



NAATI COMPLAINTS POLICY

Background

1. NAATI's role as the national standards and accreditation body for translators and interpreters in Australia means that it receives feedback/complaints about its own performance and the performance of translators and interpreters. Both types of complaints are important and provide an important mechanism for review of internal policies and procedures. Management of complaints is therefore a core function of NAATI.
2. This Policy is intended to provide delegations and guide the way in which NAATI handles complaints made to it.

What is a complaint

3. For the purposes of this policy, a complaint is an reasonable expression of dissatisfaction that is made to NAATI relating to services or administrative procedures performed by NAATI Staff (including Contractors), or pertaining to an Accredited Translator or Interpreter, where a reasonable response or resolution is expected and appropriate. A complaint does not include a request for information (even if, as a subsidiary matter, some dissatisfaction with NAATI is also expressed). When a complaint relates to results of Accreditation Test or Assessment candidates will be referred to NAATI's process for requesting a review process.

Examples of matters that may be treated as a request for information rather than a complaint:

- Paid for product not yet received.
- Follow up of results where results not yet overdue.
- Name not in directory – but person did not pay for this service.
- Graduated from course but not accredited – did not apply.

Principles

4. In developing its complaints handling approach, NAATI has been guided by ISO/IEC 17024 Conformity assessment – General requirements for bodies operating certification of persons. Consistent with this, NAATI has adopted the following principles to guide its handling of complaints:
 - a. Accessibility: the process of making a complaint must be as easy as possible for complainants.
 - b. Confidentiality: NAATI will attempt to ensure that all information provided to NAATI in confidence will be kept confidential however please be aware that in managing complaint matters NAATI is required to provide a summary of the specific allegations to Respondents. Information provided will however only be shared on a confidential basis by those involved in the complaint process.
 - c. Fairness: a complaint must be fairly considered with due regard to the position of all involved in the matter.
 - d. Proportionate process: the complaint handling process must be appropriate to the context including the seriousness of the matter.
 - e. Responsiveness: the complainant must be kept informed of progress in relation to the complaint.

- f. Efficiency: the complaint must be resolved as efficiently and promptly as possible.
- g. Integration: the information and learnings from complaints must be integrated into NAATI's accreditation work.

Who may make a complaint and how

5. A complaint may be made to NAATI by:
 - a. an individual who has obtained, or is seeking to obtain, NAATI accreditation;
 - b. a client of a NAATI accredited person or third person acting on their behalf;
 - c. a Court, government department or other institution that has sought to rely upon the services of a NAATI accredited person; or
 - d. any other person.
6. Complaints should be directed to Manager Accreditation Operations, NAATI National Office can be sent via the following methods: Phone 1300 557 470 ; via the feedback form at www.naati.com.au; via email to info@naati.com.au or posted to PO Box 223 Deakin West ACT 2600.
7. A complaint must generally be made in writing. If, however, the complainant does not have the English language skills to make a complaint in writing, NAATI will assist the complainant with setting out the complaint in writing.
8. If a complaint is made with a request for confidentiality, NAATI will discuss with the complainant whether this constrains NAATI from investigating and resolving the complaint. Likewise, where a complaint does not provide sufficient information to enable NAATI to investigate and resolve the complaint, NAATI will discuss this with the complainant. These discussions provide the complainant with an opportunity to decide to provide NAATI with what is needed in order to progress the investigation.
9. If a complaint does not identify the name and contact details of the complainant, NAATI will not normally investigate the complaint unless special reasons exist (for example, the complaint raises very serious issues or NAATI has prior information that gives credence to the complaint).
10. If a complaint contains allegations based on hearsay, without additional evidence or specific information that may lead to the opportunity to gain supporting evidence NAATI will not normally investigate the complaint
11. Complaint Matters sent to the NAATI Board relating to matters of policy, operational or procedural issues will be referred back to NAATI National Office.

Preliminary assessment and acknowledgement

12. A complaint will be promptly assessed (generally within 5 business days) with a view to identifying:
 - a. whether NAATI is the appropriate organisation to handle the complaint or whether it should be referred elsewhere;
 - b. whether the complaint is about NAATI's performance or about the performance of a third party;
 - c. if about the performance of a third party, whether that person is accredited by NAATI;
 - d. the apparent seriousness of the issues; and
 - e. whether there is a need to gather information before responding to the complaint.
13. A complaint will be promptly acknowledged by email or letter (generally within 10 business days). A separate acknowledgement is not, however, required where NAATI makes a substantive response to the complaint within 10 business days.

Level 1 complaints

14. A Level 1 complaint is a complaint that can be resolved by reference to NAATI's own records and does not need any further investigation.

Level 1 complaint examples:

- Complaint about accreditation test costs.
- Complaint about NAATI implementation of policy re when fee refund requests must be refused.
- Complaint about NAATI's revalidation policy.
- Complaint about wait period for an accreditation test.
- Complaint about accreditation test standard conditions e.g. dictionary policy.
- Minor customer service-type complaint about NAATI e.g. delay in responding to email/ incorrect materials supplied.

15. It is expected that a Level 1 complaint will be resolved by succinct email or letter sent to the complainant within 10 business days of receipt of the complaint and so a separate acknowledgement of the complaint is not required.
16. A level one complaint may involve considering training needs for staff, contractors or volunteers.

Level 2 complaints

17. A Level 2 complaint requires some additional investigative steps by NAATI. These may include:
- a. revisiting of previous action taken by NAATI;
 - b. where the complaint is about an accredited person, informing that person about the complaint and seeking their response to the investigation;
 - c. assessing the conduct of an accredited person in light of the AUSIT or ASLIA Code of Ethics;
 - d. considering whether there is a need to make any changes to NAATI practices and procedures.

Level 2 complaint examples:

- Complaint about conduct of an approved course.
- Complaint about quality of service provided by a NAATI accredited person.
- Complaint about poor conduct by a NAATI accredited person.

18. It is expected that a Level 2 complaint will generally be resolved by written response to the complainant within four [4] months. To meet this timeframe and ensure the quality of the decision:
- a. NAATI will begin by working out what information is needed and how that information can best be obtained;
 - b. where information is sought from a third party, the request for information should specify a timeframe by which a reply is sought;
 - c. NAATI will promptly follow up any request to a third party for information where a response is not received within the requested timeframe; and
 - d. NAATI will tell the complainant if it realises that it might not be able to resolve the complaint within four [4] months and provide an estimate of when the complaint might be resolved.
19. If a Level 2 complaint suggests a systemic weakness in NAATI practices or procedures, the Chief Executive Officer must be informed and will be involved in the decision about what should be done to resolve that matter.
20. Where a Level 2 complaint implicates an accredited person, NAATI will:
- a. seek a response to the complaint from that person; and
 - b. write to that person to inform them of the outcome of the complaint.

Level 3 complaints

21. A Level 3 complaint is a complaint where:

- a. the issues are of such seriousness they warrant the involvement in the investigation of the Chief Executive Officer, Senior Manager of NAATI National Office; or
- b. requires the appointment of an external Investigator; or
- c. referral to an external agency such as Australian Federal Police, Department of Immigration or similar; or
- d. the complaint may result in disciplinary action such as suspension or revocation of Accreditation.

Level 3 complaint examples:

- Complaint alleging illegal conduct by a NAATI accredited person or multiple instances of unprofessional conduct.
- Complaint about significant misconduct by NAATI or its examiners or reviewers e.g. racial discrimination, significant conflict of interest.

22. A Level 3 complaint is expected to generally be resolved by written response to the complainant within six [6] months of receipt of the complaint. To meet this timeframe and ensure the quality of the decision:

- a. a written investigation plan will be prepared and progress against the plan monitored by the Chief Executive Officer or appropriate Manager;
- b. where information is sought from a third party, the request for information should specify a timeframe by which a reply is sought;
- c. NAATI will promptly follow up any request to a third party for information where a response is not received within the requested timeframe;
- d. where disciplinary proceedings are likely to be undertaken against an accredited person, procedural fairness must be accorded to that person (explanation of the concerns about their conduct, fair opportunity to answer those concerns);
- e. NAATI will inform the complainant if it appears as though the complaint may not be resolved within six [6] months and provide an estimate of when the complaint might be resolved.

23. Where the complaint implicates an accredited person, NAATI will:

- a. inform that person of the complaint and seek their response to it;
- b. inform them of possible disciplinary action that may result from their failure to participate in the investigation process or from the investigation if the allegations are found to be substantiated; and
- c. write to that person at the conclusion of the investigation to inform them of the outcome of the complaint.

Outcome of Complaint Process:

24. If the complainant expresses dissatisfaction with NAATI's response to a complaint, they should put their objections in writing outlining any supporting evidence that may not have already been considered. Please note that if there is no new information available and all relevant information has been considered an appeal may not be considered. These requests for further consideration should be addressed to the NAATI staff member who provided the response to the complaint.

Register of Complaints

25. NAATI will log all complaints received by it in its Complaints Register. The Register will include:

- a. the date of receipt of the complaint;
- b. a short summary of the complaint issues;

- c. person or entity being complained about (e.g. an accredited person or NAATI);
 - d. the level of complaint (Level 1, 2 or 3);
 - e. the date of acknowledgement of the complaint;
 - f. the date of response to the complaint and a short summary of the nature of the response; and
 - g. whether any change to NAATI practices and procedures are proposed in response to the complaint (systemic response).
26. Where a complaint is made about a person whose name is included in NAATI's System for Accreditation Management, the system will be used to note the complaint so that cross reference can be made to the Complaints Register to see the nature and result of the complaint so that this can be taken into account in NAATI's accreditation work.

Reporting about complaints

27. A quarterly report will be provided to the Board meeting about complaints. The report will include the following information:
- a. the number of complaints received during the quarter;
 - b. the number and nature of complaints closed during the quarter (issue and level of complaint) and the timeframe to resolve these complaints;
 - c. whether any complaints considered during the quarter raise any systemic issues that require change to NAATI's practices and procedures and if so what is being done about those matters;
 - d. the number and nature of open complaints (issue and level of complaint) and the age of those complaints.

Training

28. NAATI will provide complaints handling training to its staff involved in the investigation and resolution of complaints.

Policy Review

The effectiveness of this Policy will be reviewed by management at least annually.

Policy Approval

Policy approved by the NAATI Board pursuant to a resolution of the Board (134/3.4.1).