



## NAATI COMPLAINTS POLICY

### 1. Background

NAATI's mission is to set and maintain high national standards for the translating and interpreting sector to ensure a supply of certified professionals to meet the changing needs of Australia's culturally and linguistically diverse society.

We are committed to providing high quality service as part of our mission to deliver a national certification system for the translating and interpreting sector. If you believe that we (or one of our certified translators and interpreters) have not delivered in any one particular area, we would like to hear your comments.

Complaints are an important part of reviewing our policies and processes, maintaining and improving our standards and performance. This policy is intended to provide a guide to how NAATI handles complaints made to it.

### 2. What is a complaint

NAATI considers a complaint to be a description of your problem and all the steps you've taken so far to resolve it before reaching the point where you no longer know how to proceed.

If your complaint is about a certified translator or interpreter, the first step is to contact the practitioner to explain the problem and how you would like it fixed. An explanation is required if this is not feasible. If you are still having difficulty resolving a problem, then you may want to seek NAATI's assistance.

If your complaint is about the results or your test (or assessment), the first step is to request a paid review of your result. NAATI will not enter correspondence about test or assessment results outside of this process.

### 3. How to make a complaint

Complaints should be made in English via an online form on the NAATI website. If this is not possible (or you are a deaf individual), you can choose to:

- Make an appointment with a NAATI Office where staff can record your complaint in writing; or
- Submit a video to us via [info@naati.com.au](mailto:info@naati.com.au).

Complaints can be made confidentially but this may constrain us from investigating and resolving the complaint. We will contact you if this is the case.

NAATI will not normally investigate complaints that are based on hearsay or do not contain specific information or evidence. Again, we will contact you to discuss this if this is the case.

Any complaints that are sent directly to the NAATI Board of Directors, will be referred back to NAATI National Office (via the CEO) for investigation.

#### 4. How does NAATI treat complaints?

Broadly, NAATI uses the following principles (adapted from ISO/IEC 17024) to guide our handling of complaints:

- **Accessibility:** The process of making a complaint must be as easy as possible for complainants.
- **Confidentiality:** NAATI will attempt to ensure all information provided in confidence will be kept confidential. In some cases, NAATI will need to provide a de-identified summary of the specific allegations to respondents. Information provided will only be shared on a confidential basis by those involved in the complaint process.
- **Fairness:** Complaints must be fairly considered with due regard to the position of all involved in the matter.
- **Appropriateness:** The complaint handling process must be appropriate to the context including the seriousness of the matter.
- **Responsiveness:** The complainant must be kept informed of progress in relation to the complaint.
- **Efficiency:** Complaints must be resolved as efficiently and promptly as possible.
- **Integration:** Complaints reporting is factored in whenever NAATI reviews its procedures and policies.

In terms of the specific process we follow to deal with a complaint, please see section 5.

#### 5. What happens after I make a complaint?

Once NAATI has received your complaint, in the first five business days, we will:

- Send you a written acknowledgement (via email) that we have received your complaint;
- Identify whether:
  - NAATI is the most appropriate organisation to handle the complaint or should it be referred elsewhere;
  - There is a need to gather information before responding to the complaint; and
- Classify the severity of your complaint.

**The table below details the categories we use to classify your complaint and our timeframes for resolving it.**

Category	Category Description	Complaint Examples	Resolution Timeframe
<b>Level 1</b>	<p>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.</p>	<ul style="list-style-type: none"> <li>• Test or assessment costs</li> <li>• NAATI policy (e.g. when refund requests must be refused).</li> <li>• Recertification criteria or process.</li> <li>• Test date or application assessment waiting periods.</li> <li>• Test conditions (e.g. background noise in test room).</li> <li>• Minor complaints about NAATI (e.g. delays in responding to emails).</li> </ul>	<b>10 business days from acknowledgement</b>
<b>Level 2</b>	<p>A Level 2 complaint requires some additional investigative steps by NAATI. These may include:</p> <ul style="list-style-type: none"> <li>• Revisiting of previous action taken by NAATI;</li> <li>• Informing the certified practitioner about the complaint and seeking their response;</li> <li>• Assessing the conduct of the translator and/or interpreter in light of the AUSIT or ASLIA Code of Ethics; and/or</li> <li>• Considering whether there is a need to make any changes to NAATI practices and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct of an endorsed qualification institution.</li> <li>• Quality of services provided by a certified translator and/or interpreter.</li> <li>• Unethical conduct by a NAATI certified translator and/or interpreter.</li> </ul>	<b>8-12 weeks from acknowledgement</b>
<b>Level 3</b>	<p>A Level 3 complaint is a complaint where the issues are of such seriousness they:</p> <ul style="list-style-type: none"> <li>• Warrant the involvement in the investigation of the Chief Executive Officer or Manager, National Operations</li> <li>• Require the appointment of an external investigator;</li> <li>• Require referral to an external agency (e.g. Australian Federal Police, Department of Home Affairs); and/or</li> <li>• The complaint may result in disciplinary action such as suspension or revocation of NAATI credentials.</li> </ul>	<ul style="list-style-type: none"> <li>• Complaint alleging illegal conduct by a NAATI certified translator and/or interpreter or multiple instances of unprofessional conduct.</li> <li>• Significant misconduct by NAATI or its examiners or reviewers (e.g. racial discrimination, significant conflict of interest).</li> </ul>	<b>12-22 weeks from acknowledgement</b>

## 6. Level 2 complaints

If your complaint is classified as a Level 2, NAATI will:

- Begin by working out what information is needed and how that information can best be obtained;
- Request information within a specific timeframe from a third party (where needed);
- Promptly follow up any request to a third party where a response is not received within the requested timeframe; and
- Contact you if we believe we cannot resolve the complaint within 12 weeks and provide an estimate of when the complaint might be resolved.

Where a Level 2 complaint involves a certified translator and/or interpreter, NAATI will:

- Seek a response to the complaint from that person; and
- Write to that person to inform them of the outcome of the complaint.

We may also counsel or recommend specific professional development as a consequence of resolving the complaint. In some cases, NAATI will not provide details to the complainant of exactly what disciplinary action is taken.

## 7. Level 3 complaints

If your complaint is classified as a Level 3, NAATI will:

- Prepare an investigation plan which will be monitored by the Chief Executive Officer or appropriate manager;
- Request information within a specific timeframe from a third party (where needed);
- Promptly follow up any request to a third party where a response is not received within the requested timeframe; and
- Contact you if we believe we cannot resolve the complaint within 22 weeks and provide an estimate of when the complaint might be resolved.

Where a Level 3 complaint involves a certified translator and/or interpreter, NAATI will:

- Inform that person of the complaint and seek their response to it;
- 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
- Inform them of the outcome of the complaint in writing.

Possible disciplinary actions NAATI can take include:

- Counselling that person;
- Requiring that person to complete specific professional development;
- Temporarily suspending their NAATI certification; or
- Revoking their NAATI certification.

Where disciplinary proceedings occur, NAATI will ensure procedural fairness is accorded to that person. In some cases, NAATI will not provide details to the complainant of exactly what disciplinary action is taken.

#### **8. What if I am not satisfied with NAATI's response?**

If you are not satisfied with our response to your complaint, you can write to us outlining any supporting evidence that was not considered. However, if there is no new information available, you cannot appeal the decision.

Complaint appeals will be handled by a different staff member that was not involved in the original investigation.

#### **9. What information does NAATI keep about complaints receives?**

NAATI maintains a detailed register that is regularly analysed by senior management with reporting provided to the NAATI Board of Directors. We may also adjust our processes and procedures as needed to prevent problems reoccurring.

Where a complaint has been made by a certified translator and/or interpreter, NAATI may also record information about the outcome of the complaint on other operational systems (including our credentialing management system). This information is not publicly accessible.

#### **10. Policy Review**

This policy is to be reviewed by NAATI management in line with the Schedule of Policies approved by the Audit and Risk Committee.

#### **11. Policy Approval**

Policy approved by the NAATI Board on 3 May 2019 (149/6.4).