External Engagement	
Complaints, Concerns and Feedback Policy	
Relevant Legislation or other Requirements	• Human Rights Act 2019 (Qld) • Privacy Act 1988 (Cth) • Anti-Discrimination Act 1991 (Qld) • Community Services Act 2007 (Qld) • Australian Charities and Not-for-profits Commission Act 2012 (Cth) • ACFID Code of Conduct

Version Control

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2.0	**04/03/2026**	**Sneha Soy, Operations Lead**	**NCQ Board**	**Replacing with new template**	**NCQ Board**	**04/03/2029**

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1. Purpose

The purpose of this policy is to define NCQ's commitment to welcoming and managing feedback, concerns, and complaints in a way that is consistent with our values of transparency, accountability, and respect.

This policy aims to ensure that all individuals engaging with NCQ can share their experiences, raise issues, and seek resolution through a fair, inclusive, and accessible process.

NCQ views feedback as a critical tool for learning, accountability, and continuous improvement. Complaints and concerns are not seen as threats, but as opportunities to build trust, strengthen systems, and enhance our role as the peak body supporting Neighbourhood and Community Centres across Queensland.

Specifically, this policy ensures:

- Individuals have culturally safe, accessible, and clearly communicated pathways for submitting feedback, concerns, or complaints
- Complaints are assessed and responded to in a timely, respectful, and procedurally fair manner
- Anonymity and confidentiality are available where required, without impacting an individual's ability to be heard
- All feedback is systematically recorded, monitored, and used to inform strategic decision-making and governance improvements
- NCQ's obligations under the Human Rights Act 2019 (Qld), Privacy Act 1988 (Cth), and other relevant laws and standards are upheld

2. Scope

This policy applies to all stakeholders, partners, clients, community members, and members of the public who wish to provide feedback, raise concerns, or lodge complaints relating specifically to NCQ.

It covers all feedback, concerns or complaints regarding NCQ's operations, service delivery, governance, communications, programs, staff, Board members, volunteers, or contractors acting on behalf of NCQ.

This policy does **not** apply to:

- **Individual Neighbourhood or Community Centres**: Where feedback or complaints relate to an individual Neighbourhood or Community Centre, NCQ will direct the individual to the Centre's own complaints process and, if appropriate, may forward the information for their awareness. This is the full extent of NCQ's involvement; NCQ does not investigate or follow up on matters under a Centre's jurisdiction
- **Internal employment-related grievances**. These are managed under NCQ's internal grievance resolution or human resources procedures.
- **Safeguarding or misconduct concerns.** Serious issues such as child protection, discrimination, fraud, or reportable conduct are managed separately to ensure appropriate escalation and investigation.

Note: While NCQ will make reasonable efforts to refer individuals to the correct pathway when a matter falls outside our scope, we strongly encourage individuals to independently consult the relevant Centre or policy to ensure timely and appropriate resolution.

Where an NCQ Board member is also a Centre employee or volunteer, complaints about their conduct in that Centre role must be managed by the Centre, not NCQ. Only matters arising from their actions as an NCQ Board member fall under this policy.

3. Policy Statement

Neighbourhood Centres Queensland (NCQ) is committed to fostering a culture of openness, accountability, and continuous improvement. As the peak body for Neighbourhood and Community Centres in Queensland, NCQ recognises the value of feedback, concerns, and complaints as essential tools for learning, strengthening relationships, and enhancing the quality and integrity of our work.

NCQ welcomes all forms of feedback, including compliments, suggestions, concerns, and complaints, and actively encourages individuals to share their experiences in order to support ongoing service development and sector leadership.

We are committed to:

- Providing clear, accessible, and culturally safe pathways for submitting feedback and complaints
- Addressing all matters in a timely, respectful, and impartial manner, consistent with principles of natural justice and procedural fairness
- Upholding the privacy and confidentiality of all parties involved, in accordance with legislative and ethical obligations
- Protecting individuals who raise concerns in good faith from any form of reprisal, discrimination, or disadvantage
- Systematically recording, analysing, and using feedback and complaints to inform quality improvement, risk management, and organisational learning

Through this policy, NCQ demonstrates its commitment to transparency, human rights, and the delivery of high-quality, accountable services to its members and the broader community.

4. Types of Feedback

NCQ acknowledges that feedback may be expressed in various forms, each offering valuable insight into organisational performance, stakeholder expectations, and areas for improvement. For the purposes of this policy, feedback is categorised as follows:

Type	Description
Compliments	Expressions of satisfaction or praise regarding NCQ's services, staff, programs, or operations. These affirm what is working well and help recognise positive impact and performance.
Suggestions	Recommendations or ideas provided to enhance NCQ's services, systems, communications, or practices. These are considered opportunities for innovation and improvement.
Concerns	Expressions of uncertainty, unease, or discomfort about a service, decision, or process. While concerns may not require formal resolution, they warrant acknowledgement and may indicate emerging issues.
Complaints	Formal or informal expressions of dissatisfaction with NCQ's services, actions, decisions, conduct, or representatives, where a response or resolution is expected. Complaints trigger a defined process to ensure fair, timely, and impartial handling.

All types of feedback are valued and contribute to NCQ's commitment to continuous improvement, accountability, and stakeholder engagement.

5. Definitions

Term	Definition
Appeal	A formal request to review or reconsider a decision made by NCQ in response to a complaint, typically due to concerns about fairness or process.
Anonymous Submission	A complaint or feedback provided without identifying the individual. NCQ accepts anonymous submissions but may be limited in its ability to investigate or respond.

Advocate / Support Person	An individual nominated by the complainant to support or represent them throughout the process. This may include a carer, family member, community leader, or professional advocate.
Complainant	A person or representative who submits a complaint to NCQ.
Complaint	An expression of dissatisfaction about NCQ's services, operations, decisions, staff, Board members, or representatives, where a response is expected.
Concern	An issue or worry raised about NCQ's conduct, decisions or services, which may not require formal resolution but warrants acknowledgement.
Confidential Submission	A submission where the complainant's identity is known to NCQ but is kept private and shared only with those directly involved in resolving the matter.
Escalation	The process of referring a complaint to a higher level of authority within NCQ or to an external oversight body if it cannot be resolved at the original level.
Feedback	A general comment, compliment, suggestion or observation (positive, negative or neutral) regarding NCQ's operations, culture or services.
Formal Investigation	A structured, impartial process undertaken to examine and determine an appropriate response to a complaint.
Frontline Resolution	Informal and immediate attempt to resolve a complaint at the first point of contact, without needing a formal investigation.
Natural Justice	The right of all individuals involved in a complaint to a fair and unbiased process, including the right to be heard, to respond, and to receive an outcome.
Procedural Fairness	The consistent application of fair processes, including transparent communication, timely decision-making and unbiased handling of complaints.
Resolution	The agreed outcome or conclusion of a complaint or concern, which may involve actions, apologies, explanations or system improvements.
Respondent	The individual or team whose actions, decisions or conduct are the subject of a complaint.
Support Needs	Any assistance or adjustments required to ensure an individual can access and participate in the complaints process (e.g. interpreter, plain language materials, cultural broker).

Vexatious Complaint	A complaint made without substance or in bad faith, typically intended to harass, delay, or cause reputational or administrative harm.

6. Guiding Principles

NCQ's approach to managing feedback, concerns and complaints is grounded in the following principles. These principles guide every interaction, decision and system related to complaint handling and reflect our organisational values, governance standards and commitment to human rights:

Principle	Description
Respect	All people engaging with NCQ are treated with dignity, empathy and professionalism.
Cultural Safety	Processes and responses are inclusive, trauma-aware, and responsive to diverse identities, backgrounds and lived experiences.
Accessibility	All individuals can access feedback and complaints processes through a range of formats, supports, and languages.
Fairness	Complaints are handled impartially, following the principles of natural justice and procedural fairness.
Responsiveness	Feedback and complaints are acknowledged, triaged, and responded to within defined timeframes.
Confidentiality	Information is protected and disclosed only on a need-to-know basis to ensure privacy and trust.
Accountability	Processes are documented, decisions are reviewable, and learnings are reported through governance structures.
Safety	All parties are protected from harm, intimidation, retaliation or adverse consequences for speaking up.

6.1. Policy Commitments

To uphold the principles and intent of this policy, NCQ makes the following organisational commitments:

- **Maintain a clear distinction between feedback, complaints and safeguarding concerns**, ensuring that each is managed under the appropriate policy and response pathway. Issues involving misconduct, harm or child safety will be escalated via appropriate channels.
- **Ensure all staff, volunteers and Board members understand their roles** fostering a respectful and fair complaints culture. Complaint handling expectations will be embedded into induction, training, and professional conduct guidance.
- **Record and use data to identify opportunities for service improvement**, ensuring that all complaints and feedback are logged, reviewed and analysed for emerging themes, risks and strengths.
- **Promote a speak-up environment without fear of reprisal**, where individuals are encouraged to raise concerns in good faith and are protected from retaliation or discrimination.
- **Monitor and report on trends annually to the NCQ Board**, including a de-identified summary of feedback and complaint patterns, resolution timeframes, key risks and improvement actions.

7. Rights and Responsibilities

The following table outlines the rights and responsibilities of key stakeholder groups involved in the feedback and complaints process. These expectations ensure a fair, respectful, and accountable approach to all interactions.

Stakeholder	Rights	Responsibilities
Complainants	To be heard, supported, informed of the outcome, and protected from adverse consequences	To raise concerns in good faith, provide accurate information, and engage respectfully
NCQ Staff	To be treated fairly, without bias or undue pressure during the complaint process	To receive and respond to concerns respectfully, protect confidentiality, and document accurately
NCQ Organisation	To manage complaints fairly and proportionately, and protect the rights of all involved parties	To implement and maintain robust systems for complaint handling, quality assurance and governance oversight

8. How to Provide Feedback or Make a Complaint

NCQ is committed to receiving and responding to all feedback in a structured, timely, and respectful manner. Individuals are encouraged to raise feedback, concerns, or complaints through any of the following methods:

8.1. Verbal Submissions

- **In person -** Feedback may be provided directly to an NCQ staff member during meetings, events, or other official engagements.
- **By phone** - Individuals may contact the NCQ office to speak with a staff member or request a call-back to discuss the matter verbally.

Verbal feedback may be documented by staff in accordance with internal procedures to ensure appropriate follow-up and recordkeeping.

8.2. Written Submissions

- **Email** - Feedback or complaints may be sent to info@ncq.org.au or to the appropriate staff contact.
- **Website**: Individuals can submit feedback via the designated contact or feedback form available on the NCQ website: https://ncq.org.au/feedback/

Written submissions may be informal (e.g. a suggestion or comment) or formal (e.g. a complaint requiring investigation and response).

8.3. Via a Representative

- Individuals may nominate a third party (e.g. a family member, colleague, advocate, or representative organisation) to submit feedback or a complaint on their behalf.
- The representative must have appropriate consent or authority to act on behalf of the individual and may be contacted for clarification if required.

8.4. Anonymous Submissions

- NCQ accepts anonymous feedback and complaints. However, the ability to investigate or respond may be limited if sufficient detail or contact information is not provided.

All feedback and complaints received will be recorded and handled in accordance with NCQ's defined procedures under this policy. Where appropriate, the matter may be escalated or referred internally for further review or investigation.

8.5. Complaint Handling Stages

Stage 1: Early Resolution

NCQ encourages the resolution of straightforward or low-risk complaints at the earliest opportunity and closest point of service. Early resolution is intended to provide a prompt and proportionate response without the need for formal investigation.

This includes:

- **Frontline handling -** The staff member who receives the complaint, or another relevant team member, will attempt to resolve the matter directly and informally where appropriate.

- **Timely response -** Resolution is typically expected within **3 to 5 business days** from the date the complaint is received. If additional time is required, the complainant should be informed of the delay and advised of the next steps.
- **Informal outcomes -** Common outcomes may include:
    - A clear explanation or clarification
    - A verbal or written apology
    - Immediate corrective action or service adjustment
- **Recordkeeping -** All complaints managed through early resolution must still be documented in NCQ's complaints register or equivalent system. Records should include the nature of the complaint, steps taken to resolve the issue, and the outcome.

If a complaint cannot be resolved at this stage due to its complexity, sensitivity, or the complainant's dissatisfaction it will be escalated to **Stage 2** for further handling.

Stage 2: Formal Investigation

Where a complaint is not suitable for early resolution, cannot be resolved informally, or involves serious or complex issues, it will progress to a formal investigation. This stage ensures a structured, impartial, and fair assessment of the matter.

This includes**:**

- **Assignment of responsibility -** The complaint will be referred to a designated manager or other authorised officer within NCQ who is independent of the initial incident or issue. This person will be responsible for managing the investigation process.
- **Investigation process:**
    - Collect relevant information and documentation
    - Conduct interviews with the complainant, respondent, and any relevant witnesses
    - Review applicable policies, procedures, and evidence
    - Assess the facts in line with principles of procedural fairness and natural justice
- **Timely resolution -** NCQ aims to conclude formal investigations within **10 to 15 business days** from the date of escalation. If more time is required due to the nature or scope of the complaint, the complainant will be informed of the delay and provided with regular updates.
- **Written outcome:**
    - The complainant will receive a written response outlining the findings, outcome, and any actions taken or planned by NCQ
    - The respondent (if applicable) will also be informed of the outcome and any implications relevant to them
- **Confidentiality -** All parties involved in the investigation are expected to maintain confidentiality. Information will only be disclosed on a strictly need-to-know basis to those involved in managing or responding to the complaint.

- **Right to review -** If the complainant is dissatisfied with the outcome, they may request an internal review under **Stage 3**.

All documentation related to the formal investigation, including findings and actions taken, will be recorded in NCQ's complaints register and retained in accordance with NCQ's recordkeeping and privacy obligations.

Stage 3: Internal Review

If a complainant is dissatisfied with the outcome of a formal investigation, they may request an internal review of the process and decision. The internal review stage provides an additional layer of accountability and ensures that complaints have been handled fairly, consistently, and in accordance with organisational policy.

This includes:

- **Eligibility for review:**
  - The complainant must submit a written request for review within a reasonable timeframe (typically within 10 business days of receiving the Stage 2 outcome).
  - The request must outline the basis for the review, such as perceived procedural error, lack of fairness, new evidence, or dissatisfaction with the outcome.
- **Review conducted by the CEO or Board:**
  - The CEO or a Board member who was not involved in the original investigation will be appointed to conduct the review.
  - Their role is to assess whether the original complaint was managed appropriately, fairly, and in line with policy and procedural requirements.
- **Review process:**
  - Re-examination of the original complaint, investigation documentation, and outcome
  - Consideration of any new or additional information provided by the complainant
  - Consultation with relevant personnel where necessary
  - Ensuring that procedural fairness, neutrality, and due process were upheld
- **Timeframe:**
  - Internal reviews should be completed within **10 business days** of receipt of the request.
  - If delays occur, the complainant will be notified with an explanation and anticipated timeframe.
- **Outcome:**
  - The outcome of the review will be provided to the complainant in writing.
  - Possible results may include upholding the original decision, overturning the decision, or recommending further investigation or corrective action.

The internal review decision is final within the organisation. If the complainant remains dissatisfied, they may proceed to **Stage 4 (External Escalation)** through an appropriate oversight or regulatory body.

All internal review activities will be documented and stored in accordance with NCQ's recordkeeping protocols.

Stage 4: External Escalation

Where a complainant remains dissatisfied after completing NCQ's internal complaint process, they have the right to escalate their complaint to an appropriate external authority. External escalation ensures that individuals can seek independent review and accountability when internal mechanisms do not resolve the issue to their satisfaction.

External Escalation include:

- **Referral to external bodies:**
  Complainants may choose to contact one or more of the following bodies, depending on the nature of the complaint:

Queensland Human Rights Commission (QHRC)	For complaints involving discrimination, human rights, or equal opportunity issues
Office of the Australian Information Commissioner (OAIC)	For privacy-related complaints
Office of Fair Trading, Queensland	For matters involving contractual, consumer, or organisational conduct
Australian Charities and Not-for-profits Commission (ACNC)	For concerns about governance, compliance, or accountability of registered charities

- **NCQ's role:**
  - NCQ will cooperate fully with any external investigation or inquiry, in accordance with its legal obligations.
  - Where required, NCQ will provide relevant documentation and evidence and respond to requests for information within reasonable timeframes.
- **Communication to complainant:**
  - Complainants will be informed of their right to escalate the matter externally if they remain dissatisfied.

- NCQ may also assist in directing individuals to the appropriate agency, but does not advocate on behalf of complainants in external forums.

Once a matter has been referred to an external body, NCQ will cease internal handling of the complaint unless otherwise directed.

9. Confidentiality and Privacy

NCQ is committed to protecting the confidentiality and privacy of all individuals involved in the feedback and complaints process. All personal and sensitive information will be managed in accordance with the *Privacy Act 1988 (Cth)* and other applicable data protection laws.

Key commitments include:

Limited disclosure	Information related to a complaint or concern will only be shared with those directly involved in managing, investigating, or resolving the matter. Disclosure will be strictly limited to what is necessary to perform these functions.
Secure recordkeeping	All records relating to feedback and complaints will be stored securely in NCQ's record management systems, with access restricted to authorised personnel only.
Anonymity and confidentiality	Where requested, NCQ will take reasonable steps to protect the identity of the complainant, noting that full anonymity may limit the organisation's ability to respond effectively. Confidential complaints will be handled discreetly, and identities will not be disclosed without consent unless required by law.
Legislative compliance	NCQ will comply with all legal obligations relating to privacy, including the handling, storage, access, correction, and destruction of personal information.

Breaches of confidentiality by staff or representatives may result in disciplinary action in accordance with NCQ's Code of Conduct and internal procedures.

10. Recordkeeping

NCQ maintains a robust approach to recordkeeping in relation to all feedback, concerns, and complaints. Accurate and secure documentation ensures transparency, supports accountability, and enables continuous improvement.

We maintain appropriate recordkeeping practices to ensure transparency, accountability, and compliance with legal and organisational requirements. All records relating to complaints, concerns, and feedback, including submissions, correspondence, investigation notes, outcomes, and actions taken are securely

stored in NCQ's approved record management systems, with access restricted to authorised personnel only. NCQ uses internal registers to monitor complaints from receipt through to resolution, ensuring consistency, timeliness, and appropriate escalation.. Emerging themes and lessons learned will be regularly reviewed to inform governance and strengthen service quality.

Records will be retained in accordance with applicable legal, contractual, and organisational obligations, and securely archived or destroyed once the retention period has lapsed. Failure to meet recordkeeping responsibilities may result in corrective action in line with NCQ's internal procedures.

10.1. Monitoring, Reporting and Continuous Improvement

NCQ is committed to using feedback and complaints data to strengthen organisational performance, support governance oversight, and drive continuous improvement as per our Quality Management standards.

De-identified summaries of complaints are reported regularly to the CEO and Board, highlighting volumes, resolution timeframes, emerging themes, and systemic issues. Data is analysed to identify trends, risks, and opportunities to inform policy, service design, and operational reviews.

Insights are also integrated into NCQ's Quality Management System to guide updates to procedures, training, and stakeholder engagement. An annual review of the complaints process is undertaken to assess its effectiveness and alignment with relevant legal and regulatory standards, ensuring NCQ remains responsive, accountable, and committed to service excellence.

11. Unreasonable or Vexatious Complaints

While NCQ is committed to responding to all complaints with fairness and respect, we also recognise the need to protect staff, resources, and the integrity of the complaints process from conduct that is unreasonable, persistent, or vexatious.

An unreasonable or vexatious complaint is one that, by its nature or frequency, places unreasonable demands on NCQ's staff or processes and does not contribute to a genuine or proportionate outcome.

Such complaints may include:

- Repeated complaints with no new information or basis for review
- Demands for disproportionate remedies or unrealistic outcomes
- Aggressive, abusive, or threatening language or behaviour
- Excessive contact or harassment of staff
- Refusal to accept evidence-based decisions or pursue internal/external resolution avenues in good faith
- Deliberate misrepresentation of facts or submission of false information

The classification of a complaint as unreasonable or vexatious will be made with caution, fairness, and clear documentation, following review by the CEO or the Board.

11.1. Management of Unreasonable or Vexatious Complaints

To protect staff and ensure a fair but efficient process, NCQ may implement appropriate strategies to manage unreasonable or vexatious complaints. These may include:

- **Communication limits -** Restricting the method, frequency, or personnel involved in ongoing communication with the complainant
- **Referral closure -** Advising the complainant that no further correspondence will be entered into unless new, relevant information is provided
- **Documentation and oversight -** Maintaining detailed records of all interactions and decisions relating to the classification and management of the complaint
- **Staff support -** Providing guidance, debriefing, and managerial oversight to staff managing such matters

Where applicable, NCQ reserves the right to escalate the matter to legal or regulatory bodies if the behaviour poses a risk to staff safety or breaches lawful boundaries.

These measures ensure that NCQ continues to provide a fair, transparent, and respectful complaints process while safeguarding the wellbeing of its workforce and the effectiveness of its operations.

12. Training and Awareness

NCQ recognises that effective feedback and complaints handling requires a workforce that is knowledgeable, confident, and equipped to respond appropriately. To uphold the standards outlined in this policy, NCQ will ensure that all relevant personnel receive appropriate training and ongoing support.

NCQ will periodically review training content to ensure it remains fit for purpose, aligned with policy expectations, and responsive to identified gaps or risks.

13. Review processes

Policy review frequency: Every 3 years	**Responsibility for review:** CEO and Operations Lead
Review process: Policies will be ratified at Governance Working Group	
Documentation and communication: • The revised policy document shall be uploaded to the organisation's SharePoint system. • Superseded versions shall be archived in accordance with NCQ's document control procedures.	