



Australian Government

**NAIF**

Northern Australia Infrastructure Facility

# External Complaint Handling Policy

SEPTEMBER 2024

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## Document purpose

The External Complaint Handling Policy (Policy) outlines Northern Australia Infrastructure Facility’s (NAIF) approach to the submission and management of external complaints received by the organisation.

## 1. Scope of this Policy

This policy applies to all external complaints received by NAIF from customers, clients, suppliers, and other stakeholders. It covers complaints related to:

- products and services provided by NAIF;
- interactions with NAIF employees or representatives;
- NAIF policies and procedures; and
- any other issues where an external party feels aggrieved by NAIF's actions or omissions.

NAIF Board Members, employees and extends to contractors and consultants (for the purpose of this Policy, 'employees' includes each of these categories) are required to comply with this policy.

NAIF can only respond to complaints that are within the scope of NAIF and meet the requirements of this policy. General queries about NAIF and feedback do not fall within the scope of this policy.

## 2. Policy Statement

NAIF is committed to delivering high-quality service that responds to our stakeholders' needs. NAIF values the benefits of effective feedback, both positive and negative, about our service and engagement. Effective complaint management is about accountability, responsiveness, and business improvement, and it is an important part of meeting our stakeholders' expectations.

This policy outlines NAIF's approach to handling external complaints to ensure they are addressed fairly, promptly and effectively.

A complaint can be submitted by any client, group, community, or entity concerned about, affected, or potentially affected by NAIF's activities.

## 3. Principles

### 3.1. NAIF's approach to complaints

This policy aligns with the Commonwealth Ombudsman Better Practice Complaint Handling Guide (Guide).

NAIF will take all reasonable steps to ensure:

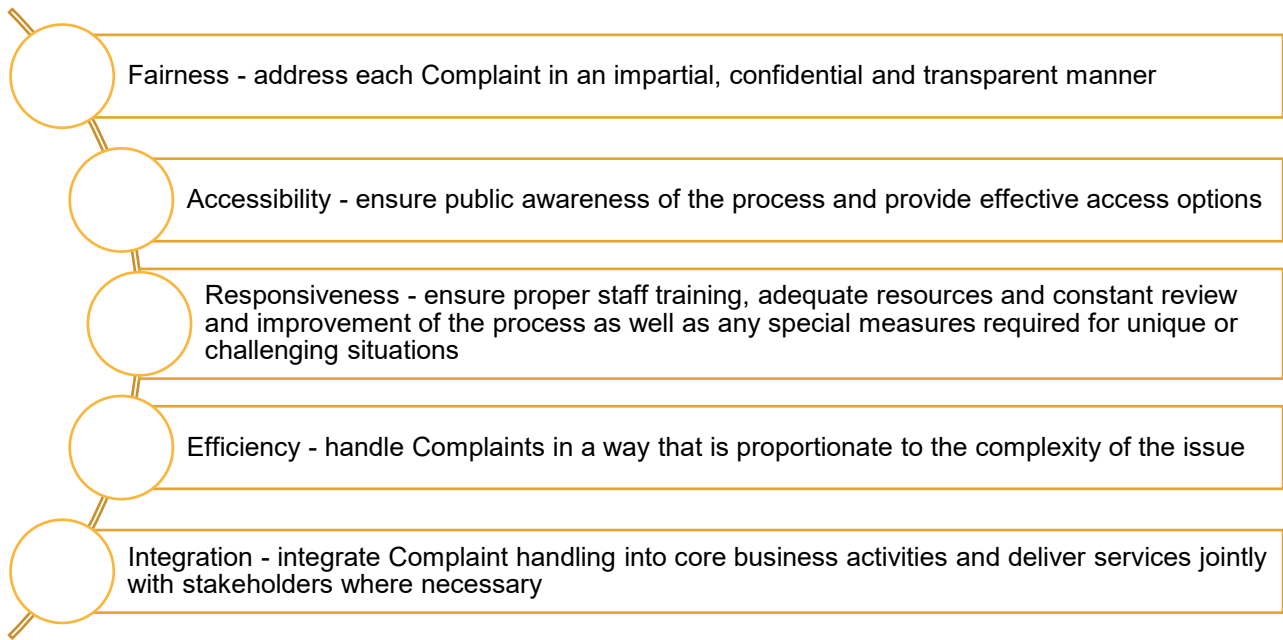
- that complaints follow the structured process outlined in the Complaints Procedure; and
- Complainants are not adversely affected by the complaint handling process.

The Guide defines a complaint as an *implied or express statement of dissatisfaction where a response is sought, reasonable to expect or legally required*.<sup>1</sup>

NAIF adheres to the five key principles for effective complaint handling outlined in the Guide.

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<sup>1</sup> [Part 2 - What is a complaint - Commonwealth Ombudsman](#).



This Policy sets out how NAIF applies these principles in its Complaint handling process.

### 3.2. How to submit a complaint and what to include

A complaint can be submitted in post or via email. Complaints on NAIF’s social media accounts are referred to the NAIF complaints inbox.

Post	Email
<b>NAIF Complaints</b> PO Box 4896 Cairns, QLD 4870	<a href="mailto:complaint@naif.gov.au">complaint@naif.gov.au</a>

A complaint must include:

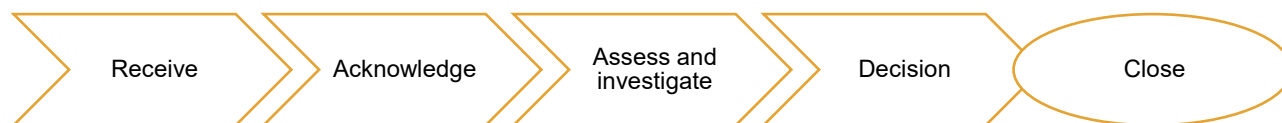
- contact information. Complaints provided without contact information will be treated as feedback only; if representing another party, that party’s contact information;
- an outline (within 500 words) of the complaint and any previous efforts made to resolve the matter; and
- the desired outcome or result of the complaint.

Complainants may request to remain anonymous. NAIF will protect the identity of complainants and will endeavour to address specific concern within the bounds of this request. Where this is not achievable, NAIF will advise the complainant.

### 3.3. Management of complaints

Complaints are managed via the Complaint Management Procedure.

There are five stages in the lifecycle of a complaint, receive, acknowledge, assess and investigate, decide and close.



When we receive your complaint, we:

- acknowledge we have received your complaint within three business days;
- forward it to the relevant area who will investigate and keep you informed;
- resolve issues within 20 business days (where possible);
- final drafting of the response will be completed by the Complaint Manager; and
- at the end of the process, you will receive the decision in writing.

NAIF may be required to extend response dates if further information is required or received from the complainant in order to adequately progress or resolve the initial complaint.

### 3.4. Types of Complaints

Some common complaints may include:

- services - accessibility of services, quality of services, treatment by staff;
- actions or decisions – incorrect or unfair, reasons not properly explained.
- inaction or delay – Nil response, delay providing services, inaction or delays not explained; or
- Policy or procedures – disagreement, not properly explained.

### 3.5. Confidentiality

While NAIF aims to be as transparent as possible, NAIF is bound by the Privacy Act and is legally required to maintain confidentiality.

### 3.6. Review of Complaints

We are committed to ensuring all complaints received are taken seriously and handled efficiently, fairly and confidentially. We endeavour to provide clear and informative responses to complaints. If you are dissatisfied with the response, independent external review and mediation options may be available depending upon the nature of the complaint.

If you remain dissatisfied with the outcome of your complaint, you can contact:

- the Commonwealth Ombudsman for actions relating to a matter of administration;
- Federal Court (Administrative Decisions Judicial Review) for administrative decisions made under Commonwealth legislation; or
- Australian Human Rights Commission for administrative decisions in relation to discrimination, bullying and/or harassment.

## 4. Reporting

All employees are required to use the Risk and Compliance system to report any incidents or near misses. This includes, but is not limited to, situations where you become aware of mishandling of complaints (whether intentional or unintentional). Employees are encouraged to refer to the incident guideline on NAIF Connect or contact the Risk and Compliance team for any queries or concerns related to reporting procedures.

## 5. Consequences of non-compliance

Deliberate breaches of this Policy may have serious consequences in accordance with the Code of Conduct, which could result in termination of employment or other engagement at NAIF.

## 6. Roles and Responsibilities

Role	Responsibility
<b>Board</b>	<ul style="list-style-type: none"> <li>• Approving material policy changes and any proposed changes after a review and recommendation by the Policy Sponsor.</li> <li>• Tasking management with policy implementation, exception reporting, and for developing procedures to support the Policy.</li> <li>• Complying with the requirements of this Policy.</li> <li>• Authorising the response to complaints involving the CEO.</li> </ul>
<b>Chief Executive Officer (CEO)</b>	<ul style="list-style-type: none"> <li>• Approving immaterial policy and any proposed changes after a review and recommendation by the Policy Sponsor.</li> <li>• Overseeing the implementation of the Policy.</li> <li>• Authorise the response to complaints unless the complaint includes the CEO.</li> <li>• NAIF's Complaint Manager with access to the <a href="mailto:complaint@naif.gov.au">complaint@naif.gov.au</a> mailbox (may be delegated to another member of staff as required).</li> <li>• Complying with the requirements of this Policy.</li> </ul>
<b>Company Secretary</b>	<ul style="list-style-type: none"> <li>• Authorise the response to complaints involving both the CEO and Board.</li> </ul>
<b>Chief Operating Officer</b>	<ul style="list-style-type: none"> <li>• Implementing this policy at NAIF.</li> <li>• Reviewing the Policy each calendar year.</li> <li>• Complaint Manager with access to the <a href="mailto:complaint@naif.gov.au">complaint@naif.gov.au</a> mailbox (may be delegated to another member of staff as required).</li> </ul>
<b>Director, Risk and Compliance</b>	<ul style="list-style-type: none"> <li>• Ensure all employees are aware of this policy and understand their responsibilities</li> <li>• Providing training to NAIF Board Members, employees, and contractors on this policy.</li> </ul>
<b>Employees, contractors, and consultants</b>	<ul style="list-style-type: none"> <li>• Complying with the requirements of this Policy.</li> </ul>

## 7. Review and Approval

The Chief Executive Officer approves the Policy every two years.

The Policy is reviewed annually (or more frequently if required) by the Policy Sponsor to ensure it remains aligned with legislation and good practice. If any material amendments occur to the Policy out of the review cycle, it is provided to the NAIF Board for approval.

### Document Review and Approval

Policy Sponsor	Policy Approver	Approval Date	Next Review
Chief Operating Officer	Chief Executive Officer	September 2024	September 2026

### Related Documentation

- Compliance Management Framework
- Privacy Policy
- Public Interest Disclosure Policy
- Records and Information Management Policy
- Freedom of Information Policy
- Confidentiality Policy
- Commonwealth Ombudsman Statement of Expectations



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