



# Complaints Handling Policy

## Qantas Cabin Crew Team Limited (ACN 664 428 997)

**Effective Date: 25 June 2023**

In this Policy, 'us' 'we' 'our' or 'QCCT' means Qantas Cabin Crew Team Limited (ACN 664 428 997) and its wholly owned subsidiaries from time to time, if any.

### 1. Statement of Purpose

- 1.1 QCCT is committed to the timely, impartial and effective resolution of Complaints. It is the responsibility of Personnel and the Board to ensure that anyone wishing to make a Complaint about QCCT and/or its ways of working is able to do so in an accessible and safe way.
- 1.2 This Policy applies to:
  - (a) all Personnel; and
  - (b) Partner organisations.

### 2. Key Principles

- 2.1 Increasing our transparency and accountability to individuals, communities and partners for and with whom we work is important to us. Recognising the importance of Complaints and the opportunity to review and learn from previous Complaints is an important mechanism to increase accountability between all stakeholders and QCCT representatives.
- 2.2 This Policy and procedure aims to ensure that:
  - (a) Complainants will be treated with respect at all times.
  - (b) Personnel receiving Complaints will listen, accept the Complaint and be courteous and committed to solving the Complaint.
  - (c) Formal Complaints will be acknowledged within 5 working days of receiving them.
  - (d) Donors and sponsors are provided with the highest possible customer service.
  - (e) Feedback from Complaints is included in the organisations' learning and processes.
  - (f) Complaints can be made quickly and easily by all, by providing access to the Complaints mechanism on our website.

### 3. Definitions



In this Policy, unless the context clearly indicates otherwise:

**ACFID** means Australian Council for International Development.

**Administration Manager** means the person appointed to the QCCT Executive Committee with the responsibility for all of QCCT's administrative matters.

**Board** means the board of directors.

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**Chairperson** means the chair of the Board and the QCCT Executive Committee.

**Complaint** means any reference to the term 'Complaint' is taken to mean an expression of dissatisfaction about the standard of service, actions or lack of action by a direct representative of QCCT or some practice, process or procedure employed by QCCT itself.

**Complainant** means any reference to the term 'Complainant' is taken to mean a person, organisation or its representative, making a Complaint.

**Finance Manager** means the person appointed to the QCCT Executive Committee with the responsibility for QCCT's finance and treasury functions.

**Personnel** means all of our directors, officers, employees, agents, sub-contractors, volunteers, interns and participants (whether permanent, fixed-term or temporary), both in Australia and internationally.

**Project Manager** is the person appointed to manage QCCT's projects in any specific country.

**QCCT Executive Committee** means the executive committee of QCCT appointed from time to time, and includes (but is not limited to) the Chairperson, the Finance Manager and the Administration Manager.

**Whistleblowing** means the disclosure by or for a witness, of actual or suspected serious misconduct in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.

**Whistle Blower** means a person who reports serious misconduct in accordance with this Policy.

#### 4. Informal Complaints

Informal Complaints can be solved quickly and effectively via an immediate apology or explanation. Where an informal Complaint resolution is not satisfactory, Complainants are encouraged to pursue the below Complaint handling procedure for an effective remedy to their Complaint.

#### 5. Complaint handling mechanism

##### 5.1 Receiving Complaints

- (a) Complaints can be made via any of the following:
  - (i) telephone;
  - (ii) email;
  - (iii) online enquiry using the contact details on our website;
  - (iv) in person; or
  - (v) in writing.
- (b) Complaints can be made by a friend or representative of the Complainant on their behalf if duly authorised by the Complainant. Anonymous Complaints will also be accepted however the ability of QCCT to investigate and resolve such Complaints may be limited.
- (c) All Personnel are empowered to deal with Complaints upon their receipt. If an immediate resolution is not met upon initial point of contact with the Complainant, QCCT will ensure

that an official receipt of the Complaint is acknowledged in writing to the Complainant and to the Chairperson within 5 working days with an appropriate time frame for action steps to be taken. The QCCT Executive Committee will be notified immediately when a Complaint is not resolved in the first instance.

## **5.2 Australian and International point of contact for Complaints**

- (a) Chairperson; and
- (b) Administration Manager.

## **5.3 Investigating Complaints**

- (a) Any Complaint that is not resolved in the first instance will be referred to the appropriate person for investigation as outlined below:
  - (i) A member of the QCCT Executive Committee will investigate any Complaints made against Personnel.
  - (ii) The Chairperson will investigate any Complaints made against any member of the QCCT Executive Committee, unless the Complaint is against the Chairperson, in which case an independent director of the Board will investigate the Complaint.
- (b) QCCT will make every reasonable effort to investigate all the relevant circumstances and information surrounding the Complaint. Investigation will occur through Personnel interviews, Complainant interviews, and any other available evidence of the Complaint. All investigations will be recorded and notes written.
- (c) Any Personnel with a Complaint against them will be assumed to be innocent until proven otherwise. No disciplinary action will be taken against any Personnel until the Complaint has been established as truth.
- (d) If there is an obvious or perceived bias or conflict of interest of the member of the QCCT Executive Committee investigating the Complaint, the Complaint will be passed to the Chairperson. Complainants have the option to escalate their Complaint if they feel that the Personnel handling their Complaint is not the appropriate person to do so.
- (e) If the Complaint at any level is deemed a serious breach of the law or involves criminal conduct, child protection issues, or sexual exploitation, abuse and harassment, the Chairperson and the Board will be informed and will immediately refer the matter to the relevant legal body, such as the Police.

## **5.4 Resolving Complaints**

- (a) Complaints upheld
  - (i) If the Complaint is deemed to be substantive following investigation by a member of the QCCT Executive Committee or Chairperson, the Complainant will be informed that their Complaint has been upheld and that a decision is pending.
  - (ii) A decision will be made through consultation with the Board as to how to resolve the Complaint. This will occur as soon as a board member meeting can be established with a quorum in attendance.
  - (iii) Once the Complaint has been resolved, the Complainant will be notified and informed of the action taken. In some instances however, it may not be appropriate

to inform the Complainant of the action taken for the sake of maintaining the privacy of other parties. In this case, the Complainant will be notified that the Complaint was received, investigated and the appropriate action taken.

- (iv) Where appropriate, QCCT may consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.
- (v) Where appropriate, QCCT may consider providing assistance to Complainants which might include referring the Complainant to external medical, social, legal and financial assistance organisations which may be of value to the Complainant.

(b) Complaint not upheld

If the Complaint is not upheld, the Complainant will be informed of this as well as their right to contact the Chairperson directly to discuss and review the decision.

(c) Disciplinary action

- (i) In accordance with its Code of Conduct and Control of Funds Policy, QCCT is firmly against any behaviour of Personnel that could potentially bring the organisation into disrepute and has established adequate systems to mitigate risks of wrongdoing or misconduct.
- (ii) QCCT however reserves the right to determine the disciplinary action to be taken in relation to Personnel who are found to have engaged in wrongdoing or misconduct, except where the wrongdoing or misconduct is a breach of law and punishable by the courts.

## 5.5 Learning from Complaints and records

A key part of the Complaint process is to identify any issues that need to be addressed so that similar Complaints do not arise. All Complaints will be kept on file in writing for a minimum of 5 years. A yearly review will take place to integrate lessons learned from all complaints received into our organisational learning and into strengthening this Policy and procedure.

## 5.6 Referring Complaints

Where Complaints do not fall within the scope of this Policy (for example they are Complaints against an employee of another organisation or strategic partner), a member of the QCCT Executive Committee will, as appropriate and with the express permission of the Complainant, refer the Complaint to the relevant organisation; in doing so the member of the QCCT Executive Committee will be guided by that organisation's complaints policy in terms of which individual to refer to.

## 5.7 Internal Complaints

- (a) All Personnel are encouraged to make Complaints or report misconduct they suspect or witness occurring within QCCT. Internal Complaints will be dealt with in the upmost confidence and Complainants will not be punished or adversely treated for making a Complaint against Personnel or organisational practices or procedures. Not only would such personal disadvantage be illegal it may directly oppose the values and mission of QCCT.
- (b) Where appropriate, QCCT encourages all Personnel to endeavour to resolve issues directly and informally through a process of discussion and conciliation. This process may involve seeking advice from others within the organisation such as a board member or a trusted

colleague. QCCT however strongly discourages behaviour which will escalate the issue such as gossiping about or ignoring the person concerned.

- (c) In the event that informal options of resolution have been exhausted or are not appropriate in the circumstances, QCCT encourages the submission of a formal Complaint using the same Complaints handling mechanism as outlined above.

## **5.8 Whistle Blower Complaints**

- (a) QCCT is committed to the highest standards of legal, ethical and moral behaviour. Any Whistle Blower who suspects misconduct by QCCT has an obligation to report this misconduct. QCCT understands that the person Whistleblowing should not be personally disadvantaged for reporting a wrongdoing. Not only may this misconduct be illegal, but it may directly oppose the values and mission of QCCT. QCCT is committed to maintaining an environment where legitimate concerns can be reported without fear of retaliatory action or retribution. When a Whistle Blower makes such a disclosure they are entitled to expect that:
  - (i) their identity remains confidential at all times to the extent permitted by law or is practical in the circumstances,
  - (ii) they will be protected from reprisal, harassment or victimisation for making the report,
  - (iii) should retaliation occur for having made the disclosure then QCCT will treat it as serious wrongdoing under this Policy.
- (b) A person considering making a whistle blower report is obliged to act in good faith and have reasonable grounds for believing the disclosure is reportable wrongdoing.
- (c) For the purposes of Whistleblowing, serious misconduct includes behaviour that:
  - (i) is fraudulent or corrupt;
  - (ii) is illegal;
  - (iii) is unethical, such as acting dishonestly; altering company records; wilfully making false entries in official records; engaging in questionable accounting practices; or wilfully breaching our Code of Conduct or the ACFID Code of Conduct;
  - (iv) is potentially damaging to QCCT, such as maladministration;
  - (v) is seriously harmful or potentially seriously harmful to Personnel, such as deliberate unsafe work practice or wilful disregard to the safety of others in the workplace;
  - (vi) may cause serious financial or non-financial loss to QCCT; or damage its reputation.

## **6. Confidentiality**

QCCT is committed to ensuring that all stakeholders feel free and safe to bring any Complaints to its attention (including internal Complaints, see above). For this reason, QCCT agrees not to reveal a Complainant's name or personal information to anyone in or outside of our organisation, other than to Personnel directly involved in handling the Complaint, without first obtaining the Complainant's consent.

## **7. Documenting Complaints**

QCCT will keep a record of all and any misconduct Complaints received by the organisation, and, where requested by the Complainant, will make this record anonymous without so that the Complainant's identify could not be found from this record.

## **8. Dissatisfaction with resolution**

If you do not consider our response to your Complaint satisfactory or you consider a breach of the ACFID Code of Conduct has occurred, you may contact the ACFID Code of Conduct Committee at its website [www.acfid.asn.au](http://www.acfid.asn.au) or by telephone on (02) 6285 1816.

## **9. Education and implementation of this Policy**

**9.1** This Policy has been distributed to all Personnel, who may from time to time act on behalf of QCCT.

**9.2** In addition, all board members and relevant personnel are trained in the aspects of this Policy and its implementation during their initial induction to QCCT.

## **10. Access to this Policy**

**10.1** It is important to QCCT that the complaints handling process is available to all of its stakeholders including beneficiaries of our programs, donors and supporters. QCCT therefore endeavours to ensure that access to this Policy is made as easy as possible.

**10.2** This Policy is available for download from our website.

**10.3** It is the responsibility of QCCT Project Managers and the QCCT Executive Committee to ensure that all relevant stakeholders regardless of location are informed of the existence and implementation of this Policy in any way they consider to be culturally appropriate.

## **11. Policy review**

**11.1** This Policy may be amended at any time by the Board in its absolute discretion.

**11.2** It is intended this Policy may be reviewed on an annual basis.

**11.3** Review will include collection of paperwork to audit this process and ensure it is operating effectively.