



# 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 appropriately certified professionals, responsive to the changing needs and demography of Australia's culturally and linguistically diverse society.

NAATI is committed to providing quality service as part of its mission to deliver a national certification system for the translating and interpreting sector. If you believe that we (or one of the translators or interpreters certified by NAATI) 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: (a) provide guidance on how NAATI handles complaints; and (b) ensure that NAATI handles complaints fairly, efficiently and effectively.

## 2. What is a complaint?

NAATI considers a complaint to be an expression of dissatisfaction with NAATI's services, service delivery and any other performance matters relating to NAATI or its staff that you would like NAATI to investigate and resolve.

**If you have a complaint about the performance of a certified translator or interpreter**, you should discuss the complaint with the practitioner directly or with the language service provider that employs them. If you are still having difficulty resolving a problem, you can write to NAATI to seek advice.

**If you are dissatisfied with your results, the first step is to request a paid review of your test results through your myNAATI account.** Dissatisfaction with results is not grounds for complaint and NAATI will not enter into correspondence about test or assessment results outside of this process.

## 3. Making a complaint

Complaints should be made in writing in English to [info@naati.com.au](mailto:info@naati.com.au)

If this is not possible you can choose to:

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

Complaints can be made confidentially but this may prevent us from investigating and resolving the complaint. NAATI will not normally investigate complaints that are based on hearsay or do not contain specific information or evidence. If we need more information to support the resolution of your complaint, we will contact you to discuss further.

## 4. How does NAATI treat complaints?

NAATI uses the following principles (adapted from ISO/IEC 17024 *Conformity assessment – General requirements for bodies operating certification of persons*) to guide its handling of complaints:

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

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

## 5. What happens after I make my 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 whether it should be referred elsewhere, and
  - there is a need to gather more information before responding to the complaint; and
- classify the severity of your complaint.

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

Category	Category Description	Complaint Examples	Resolution Timeframe
<b>Level 1</b>	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.	<ul style="list-style-type: none"> <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>Within 15 business days</b>

Category	Category Description	Complaint Examples	Resolution Timeframe
<b>Level 2</b>	<p>A Level 2 complaint requires NAATI to undertake additional investigative steps. 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, NZSTI, or ASLITA 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 NAATI or a NAATI certified translator and/or interpreter</li> <li>Invalidation of test or application</li> </ul>	<b>Within 60 business days</b>
Category	Category Description	Complaint Examples	Resolution Timeframe
<b>Level 3</b>	<p>A Level 3 complaint is a complaint where the issues are of such seriousness that they:</p> <ul style="list-style-type: none"> <li>warrant the involvement in the investigation by Executive managers of NAATI</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>require 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>Within 100 business days</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 60 business days 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 practitioner, and
- write to that practitioner to inform them of the outcome of the complaint.

NAATI may also counsel or recommend specific professional development as a consequence of resolving the complaint. In most cases, NAATI will not provide details to the complainant of exactly what disciplinary action (or not) is taken - only that NAATI is satisfied the matter is resolved.

### **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 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 100 business days 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 practitioner 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 most cases, NAATI will not provide details to the complainant of exactly what disciplinary action is taken, only that NAATI is satisfied the matter is resolved.

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

If you have made a complaint and are dissatisfied with the outcome of NAATI's review of your complaint, you may seek an external review of NAATI's decision by contacting the relevant regulatory body.

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

NAATI maintains a register that is regularly analysed by senior management with a Complaints Summary report provided to the NAATI Board of Directors each year. NAATI may also adjust its 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 shall be reviewed in accordance with the NAATI Schedule of Policies or as required. Any changes to this policy must be approved by the Board.

## 11. Approval

Date	History/Description	Policy Owner	Approval
6 September 2024	Version 3.1 – new policy template and minor amendments to accord with current business processes and procedures	Chief Operating Officer	Approved by the Board on 6 September 2024 at Meeting 176 (6.3)
27 August 2021	Version 3.0 – minor edits and alignment with Organisational KPIs re complaints handling timeframes	Manager, National Operations	Endorsed by the Audit and Risk Committee Meeting 22, 19 May 2021.  Approved by the Board on 27 August 2021 at Meeting 163 (6.5)
3 May 2019	Version 2.0 – redrafted in new policy format and simplified	Manager, National Operations	Approved by NAATI Board at Meeting 149 (6.4)
7 October 2015	Version 1.0	Manager, National Operations	Approved by NAATI Board at Meeting 134 (3.4.1)