

1. Overview & Purpose

Standard 3.8 of the 2017 Revised National Standards for Group Training Standards states:

“Complaints and appeals are dealt with by the GTO transparently in accordance with a documented complaints and appeals process, or referred to State/Territory dispute resolution mechanisms, where the completion of the Training Contract is at risk.”

This policy is to comply with Standard 3.8.

This policy is intended to:

- Enable MEGT RMS to respond to issues raised by apprentices and trainees or host employers making complaints in a timely and cost effective manner
- provide information that can be used by us to deliver quality improvements in our services, service delivery, staff and policies and procedures.

2. Scope

This policy applies to any person or entity dealing with MEGT RMS including an apprentice, trainee, host employer, recruitment only customer, payroll services employer or employee. In the case of an apprentice or trainee aged under 18 years, this can be their parent or legal guardian.

This policy applies to all staff receiving or managing complaints made to or about MEGT RMS, regarding our services, service delivery, staff and policies and procedures.

Staff grievances, code of conduct issues, conflicts of interest and whistle-blower matters are dealt with through separate mechanisms.

3. Policy

3.1 Terms and Definitions

Complaint

Expression of dissatisfaction made to or about MEGT RMS, services, service delivery, staff and policies and procedures where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- Staff grievances, code of conduct issues, conflicts of interest and whistle-blower matters
- responses to requests for feedback about the standard of our service provision [see the definition of ‘feedback’ below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of ‘feedback’], and

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- service requests [see definition of 'service request' below].

Complaint management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of our organisation.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services, including all exit interviews and customer satisfaction surveys.

People Making Complaints

This can be any person or entity dealing with MEGT RMS including an apprentice, trainee, host employer, recruitment only customer, payroll services employer or employee. In the case of an apprentice or trainee aged under 18 years, this can be their parent or legal guardian.

Service request

Requests made by any person relating to the MEGT RMS service or service delivery. This can include:

- Timesheet issues;
- Payroll issues;
- Invoicing issues;
- Provision of personal protective equipment;
- Training issues;
- Administration issues; or
- Apprentice or trainee management issues.

3.2 Guiding principles



3.2.1 Facilitate complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, service delivery, staff and policies and procedures Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiples and accessible ways to make complaints
- 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

We will take 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

We cannot accept anonymous complaints and will not carry out an investigation of the issues raised where there is insufficient information provided. We will ask for more information to be provided so that we can carry out an investigation.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

Where the apprentice or trainee is aged under 18 years we will communicate with their parent if this is their wish.

No charge

Complaining to us is free.

3.2.2 Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with the relevant MEGT representative, whether a field officer, payroll officer or other MEGT contact person including a National Manager, if person was not the original decision maker.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will 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 will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate). This may include referral to the relevant State Training Authority ("STA").

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and fairness

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

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

Conflicts of interests, 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

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Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints.

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

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by MEGT as permitted under the relevant privacy laws, and any relevant confidentiality obligations.

3.2.3 Manage the parties to a complaint

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are 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, including all apprentices and trainees, 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.

3.3 Complaint management system



3.3.1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

3.3.2 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint in the MEGT RMS Complaints Register maintained by the MEGT RMS National Risk & Compliance Manager.

The record of the complaint will document:

- the name of the person making a complaint
- the nature of the complainant's relationship to MEGT RMS i.e. whether an apprentice, trainee, host employer, recruitment only customer, payroll services employer or employee.
- issues raised by the person making a complaint
- relevant staff member involved in the complaint
- the person assigned to handle the complaint
- the action taken as a result of the complaint
- the date of the action taken
- whether the complaint was resolved
- whether the complaint was not resolved, future actions to be taken.
- The close off date when the future actions are completed.

3.3.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 2 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

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3.3.4 Initial assessment and addressing of complaints

Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider 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 will be managed, we will consider:

- 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, including the relevant State Training Authority.

Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:

- Give the person making a complaint information or an explanation
- Gather information from the person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

3.3.5 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have 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.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy Act* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

3.3.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

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- How we managed the complaint
- 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 that need to be followed up.

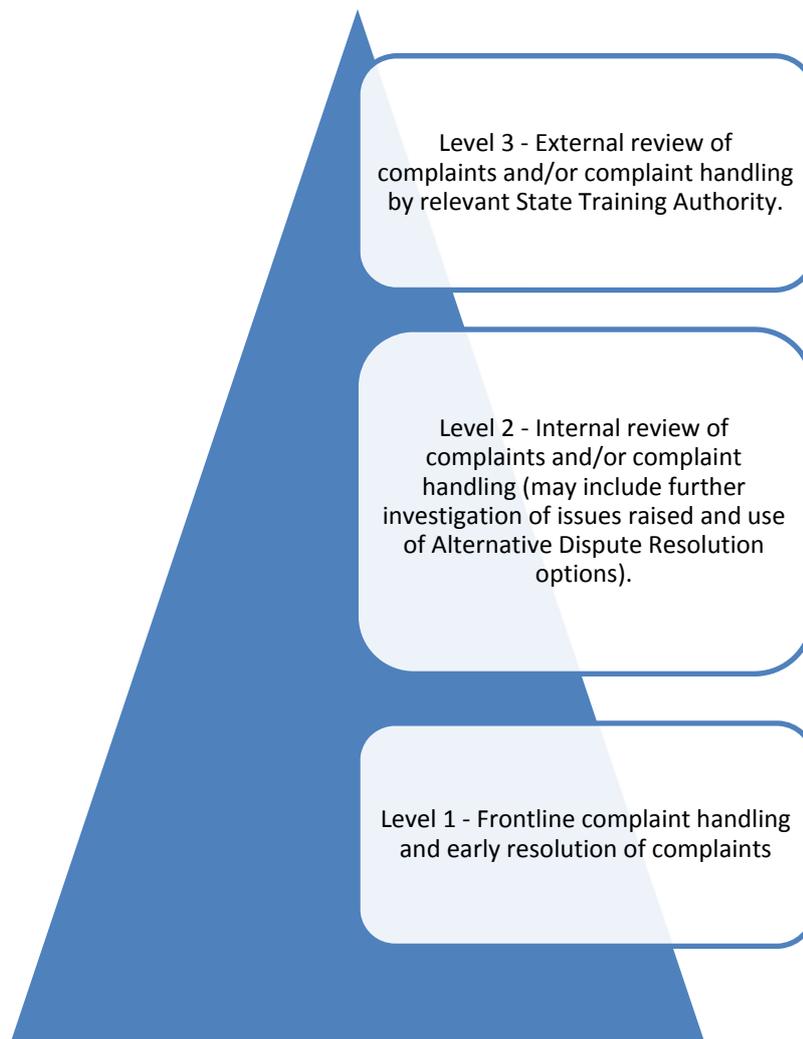
We will ensure that outcomes are properly implemented, monitored and reported to the MEGT RMS General Manager and National Operations Manager.

3.3.7 Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them (including the relevant State Training Authority, as detailed in Section 3.4 below).

3.4 The three levels of complaint handling

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We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint to the MEGT RMS National Risk & Compliance Manager or other senior officer within MEGT RMS. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where this second level of complaint handling fails to resolve the dispute or where the complainant is dissatisfied with the decision and seeks to appeal the decision, there will be the third level of handling by referral to the external agency, being the relevant State Training Authority, that oversees the apprentice and traineeship system in each jurisdiction.

The relevant STA details are:

South Australia

Work Ready

Department of State Development

Adelaide SA 5001

Ph: 1800 673 097

Fax: (08) 8463 5654

Web: www.skills.sa.gov.au/apprenticeships-traineeships

New South Wales

Training Services NSW

Department of Industry

Locked Bag 53

Darlinghurst NSW 1300

Ph: 13 28 11 (NSW callers) or (02) 9266 8450 (interstate callers)

Fax: 02 9266 8590

Web: training.nsw.gov.au

Tasmania

Skills Tasmania

GPO Box 536, Hobart, TAS 7001

Ph: Free call 1800 655 846

Fax: (03) 6234 4358

Web: skills.tas.gov.au

Victoria

Further Education and Skills

GPO BOX 4367, Melbourne VIC 3001

Ph: (03) 9651 9999

Fax: (03) 9637 3564

Web: skills.vic.gov.au

Queensland

Department of Education, Training and Employment

LMB 527, Brisbane QLD 4001

Ph: 1800 210 210

Web: training.qld.gov.au

Western Australia

Department of Training and Workforce Development Apprenticeship Office

Locked Bag 16, Osborne Park Delivery Centre WA 6916

Ph: 13 19 54 (local) or (08) 6551 5499 (interstate)

Web:

<http://www.dtwd.wa.gov.au/employeesandstudents/apprenticeshipoffice/Pages/default.aspx>

All complainants will be informed of their right of internal review (second level of complaint handling) as well as their right of appeal to the STA (third level of complaint handling).

Any complainant is able to immediately make complaint to the STA at any stage of the complaint process.

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3.5 Accountability and learning

3.5.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to MEGT's CEO and RMS senior management for review.

3.5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits, complaint satisfaction surveys and exit interviews.

3.5.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

4 Responsibilities

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Who	Commitment	How
MEGT RMS General Manager & National Operations Manager	Promote a culture that values complaints and their effective resolution	<p>Provide adequate support and direction to key staff responsible for handling complaints.</p> <p>Regularly review reports about complaint trends and issues arising from complaints.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Encourage staff to make recommendations for system improvements.</p> <p>Recognise and reward good complaint handling by staff as well as commendations of staff.</p> <p>Support recommendations for improvements to RMS service, service delivery, staff and policies and procedures arising from the analysis of complaint data.</p>
Manager responsible for complaint handling	Establish and manage our complaint management system.	<p>Provide regular reports to RMS General Manager & National Operations Manager on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with RMS General Manager & National Operations Manager and implemented where appropriate.</p> <p>Recruit, train and empower staff to resolve complaints promptly and in accordance with MEGT RMS's policies and procedures.</p> <p>Encourage staff managing complaints to provide suggestions on ways to improve the organisation's service, service delivery, staff and policies and procedures</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</p>
Staff whose duties include complaint handling	Demonstrate exemplary complaint handling practices	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the organisation's service, service delivery, staff and policies and procedures</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management resulting in changes to RMS organisation's</p>

<p>All staff</p>	<p>Understand and comply with RMS's complaint handling practices.</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of the RMS complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access the RMS complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Provide suggestions to management on ways to improve the organisation's service, staff and policies and procedures</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management resulting in changes to RMS organisation's service, service delivery, staff and policies and procedures</p>
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5 Communication

This policy is available for all staff on the MEGT RMS Intranet site. It shall be publicly available for all apprentices and trainees on the MEGT website. It shall be communicated to all apprentices and trainees upon commencement of employment at Induction and in the RMS Apprentice/Trainee Induction handbook. It shall be communicated to all host employers in the RMS Host Employer Manual.

6 Review

This policy will be reviewed every three years or sooner if requested by management.

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