

## Complaints Management Policy Including Complaint Form

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### Document Version Control

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PACFA acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this nation. We pay our respects to Elders, past and present, as the Traditional Owners of the lands on which we work and live. Our office is on the land of the Wurundjeri Woi-wurrung people of the Kulin nation in Naarm/Melbourne and we thank them for their enduring and continuing contribution to the life of this place. We recognise that First Peoples' sovereignty was never ceded. This policy applies across all lands where PACFA workers carry out work, including online environments.

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# Complaints Management Policy

## 1. Purpose

PACFA values accountability, fairness and respectful engagement with members, staff, volunteers, contractors and the wider community. PACFA recognises that clear and accessible complaints processes help maintain trust, improve organisational practice and support compliance with legal and governance obligations.

This policy sets out how PACFA receives, assesses, manages and resolves complaints about its operations, services, staff, volunteers, contractors and alleged breaches of PACFA policies, including the Code of Conduct. It is intended to ensure complaints are handled promptly, fairly, confidentially and in a manner proportionate to the nature and seriousness of the issues raised.

## 2. Scope

This policy applies to complaints about PACFA's operations, services, decisions, conduct, communications, activities, staff, volunteers, contractors and governance processes. For PACFA members, this includes concerns about PACFA's governance, services, decisions, communications or the conduct of those acting on PACFA's behalf in their capacity as representatives of the organisation.

This policy does not apply to:

- complaints about the ethical practice of PACFA members or registrants acting in their professional capacity, which are dealt with under PACFA's Professional Conduct Procedures and on PACFA's website;
- workplace grievances or employment matters that are more appropriately handled under PACFA's HR, WHS or other internal employment procedures; or
- criminal matters or matters that must be referred to a regulator, police, insurer or other external body.

The term complaint is used throughout this policy to include written or verbal complaints made by members, staff, volunteers, contractors or other stakeholders about matters within scope.

## 3. Legislative and Policy Framework

PACFA is committed to maintaining complaints processes that support accountability, procedural fairness and appropriate escalation of concerns. For charities with members, ACNC Governance Standard 2 requires reasonable steps to be accountable to members, to allow adequate opportunities for members to raise concerns about how the charity is run, and to ensure those concerns are handled appropriately.

Depending on the issue raised, other laws may also be relevant, including privacy, discrimination, defamation, work health and safety, employment and recordkeeping laws. This policy is designed to be consistent with AS/NZS 10002:2014 Guidelines for Complaint

Management in Organisations, the national standard for complaint management, which informs PACFA's approach to accessibility, responsiveness, procedural fairness and continuous improvement.

## 4. Relationship with other policies

The Code of Conduct sets expected behaviour and professional standards for PACFA staff, volunteers and contractors. This Complaints Management Policy sets out how PACFA receives, assesses and responds to concerns about its operations and alleged breaches of PACFA policies, including the Code of Conduct. These documents work together and are not interchangeable.

This policy should also be read with the Professional Conduct Procedures, WHS Policy, Privacy Policy, Whistleblower and Protected Disclosure Policy (in development, applies where the complaint engages a protected disclosure), HR Policy Manual and any other relevant governance or operational procedures.

## 5. Definitions

For the purposes of this policy:

- **Complaint** - an expression of dissatisfaction about PACFA's services, activities, decisions, conduct, staff, volunteers, contractors or governance processes, including an alleged breach of PACFA policies or standards.
- **Feedback** - a comment, suggestion or concern provided to help PACFA improve its services, policies, communications or activities, where the person is not necessarily seeking a formal determination or outcome.
- **Complainant** - the person making the complaint.
- **Respondent** - the person, role, team or part of PACFA that is the subject of the complaint.
- **Member** - a person or entity that has been admitted to membership of PACFA in accordance with PACFA's Constitution, rules and membership requirements, and whose membership remains current
- **Complaints Officer** - the person appointed by PACFA to receive, document, triage and coordinate complaints under this policy.
- **Procedural fairness** - a fair process in which concerns are considered impartially, relevant parties are informed of the substance of the matter, and each person affected is given an appropriate opportunity to respond.
- **Conflict of interest** - a situation in which a person involved in receiving, assessing, investigating or deciding a complaint has a personal, professional or organisational interest that could improperly influence, or reasonably be perceived to influence, their role.

## 6. Policy Statement

PACFA welcomes feedback and complaints as an important part of accountability, continuous improvement and member confidence. People who raise concerns in good faith perform a valuable service to the organisation and should be treated with respect.

PACFA will handle complaints in a way that is accessible, timely, fair and proportionate. PACFA will seek to acknowledge complaints promptly, clarify the issues raised, identify the appropriate pathway, provide procedural fairness to relevant parties, and communicate outcomes to the extent appropriate and lawful.

PACFA recognises that complaints processes can be difficult for all involved. EAP support is available to staff and volunteers at any stage at no cost: Converge International 1300 687 327 [convergeinternational.com.au](http://convergeinternational.com.au), citing code: PSYCDDQM. PACFA will not victimise or disadvantage a person for making a complaint, seeking support, providing information or participating in a complaint process in good faith. Complaints may also inform improvements to PACFA's systems, policies and practices.

## 7. Roles and Responsibilities

Accountability for complaints management is shared across PACFA's governance and operational structures.

Role	Responsibilities
Board of Directors	Hold governance oversight for complaints management. Approve this policy. Receive de-identified or summary reporting on complaint themes, systemic issues and significant matters. Consider recommendations for policy, governance or operational improvement arising from complaints.
Chief Executive Officer	Accountable for implementation of this policy. Ensure complaints are managed appropriately, resourced proportionately, and escalated where required. Ensure serious or systemic complaints are reported to the Board or relevant committee where appropriate.
Complaints Officer	The Complaints Officer function is held by the CEO. Where it is not appropriate for the CEO to act as Complaints Officer due to conflict of interest or perception of bias, the Board Chair will appoint an alternative Complaints Officer or investigator. The Complaints Officer receives, documents, acknowledges and triages complaints; assists complainants to access the process; identifies the appropriate pathway; arranges investigation or other inquiry where needed; maintains records; and communicates with relevant parties throughout.
Complaint Investigator or decision-maker	Conduct investigations or inquiries fairly, proportionately and without conflict of interest. Consider relevant information, make findings, recommend outcomes or actions, and document reasons where appropriate.

Role	Responsibilities
Staff, volunteers and contractors	Cooperate with complaint processes, respond honestly and respectfully to requests for information, maintain confidentiality where required, and comply with resulting actions or decisions.

## 8. Procedures and Implementation

### 8.1. How to make a complaint

Complaints may be made in writing, by email, using Appendix A Complaint Form, or verbally where a person needs support to make a complaint. PACFA will, where reasonably practicable, assist a person who has language, literacy, disability or other access needs to make their complaint.

A complaint may be made by a third party on behalf of another person where that person has consented or is unable to make the complaint themselves. PACFA will seek to confirm the wishes of the affected person before proceeding where reasonably practicable.

A complaint should be made to the Complaints Officer. Where the complaint concerns the Complaints Officer, the CEO, or another senior role-holder, PACFA will nominate an alternative contact or investigator to support independence and trust in the process. There is no fee or charge for making a complaint to PACFA under this policy.

### 8.2. Initial assessment and acknowledgement

PACFA will acknowledge receipt of a complaint within 5 business days, unless exceptional circumstances prevent this.

On receipt, the Complaints Officer will make an initial assessment to determine:

- whether the matter is feedback, a formal complaint, or should be referred elsewhere;
- whether urgent action is needed to address safety, wellbeing, confidentiality or other immediate risk;
- whether another PACFA policy or external body is the more appropriate pathway; and
- whether the complaint can be resolved quickly or requires investigation.

Where a complaint falls outside this policy, PACFA will explain the more appropriate pathway where reasonably possible.

### 8.3. Complaint handling process

PACFA will work with the complainant and relevant parties to identify a fair and proportionate response. Depending on the matter, this may include:

- provision of information, clarification or explanation;
- local or informal resolution;
- referral to the relevant manager, committee chair or responsible officer for response;

- formal investigation or other structured inquiry;
- interim protective measures;
- referral to an insurer, police, regulator or other external body; or
- closure of the complaint where the issue has been addressed or is outside scope.

PACFA aims to resolve complaints as efficiently as possible. Where a complaint is not resolved within 10 business days, the Complaints Officer will provide the complainant with a status update and an estimated timeframe for resolution, and will continue to do so at reasonable intervals until the matter is closed.

Where an investigation is required, PACFA will aim to complete it within 45 business days, or otherwise within a reasonable timeframe having regard to complexity, urgency, evidence and the wellbeing of affected persons. If additional time is needed, PACFA will advise the complainant where appropriate.

#### 8.4. Procedural fairness

PACFA will provide procedural fairness to complainants and respondents. This includes considering the issues impartially, informing relevant parties of the substance of the complaint where appropriate, giving them an opportunity to respond, and ensuring decisions are made by a person without a relevant conflict of interest.

Procedural fairness does not require PACFA to disclose every document, every piece of evidence or confidential personal information, particularly where doing so would create risk, breach privacy, or undermine the integrity of the process.

#### 8.5. Confidentiality and privacy

PACFA will handle complaints with care and will seek to maintain confidentiality and privacy to the extent reasonably possible and lawful. Information will be shared only on a need-to-know basis for the purposes of managing the complaint, supporting the parties, investigating the issues, managing risk, and meeting legal or governance obligations.

A complainant may request anonymity. PACFA will discuss the practical limits of anonymity, including that the identity of the complainant may sometimes be inferred from the nature of the complaint, and that anonymity may limit the options for investigation or response.

#### 8.6. Outcomes and sanctions

At the conclusion of a complaint process, PACFA may determine that the complaint is upheld, upheld in part, not upheld, unable to be determined on the available information, or outside scope.

Where a complaint is upheld in whole or in part, outcomes may include one or more of the following:

- apology, explanation or corrective information;
- facilitated resolution or agreed action;
- policy, process or service improvements;
- education, training, coaching or supervision;

- formal direction, warning or performance management;
- changes to duties, delegations or role scope;
- removal from a volunteer, committee or representative role;
- termination of employment, engagement or appointment, where appropriate; or
- referral to a regulator, police, insurer or other external body where required or appropriate.

Where a complaint involves alleged breaches of the Code of Conduct, outcomes may include actions under PACFA's HR, volunteer, governance or performance processes, consistent with that Code and applicable law.

PACFA will communicate the outcome and reasons to the extent appropriate, lawful and practicable, recognising that privacy, employment, legal and confidentiality constraints may limit what can be shared.

## 8.7. Right of review

If a complainant or respondent is dissatisfied with the outcome of a complaint, they may request an internal review within 10 business days of being notified of the outcome, stating the reasons for the request.

PACFA may decline a review request where:

- the request raises no new issue and identifies no procedural concern;
- the matter has already been reviewed; or
- the request is frivolous, vexatious or otherwise an abuse of process.

Where a review is accepted, it will be conducted by a person who was not involved in the original decision, where reasonably practicable. The review may affirm, vary or set aside the original outcome, or require further inquiry.

Nothing in this policy prevents a person from raising a concern with an external body at any stage. Depending on the nature of the complaint, relevant bodies may include the Australian Charities and Not-for-profits Commission (ACNC) for governance matters ([acnc.gov.au](http://acnc.gov.au)), the Fair Work Commission for workplace matters ([fwc.gov.au](http://fwc.gov.au)), the Australian Human Rights Commission for discrimination or harassment matters ([humanrights.gov.au](http://humanrights.gov.au)), or another relevant regulator or authority. PACFA will not obstruct or discourage a person from accessing external pathways.

## 8.8. Records, reporting and improvement

PACFA will keep appropriate records of complaints, actions taken, outcomes and any systemic issues identified. De-identified complaint themes, serious matters and recommendations for improvement may be reported to the Board or relevant committee as part of PACFA's governance, risk management, and continuous improvement processes. Findings from complaints may be used to improve PACFA's policies, systems, service delivery, training and governance arrangements.

Complaint records will be retained for a minimum of seven years from the date of closure, or longer where required by applicable law, the nature of the matter, ongoing legal proceedings,

or governance obligations. Records are held confidentially and in accordance with PACFA's Privacy Policy (1.2.3).

Where complaint data or patterns suggest a systemic issue, the CEO will escalate the matter to the Board for consideration regardless of whether individual complaints have been resolved.

## **9. Related Documents**

This policy should be read together with the PACFA Code of Conduct (Policy 1.2.1), Professional Conduct Procedures, WHS Policy (3.3.7), Privacy Policy (1.2.3), HR Policy Manual, Whistleblower and Protected Disclosure Policy (in development, applies where the complaint engages a protected disclosure), and Complaint Form at Appendix A.

## **10. Monitoring and Review**

This policy will be reviewed at least every two years, and earlier if a complaint, review outcome, legal development, audit finding, governance issue or operational change suggests revision is needed. The CEO is responsible for ensuring this policy remains current, implemented and appropriately aligned with PACFA's governance and operational needs.

## Appendix A Complaint Form

Parts 1–4 are for the person making the complaint. Parts 5–8 are for completion by the Complaints Officer (CEO, Board Chair or delegate).

This form is a support tool. You can also make a complaint verbally and PACFA will document it and confirm the record with you as soon as practicable. Submit to the CEO at [ceo@pacfa.org.au](mailto:ceo@pacfa.org.au), or to the Board Chair where the complaint involves the CEO. Everything in this form is treated with confidentiality and care. You will not be disadvantaged for making a complaint in good faith. EAP support is available: Converge International 1300 687 327, citing code: PSYCDDQM.

### Part 1 About you

<b>Your name</b>	_____
<b>Your role with PACFA</b>	_____
<b>I am a:</b>	<input type="checkbox"/> Member <input type="checkbox"/> Employee <input type="checkbox"/> Volunteer <input type="checkbox"/> Contractor <input type="checkbox"/> Board member <input type="checkbox"/> Other
<b>Preferred contact details</b>	<input type="checkbox"/> Phone <input type="checkbox"/> Email
<b>Do you wish to remain anonymous?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, please note that anonymity may limit PACFA's ability to investigate or respond fully
<b>Do you need any accessibility, interpreter or other support to make this complaint?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes If so, please provide details: _____ _____
<b>Date of this complaint</b>	_____

### Part 2 Your complaint

<b>What is your complaint about?</b>	<input type="checkbox"/> PACFA's services or communications <input type="checkbox"/> A decision made by PACFA <input type="checkbox"/> Conduct of a staff member <input type="checkbox"/> Conduct of a volunteer or Board member <input type="checkbox"/> Conduct of a contractor <input type="checkbox"/> A PACFA policy or process <input type="checkbox"/> Governance or accountability concern <input type="checkbox"/> Other
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<b>Describe what happened</b>	Include relevant dates, locations, and how the matter arose: _____
<b>Who is involved or affected?</b>	Names or descriptions; include any witnesses if relevant: _____
<b>When did this occur?</b>	Date or date range: _____
<b>Have you previously raised this concern?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, when, with whom, and what happened: _____
<b>What outcome are you seeking?</b>	For example: an explanation, an apology, a change to a decision, corrective action, a systemic improvement

### Part 3 Supporting information

<b>Do you have any documents, emails or other materials relevant to this complaint?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, please attach or describe: _____
<b>Is there anything else you would like PACFA to know?</b>	_____ _____

### Part 4 Declaration

	I confirm that the information in this form is accurate to the best of my knowledge and that this complaint is made in good faith. _____
<b>Signature</b>	_____
<b>Date</b>	_____

**FOR COMPLAINTS OFFICER / CEO / BOARD CHAIR / DELEGATE USE**

*Do not complete this section if you are the complainant.*

**Part 5 Receipt and triage**

<b>Date complaint received</b>	_____
<b>Received by</b>	_____
<b>Acknowledgment sent to complainant</b>	Date: _____
<b>Initial assessment complaint type</b>	<input type="checkbox"/> Within scope of this policy <input type="checkbox"/> WHS matter, refer to WHS Policy (3.3.7) <input type="checkbox"/> Ethics / registrant conduct, refer to Professional Conduct Procedures <input type="checkbox"/> Employment matter, refer to HR Policy Manual <input type="checkbox"/> External referral required <input type="checkbox"/> Outside scope, explain to complainant
<b>Does the complaint require urgent action?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, describe immediate steps taken: _____
<b>Proposed pathway</b>	_____
<b>Conflicts of interest assessed?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, none identified <input type="checkbox"/> Yes, conflict identified, managed as follows: _____
<b>Pathway communicated to complainant</b>	Date: _____

**Part 6 Investigation or response**

<b>Investigation or response assigned to</b>	_____
<b>Target completion date</b>	_____
<b>Were interim protective measures implemented?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, please describe: _____



<b>Was the respondent informed of the substance of the complaint and given an opportunity to respond?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No, reason: <hr/>
<b>Summary of key information considered</b>	<hr/>

### Part 7 Outcome

<b>Outcome determination</b>	<input type="checkbox"/> Upheld <input type="checkbox"/> Upheld in part <input type="checkbox"/> Not upheld <input type="checkbox"/> Unable to determine on available information <input type="checkbox"/> Outside scope <hr/>
<b>Reasons for outcome</b>	<hr/>
<b>Actions arising</b>	Action:  Owner:  Due date:  <hr/>
<b>Policy or process improvement identified?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, please describe: 
<b>Outcome communicated to complainant</b>	Date:
<b>Outcome communicated to respondent</b>	Date:
<b>Date completed</b>	
<b>Signature of Complaints Officer/CEO/Board Chair/Delegate</b>	



## Part 8 Closure

<b>All actions completed</b>	Date: _____
<b>Reported to Board/GC?</b>	<input type="checkbox"/> Yes, date: _____ <input type="checkbox"/> No _____
<b>Was a review requested?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, outcome of review: _____
<b>Complainant advised of closure</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Any further support or follow-up required?</b>	<input type="checkbox"/> No <input type="checkbox"/> Yes, details: _____
<b>Record retained for</b>	<input type="checkbox"/> 7 years (standard) <input type="checkbox"/> Longer, reason: _____