

COMPLAINTS POLICY

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1. RATIONALE

“Hear counsel, receive instruction, and accept correction, that you may be wise in the time to come.” Proverbs 19: 20 AMP

At ALWS we strive to improve to enable us to best serve people, communities and supporters by encouraging feedback and through continual learning and reflection. We are committed to providing high-quality humanitarian, development and advocacy programs and to working in an open and accountable way. In an effort to achieve high quality, we strive to meet the expectations of our own organisation (Board, employees, volunteers and contractors), partners, local communities, donors, supporters and the wider public. We acknowledge that there may be situations when we do not meet our own standards and policies, which has an impact on these groups. In these circumstances they have a right to complain and have those complaints taken seriously, and addressed in a professional and timely manner.

We also recognise that we have a responsibility to work with our overseas partners to ensure they also develop safe and effective complaints mechanisms that are accessible to all women, men, boys and girls, as well as vulnerable groups, with whom we work. Communities should be informed of their rights and entitlements and about how to make a complaint.

1.1 Guiding principles

The following principles guide our Complaints Policy and its implementation:

Visibility: We will clearly publicise information about how and where to complain.

Accessibility: We will ensure that our complaint handling process is as accessible as we can practically make it to all complainants.

Responsiveness: We will respond to complaints in a timely and efficient manner.

Objectivity: We will address all complaints in an equitable, fair and unbiased manner using evidence obtained through the complaint handling process. The person handling the complaint is different from any staff member/s whose conduct or service is being complained about. Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, if an internal review of how a complaint was managed is required, this will be conducted by a person other than the person who handled the complaint.

Provision of a safe environment: We seek to provide a safe environment through which to voice a concern, without fear of reprisal or unfair treatment. We are committed to ensuring that all Board members, staff and volunteers, as well as external stakeholders should be able to raise reasonable concerns:

- Without any risk of losing their employment or entitlements or suffering any form of retribution in the workplace or outside;
- Understanding that if the complaint is not upheld following an investigation, no action will be taken against the complainant if the complaint was made in good faith;

- Knowing that harassment or victimisation will not arise from raising a genuine concern or cooperating with an investigation - and if it does, to know that ALWS will deal with it as a disciplinary action under the appropriate procedure.

Confidentiality: We are committed to ensuring that all information related to complaints and their resolution will remain confidential. The privacy of individuals will be maintained and personal information will not be divulged in accordance with the relevant privacy laws and confidentiality obligations.

Person-centred approach: The interests of primary stakeholders, partners and other stakeholders are foremost in our approach to complaints handling. We will take into account cultural and gender sensitivities to ensure complaints are handled appropriately.

Accountability: We encourage feedback from those we serve. We will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.

Continual improvement: Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives.

Charges: Access to the complaint handling process is free of charge to complainants.

2. DEFINITIONS

A **complaint** as a formal expression of dissatisfaction or discontent, about the standard /quality, processes, decisions, actions or lack of actions by ALWS, its Board Directors, employees, volunteers and contractors, where a response or resolution is explicitly or implicitly expected or legally required. It is mandatory to report any communication regarding sexual assault or criminal activity as a complaint.

The subject matter of complaints can include:

- Exploitation or abuse of children, vulnerable adults or any other person;
- Misuse of funds or fraudulent acts;
- Misconduct (including sexual exploitation, abuse, harassment and bullying) by an individual involved in the work of ALWS, including employees, volunteers and contractors of ALWS;
- A grievance one person may have against another (e.g. because of inappropriate, but not illegal, behaviour);
- Infringements of privacy;
- Concerns about funding or programming decisions - geographic and sectoral priorities, strategic approaches, focus groups, choice of partners;
- Concerns about program implementation - adherence to programmatic policies and procedures;
- Concerns about responses to emergencies and the provision of humanitarian responses;
- Any breach of the *ACFID Code of Conduct*.

ALWS will not respond in the following situations:

- Where a complaint is deemed by the Complaints Manager to be offensive or abusive. However, the Complaints Manager has the discretion to contact the complainant and advise that no action will be taken unless the complaint is resubmitted in a more civil tone and speaks solely to the issues.
- When a complaint has been sent as part of a bulk mail or email to multiple organisations. However, the Complaints Manager has the discretion to contact the complainant and advise that no action will be taken unless the complaint is resubmitted specifically to ALWS.

A **complainant** is a person or an organisation or its representative, making a complaint.

The **Complaints Manager** is the ALWS employee identified as the point of contact for any complaint received externally. Currently the Complaint Manager is attached to the role of the Deputy Executive Director.

Feedback includes compliments, opinions, comments – positive or negative, expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about employees,

volunteers, contractors, programs or the complaint handling process where a response is not explicitly or implicitly expected or legally required.

A complaint is different from feedback or enquiries, and is usually more formal and requires a response or resolution for the complainant.

Sometimes, feedback (especially negative comments) received through the feedback channel is in fact a complaint because the nature of the feedback implicitly or explicitly expects a response, other than the provision of information. In such cases, feedback received should be forwarded to the Complaints Manager.

ALWS values feedback and the channel for giving and receiving feedback is detailed in Section 7 below.

Subject of the complaint is the individual or organisation about whom a complaint is made.

3. SCOPE OF THE POLICY

This policy applies to all ALWS personnel defined here to include: Board members, employees, volunteers, contractors, employees, supporters/donors, or anyone else acting on our behalf.

This policy applies to complaints about any aspect of ALWS and its work received from any individual or agency, external to ALWS, including primary stakeholders, partners, supporters/donors and the general public.

4. GOAL

To provide a safe, fair, responsive, accessible and transparent environment in which complaints can be made, addressed in a professional and effective process, and resolved appropriately.

5. EDUCATING OURSELVES ON OUR POLICY AND TRAINING ON POLICY IMPLEMENTATION

Our *Complaints Policy* has been distributed to Board members, our employees, our volunteers, our partners, our contracted service providers and any others acting on our behalf. We ensure familiarisation with the policy through our induction programs and refresher training. Employees directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. We take special care to train our personnel who visit our overseas partners to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

We support our overseas partners to understand the *ALWS Complaints Policy*.

6. COMMUNICATING THE POLICY

We make clear the value we place on receiving concerns and complaints in relevant communications. Our website About Us page contains a Complaints tab which links to our Complaints Policy and information on how to make a complaint.

We ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can. Relevant communications (website, partnership agreements, policies) explain this and our procedures for handling complaints.

7. GIVING AND RECEIVING FEEDBACK

We recognise the value of feedback and are committed to receiving input and feedback (compliments, opinions, comments, requests for further information, suggestions about any aspect of ALWS as an organisation and our operations) from stakeholders and responding to it as required. We distinguish feedback from complaints as in the definitions above, but recognise that there is often a fine line between critical feedback and a complaint.

Feedback from stakeholders can be given in the following ways:

- To give verbal feedback, stakeholders call 1300 763 407, and the feedback will be listened to and a written record made to document the receipt of feedback and in case a response is required.

- To give written feedback, stakeholders complete the Contact Us fields on the Web-site and submit or send written feedback in an email to alws@alws.org.au .

The ALWS employee receiving verbal feedback will record the following details and email them to the relevant manager:

- The name of the person giving feedback
- The date and time the feedback is received
- A brief description of the feedback and the expectations of the person giving the feedback.

The ALWS employee receiving verbal feedback should also inform the person giving feedback that any personal information will be handled in accordance with the ALWS *Privacy Policy* that can be found on the ALWS website.

The ALWS employee receiving feedback through the Contact Us fields or by email will forward the feedback to the relevant manager.

If the nature of the feedback requires a response, other than the provision of information, it will be deemed a complaint and forwarded to the Complaints Manager who will respond accordingly.

8. MAKING A COMPLAINT

We are able to receive complaints orally, in person or by telephone, and in writing by post or email. Where complaints are made orally, we will ensure our write up of the complaint contains all the information the complainant wishes to provide. The person receiving the complaint will ask the complainant if s/he wishes to make an official complaint. If they do not wish to lodge an official complaint, the communication is regarded as 'feedback'.

Complaints may be made by a friend or advocate of the complainant on their behalf.

In countries where we work, complaints can be made through our partners. We work with them to ensure that accessible ways to make complaints are handled in line with our policies and in ways that are appropriate to those countries. We will continue to work with our partners on effective primary stakeholder feedback mechanisms that meet the obligations of both the partners and ALWS. These processes are covered by the Partnership Agreements (see Section 10 below).

We recognise that, at times, people who have genuine concerns can't speak out because of special circumstances and may wish to lodge a complaint to a specific person without revealing their identity in the normal manner. In such circumstances, the ALWS Complaints Manager can initiate an investigation if it is evident that there are grounds for further action and in an effort to ensure a safe and abuse-free environment. Anonymous complaints can alert us to matters that may need to be investigated, even though we would not be able to respond directly to the anonymous complainant.

Complaints can be made through the following channels:

Phone: 1300 763 407 from within Australia or +61 2 6021 5329 from overseas and ask to speak to the Complaints Manager.

Email: written complaints can be sent by email to complaints@alws.org.au

Post: written complaints can be sent by post to the Complaints Manager, ALWS, PO Box 488, Albury NSW 2640 Australia.

In person: Complaints can be made in person at the ALWS Office, 10 Somerset Drive, Albury, NSW 2640, Australia. In addition, where a complaint cannot be made by phone, email or post, it may be made directly and confidentially to an ALWS employee (for example an employee visiting a community) who will document the details and forward the complaint immediately to the Complaints Manager (see Appendix 1 for the form to be used).

If the complainant believes ALWS has breached the *ACFID Code of Conduct*, a complaint may be made to the ACFID Code of Conduct Committee (<https://acfid.asn.au/content/complaints>). ALWS can provide information to the complainant for referral to the ACFID Code of Conduct Committee and offer assistance as appropriate.

ALWS will work with partners and local communities (where possible) to establish the most cost-effective and efficient means for them to lodge complaints against ALWS and/or its staff. This will

endeavour to take account of factors such as language and literacy constraints, means of communication available, age, gender and other vulnerabilities such as disability.

9. COMPLAINTS HANDLING PROCESS

9.1 How we will handle complaints

When we take an oral complaint, either over the phone or in person we will:

- Identify ourselves, listen, record details, and determine what the complainant wants;
- Confirm that we have understood and received the details;
- Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive.

For each complaint received we will:

- seek from the complainant the outcome/s they are expecting;
- make an initial assessment of the severity of the complaint and the urgency for action;
- acknowledge receipt of the complaint and clearly inform the complainant the course of action that will follow:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given; or
 - if the complaint is to be investigated.
- not create false expectations, but assure the complainant that the complaint will receive full attention;
- give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
- check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives;
- ensure that the complaint is appropriately acknowledged;
- follow up where necessary, and monitor whether the client is satisfied;
- make a record in the Complaints Register see 8.8 below.

We will work with our partners to ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural, gender and disability sensitivities, and to ensure that cases involving children are handled appropriately.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint. If the complaint is about the Complaints Manager, the complainant will express their complaint to the Executive Director. If the complaint is about the Executive Director, the Complaints Manager will inform the Board Chairperson in writing. If the complaint is against the Chairperson or a Board member, the Executive Director and either the Chairperson or Vice-Chairperson (depending on who is the subject of complaint) will inform the Chair of the General Church Board (GCB) and/or relevant District Church Board (DCB) about the complaint and agree whether or not a nominee of the GCB (if the complaint is about the Chairperson) or DCB (if against a District Director) should be included on the Complaints Committee. The complain process shall be confidential.

9.2 Making an initial assessment

The Complaints Manager will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed. To determine how a complaint should be managed, we will assess it in terms of the following criteria:

Operational - complaints questioning or objecting to issues such as ALWS' geographic and sectoral priorities, strategic approaches, focus groups, choice of partners and adherence to programmatic policies and procedures or

Sensitive- complaints including but not limited to allegations of harassment or bullying, sexual exploitation and abuse, fraud and corruption or other forms of gross misconduct.

The Complaints Manager will immediately escalate sensitive complaints to the Executive Director or her delegate. The Board Chair will be notified of all sensitive complaints. The Executive Director, in consultation with the Board Chairperson if necessary, will determine if the investigation should be conducted externally.

9.3 How we will investigate complaints

On receipt of a complaint we will attempt to determine expeditiously whether an investigation is required or not, and if so, whether it can be handled internally or requires involvement of an external party. This will depend on a range of factors including the nature of the complaint, jurisdictional questions and whether the complaint is ill-conceived.

If the complainant disputes an assessment that a complaint should not be investigated because it is frivolous or capricious, vexatious or relates to a matter outside the jurisdiction of ALWS, the Complaints Manager will refer it to the Executive Director for review. If such a dispute is unresolvable we will refer the complainant to ACFID Code of Conduct Committee.

To conduct an investigation, the Complaints Manager will make every reasonable effort to establish the facts, gather the relevant information and review the circumstances surrounding a complaint. The level and type of investigation will be commensurate with the seriousness and frequency of the complaint.

Once the investigation is completed, a recommended course of action will be made by the Complaints Manager to the Executive Director for approval.

If the outcome of the investigation is that there should be action taken in relation to an employee, then the appropriate disciplinary action, and other ALWS policies will be followed (e.g. *Child Safeguarding Policy*, *People & Culture Policy* in the case of a complaint about bullying, sexual harassment or discrimination.). ALWS strives to treat all those involved in the process with fairness, dignity and respect, assuming innocence and ensuring safety for all.

9.4 Timeframe for response

We will acknowledge written complaints within seven days. The subject of the complaint (if an individual) will also be advised that a complaint has been lodged against them.

We will acknowledge oral complaints immediately.

We will aim to resolve complaints as quickly as possible and within 30 days. We recognise that in some circumstances more time may be needed to adequately handle the complaint, particularly if the matter is an international one or requires an external investigation. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

9.5 How we will respond to and close a complaint

ALWS Executive Director or a senior manager delegated by her will normally make the decision on a complaint that has required investigation (i.e. not a minor complaint). The Executive Director may refer decisions on serious complaints to the ALWS Board.

We will communicate our decision on a complaint to the complainant, as well as the subject of the complaint (if an individual) as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language.

We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied, they have the option of submitting a formal appeal (see 9.6 below).

We will provide appropriate assistance and referral to the complainant and the respondent. We aim to enable all those involved in or affected by a complaint with a safe and dignified work environment, free of fear. In all cases we will advise that the complaint may be referred to the *ACFID Code of Conduct* Committee. We will provide all necessary information for referral to the Committee and offer to assist in referral.

We will prioritise safety, sensitivity and confidentiality in all steps of our response to complaints.

9.6 Appeal process

If the complainant(s) or subject of the complaint does not accept the outcome of the decision, he/she/they can appeal the decision. The ALWS Board Chair will establish an Appeals Committee, consisting of no more than two Board members, and at least one independent member appointed on the basis of the skills and experience required to adjudicate the matter under review.

If the subject of complaint is a Board member, the Executive Director and either the Chairperson or the Vice-Chairperson will inform the Chair of the Lutheran Church of Australia General Church Board (GCB) and/or the relevant District Church Council about the complaint and the appeal. They will appoint a nominee of the GCB or DCC to the Appeals Committee.

The Appeals Committee should convene the meeting within 14 days of the request for appeal and, where possible, complete the review within 30 days of the request for an appeal.

The Committee will submit its report and recommendation to the ALWS Board within the 30-day period. The Board will then make a decision regarding appropriate action within 14 days of receiving the report.

The decision taken by the ALWS Board will be communicated to the complainant and Subject of the Complaint in writing within 10 days.

9.7 Recording complaint data

The Complaints Manager will register all complaints in the confidential Complaints Register (see Appendix 2 for the template) which has been set up as a password protected confidential folder maintained in the ALWS Cloud. These include feedback received either orally in person or by phone, or through the Contact Us function on the website that has been forwarded to the Complaints Manager because it seems to require a response, and therefore is classified as a complaint.

The following information must be recorded in the Complaints Register. If written complaints received, do not contain information a-f, the Complaints Manager contacts the complainant in writing to request the missing information. In the case of oral complaints this information is recorded on behalf of the complainant. If a complaint is received anonymously and information is missing, it may not be possible to contact the complainant.

- a) Date of receipt of complaint
- b) Name of person who received the complaint in the first instance
- c) Personal details of the complainant
- d) Description of the complaint and relevant supporting information
- e) The requested remedy
- f) What is being complained about – service, goods, practice, policy, procedure etc.
- g) Due date for a response
- h) Action taken to resolve the complaint
- i) Outcome – outline of what has happened as a result of the complaint
- j) Follow-up action required – any action required as a result of the complaint e.g. changes to policies

10. OVERSEAS PARTNER ORGANISATIONS AND PRIMARY STAKEHOLDERS

ALWS will include in its Partnership Agreements a mutual recognition of each Partner's complaints policy and handling procedures and the articulation of any specific protocols that have been agreed in relation to how complaints will be managed. The Agreement will also outline how each Partner will inform staff, Board, volunteers, community members (primary stakeholders) and other stakeholders about the other's Complaints Policy and Procedures.

When requested, ALWS will provide advice to partners on complaints handling and/or refer queries beyond its scope to a technical expert within or outside ALWS networks.

11. LEARNING FROM COMPLAINTS AND CONTINUOUS IMPROVEMENT IN COMPLAINT MANAGEMENT

We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our operations, at all times and with our best endeavours, respecting the confidentiality of persons directly involved in complaints.

We will take all required remedial action. We will be prepared to change the way in which we operate – improving our systems, policies, procedures or organisational culture – and improve or undertake further training of employees. Where needed we will counsel employees or volunteers and where appropriate take disciplinary action.

Where appropriate, we will consult and take advice from ACFID and/or other relevant regulatory bodies, maintaining confidentiality and privacy requirements.

On a continuing basis we will monitor the effectiveness of our complaint handling and make improvements as appropriate. We will:

- maintain data collection on complaints for the purpose of identifying trends or upcoming issues;
- provide reports on complaints to the management team on a quarterly basis to identify trends or review issues and improve practice where necessary;
- report to the ALWS Board about complaints received and their resolution on an annual basis to inform policy decisions and improvements in management processes;
- keep abreast of best practices (both locally and overseas) regarding complaint handling;
- foster a person-centred approach;
- undertake specific training and retraining of staff to foster better complaint handling practices;
- encourage innovation in complaint handling development.

Complaints may also emerge from employee exit interviews and an analysis of employee turnover. In such cases, the Complaints Manager should be informed so that data can be included in the Complaints Register and be used as a tool for learning and continuous improvement.

The process of policy review, every three years, will include consideration of the effectiveness of our complaint handling.

12. RESPONSIBILITIES

All staff are responsible for participating in informational, awareness raising and training sessions about the policy

The ALWS Management Team is responsible for ensuring that ALWS responds to complaints according to the policy.

The Executive Director is responsible for approving the Complaints Manager's recommended course of action following an investigation.

The Board Chairperson is responsible for managing complaints about the Executive Director.

The Complaints Manager is a designated ALWS employee responsible for:

- receiving complaints and making an initial assessment of complaints and identifying those which can be dealt with informally and those which are clear, serious or complex complaints to be addressed according to the complaints handling procedure;
- ensuring complaints are appropriately referred, resolved and that follow-up actions have taken place;
- maintaining the secure complaints register;
- developing a synthesis report to the ALWS Board of the types of complaints received and the status of their resolution annually.

13. RELATED DOCUMENTS

Internal

Child Safeguarding Policy

Code of Conduct

People and Culture Policy

Complaints Record Form App.1

Complaints Register Template App 2

Privacy Policy

Fundraising and Communications Policy

Conflict of Interest Policy

Whistleblowing Policy

Policy on Prevention of Bullying and Sexual Harassment

External

ACFID Code of Conduct (Revised 1 January 2019) available at < <https://acfid.asn.au/code-of-conduct>>

ACFID Fundraising Charter (August 2018) available at <https://acfid.asn.au/sites/site.acfid/files/resource_document/The%20ACFID%20Fundraising%20Charter_Aug%202018.pdf>

Core Humanitarian Standard on Quality and Accountability (2014) available at <<https://corehumanitarianstandard.org/the-standard>>

ACFID Guidelines for the Development of a Complaints Policy Attachments A-E (October 2017) – useful guidance re best practice, available at <https://acfid.asn.au/sites/site.acfid/files/resource_document/Complaints-Handling-Policy-Guidelines-and-Template.pdf>

Privacy Act (1988) available at < <https://www.legislation.gov.au/Details/C2018C00456>>

LWF/DWS Complaints Mechanism Policy and Procedure (June 2010) available at <https://www.lutheranworld.org/sites/default/files/DWS-Complaints_Mechanism_Policy_0.pdf>

Complaints Policy for the Act Alliance (October 2016) available at <<https://actalliance.org/documents/act-alliance-complaints-handling-policy>>

14. REVIEW

This policy will be reviewed every three years, or earlier should organisational learning or sector best practice demand it.

14.1 Record of Policy Review and Version History

Version No.	Date Approved	Approved By	Description of Changes
1.0	15 May 2014	ALWS Board	
2.0	9 Feb 2018	ALWS Board	Section 5 Definition revised to include further explanation of the difference between a complaint and feedback. Appendix 3 Telephone Complaints Log has been added.
3.0	7 Mar 2019	ALWS Board	The structure and content of the Policy has been completely revised following the ACFID Guidelines for the Development of a Complaints Policy to ensure compliance with ACFID's Quality Principle 7 Commitment 7.3, indicators 7.3.3 and 7.3.5 (see < https://acfid.asn.au/content/commitment-73-we-are-accountable-our-stakeholders >)

Appendix 1: Confidential Complaints Record Form

This form is to be used by any employee or volunteer receiving a complaint in person or over the phone. It is particularly useful for anyone travelling to the field who may receive a complaint from a primary stakeholder or a partner's employee.

The employee receiving the complaint should forward the Form immediately to the Complaints Manager who will use the Form to record information in the Complaints Register and will file the Form accordingly.

Date complaint received.	
Name of person receiving the complaint.	
Personal details of the complainant. Name Contact Details. If the complainant wishes to remain anonymous do not record any details.	
Nature of complaint. What matter/issue/subject is the complaint related to?	
Details of the complaint. A detailed description of the complaint the person has made.	
Expectations of the complainant / the requested remedy Find out what outcomes the complainant is expecting in terms of the resolution or remedy for the complaint.	
Date forwarded to Complaints Manager.	

Appendix 2: Confidential Complaints Register Template

This template can be created in Excel if preferred and should be stored as the Complaints Register in a confidential password protected secure folder in the ALWS Cloud. If it is created in Excel, it can be in a landscape orientation with 10 columns. If in Word, each complaint will need a separate page or file.

Date of receipt of complaint	
Name of person receiving complaint in first instance	
Personal details of the complainant: name, address, email, phone numbers	
Description of the complaint and relevant supporting information	
The requested remedy	
What is being complained about : service, goods, policy, procedure, person etc.	
Due date for a response	
Action taken to resolve the complaint	
Outcome: outline of what has happened as a result of the complaint	
Follow-up action required – any action required as a result of the complaint e.g. changes to policy	