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**Australian Catholic Religious
Against Trafficking in Humans**

Safeguarding Complaints Handling Process

Introduction

ACRATH's Safeguarding Complaints Procedure is to be read alongside ACRATH's Statement of Commitment and Safeguarding Policy. ACRATH is committed to natural justice for all parties. ACRATH's practices are consistent with the National Principles for Child Safe Organisations and the legislation of State and Territories and National Catholic Safeguarding Standards.

ACRATH Safeguarding Complaints Handling Process

Safeguarding Complaints may be received by ACRATH in person, by phone, by mail or by email. Contact details and a complaints form are listed on the ACRATH website. The process to be followed after receiving the complaint is outlined below.

Note: The President and Vice President are to ensure all interaction and action is documented. (See *Record Keeping* and *Appendix A*)

After Receiving the Complaint

As per the Safeguarding Policy, complaints are referred to the President and Vice President who will:

1. Assess and decide:
 - a. whether or not mandatory reporting is required;
 - b. if any additional communication or support required.

2. Record the key complaint details:
 - a. the subject of the complaint;
 - b. the complaint issues;
 - c. details about the complainant;
 - d. describe how the complaint was investigated and the findings;
 - e. name and document how risks were managed;
 - f. the complaint outcome.

The Safeguarding Coordinator, who reports directly to the ACRATH President, immediately notifies the President of a complaint.

Anyone who receives a complaint regarding Safeguarding is to immediately contact the President and Vice President (safeguarding@acrath.org.au) and provide it to the President and Vice President within ONE business day of receiving it.

Confidential information about a complaint is only provided to those people who need to know about it, in order for the complaint to be actioned properly or, if required by legislation.

The President and the Safeguarding Coordinator liaise throughout the process as appropriate

Acknowledge the Complaint

- Complaints will be acknowledged at the time of receipt or as soon as possible afterwards, and no later than 3 business days. Children and adults at risk are often wary about making a complaint, and want to be assured they are being listened to straight away.
- Acknowledge the complaint by using the preferred communication method nominated. Identify a contact point for the child or adult at risk and their parent or carer.
- Provide the child or adult at risk with information about the complaint-handling process, the likely next steps and expected timeframe.
- Where the complaint relates to Reportable Conduct, the appropriate report will be made as soon as possible according to the legislation of each State and Territory.

Assess the complaint and address immediate risks

The initial assessment of a complaint will involve the following questions being asked:

- Does the complaint raise any immediate risks to the safety or wellbeing of a child or adult at risk or other person?
- What other issues does the complaint raise?
- What steps need to be taken to address and manage risks throughout the complaints process?
- Does the child or adult at risk affected by the complaint (or other persons involved or impacted) require any additional supports during the complaints process?
- What evidence needs to be immediately secured/protected/kept confidential?
- How serious, complicated or otherwise urgent are the issues raised in the complaint (from both the perspective of the complainant, involved child or adult at risk and the organisation)?
- Are the issue/s raised within the remit of ACRATH's control?
- Are the outcomes sought by the complainant viable?
- If more than one issue is raised, will they need to be separately addressed?
- What other authorities or agencies (e.g., police, health services) need to know about the issues raised by the complaint or be involved in the response?
- What type of information should the complainant be provided following the assessment?
- Is further information needed from the complainant in order to properly assess and resolve the complaint?

If the complaint is not about something ACRATH can respond to, the complainant will be told this and (wherever possible) referred to a person or organisation that can help as quickly as possible.

Planning the involvement of the child or adult at risk

Once the issues raised by the complaint have been assessed, the President and Vice President will develop a plan for involving the affected child or adult at risk and their parent or carer at key stages of the complaint, including:

- when and how information will be communicated to them throughout the process and how they will be supported;
- a record of the rationale for all decisions reached in this area will be provided;
- offering the person who is the subject of the complaint with ongoing pastoral support and counselling services.

Resolving complaints

After assessing the complaint, the actions required to manage and resolve it will be decided. Wherever possible, ACRATH will try to resolve complaints promptly for the complainant and - particularly where the matter is such that decisions can be agreed as soon as possible after the complaint is made. However, where the complaint relates to a serious allegation or incident, this may not be appropriate. The complainant will be adequately informed about what is happening with their complaint and time frames will be clarified where there are delays.

To resolve the complaint the President and Vice President will:

- work with the person making the complaint to see how the issues may be appropriately addressed;
- make inquiries with the person or organisational team/unit the subject of the complaint, and/or
- ensure that an investigation is held into the issues raised in the complaint, in cooperation with police/child protection authorities where required.

The nature and scope of any action taken will depend on a number of factors including:

- the circumstances of each case;
- any statutory requirements;
- the issue(s) complained about;
- the parties involved;
- the processes required to reach an outcome.

Serious complaints will require an evidence-based rather than an outcome-focused approach by ACRATH.

Conducting an investigation

As judged appropriate, the following steps will be undertaken as part of an investigation, whether by internal arrangement or by external consultants:

- Action the relevant issues identified through the assessment process, starting with any immediate safety risks posed to a child or adult at risk and undertaking any risk management associated with the subject of complaint.
- Select the appropriate investigative approach by considering any statutory requirements, consulting relevant external bodies (e.g. police and child protection agencies) and considering the nature of the issue or allegations raised.
- Develop an investigation plan, ensuring that, where appropriate, relevant authorities are consulted and involved in its design and implementation to ensure an organisation's actions do not compromise a police or child protection investigation.
- Obtain and protect evidence, including identifying relevant witnesses and putting the allegations to the subject of complaint at the appropriate point in time - affording them natural justice.
- Analyse, assess and weight all of the evidence gathered.
- Make decisions following the investigation and explain them to the complainant and the subject of complaint.

Provide regular updates throughout the complaints process

The complainant - depending on the complainant's needs, also their family, guardian and/or support person - will be informed of the progress with their complaint, and whom to contact for more information or if they have questions about the process.

The frequency of updates and the nature and quantity of information provided to the complainant will be determined in accordance with their specific needs and wishes, and privacy and confidentiality obligations.

Provide the final outcome

Report final findings to the complainant, the subject of complaint and other stakeholders, considering privacy, confidentiality and procedural fairness obligations.

Explain to the complainant and the subject of complaint - using the most appropriate communication channel and putting in place any necessary supports - the key steps taken to investigate the complaint, the outcome (including the reasons for the decision), and available avenues for review and/or appeal.

Close the complaint and record the outcome.

Invite feedback at the conclusion of the complaints process from those involved in the process.

Record Keeping

Any documentation regarding a Safeguarding complaint is confidential and is to be filed in the dedicated restricted folder on the ACRATH electronic file system. The dedicated restricted folder is only accessible to the President (unless the complaint involves the President) and to the Vice-President.

The President and Vice-President will formally close the complaint and keep confidential and secure comprehensive records in the dedicated restricted folder about:

- how the complaint was recorded and managed;
- the decisions;
- any recommendations and/or outstanding actions and how they have been addressed;
- any systemic issues identified.

Records

Records of any complaint of abuse to children or adults at risk will be retained for 50 years, even if ACRATH ceases to operate.

All complaints will be stored in a complaint's register and regularly reviewed by the President and Vice-President to identify policy, procedures or practice learnings.

Continuous Improvement

In addition to making adjustments to any systems or practice weaknesses identified by a specific complaint or general feedback, on a regular basis non-identifying complaints data will be given to the Safeguarding Committee to identify any broader trends with the aim of improving ACRATH's performance and processes for complainants.

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APPENDIX A

Safeguarding Complaints Notification Form

Family name		First Names	
Mobile		Phone	
Email			
Address, State, Postcode			
I would like to be contacted by:			
Phone	Email	Letter via Post	
What is your complaint about?			
Please provide some details to help us understand your concerns:			
What happened?			

Where did it happen?	
When did it happen?	
Who was involved?	
Any additional information	
What outcome are you seeking that would assist in resolving your complaint?	
If you have any further information or supporting documentation or evidence, please attach or scan and return with this form to: safeguarding@acrath.org.au	
National Office: 54 Beaconsfield Parade Albert Park, Victoria 3206 T: 03 9645 5986 Contact will be made with you within 3 business days.	
Signature	
Date	