



Complaints Management Policy

1. Purpose of this Policy

This policy ensures that the Halberg Foundation (Halberg) provides a safe and effective child-focused complaints process for children, young people and families. It is designed to ensure that:

- Children, young people and families have access to a complaint system that promotes their rights and prioritises their safety and well-being.
- Staff can be informed about what is expected of them if children, young people and families contact them regarding making a complaint.

2. Scope

This policy applies to the Halberg Board and staff (as per Halberg’s definition).

The policy also supports all children, young people and families who may wish to make a complaint about Halberg’s services or staff, and this complaint policy is communicated to children, young people and families to ensure that they know how to make a complaint and what to expect from Halberg’s complaint management processes.

Complaints can be made to Halberg about:

- Any aspect of the services Halberg provides.
- Any practice, policy or procedure.
- Staff behaviour or conduct.
- Any decision made about service changes, engagement or support.

3. Key Definitions

Complaint:	Refers to any matter ranging from a general expression of dissatisfaction with a service provided by Halberg to a particular experience with a person or persons involved with Halberg, including an allegation about the conduct of a staff member, volunteer or other individual engaged by Halberg or another child/young person at Halberg; or the handling of a prior concern. ¹ .
Child-Focused or Child-Centred	Being child-focused and centred is a term used to reference our thinking and ways of working, which regard the child's needs as paramount. Our policies and processes uphold child rights, and our processes are applied in a manner appropriate to the child or young person. This includes keeping actions and responses timely from the perspective of a child or young person, which may differ from that of an adult.
Children and Young People	This guidance supports all children and young people under 18 years, in accordance with the Children’s Act 2014 and the United Nations Convention on the Rights of the Child 1989 (ratified by New Zealand in 1993). Although not covered by New Zealand’s statutory child protection system, we can extend our support for state-care-experienced young people between the ages of 18 and 25 who are also recognised under the Children’s Act 2014.

¹ Adapted from the Complaint Handling Guide: Upholding the rights of children and young people, Australian Government, National Officer for Child Safety, 2019



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Complainant:	Refers to the person raising the complaint.
Safeguarding Complaint:	<p>Any complaint that indicates or refers to:</p> <ul style="list-style-type: none"> ▪ Misconduct in relation to children and young people safety. ▪ Non-compliance with safeguarding policies. ▪ Child abuse or a belief(s), concern(s), suspicion(s) or allegation(s) related to child abuse. ▪ A belief(s), concern(s), suspicion(s) or allegation(s) related to child safeguarding misconduct/ non-compliance.
Staff	Staff is any person serving or representing the Halberg Foundation, regardless of whether they are in a paid, voluntary, or contracted position or in child or non-child facing roles.
Subject of the complaint:	The person whose conduct is the focus of a complaint.

4. Implementation Responsibilities

Halberg promotes responsible and respectful behaviour and expects staff at all levels to be committed to fair, effective and efficient complaint handling, as outlined below.

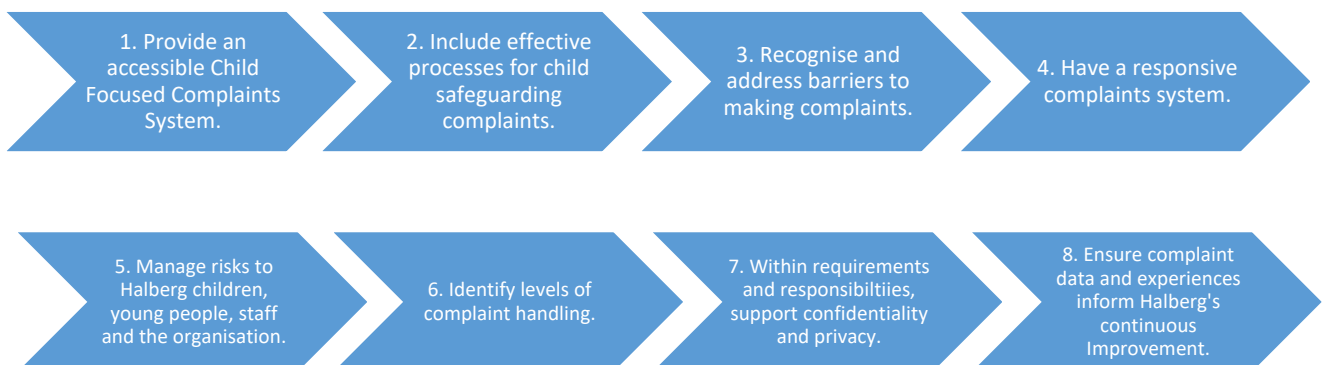
All Staff	<p>All staff are responsible for:</p> <ul style="list-style-type: none"> ▪ Understanding, complying and aligning with our complaint handling processes. ▪ Helping people to make a complaint and receive complaints in line with the Complaints Policy and Complaints Management Process. ▪ Escalating complaints in line with the complaint level and identified escalation lines. ▪ Ensuring all complaint data is recorded.
Executive Board:	<p>The Board is responsible for:</p> <ul style="list-style-type: none"> ▪ Ensuring systems and structures are in place within Halberg to implement and monitor the effectiveness of the Complaint Management Policy. ▪ Monitoring the effectiveness of complaints handling processes via reports to Halberg Senior Leadership. ▪ Overseeing complaints handling where complaints are escalated to Board level. ▪ Responding to and overseeing complaints made about or referring to the Chief Executive.



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<p>Chief Executive</p>	<p>The Chief Executive is responsible for:</p> <ul style="list-style-type: none"> ▪ Promoting a culture that values complaints and their effective resolution. ▪ Ensuring the Complaints Policy is implemented and is operating across Halberg. ▪ Receiving and responding to complaints in line with the Complaints Policy. ▪ Monitoring and ensuring all reporting requirements are met as outlined in our child safety policies and procedures. ▪ Reporting complaint trends and information to the Board.
<p>Leadership and Management</p>	<p>Leadership and Management are responsible for:</p> <ul style="list-style-type: none"> ▪ Providing adequate support and direction to staff responsible for handling complaints. ▪ Encouraging staff to be alert to complaints and assist them in handling complaints promptly and effectively. ▪ Encouraging staff to give feedback and/or make recommendations for system improvements around complaints. ▪ Regularly reviewing reports around complaint data and trends and/or any issues arising from complaints. ▪ Supporting the CE with Executive Board complaint data.
<p>Safeguarding Staff</p>	<p>Safeguarding Staff are responsible for:</p> <ul style="list-style-type: none"> ▪ Maintaining oversight of child safeguarding-related complaints. ▪ Ensuring any child safeguarding-related complaints are responded to as outlined in our child safety policies and procedures. ▪ Receiving and responding to complaints in line with the Complaints Policy.

5. Guiding Principles





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6. A Child-Focused Complaints System

We will seek to ensure that any child/young person and their families are:

- Provided with information about our complaint handling process in easy-to-understand language.
- Provided with multiple, accessible pathways to make complaints, including child-friendly complaint forms and explanations of the policy and related process.
- They will be listened to, taken seriously and treated with respect by staff.
- Able to include a support person in the complaints process.
- If a person prefers or requires another person or organisation to assist or represent them, we will communicate through their representative if that is their wish.

7. Acknowledging and Responding to Complaints

We are committed to ensuring all complaints are responded to as quickly as possible, including at the initial receipt of a complaint. We seek to ensure that any child/young person and their families who make a complaint can expect:

- Wherever possible, complaints to be resolved at first contact with us, and when appropriate, we may offer an explanation or apology to the person making the complaint at that time.
- If this is not possible, we will acknowledge the receipt of the complaint within 2 business days (and no later than 5 business days) following receipt of the complaint.
- To be informed as to how they will be involved in the process and estimated time frames for resolution.
- If an investigation is required, the investigation will be conducted in accordance with Halberg's Investigation Policy.
- To be listened to and treated with respect by Halberg staff and actively engaged in the process where possible and appropriate.
- That we will address complaints in an unbiased manner and will ensure the person handling a complaint is different from any staff member whose conduct or service is being complained about. Conflicts of interest, actual or perceived, will be managed responsibly.
- To be communicated with and given updates in line with confidentiality and privacy requirements throughout the process.
- To be provided with reasons for complaint outcomes and decisions, as well as any options for redress or review.
- An offer that all complainants have the opportunity to have their complaint outcome reviewed and/or identify external pathways where the complaint can be taken, e.g. New Zealand Sport and Recreation Complaints and Mediation Service.



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8. Managing Complaints

Halberg will:

- Endeavour to ensure that anyone making a complaint does not suffer adverse consequences from making that complaint.
- Implement strict confidentiality as outlined in our policy.
- Offer all complainants the opportunity to have their complaint outcome reviewed and/or identify external pathways where the complaint can be taken, e.g. New Zealand Sport and Recreation Complaints and Mediation Service.
- Accept and work to investigate anonymous complaints to the extent possible with the information provided.
- If a complaint involves multiple organisations, we will work with the other organisation/s where possible to ensure that communication with the complainant (or their representative) is clear and coordinated and that subject to privacy and confidentiality considerations, communication and information sharing between the parties will be organised to facilitate a child-centred (as defined in Halberg's Investigation Policy). timely response

Halberg will always aim to manage and resolve complaints upon initial receipt as efficiently and directly as possible in the first instance. Complaints are managed along the following levels:

Level 3	Where complaints cannot be resolved at Level 2 or where the complaint is of a very serious nature, they will be escalated to Level 3. Any concern or suspicion that a complaint involves a potential or actual child safeguarding issue must be immediately categorised as a Level 3 complaint.	Board CE HR Safeguarding Staff
Level 2	Where complaints cannot be resolved on first contact and/or present particular complexity or potential systemic or serious issues, those complaints can be escalated to the appropriate Senior Manager, who will seek to resolve the complaint.	Senior Leadership Management Staff Safeguarding Staff
Level 1	Halberg recognises that the most efficient and effective way to resolve complaints and/or feedback is to deal with them at initial receipt.	All staff

Any concern or suspicion that a complaint involves a potential or actual child safeguarding issue must be immediately categorised as a Level 3 complaint.

Halberg has a zero-tolerance policy in relation to all forms of abuse and neglect. We are committed to ensuring that all complaints that indicate misconduct concerning child safety, non-compliance with child safety policies, child abuse and/or concerns, suspicions or allegations related to child abuse will be reported to our Safeguarding Staff and, where applicable, Executive staff (including up to our Board) and child protection services.

Confidentiality and Privacy

Subject to child protection and police reporting obligations, children and young people have the same right to privacy, anonymity and confidentiality as adults. However, absolute confidentiality cannot be assured due to reporting and Privacy Act 2020 obligations and procedural fairness in investigations.



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Therefore, complaints will be kept confidential to the extent possible, consistent with Halberg’s reporting requirements and the need to conduct investigations aligned with New Zealand legislation and our policies.

Policy Exceptions

Halberg is committed to being accessible and responsive to all people who approach us with feedback or complaints. However, we remain mindful to:

- The health, safety and security of children, young people and our staff.
- Our ability to allocate our resources fairly across any complaints received and adhere to ongoing commitments.

Therefore, if in their dealings with us, a person behaves in a manner deemed to be unreasonable and/or that questions the well-being and safety of others, we will take proactive 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.

Approved Date:	January 2024	Next Review Date:	January 2027
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