy and Community contacts the National Member subject to the allegation and advises that a complaint has been made. During this call the national member offered an explanation of what happened during the interaction with the young person in the room. This is recorded in a file note:

File note:

Date: 1 October 2018

In attendance: Jane Doe, Manager—Policy and Community, and Leanne Boyle, National Youth Officer

Leanne offered an explanation of the event. She advised that the young member, Damian Jones, had sprained his ankle at the camp in the dormitory area and had sought assistance from her. Leanne advised that a second adult member (Katie James, from Victoria—who is from the same state as the young member with the injury) was present but left the room briefly to get the first aid kit and alert the camp medical staff. Katie and Damian are from the same state. No other adults appeared to be in the vicinity at the time. Leanne advised that the second adult member, Katie had closed the door on exiting the room and the national member didn't notice it had been closed at the time as she was assessing the patient's injury and trying to keep the patient calm. Leanne advised that the second adult member, Katie, returned within minutes with the first aid kit, and the staff medical team were elsewhere on site and would be along as soon as they were able.

I thanked Leanne for her assistance with the investigation and advised that they will be kept advised of the progress of the investigation.

Jane Doe

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At this stage, the Manager—Policy and Community sees no reason to stand the member down.

Next, the Manager informs the state/territory youth manager of a complaint relating to their young member, Damian and of the involvement of the adult member, Katie. The state/territory youth manager agrees to contact the family of the young member to discuss the matter and seek a conference call between the family, state/territory youth manager with the Manager—Policy & Community. In addition, the state/territory youth manager also agrees to seek a conference call and Katie.

The family agrees to participate in the conference call and they choose to invite their Damian to attend. During the conference call, enquiries are made of the young member, whose story is consistent with the national member's story. The young member and their family both advise that the young member was safe and well-cared for during the interaction.

Next, an enquiry is made of the second manager, Katie, involved in treating the young member. The second manager's statement is consistent with both Leanne and Damian's statements.

Determine the outcome:

Based on the findings, the Manager—Policy and Community determines:

- nothing in the investigation lends itself to concluding that the child, Damian, has been harmed and a report to child services or engaging the services of an external investigator is not warranted
- that a breach of national policy has occurred, so the complaint is sustained. In rectifying that breach, she determines that re-education of both the national member in terms of the Child Safety Code of Conduct and Guidelines is an appropriate measure in addressing the behaviour of both adults involved in the care of the child. The state/territory youth officer of the second adult, Katie, agrees with this finding and re-education.

The National Manager informs the complainant of the outcome of the investigation via phone. The complainant is satisfied with the outcome of the investigation. The phone call is followed up in writing.

From start to finish, the matter is resolved in less than one week.

The Manager ensures that the matter is thoroughly documented, placed in the complaints register and the policy reviewed in terms of effectiveness following this complaint.

Example 2

Background:

A complaint has been made regarding the service provided for the eLearning help desk. It has been received via email, with no other contact information supplied. The complainant advises that they did not receive a prompt response to their request for support, suggesting that they have now waited more than 48 hours for a response. The complainant provides their full name. The complaint has been sent at 7:49pm on Sunday.

The complaint has been received by the National IT Projects Manager. On receiving the complaint, the Manger undertakes the following actions:

Receive:

The Manager receives the email and identifies that the issue raised in the complaint is the timeliness of support services. A desired outcome is not identified and from the information provided, no support issues can be identified at this stage.

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Acknowledge:

The Manager, by return email within 30 minutes of receipt of the email, acknowledges receipt of the complaint. In this acknowledgment, the Manager requests more information, including the date and time of the support request, the course being undertaken, and a description of the problem encountered. The Manager also advises that St John takes all complaints very seriously and outlines the complaints process. In addition, the Manager asks for a phone contact so that we can give them a call.

The complainant responds via return email the next day. They advised that they were undertaking the eLearning component of the PFA course which quit around the half-way point during the program. Their support request sought information on whether they needed to start the eLearning course all over again or if they could continue from the point the program quit. They advised that the complaint was sent at 11pm on Friday night. The complainant logged the support ticket as soon as the issue arose. They are due to undertake their practical PFA course this coming Friday. They provide their contact number.

Assess and investigate:

The Manager reviews the log history for the St John support ticket system and identifies that no such support request has been received by St John. In terms of timeliness, the support desk is only staffed during business hours, Monday to Friday, and as such, no support is available outside of business hours. The Manager is reviewing the email at 8.30am on Monday morning.

The Manager investigates the program itself to determine if there are any errors as well as locate the complainant entry in the system. The system check does not reveal any errors at St John's end, so it is possible that an error occurred at the user's end (such as an interruption to their internet supply). The system also tells the Manager that the complainant is around half way through the course, so they should be able to pick up where they left off.

Determine the outcome:

The Manager phones the complainant. The Manager advises that St John is very sorry that the complainant experienced trouble with our eLearning program, and advised that their progress in the course has been saved and they should be able to pick up where they left off by simply re-logging in. The complainant queries why the problem occurred and why St John didn't get back to him sooner and the Manager advises that St John ran a system check and could not find any errors, and that often problems with interruption can be as a result of internet supply issues. The Manager also advised that there is no support ticket logged in their system for him, so that unfortunately the original complaint never arrived at St John's end. He advised that the Help Desk is also only staffed during business hours. The Manager then supported the customer to regain access to their course and confirmed that they were able to do this. In ending the conversation, the Manager again reinforced that St John is sorry that the customer had trouble in using our system and to feel free to give them a call if any further problems occurred. The complainant advised that they were happy with this response.

The Manager ensures that the matter is thoroughly documented, placed in the complaints register and the policy reviewed in terms of effectiveness following this complaint.

Example 3

Background:

An allegation of child sexual abuse has been made against a current National Office member. The complaint was received via email to the enquiries@stjohn.org.au address. The complainant is unsigned (anonymous). The email address has no identifiers. The complainant advises that they were

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sexually abused at a Youth Camp 21 years ago, when they were sixteen years of age, and they identify the alleged offender (the National Office member). They provide brief details of the abuse that is alleged to have occurred, including dates, times, nature of abuse and they suggest there was a witness, being friend on camp who they told after the assault occurred time. The complainant wants the member to be terminated from St John, although they advise they have no intention of going through a criminal process. They advise that they wish to remain anonymous.

The Manager—Policy and Community received the complaint and performed the following actions:

Receive:

The only method of communicating with this person at this stage is via return email. The subject of the complaint is alleged sexual abuse that is historic in nature. The alleged offender is a current National Office member. There are a variety of support implications for the alleged victim, including psychological counselling—although willingness to partake in support activities is not yet established. Given the nature of the complaint, the Manager advises the National CEO immediately of the complaint.

Acknowledge:

- After discussions with the CEO, the Manager provides acknowledgment of the complaint via return email within 12 hours of receiving the complaint. In the email, the Manager thanks the complainant for contacting St John and acknowledges how challenging taking this step must have been for them. The Manager outlines the complaints process, including advising that given the nature of the complaint, an external investigator will be appointed in order to make a determination in relation to the matter. In addition, the Manager advises, that in line with the St John Child Safety Policy, that the National Office member who is the subject of the complaint will be stood down until the conclusion of the investigation. An offer of provision of psychological counselling is made, as well as for the person to engage a support person, such as a friend, family member or advocate in their dealings with St John. The Manager encourages the person to provide their name, advising the complainant that it is very challenging for an investigator to pursue an investigation without the name and statement of the complainant, should the complainant wish to take the matter further. An offer of support from St John in approaching the authorities is also made. The Manager also asks the complainant if they would be willing for us to share their email address with our external investigator so that they may be contacted.
- The complainant responds that they do not want anything from St John other than for the person to be terminated from St John. They do not wish to go to the authorities. They are willing to talk with our external investigator over email only.
- The Manager responds acknowledging the complainant's wishes to remain anonymous, to not take up our offer of support at this stage, and not to go to take their complaint to the authorities. The Manager advises that the matter has been referred to an external investigator, who will be in contact with them via email within 24 hours. The name and company the investigator works for is provided to the complainant.

Assess and investigate:

- In consultation with the CEO, the Manager determines that the current role of the National Office member subject to the complaint is one that does not presently work directly with children but may come into contact with young members from time to time (e.g. via attending public events and/or a national events). The member is retired and, as far as St John is aware, does not engage in paid or other volunteer work of any nature with children. The decision is made that, in line with the Child Safety Procedures, the National Member is stood down until the complaint has been resolved. The National CEO calls the National Member direct and makes them aware that an

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allegation has been made against them and offers support via the St John National EAP. The phone call is followed up in writing via email (to an email address of the members choosing).

- Given the long time that had elapsed since the alleged abuse and the allegation arising, the urgency of the complaint was considered to be low. However, the impact of the alleged abuse on the complainant is likely very high.
- The complaint should be resolved as quickly as possible.
- The complaint did not relate to the health and wellbeing of a child currently in the care of a St John entity.
- Additional or clarifying information is required from the complainant in order to pursue an investigation.
- External organisation involvement must occur, including the appointment of an external investigator and police involvement (should the complainant wish to pursue this).
- The Child Safety Procedures, Child Safety Code of Conduct and Child Safety Rules, Standards and Guidelines, Counselling and Disciplinary Policy are applicable to this complaint.
- The Police were notified, but unable to act as there was insufficient evidence.

Determine the outcome:

- The external investigator was appointed, with external investigator attempting to contact the complainant several times via the email address supplied, as well as interviewing the alleged offender. No further contact was able to be made with the complainant. The investigator supplied their final report, finding that there was 'inconclusive' evidence to substantiate the claim and recommended that the National Member be reinstated.
- The National Office decision was to follow the recommendation of the external investigator.

Close:

- Accurate and factual written records of the complaint were kept including all correspondence, and file notes of all actions taken by St John. The details of the complaint were entered into the Complaints Register, and the Child Safety Procedures and Complaints Policy were reviewed and found to be sound and no changes required.

Example 4

A child safety report has been made against a National member by a parent of the alleged victim. The report was received via emailed form by the National Child Safety Officer. In the report, the parent advises that the complaint relates to the inappropriate physical restraint of their child (including locking them in a room) by a National member during attendance at a youth event. The family member advises in the report they are heading to the Police station this morning to make a formal complaint.

Receive:

A written report submitted by the parent of a child attending a national youth event. The report contains contact details of the parent, plus details of the alleged abuse, including the name of the alleged offender. There are support implications for the alleged victim and their family members, in addition to the National Office member who is the alleged offender.

Acknowledge:

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Upon receiving the written report, St John immediately contact the parent via phone to advise that their report has been received, and that St John is contacting the Police to make their own report. Given the nature of the report, assessment has occurred immediately.

In the conversation with the Police, the Police seek information about the member who is the alleged offender (routine information such as full name, date of birth, address, profession and length of membership). They advise St John that the alleged victim is currently in attendance making a statement to Police and that the Police will contact St John following that interview and advise appropriate next steps. Given that the matter relates to a National member, the National Child Safety Officer immediately advises the National CEO in line with the National Child Safety Procedures. No other action is taken until the Police advise St John that it is permitted to do so.

Later that day, the Police contact St John and advise that they are satisfied that there is enough evidence to proceed with a formal investigation. They advise St John that they may stand the member down pending the outcome of the police investigation. They advise that at this stage, St John should not conduct their own internal investigation as it may jeopardise any police investigation.

Assess and Investigate:

Given that the police have instructed St John not to proceed with any investigation, beyond standing the member down, St John will take no other action until advised to do so by Police.

Determine the outcome:

Police lay formal charges against the National Office member. Following Court proceedings, the offender is convicted. In line with the National Office Child Safety Procedures, the National Member engagement with the organisation is terminated. In doing so, the organisation ensures that the National Member is provided support via the Member Welfare Program, as this Program extends to past employees and volunteers. The National Member was also a member of the Order, and as such, their Order status is revoked as a result of the conviction.

Close:

Accurate and factual written records of the report were kept throughout the duration of the case, including all correspondence, and file notes of all actions taken by St John. The details of the complaint were entered into the Child Safety Complaints Register, and the National office Child Safety Procedures and Complaints Policy were reviewed and found to be sound and no changes required.

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Appendix 2—Detailed flowchart of complaint handling framework



Our principles | Having a people focus | No repercussions for complainants | Accessibility | Responsiveness | Early resolution | Objectivity and fairness | Flexibility | Confidentiality | Accountability | A commitment to quality improvement | Empowering our people

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