

Compass Complaint Handling Policy

1. Purpose

This policy outlines Compass’ commitment to the provision of a system for managing client and stakeholder complaints and how we will deal with complaints from clients and stakeholders about our service delivery.

Compass is a socially regenerative landlord and together with a large network of partners provides housing and support to individuals, families and vulnerable people including people who are homeless or at risk of homelessness, people on very low, low and moderate incomes, people with disability and people with complex and specialist support needs.

Compass recognises the importance and value of listening and responding to concerns and complaints and are committed to achieving the highest standard we can in every area of our work and continuous improvement. This applies - especially to delivery of services, seeking donations and accountability to stakeholders generally.

Compass is committed to providing fair and just review of its services and decisions to tenants, applicants, residents, families, carers, Partners, Workers and other Stakeholders. by ensuring that complaints are addressed effectively, promptly and fairly. Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work.

Compass is committed to working according to or above the standards required by Code of Conduct of the Australian Council for International Development (ACFID) signatory organisations, and the National Standards for Disability Services.

Compass makes clear the value we place on receiving concerns and complaints in all relevant communications, advises how a copy of this policy may be obtained and provides clear information on how complaints may be made.

2. Scope

A complaint may be made by a person to whom we deliver services or who is affected by our services which relates to our Workers, Partners, Associates and anyone else acting on behalf of a member of the Compass Group.

This policy is intended to apply to any such complaint, regardless of who makes it - with the following exceptions:

- Neighbourhood disputes and difficulties, including accusations of anti-social behaviour, are covered by **Compass Anti-Social Behaviour Policy (POL-025-03)**, **Compass Dealing with Anti-Social Behaviour Procedure (PROC-025-03)**, **Compass Neighbour Disputes & Nuisance and**

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Annoyance, Pets & Cleanliness Policy (POL-025-34) and Compass Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Procedures (PROC-025-34).

- Complaints and grievances by Compass’ Workers against other Compass Workers are dealt with in **Compass Workplace Relations Policy Manual Complaints and Grievance Policy (POL-028-06)**.
- Complaints received from the Registrar for Community Housing are managed in accordance with **Compass Registrar for Community Housing Complaints Procedure (PROC-012-04)** and recorded in Tickit Compass online system for compliance, incident and risk management.
- Appeals about decisions made by Compass are dealt with in **Compass Internal Review and Appeal Policy (POL-001) and Procedures (PROC-001)**.

Anonymous complaints can be made; however, our ability to investigate them may be limited because of this.

3. Policy Statement

Effective complaints management is fundamental to the provision of quality service and is one of the most important ways for obtaining feedback from clients and stakeholders, resolving disputes, learning what we need to do to improve our work and reforming policies and procedures.

Compass is committed to effectively handling complaints promptly and professionally. This includes anonymous complaints.

Compass will ensure that:

- complaints will be treated seriously and assessed in a timely manner in accordance with Compass Complaints Management Procedure (PROC-012-01),
- the level of investigation will be commensurate with the seriousness, frequency and consequences of a complaint,
- attempts will be made to resolve complaints within the local area in which they originate, to the greatest extent practical, and
- as part of our active tenancy management plan we will manage tenants and stakeholders to encourage feedback, compliments and complaints so that they can be addressed in a timely manner and we can proactively work on de-escalating issues to reduce the amount of escalated complaints.
- adopt a child-friendly approach to receive and deal with complaints from children. Refer Compass Children Friendly Complaint Handling Guideline and Procedure (PROC-012-02).

Principles

Compass’ commitment to complaint handling are based on the standards required by signatories to the ACFID Code of Conduct, the principles as set out in ISO 10002:2014 Quality management – Customer Satisfaction – Guidelines for complaint handling in organisations, and the principles.

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We have adopted the following principles for our complaint policy and procedures:

Principle	What this means
<p>Visibility</p>	<p>Compass will clearly publicise information about how and where to complain. Information about how and where to complain is - well publicised and visible to clients, personnel and other interested parties through complaint information on our website, via brochures, newsletters and mail outs. Regarding Specialist Disability Accommodation, information relating to Compass' complaints process is available to all Supported Independent Living providers.</p>
<p>Accessibility</p>	<p>Compass will ensure that our complaint handling process is as accessible as we can practically make it to all complainants: information about our complaint process is readily available; complaints can be made by a person other than the actual complainant, such as an advocate of a person with disability; complaints can be made verbally, in writing (including drawings done by a person with disability), in person or by an electronic means including by lodging through our website or by email; and special arrangement and/or support can be made available for complainants with specific needs (including availability of interpreters, cross-culturally trained staff, and accessibility requirements for people with disability) as required.</p>
<p>Responsiveness</p>	<p>Compass will respond to a complaint according to our predetermined timeframes. Complaints will be addressed promptly in accordance with their urgency. If complaints are received via face to face or telephone, acknowledgement is immediate. If complaints are received via email, acknowledgement is sent upon receipt of email. If it is established that an enquiry is in fact a complaint, then written acknowledgement will be sent within -3 working days. The complainant will be contacted with the proposed resolution within 2 weeks of Compass receiving the complaint unless there are multiple or complex issues. More complex complaints and complaints with multiple issues will receive an initial response within two (2) weeks and a final response as soon as possible thereafter generally no later than six (6) weeks after the complaint was lodged. If more time is needed, the complainant will receive an update at six weeks and estimated time for a final response. The Customer Feedback and Resolutions Officer is responsible for closing the complaint and will review and ensure the complaint is resolved, a final response sent and closed in accordance with our predetermined timeframes. Complainants are to be treated courteously and be kept informed of the progress of their complaint through the complaints-handling process. If a complaint relating to a person living in an SDA dwelling is deemed to be a reportable incident, the person receiving the complaint will act according to SDA Incident Management and Reportable Incidents Policy (POL-???)</p>
<p>Charges</p>	<p>Access to the complaint handling process is free of charge to complainants.</p>

Principle	What this means
Objectivity	Compass will address all complaints in an equitable, fair and unbiased manner through the complaints-handling process considering evidence submitted by the complainant and Compass Workers, Partners and Associates.
Confidentiality	We will observe strict confidentiality in complaint handling: Personally, identifiable information concerning the complainant will be made available only where needed and for the purposes of addressing the complaint within the organisation, and will be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure. The complainant will be advised of this in the acknowledgement of the complaint.
Customer/ client-focused approach	Compass has a customer/client-focused approach considering the interests and rights of customers and clients, being open and responsive to feedback including complaints and demonstrating a commitment to resolving complaints fairly, effectively and in a timely manner. In relation to people with disability, customer/client-focused has the same meaning as person-centred.
Accountability	Compass will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established. All employees accept responsibility for effective complaints handling. The responsible officer will ensure that, where appropriate, issues raised in the complaints-handling process are reflected in reporting.
Continual Improvement	Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives. Data and information provided from the complaint-handling process will be used by Compass in our commitment to continuous improvement and the quality of the provision of our services.
Child friendly	Compass will adopt a child friendly approach to receive and deal with complaints from children using simple and child-friendly questions and/or using staff who have received training in working with children to assist with the complaint. Only Compass staff who have a current Working with Children Check will be involved in dealing with complaints from children.

Complaint Levels

Low priority Complaint	Moderate priority Complaint	High priority Complaint
<p>May relate to a single issue;</p> <ul style="list-style-type: none"> • Involves minimal risk to the complainant, department or engaged service provider; • Will require an initial informal investigation with notes on the outcome and reasons for the decision documented in the SR but will not generally require a formal written report; and • Will be suitable for local resolution. 	<p>May relate to one or more issues;</p> <ul style="list-style-type: none"> • Involves a reasonable degree of risk to the complainant, organisation or engaged service provider; • In relation to people with disability, this may need to be reported to the NDIS Quality and Safeguards Commission as a reportable incident; • Will involve a more detailed investigation and documentation to substantiate the decision; and may require a report be prepared to management. • Should involve consultation as to whether it will be suitable for local resolution. 	<p>May involve a serious or significant risk to the complainant, organisation or engaged service provider;</p> <p>In relation to people with disability, this will be reported to the NDIS Quality and Safeguards Commission as a reportable incident;</p> <ul style="list-style-type: none"> • Will involve a formal investigation and may include a report on the outcome findings and recommendations to the Executive Manager or GMD; and • Is not suitable for local resolution.
<p>Low priority complaints would usually be handled by a Senior Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>	<p>Moderate priority complaints would usually be handled by a Senior Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>	<p>High priority complaints must be handled by a Senior Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>

Complaints Compass will not Action

Compass will not accept complaints about matters already dealt with or currently being dealt with by another third-party agency, court or tribunal; matters that are impractical to investigate; or matters that appear to be frivolous, vexatious, misconceived or lacking in substance.

If a complainant would like to request a review or appeal a decision made by Compass, please refer to Compass Internal Review Policy for how to lodge a request for an internal review.

In NSW, community housing tenants and applicants can request a second-tier appeal about some decisions made by Compass Workers. These are referred to as 'Reviewable and Appealable Decisions'.

Reviewable or Appealable Decisions

Some decisions made by Compass workers about housing services provided to clients can be appealed (reviewed).

Clients may request a review of a decision made by a worker of Compass about their tenancy.

More information about this is available in **Compass Internal Review and Appeal Policy and Procedure (POL-001)** or from the Housing Appeals website (www.hac.nsw.gov.au).

Registrar for Community Housing Complaint

From time to time the Registrar may receive complaints and allegations relating to dissatisfaction with Compass compliance with the Community Housing Providers National Law and National Regulatory Code.

These complaints are acknowledged, investigated and responded to by the Group Chief Governance Officer as delegated by the Group Managing Director. When a complaint from the Registrar is received it is lodged in Tickit Compass online system for compliance, incident and risk management.

Refer to **Compass Registrar for Community Housing Complaints Handling Procedure (PROC-012-04)**.

Privacy Complaints

The Group Chief Governance Officer is appointed as Compass Privacy Officer.

Privacy complaints are lodged via Tickit and referred to the Group Chief Governance Officer for investigation and action in accordance with **Compass Privacy Policy (POL-019)** and **Compass Privacy Complaint and Notifiable Data Breaches Procedures (PROC-019-01)**.

Complaints including allegations of fraud, corruption, misconduct and/or financial wrongdoing

The Group Chief Governance Officer is appointed as the Compass Fraud Officer.

Complaints including allegations of fraud, corruption, misconduct and/or financial wrongdoing are required to be lodged via an incident form in Tickit and referred to the Group Chief Governance Officer for triage and action in accordance with **Compass Fraud and Corruption Policy (POL-005-04)**, **Compass Financial Wrongdoing Policy (POL-005-06)** and **Compass Investigation Procedures (PROC-033)**. The person responsible for managing the complaint is responsible for lodging the incident form.

If the complaint is from an Eligible Whistleblower refer to Compass Whistleblower Policy (POL-005-03) for whistleblower protections and provisions that apply to the complaint investigation.

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Complaints from Children

Compass has in place a child-friendly complaint handling process that include access to support from appropriate children support agencies and/or a person who has received training in working with children or equivalent. Refer to **Compass Child Safeguarding Policy (POL-003-02)**, **Compass Child Friendly Complaint Handling Guidelines (PROC-012-02)** and **Compass Child Abuse Reporting Procedure (PROC-012-04)** for additional requirements for managing child complaints.

The Group Chief Governance Officer is appointed as Compass Child Protection Incident Reporting Focal Officer who is responsible for overseeing all child complaint handling processes.

Complaint regarding breach of ACFID Code of Conduct

Compass is committed to adhering to the ACFID Code of Conduct. If a person has reasonable grounds to believe there has been a breach of the Code, they may make a complaint about to ACFID. Complaints against a member may be initiated by any member of the public, other ACFID members, and any other body. The independent Code of Conduct Committee (the Committee) is responsible for investigating complaints. The process through which complaints are investigated and findings determined is outlined in ACFID Code of Conduct Complaints Handling. Click on the following link for further information <https://acfid.asn.au/content/complaints>.

Contact for complaints

Any person in Australia or from countries where work is being conducted by Compass representative, may raise concerns or complaints about Compass discretely and confidentially.

Complaints about Compass workers, associates and partners carrying out business on behalf of Compass should be marked confidential and can be made by email to the Complaints and Customer Service Officer, complaints@compasshousing.org

or posted to

Compass Complaints and Customer Service Officer,
Compass Housing Services Co Ltd
P O Box 976, Hamilton NSW 2303
Australia

The complainant will receive an acknowledgement letter. If you have any queries or would like information about your complaint progress or Compass complaints process may contact Compass by telephone on 1300 333 733 and request to speak to the Compass Complaints and Customer Service Officer.

Communication, Training and Awareness

Information on how to make a complaint is available on the Compass website, available from local branch offices or be telephone to Compass Customer Service Centre on 1300 333 733 and from Compass website.

This includes:

- Having a brochure about Compass complaint management and handling process brochure available in the waiting areas;
- Including the procedures in the organisation’s information package for tenants/applicants;
- Displaying information on noticeboards;
- Placing reminders in newsletters; and,
- Providing access online to information and forms.

Workers involved in managing or coordinating complaints receive information and training on Compass complaints management process as required. Information is available to workers internally from Compass SharePoint Intranet Site for Company Documents.

Where appropriate we will ensure Workers working in communities, we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints considering cultural and gender sensitivities and to ensure that cases involving children and people with a disability are handled appropriately.

Electronic complaints register

Compass registers all inquiries and complaints.

Compass maintains an electronic complaint record system and GreenTree is the primary tool for the electronic collection of this information, although Compass Tickit incident and risk reporting system is used for managing Privacy and Notifiable Data breaches, Child Complaint Investigations and investigations related to violence, neglect or abuse of children or people with a disability. Records relating to complaints will be maintained within each respective area of responsibility.

Collection and reporting of complaint information

Compass has established procedures for recording complaints and responses and for using these records and managing them, while protecting any personal information and ensuring the confidentiality of complainants.

Compass immediately escalates complex and/or major complaints to our Group Managing Director or his/her delegate.

Compass complaints are reported monthly to the Group Chief Corporate Services Officer and a quarterly complaints report is prepared and submitted to our Group Managing Director and Compass Parent Board. Minor complaints are reported in summary form. Major complaints will be reported in detail. This report includes an analysis of complaints data and the performance of its complaints-handling process.

Continual improvement

Compass is committed to continually improve the effectiveness and efficiency of the complaints-handling process. As a result, Compass continually improves our standard of work and the quality of our services. This can be achieved through corrective and preventive actions and innovative improvements.

On a continuing basis we will monitor the effectiveness of our complaint handling and make improvements as appropriate.

Compass will act to eliminate the causes of existing and potential problems leading to complaints in order to prevent recurrence and occurrence, respectively. In Compass’ commitment to continuous improvement we will;

- explore, identify and apply best practices (both locally and overseas) regarding complaint handling,
- foster a customer/client-focused approach,
- encourage innovation in complaints-handling development,
- maintain data collection on complaints for the purpose of identifying trends or upcoming issues,
- provide data on complaints to Compass management team on a quarterly basis to identify trends or review issues and improve practice where necessary,
- undertake specific training and retraining of staff to foster better complaint handling practices,
- encourage innovation in complaint handling development, and
- recognise exemplary complaints-handling behaviour.

Analysis and evaluation of complaints

All complaints should be classified and assessed as per the Complaint Handling Procedures and then analysed to identify -systemic, recurring, and single incident problems and trends, and to help eliminate the underlying causes of complaints.

Satisfaction with the Complaints-Handling Process

Regular action will be taken to determine the levels of satisfaction of complainants with the complaints-handling process. This may take the form of random surveys of complainants and other techniques.

Monitoring of the Complaints-Handling Process

Continual monitoring of the complaints-handling process, the resources required (including personnel) and the data to be collected should be undertaken.

The performance of the complaints-handling process should be regularly reviewed.

Auditing of the Complaints-Handling Process

Compass will regularly perform or provide for audits in order to evaluate the performance of the complaints-handling process. The audit should provide information on:

- Process conformity to complaints-handling procedures, and;
- Process suitability to achieve complaints-handling objectives.

The complaints-handling audit may be conducted as part of the quality management system audit, for example in accordance with ISO 19011. The audit results should be considered in the management review to identify problems and introduce improvements in the complaints-handling process. The audit should be carried out by competent individuals independent of the activity being audited.

4. Responsibilities

All Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass clients of the impact of this policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and

- ensure appropriate processes and controls are implemented to enable breaches of approved Compass Policy and Procedures to be reported and managed.

In the context of Specialist Disability Accommodation services provided by Compass, all staff are responsible for safeguarding the wellbeing and safety of people with disability. Any staff member aware of any risk to a person with disability, whether that is a concern, complaint or a specific incident, must immediately report it to their manager.

5. Implementation and Review

This policy is listed on Compass Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside Compass without approval.

The policy is reviewed regularly and published on Compass SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.

Compass complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of Compass Group Executive Services (governance@compasshousing.org) to maintain and update the Compass Master Policy Document, Policy Directory and the Policy Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

Compass Workers should refer to [SharePoint Company Documents Policy and Procedure site](#) for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

6. Resources and related documents

Related documents

- Compass Internal Review and Appeal Policy (POL-001)
- Compass Child Safeguarding Policy (POL-003-02)
- Compass Safeguarding People with Disability Policy (POL-003-03)
- Compass Complaints Management Policy (POL-012)
- Compass Privacy Policy (POL-019)
- Compass Anti-Social Behaviour Policy (POL-025-03)
- Compass Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (POL-025-34)
- Compass Workplace Relations Manual Complaint and Grievance Policy (POL-028-06)

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- Records Management Policy (POL-035)
- Records Management Policy Schedule (POL-035-01)
- Internal Review and Appeal Management Procedures (PROC-001)
- Compass Safeguarding People with Disability Procedure (PROC-003-03)
- Compass Policy and Procedure Development Approval and Review Procedure (PROC-011)
- Compass Child Friendly Complaint Handling Guidelines (PROC-012-02)
- Safeguarding People with A Disability Complaint Handling Guidelines (PROC-012-03)
- Compass Registrar for Community Housing Complaints Handling Procedure (PROC-012-04)
- Compass Privacy or Notifiable Data Breach Procedure (PROC-019-1).
- Compass Dealing with Anti-Social Behaviour Procedure (PROC-025-03)
- Compass Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (PROC-025-34)
- Complaint form / Online complaint enquiry form
- Compass' Group Documentation Structure and Quality Assurance ("QA") Management Guidelines (GUI-018)

Related legislation/standards

National

- Corporations Act 2001
- Privacy Act 1988
- Disability Services Act 1986 (Cwlth)
- Disability Discrimination Act 1992 (Cwlth)
- National Disability Insurance Scheme Act 2013 (Cwlth) and associated Rules
- National Standards for Disability Services
- United Nations Convention on the Rights of Persons with Disabilities

New South Wales

- Residential Tenancies Act 2010
- Housing Act 2001 (NSW)

Queensland

- Housing Act 2003 (QLD);
- Residential Tenancies & Rooming Accommodation Act 2008;
- Residential Tenancies & Rooming Accommodation Amendment Regulation (No 1) 2014

Standards and Guidelines - External

- Australian Standard AS/NZS ISO 10002:2004, MOD. – ‘Customer Satisfaction – Guidelines for complaints handling in organisations.
- National Housing Standards as specified Standard 3.6 Complaints and Appeals.
- Ombudsman Better Practice Guide to Complaints Handling.

7. Definitions

Please refer to Compass Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this policy and are critical to its effectiveness:

Term	Definition
Anti-Social Behaviour	Relate to wide neighbourhood issues, such as difficulties with neighbours or accusations of antisocial behaviour. Often, these are areas that Compass does not have direct control over, which is why it is covered under Dealing with Anti-Social Behaviour Policy.
Appeals	A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation. <i>For example:</i> <i>A tenant may have been refused a transfer and believe the decision is flawed in some way. The appeal process gives them the opportunity to dispute the decision and possibly have it changed.</i>
Associate	An “associate” of a regulated entity includes directors and company secretaries of the regulated entity and its related bodies corporate and may also include a range of individuals within whom the regulated entity acts in concert or is otherwise associated in a formal or informal way. These include visitors to our programs (including media), advisory group members, interns, supporters (donors, sponsors, advocates, ambassadors), trustees, members, staff in consulting and partnership agencies, and any other individuals or groups that have been brought in contact with children (including their personal information and images) while working with and / or supporting Compass.
Client	Means an Applicant, Tenant, Resident, Participant or any other person attending an activity or using services provided by Compass.
Committee	means a committee established by resolution of and reporting to the Parent Board in accordance with Compass Constitution Clause 6 (specifically 6.1, 6.8 – 6.16).
Committee member	means a member of a Committee as defined in this Policy
Complaint	Complaint is a generic term referring to the expression of dissatisfaction, orally or in writing, about the service or actions of the Compass or its employees. A complaint is not a question, an enquiry or a request for information or review; unless the person specifies that they wish to make a complaint.
Complainant	Person or their representative or organisation or its representative making a complaint.
Compliment	A compliment is an expression of satisfaction about Compass’ staff, services or contractors on a specific occasion or relating to a particular matter. However, a compliment may also be in relation to a general feeling of satisfaction with Compass due to the service you have received over a period of time. Compliments provide relevant workplace examples that can be used in Compass’ client service training.
Customer Satisfaction	A Customer’s perception of the degree to which the customer’s requirements have been fulfilled.

Term	Definition
Director	means a person appointed by the members of Compass (or appointed by the Parent Board under the Constitution to fill a vacant position) as a director to the Parent Board.
Eligible Whistleblower:	Is a director, current and former company officers, employees, volunteers, partners and their staff. Associates and specified family members and other external parties, such as program beneficiaries, tenants and members of the public who attempts to make or wishes to make a report about reportable conduct under this policy and avail themselves of the protections offered by this policy related to Compass or a related body corporate. An eligible whistleblower can only be an officer, employee, associate or supplier (and the supplier’s employees) of an Australian incorporated company or foreign company registered in Australia.
Feedback	Feedback includes complaints, compliments and suggestions for improvement about a particular service, experience or event - not simply a statement of overall opinion about Compass services.
Other personnel (NDIS-SDA)	The National Standards for Disability Services defines ‘Other personnel’ as those who: <ul style="list-style-type: none"> • Are not employed or otherwise directly engaged by the registered NDIS provider; e.g.: generally, employees, volunteers, consultants and contractors directly engaged by the provider would be considered workers. • Perform work at the premises of, or otherwise as part of the provision of supports and services to any person with disability by, the registered NDIS provider. This is generally under a commercial arrangement and would include other service providers, labour hire, subcontractors etc.
Partners	individuals, groups of people or organisations that collaborate with ACFID Members to achieve mutually agreed objectives in development and humanitarian initiatives. This may include affiliates. ¹
Partnership	An ongoing working relationship where risks and benefits are shared (Partnership Brokers Association) ¹
Safeguarding	Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds. ¹
Suggestion for Improvement	Suggestions about services provided by Compass and how these may be improved.
Worker	Compass has adopted a modified version of SafeWork NSW definition of a ‘worker’ where the term is used in policy. The definition of a ‘worker’ for Compass includes any person who is an Officer under the Corporations Act 2001 or who carries out work for a ‘person conducting a business or undertaking’ (PCBU - includes employers). The term ‘Worker’ includes any person who works as an: <ul style="list-style-type: none"> • Employee, trainee or volunteer

¹ Definition adopted from ACFID general definitions provided to clarify the use of key terms with reference to the ACFID Code of Conduct, June 2019, <https://acfid.asn.au/content/general-definitions>

Term	Definition
	<ul style="list-style-type: none"> • outworker or apprentice • work experience student • contractor or sub-contractor • employees of a contractor or sub-contractor • employee of a labour hire company assigned to work for a PCBU. <p>For clarity Directors, Committee and Advisory Group members are listed separate from Workers in this document.</p> <p>In the context of this policy, the term 'Worker' also includes any person defined by the National Standards for Disability Services as 'Other personnel' (see definition below).</p>