

Compass Child Friendly Complaint Handling Guideline and Procedure

1 Introduction

In order to effectively follow up a child protection report or concern lodged by a child, it is extremely important for Compass to develop a set of clear, fair, safe and child friendly guideline(s)/procedure(s) to guide our Worker through the complaints handling process. This will help our Worker to manage the report professionally and in a way that respects the best interests and legal rights of the child lodging the complaint.

2 General Statement

Compass will treat all concerns raised seriously and ensure that all parties will be treated fairly, and the principles of natural justice will be a prime consideration.

All reports will be handled professionally, confidentially and expediently.

All reports made in good faith will be viewed as being made in the best interests of the child regardless of the outcomes of any investigation.

Compass will ensure that the interests of anyone reporting child abuse in good faith are protected. The rights and welfare of the child is of prime importance. Every effort will be made to protect the rights and safety of the child throughout the investigation.

Compass will use skilled Workers to handle complaints (where ever possible someone who is trained in working with children and/or interviewing with children and who can be impartial and fair).

Children and community members with whom Compass works will be provided with information about how to report any child protection concerns about Compass Workers and Associates.

Child protection reporting focal points:

Compass' designated Child Protection incident reporting/Complaint Focal Person is the Group Chief Governance Officer (GCGO). This is normally established as part of the child protection reporting procedure. The GCGO is also responsible for monitoring the Child Safeguarding Policy and providing advice and education to the organisation on child protection matters.

If the Child Protection incident reporting/Complaint Focal Person is not trained in working with children or has the skills to interview children, the person will engage an appropriate person who has trained in working with children or has the interviewing skills with children

to conduct the interview. In this instance, the Child Protection incident reporting/complaint Focal Person will attend the interview.

3 When interviewing/talking to children about their concern and complaint

What to bear in Mind and Do

Some of the things to bear in mind when talking to a child about his/her concerns, fears and complaint:

- When a child tells you that he or she has been abused, they may be feeling scared, guilty, ashamed, angry and powerless;
- You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief;
- If a child discloses abuse, whatever the outcome, the child must be taken seriously; and
- It is important for you to remain calm and in control and to reassure the child that something will be done to keep him or her safe.

When a child discloses they are being harmed you can show your care and concern for the child/young person by:

- Listening carefully
 - Telling the child, you believe him or her,
 - Telling the child, it is not their fault and he/she is not responsible for the abuse, and
 - Telling the child, you are pleased he/she told you.

You may get the child to disclose their concerns and complaints through drawing or pictures.

What to bear in mind and not to Do

You will not be helping the child/young person if you:

- Make promises you cannot keep, such as promising that you will not tell anyone;
- Push the child into giving details of the abuse. Your role is to listen to what the child wants to tell you and not to investigate (beware of asking any leading questions as this may prejudice any subsequent investigation); and
- Indiscriminately discuss the circumstances of the child with others not directly involved.

4 Compass complaint handling Procedure (in relation to handling complaints from a Child)

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Compass' complaints handling procedure in relation to handling a complaint from a child clearly outlines:

- The steps to be taken during an administrative/internal investigation;
- Roles and responsibilities including contact details for authorities, formal and non-formal child protection and support services (where they exist) to report and refer to;
- Information on local child protection legislation and the organisations legal obligations;
- A list of what behaviour(s) constitutes a breach of Compass' Child Safeguarding Policy or Code of Conduct (CoC) or a criminal offence to help guide and inform decision making;
- Reporting/interview/ investigation plan templates – for accurate records;
- Consideration should be given to the following in all cases:
 - Best interests of the child
 - Safety of all stakeholders
- Confidentiality- only passing information on a need to know basis or as required by law.

There are five phases involved in managing a child complaint:

- 4.1 Receive and Document/Record
- 4.2 Assess and Prioritise
- 4.3 Investigate and Action
- 4.4 Outcomes and System Improvement
- 4.5 Monitoring Effectiveness and Reporting

4.1 Receive and Document/Record

The primary function of receiving and documenting/recording a complaint from a child is to ensure that the child receives acknowledgement that their complaint is taken seriously, and it is recorded in Greentree for further action.

Greentree is the primary tool for the electronic collection of data in relation to complaints including complaints made by a child. Worker are required to record complaint details within Greentree in accordance with the Greentree Procedures Manual – Complaint Service Requests. The record created is a **Complaint Service Request (SR)**.

- i. **Available mediums to lodge a complaint:** A child can make a complaint with Compass via any mode of communication, such as in person, telephone, writing, fax, email or via the website. If a child requires assistance to lodge a complaint, every possible effort should be made to organise an interpreter, translator, advocate or support service to assist.

- ii. **Receiving a complaint:** When receiving a complaint from a child, it is important that the child feels heard and their complaint is acknowledged and taken seriously.
- iii. **Acknowledging a complaint:** Should a complaint from a child be received via writing, fax, email or website, the child should be contacted, and their complaint acknowledged. Should the complaint be received in person or over the phone, immediate acknowledgement will be provided. The complaint will be lodged and documented in Greentree.
- iv. **Documenting a complaint:** All complaints are to be documented in Compass' Greentree system via a Service Request. It is important to inform the child that information will be recorded and documented so the complaint can be dealt with in the most effective way.
- v. **Privacy and personal information:** When collecting personal information, Worker must provide the Privacy Notice to the child and any other person that may be requested to provide personal information while investigating the complaint. The privacy notice must be given to the child if practicable, before the collection of the personal information, or as soon as practicable after the collection.
- vi. **Confidentiality:** Confidentiality will be respected and maintained at all times within the constraints of the need to fully investigate a complaint, subject to any legal authorisation or requirements for disclosure and consistent with the principles of natural justice.

Compass will accept anonymous complaints and investigate these as practically possible. They may be lodged in writing or accepted as an oral statement. Complainants will be encouraged to provide as much information as possible. Anonymous complaints will be treated with the same priority as other complaints.

When communicating with a child regarding their complaint, it is important to collect as much information as possible, including:

- their name, address and best contact number;
- identifying whether they are a Compass tenant, applicant or a member of the community;
- the basis of their complaint; ask for dates, time and place of any associated events;
- if the complaint is about a Worker member, ask for the Worker member's name; if they are not able to provide this information, ask for a description of the Worker member and what service was being provided at the time;
- the name and, if possible, contact details of any witnesses;
- how the incident has affected the person;

- any further information or evidence that supports the complaint and will assist in the assessment and resolution process; and
- any relevant documentation relating to the complaint should be scanned and attached to the Complaint Service Request.

4.2 Assess and Prioritise

On raising a Complaint Service Request, a priority status needs to be applied to the complaint for it to be processed appropriately. For complaints made by a child, the priority is always 'High'.

4.3 Investigate and Action

4.3.1 Investigating

Compass may undertake various methods to gather information to substantiate a complaint made by a child.

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities. Wherever possible, Compass will use skilled Workers trained in working with children and/or interviewing with children and who can be impartial and fair to assist in investigating a complaint:

- clarifying the details provided in a complaint;
- identifying actions, if any, taken to resolve the issue before the complaint was lodged;
- gathering and analysing information from relevant file notes, correspondence and/or other sources;
- reviewing documentation submitted by the child making the complaint;
- reviewing previous administrative decisions or actions;
- interviewing the child, workers and/or other individuals involved in the complaint;
- reviewing relevant policies, procedures and/or legislation; and
- reviewing previous complaints about the same issue.

Records of each investigation should contain all correspondence including file notes of telephone conversations, interviews, and findings from investigations, recommendations and internal approvals. The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

All information will be gathered and recorded in Greentree against the Complaint Service Request. Any relevant documentation/evidence that has been gathered should be scanned and attached to the Complaint Service Request. This process will assist should the complaint need to undergo an Internal Review.

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It should be recognised that complex matters may require a more detailed, structured investigation to be conducted and this should be communicated to the relevant parties.

4.3.2 Actions Taken to Address a Complaint made by a Child

Following completion of the investigation into the complaint, the investigation findings are to be recorded and a written response provided, where practicable, to the child or, otherwise, the person supporting the child. Finalisation details are to be recorded in Greentree, including the reason/s for the decision and the steps taken to investigate the complaint.

4.3.3 Response Times

Complaints made by a child will be investigated as quickly as possible.

Compass acknowledges that some complaints by a child may require a more detailed investigation and, therefore, will result in more extended time for resolving the complaint. In these circumstances, the extended time for resolving the complaint will be communicated to the child.

4.3.4 Finalisation

Compass' designated Child Protection incident reporting/Complaint Focal Person will review the outcome of the complaint before closing the complaint. During the review process, consideration should be given to what remedy and systems improvement may be required.

A child who has made a complaint must receive advice about the outcome of their complaint.

4.4 Outcomes and System Improvement

When developing system improvement recommendations, consideration should be given to the extent the action will:

- prevent the recurrence of similar complaints; and
- improve service delivery

System improvements can include:

- policy and procedure change;
- practice review; and
- Worker training and other professional development activity may also be recommended.

Compass' designated Child Protection incident reporting/Complaint Focal Person is to take into consideration the complaint monitoring reports and is responsible for investigating the validity and applicability of the recommendations made by the Complaints Officer in informing corrective actions or continuous improvement strategies.

4.5 Monitoring Effectiveness and Reporting

Recording of complaints information allows identification of any trends or system issues to inform improvements to the services we provide.

The reporting function is performed by the Complaints Officer/Team Corporate Services and Compass' designated Child Protection incident reporting/Complaint Focal Person.

Quarterly analysis of complaints data to identify and address any systemic issues, including improvements to products and services, policies and procedures and Worker training needs, will be undertaken by the Complaints Team Corporate Services and Compass' designated Child Protection incident reporting/Complaint Focal Person.

Based on the quarterly analysis, the Complaints Officer/Team Corporate Services and Compass' designated Child Protection incident reporting/Complaint Focal Person prepares a report which includes:

- the number, level, category and outcomes of complaints from a child received;
- the time taken to resolve complaints by a child; and
- complaint issues and trends for continuous improvement opportunities.

5 Legislation and Compliance

Compass complies with legislative requirements for mandatory reporting, as it relates to our organisation:

In NSW, Compass is a mandatory reporter and mandatory reporting is regulated by the Children and Young Persons (Care and Protection) Act 1998 (the Care Act).

In Queensland, mandatory reporting is regulated by the Child Protection Act 1999 and whilst Compass is not a mandatory reporter under Queensland legislation Compass Workers are expected to report any concerns to their immediate Supervisor where "they form a reasonable suspicion that a child has suffered, is suffering or is at an unacceptable risk of suffering significant harm caused by physical or sexual abuse, and may not have a parent able and willing to protect them."

In New Zealand, the Children's Act 2014 regulated protecting and improving the lives of vulnerable children and organisations receiving government funding and providing services linked to child safety have an obligation to have a child protection policy and take steps to prevent child abuse and ensure the safety and wellbeing of children.

6 Related documents and resources

The following related documents are to be read in conjunction with these procedures:

- Compass Child Safeguarding Policy

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- Compass' Code of Conduct Policy
- Compass External Complaint Handling Policy
- Compass External Complaint Handling Procedure
- Compass Privacy Policy
- Compass Investigation Procedures

7 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.

8 Document Control

This procedure is part of Compass approved policies and procedures register.

Policies and procedures on the register are reviewed regularly and revised where warranted.

The Group Chief Governance Officer is ultimately responsible for the control and review of policy and procedure documents in accordance with Compass' Group Documentation Structure and Quality Assurance ("QA") Management Procedure.

Refer to Compass Policy and Procedure Development Approval and Review (PROC-011) for information on the document review process.

9 Records

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All records relevant to these procedures are to be maintained in a recognised Compass recordkeeping system in accordance with Compass Records Management Policy.

10 Definitions

Term	Definition
Compass	Compass Housing Services Co. Ltd
Child	Any person under 18 years
Worker (Compass)	<p>has the same meaning as defined in the NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of 'worker' (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as:</p> <ul style="list-style-type: none"> a) an Worker, or b) a contractor or subcontractor, or c) an Worker of a contractor or subcontractor, or d) an Worker of a labour hire company who has been assigned to work in the person's business or undertaking, or e) an outworker, or f) an apprentice or trainee, or g) a student gaining work experience, or h) a volunteer, or i) a person of a prescribed class. <p>For clarity directors, committee and advisory group members are listed separate from workers in this document.</p>

