



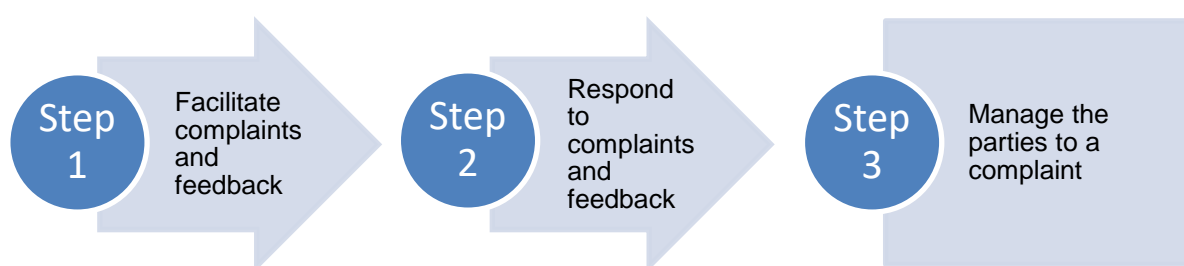
17.01 COMPLAINTS POLICY AND PROCEDURE

Applies to:	Management Committee, Principal Solicitor/CEO, staff and volunteers	Date approved:	16 June 2025
Specific responsibility:	Management Committee, Principal Solicitor/CEO, staff and volunteers	Next review date:	16 June 2027

PURPOSE

At the forefront of LGBTI Legal Service Inc’s (LGBTILS) operations is the provision of services to clients. Positive and constructive complaints are most welcome at LGBTILS through appropriate feedback channels. LGBTILS feedback management system fundamentally operates to improve upon the organisation’s strength and to improve upon its shortcomings.

LGBTILS ensures that Management Committee members, staff, volunteers and representatives of LGBTILS are given information about this policy and accompanying procedures as part of their induction.



FACILITATE COMPLAINTS AND FEEDBACK

Policy

LGBTILS encourages feedback from both internal staff, volunteers and Management Committee members, and external clients. LGBTILS ensures that clients, staff and stakeholders are provided with the opportunity to submit suggestions, improvement requests and suggestions about its service. LGBTILS conducts regular feedback sessions with stakeholders, which may take the form of surveys, group sessions, focus groups and/or course evaluations. Feedback that has been obtained incidentally from external clients are considered and evaluated. Any concerns raised in feedback or complaints are dealt with within a reasonable time frame.

People making complaints are:

- provided with information about the complaint handling process and how to access it;
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate; and
- provided with reasons for our decision/s and any options for redress or review.

No detriment to people making complaints

LGBTILS takes all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.



Anonymous complaints

LGBTILS accepts anonymous complaints if there is a compelling reason to do so and carry out a confidential investigation of the issues raised where there is enough information provided.

Responsibilities

The Principal Solicitor/CEO and Management Committee of LGBTILS are responsible for all monitoring and evaluating of all feedback, and for ensuring the appropriate responses are made.

Procedures

Lodging Feedback

Feedback can be in writing and can be lodged using LGBTILS feedback form (See: **Appendix 1**), which is available at LGBTILS premises or online at LGBTILS's website. Feedback can also be obtained via the following channels:

- Surveys;
- Telephone;
- Email;
- Social Media;
- Contact forms on LGBTILS's websites; and
- Mail.

Verbal feedback can also be provided by contacting the relevant staff member, Principal Solicitor/CEO or Management Committee member at LGBTILS. In such cases the feedback is recorded to ensure that the appropriate follow-up action is taken. Once completed the form is sent to LGBTILS Client Services. LGBTILS Client Services registers the feedback and refers it to the LGBTILS Principal Solicitor/CEO. LGBTILS Principal Solicitor/CEO, where required, refers the matter to an appropriate staff member for investigation and action.

Feedback about Employees

Complaints about employees of the LGBTILS are directed to the Management Committee President. If the President deems the feedback to be of a nature by which an internal review of the feedback may compromise the efficacy of the feedback, the President may designate an external person to review the feedback, and, give recommendations regarding the review.

Escalation of Complaints

Where a complaint relates to the conduct of the Principal Solicitor/CEO, in which the Principal Solicitor/CEO has a conflict-of-interest, or which cannot otherwise be resolved by the Principal Solicitor/CEO, this should instead be forwarded to the LGBTILS President for follow-up and actioning.

RESPONDING TO COMPLAINTS

Policy

Early resolution

Where possible, complaints will be resolved at first contact with LGBTILS. When appropriate LGBTILS may offer an explanation or apology to the person making the complaint.

Responsiveness

LGBTILS will promptly acknowledge receipt of complaints and assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security, the response is immediate and escalated appropriately.



LGBTILS will advise people as soon as possible when LGBTILS is unable to deal with any part of the complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

Objectivity and fairness

LGBTILS will address each complaint with integrity and in an equitable, objective and unbiased manner.

LGBTILS will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

LGBTILS's staff are empowered to resolve complaints promptly and with as little formality as possible. LGBTILS will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

LGBTILS protects the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals is only disclosed or used as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Procedure

Response to Feedback

LGBTILS acknowledges receipt of each complaint promptly, and preferably within 2 or 3 working days. Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

Where contact details have been provided by the staff, volunteer, Management Committee member or client, the Principal Solicitor/CEO or Management Committee member will ensure that the person lodging the feedback receives a written response within one month of the feedback being registered. Where the feedback is made in relation to LGBTILS's area of responsibility, the Principal Solicitor/CEO or Management Committee member assigns an investigating officer, obtains a report on the matter and ensures that a written response is forwarded to the person providing the feedback.

Initial Assessment

After acknowledging receipt of the complaint, LGBTILS confirms whether the issue/s raised is/are within LGBTILS' control. LGBTILS also considers the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed. When determining how a complaint is managed, LGBTILS considers:

- how serious, complicated or urgent the complaint is;
- whether the complaint raises concerns about people's health and safety;
- how the person making the complaint is being affected;
- the risks involved if resolution of the complaint is delayed; and
- whether a resolution requires the involvement of other organisations.



Investigating the complaint

After assessing the complaint, LGBTILS considers how to manage it. LGBTILS may:

- give the person making a complaint information or an explanation;
- gather information about the issue, person or area that the complaint is about; or
- investigate the claims made in the complaint.

The person making the complaint is kept up-to-date on any progress, particularly if there are any delays. The outcome of the complaint is communicated using the most appropriate medium.

The actions decided to take are tailored to each case and take into account any statutory requirements.

Determine the outcome and provide reasons for the decision

Following consideration of the complaint and any investigation into the issues raised, LGBTILS contacts the person/s making the complaint and advise them:

- the outcome of the complaint and any action taken;
- the reason/s for the decision;
- the remedy or resolution/s proposed or put in place; and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

Close the complaint

LGBTILS keeps records about:

- how the complaint was managed;
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations); and
- any outstanding actions to be followed up, including analysing any underlying or root causes.

Review of Customer Feedback Actions

A LGBTILS feedback report will be provided by LGBTILS Client Services to the Principal Solicitor/CEO or Management Committee member and the Management Committee body for review.

Record Keeping

All original customer feedback forms will be retained by LGBTILS for a period of three years, along with a copy of the written response from the manager and any other relevant reports or documents.

The record of the complaint will document:

- the contact information of the person making a complaint;
- issues raised by the person making a complaint and the outcome/s they want;
- any other relevant information; and
- any additional support the person making a complaint requires.

MANAGING THE PARTIES TO A COMPLAINT

Policy

Open communication with relevant parties

Where a complaint involves multiple organisations, LGBTILS will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.



Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where LGBTILS's services are contracted out, there is an expectation that contracted service providers have an accessible and comprehensive complaint management system. The LGBTILS takes complaints seriously, not only about the actions of our staff but also the actions of our service providers.

Empowerment of staff

All staff managing complaints are empowered to implement this Complaints Policy and accompanying procedures as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our Complaints Policy.

Managing unreasonable conduct by people making complaints

LGBTILS is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible;
- the health, safety and security of our staff; and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

Information about alternate options

We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

EVALUATION OF SERVICE QUALITY AND OUTCOMES

Policy

LGBTILS conducts periodic reviews of the organisation to ensure that service outcomes meet goals and expectations, and to ensure quality assurance. LGBTILS will analyse and evaluate all feedback and complaints received in order to improve the delivery of services. Evaluation considers LGBTILS' values and principles, strategic direction and other relevant information when assessing the service quality and outcomes.

Responsibilities

The Principal Solicitor/CEO or Management Committee member is primarily responsible for ensuring the proper and effective evaluation of service quality and outcomes across LGBTILS.

Procedures

The Management Committee:



- reviews all feedback and complaints received and if required, improve the delivery of services;
- monitors and review the feedback, complaints and appeal process for effectiveness;
- ensures LGBTILS is adequately staffed to facilitate the provision of quality service to its members;
- supports LGBTILS’ compliance with all applicable legislative, regulatory and professional standards requirements;
- monitors the quality and compliance of LGBTILS’ activities through appropriate reporting mechanisms; and
- undertakes regular reviews of its own performance.

Evaluation will be appropriately resourced, taking into account what is feasible and realistic to achieve within time and budget constraints. The process may use both quantitative and qualitative methods including the use of existing administrative data sets and information systems and collecting data from clients.

DOCUMENTATION

Documents relating to this policy	
Related policies	All policies

Reviewing and approving this policy		
Frequency	Person responsible	Approval
Biennial review	Principal Solicitor/CEO	Management Committee

Policy review and version tracking			
Review	Date approved	Approved by	Next review date
1	16 June 2025	Management Committee	16 June 2027
2		Management Committee	
3		Management Committee	



How respectful or disrespectful were our staff to you?

5	4	3	2	1
Very respectful	Respectful	Neither respectful or disrespectful	Disrespectful	Very disrespectful

Why do you feel our staff were respectful or disrespectful, if at all, to you? Please describe.

Do you have any other feedback about LGBTILS? Please describe.

Thank you for completing this questionnaire. The information you have provided will be treated confidentially and used only to improve the LGBTILS in the future.

Please email your replies to mail@lgbtilegalservice.org or post the document to PO Box 3467, South Brisbane BC QLD 4101.

Note: a copy of this form also appears on the website.