Policy and Procedures for Managing Complaints about Juvenile Justice Services

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CONTENTS

1 About this Policy
1.1 Introduction by the Chief Executive 3
1.2 Purpose 4
2.1 What is a complaint and who can complain? 5
2.2 Matters that will NOT be dealt with under this policy.....6
2.3 Implementation 7
2.4 Staff responsibilities 7
3. Procedures 9
3.1 Procedure for managing a complaint 10
3.2 Managing complaints about staff and staff behaviour 14
3.3 Managing complaints alleging loss of property 14
3.4 Managing complaints about other agencies.....15
3.5 Complaints referred to or made directly to external bodies.....15
3.6 Protecting letters between detainees and external bodies.....16
3.7 What happens if the young person has been transferred? 17
3.8 Support for the young person during the complaints process 17
3.9 Overcoming concerns of bias 19
4.1 What to file and where 19
4.2 Access and security of registered complaints files.....21
4.3 Monitoring and reporting on complaints 21
5. Common terms 22
6.1 Complaint Registration Form 27
1. Please describe what the complaint is about.....27
2. What you would like done to fix the complaint 28
6.2 Advocate Complaint Form 29
3. Please tell us what the complaint is about 30
4. Please tell us what you and/or the complainant would like done to resolve the issue 30
6.3 Complaint Resolution Form 32
CONFIDENTIAL 32
6.4 Manager’s monthly summary of complaints.....34
6.5 Complaints six monthly summary report 36

1.1 Introduction by the Chief Executive

Juvenile Justice is committed to providing services to young offenders to decrease their re-offending and increase their capacity to successfully reintegrate into their communities.

In providing these services, Juvenile Justice aims to continuously improve the quality of interventions provided to young people. The *Client Complaints Policy and Procedures* seek to guide staff in effectively managing complaints as quickly, transparently and fairly as possible and to ensure procedural fairness for both the complainants and staff. Ultimately, this policy and its procedures will provide a mechanism for clients and families to give feedback that can be used to improve the quality of Juvenile Justice services.

This policy protects the rights of young people, particularly those who are in custody. Young people have the right to receive services from Juvenile Justice that:

- are free from abuse
- are based upon their individual needs
- are planned through a coordinated case management system
- address their offending behaviour
- involve them, their family and significant others in decision making
- assist them to develop and maintain community relationships
- are confidential, sensitive and responsive to their diverse cultural, linguistic and religious backgrounds.

Juvenile Justice also provides services to victims of crime, in particular through the Youth Justice Conferencing Scheme and the Victims Register.

I encourage all staff to read and become familiar with these procedures to ensure the best possible service is provided young people and the wider community.

Valda Rusis
Chief Executive

1.2 Purpose

The following Client Complaints Policy (the Policy) and procedures demonstrate Juvenile Justice's commitment to the management of complaints made by young people, their family members/carers, support people and victims. It provides guidance to staff to ensure the resolution of complaints are timely, transparent and fair.

Policy Statement

Juvenile Justice respects the rights of young people and stakeholders, including Official Visitors and victims of crime, to make a complaint if they are not satisfied with the nature of or manner in which its services are delivered. For this purpose, the Policy and procedures have been developed and are clearly communicated to staff, to young people and to the public. The Policy and procedures act to ensure that complainants are not subject to victimisation, harassment or reprisal and that all complaints are treated discreetly.

Juvenile Justice acknowledges that complaints are a valuable means of identifying areas of service that require improvement and assisting in the planning and allocation of resources. Client feedback is integral to the Quality Assurance process in Juvenile Justice Centres and Juvenile Justice Community Services. A number of mechanisms are incorporated into the Quality Assurance process to ensure client feedback, including detainee and community client surveys, and detainee focus groups.

Complaints are taken seriously and managed openly, promptly and fairly with the intention of resolving the issue at first contact where possible, or within a reasonable time frame. Endeavours are made to resolve most complaints as soon as possible and appropriately at the local level.

The Policy is part of a range of mechanisms and avenues available for complainants. Other important mechanisms include the NSW Ombudsman, Official Visitors to juvenile justice centres and the NSW Independent Commission Against Corruption (ICAC). Information about these external avenues of redress is also made available to young people and the public when dealing with Juvenile Justice.

Principles

In responding to complaints Juvenile Justice undertakes to:

- Establish clear procedures for dealing with complaints.
- Ensure that information about the complaints process is accessible to all staff, young people, their families and carers and other interested parties.
- Ensure procedural fairness for all parties.
- Resolve complaints as quickly as possible, keeping the parties informed of progress and outcomes.
- Maintain the confidentiality of all parties.
- Protect complainants from subsequent victimisation and reprisal.
- Keep proper records of decisions made and the reasons for the decisions.
- Make use of the complaints system as feedback to improve the quality of services.

This policy and its procedures apply to all Juvenile Justice staff and is consistent with the following agency policies:

- Internal Reporting Policy
- Code of Conduct
- Personnel Handbook (which contains Guidelines for Misconduct)
- Client Protection Policy 2006 (in conjunction with the NSW Interagency Guidelines for Child Protection Intervention 2006)

- Dignity and Respect Policy and Guidelines (which includes the Grievance Procedure)

Legislation

Part 5, Clauses 47-57, of the *Children (Detention Centres) Regulation 2010*.
(Notes: The complaints guidelines may permit or require specified classes of complaints to be dealt with by specified persons, or specified classes of persons, instead of by the persons to whom they are addressed.)

Government Information (Public Access) Act 2009.

Part 3, clause 12.3 of the *Ombudsman Act 1974.*

Public Sector Employment and Management Act 2002

2.1 What is a complaint and who can complain?

What is a complaint?

A complaint is an expression of dissatisfaction with Juvenile Justice. It can include complaints about:

- the conduct of staff, including fee for service staff
- the conduct of young people in contact with Juvenile Justice
- the quality of a service offered by Juvenile Justice, including services co-delivered by agencies where Juvenile Justice is the lead
- the lack, or difficulty in gaining access to, a service offered by Juvenile Justice
- the manner in which a service is provided.

Who can complain?

A complainant can be:

- a young person who is in contact with, or has been in contact with Juvenile Justice
- the family or carers of a young person who receives or has received a service from Juvenile Justice
- a victim or victim support person participating in a Youth Justice Conference
- an Official Visitor
- the Ombudsman
- a **support person** or **advocate** of a young person including but not limited to:
    - Official visitors
    - the Ombudsman, or another authorised person conducting an inspection of the centre
    - the young person's Department of Family and Community Services caseworker
    - a member of staff, such as a Youth Officer or a delegated officer
    - a Mentor or Sessional Supervisor
    - a community support worker (eg youth services)
    - the young person's partner, if both are over the age of 16
    - the young person's barrister, solicitor, solicitor’s clerk and/or legal agency
    - a doctor
    - a field officer of the Aboriginal Legal Service, or similar approved organisation.

2.2 Matters that will NOT be dealt with under this policy

Not covered under this policy are:

- Appeals against Juvenile Justice decisions

  An appeal against a Juvenile Justice decision is not a complaint unless the complainant specifically wishes to complain about how the decision was made or the process undertaken to deal with the complaint. In this case, a new complaint should be registered.

  There are separate procedures available for appeals against a Juvenile Justice decision including *Appeals for classification decisions, Appeal Guidelines for Representative Supervision, Appeals for decisions regarding visitors* etc. These can be located on the intranet.

- Requests for information or explanation of aspects of a service, such as "Why can't I go on overnight leave?"

  A request for information should be dealt with immediately by explaining the rationale for a particular policy, decision or practice. If the young person is still dissatisfied, staff should ask whether the young person wants their request treated as a formal complaint. If the young person intends to pursue a formal complaint staff should follow the complaints procedure.

- Appeals against the determination of a complaint,

- Appeals against decisions made by Courts or Tribunals (these are not complaints)

- Appeals relating to decisions made about a young person's classification.

  An appeal against a classification is formally determined by the delegated officer.

- An application to review a Government information access decision will be decided in accordance with the provisions of the *Government Information (Public Access) Act 2009.*

- Allegations of fraud or corrupt conduct

  Allegations of fraud or corruption, as defined by the Fraud Control and Corruption Prevention Policy, must be dealt with immediately in accordance with the Internal Reporting Policy and will be referred to the police and/or the Independent Commission Against Corruption (ICAC).

- Allegations of an alleged criminal offence

  Allegations of an alleged criminal offence, such as an alleged assault, will be dealt with in accordance with the Internal Reporting Policy.

- Allegations of abuse

  Allegations of physical or sexual abuse involving a staff member must be dealt with in accordance with the Client Protection Policy and associated procedures.

- Allegations which requires mandatory reporting

  Allegations of abuse or harm by a young person are subject to mandatory reporting requirements and are handled in accordance with the mandatory reporting procedures (both internal and external reporting) in the Client Protection Policy.

- Staff grievances, such as a staff complaint over application of a policy, conflict in the workplace or disagreement over a management decision. Staff grievances are handled in accordance with Juvenile Justice's Dignity and Respect Policy and Guidelines, which include guidelines on how to address grievances.

2.3 Implementation

This policy and its procedures are an integral component of the induction training for all staff, delivered through the Juvenile Justice Self-paced Learning Kit. The Learning and Development Unit will ensure that, during the induction process, all staff are aware of, and trained in, the implementation of this policy.

The following officers are responsible for informing a young person of their right to make a complaint and their corresponding responsibilities:

- Juvenile Justice Community Service staff, including Juvenile Justice Officer, Juvenile Justice Counsellors, Psychologists, Assistant Managers and Area Managers
- Youth Justice Conference Managers through Conference Convenors, including Youth Officers, Unit Managers, Psychologists, Assistant Managers, Centre Managers and Admissions staff
- Juvenile Justice Centre staff
- Programs Branch staff

A **young person** must have easy and appropriate access to Juvenile Justice's complaints policy and procedures.

Information on how to make a complaint is also available in:

- Juvenile Justice Community Services' offices
- Juvenile Justice Centres' admissions areas
- The brochure ' A guide to youth justice conferences'
- Family Information Kits available to young people's families

During admission to a centre, each young person must be supplied with a copy of the resident's induction booklet and DVD that includes information on how to make a complaint.

During initial contact with a young person in the community, the young person must be informed of this policy.

Young people must also be informed of other avenues for making complaints, such as the NSW Ombudsman, Official Visitors and the Minister.

2.4 Staff responsibilities

All staff who receive a complaint must record the details using the Complaint Form that can be found on the Intranet and on CIMS. The complaint form must be printed and upon completion be placed in a trim file marked confidential. Each complaint must have a dedicated file.

Managers and their **management team** have responsibility for the local operation of the complaints process and must ensure that staff are aware of their responsibilities under the policy and have access to the Complaint Form. They are also responsible for ensuring the documentation is recorded and stored securely.

All **Juvenile Justice Managers** are responsible for oversighting, recording, monitoring and ensuring that complaints are acted upon in their areas of responsibility. They are also responsible

for the secure storage of the registered complaints file and for supervising confidential access to the file.

Registered Complaints Files must be recorded on the *TRIM* document management system and stored in accordance with the Juvenile Justice Records Management Policy and Procedures.

Confidentiality

A complaint and the complainant's identity will be treated as strictly confidential by those involved in the complaint resolution process. It will not be discussed with, or disclosed to, any other staff or other persons, unless for the purposes of resolving or monitoring the complaint.

The staff member to whom a complaint is made should reassure the complainant that the information will be treated discreetly and will only be discussed with people who are involved in handling the complaint. A staff member who is the subject of the complaint may be asked to respond to the complaint to ensure procedural fairness, however, each complaint will be managed discreetly and complainants will be protected against any victimisation.

Who can resolve a complaint?

All staff (except fee for service staff members, Mentors, Sessional Supervisors and Youth Justice Conference convenors) can resolve a complaint within their area of responsibility.

Complaints about staff should be resolved by that staff member's supervisor. For instance, a JJCS Assistant Manager should resolve a complaint about a Juvenile Justice Officer. Where staff have two supervisors, both are responsible for managing the complaint.

Where there is a reasonable request to have the complaint processed externally from where the complaint originates, (Office, Unit, Centre) the Manager will request that the Regional Director or Director in Central office re-allocate the complaint handler.

The staff member assigned responsibility for resolving a complaint is known as the complaint handler.

Special areas of responsibility for complaints

- **Area Managers** are responsible for handling complaints about any staff under their supervision and Youth Justice Conference Convenors in their geographical area.
- **Regional Directors** are responsible for overseeing complaints management within their region or directorate, keeping up-to-date statistical records of complaints and their status, and resolving complaints that cannot be resolved at a local level. Regional Directors will also determine where improvements in services delivery can be made.
- The **Strategic Projects Unit** is responsible for monitoring the types of complaints and providing information and advice to staff about the complaints policy and process. This Unit coordinates complaint information and statistics for the Juvenile Justice Annual Report.

3. Procedures

All complaints must be treated seriously and dealt with promptly and professionally.

Anyone can record the basic details of a complaint using the *Complaints Form* (available at the back of these procedures and in the Complaints toolkit), although it may need to be referred to another staff member with the appropriate delegation to resolve.

Complaints to the Manager

Any staff member receiving a request from a young person to speak with or make a complaint to a manager or other staff member must convey the request immediately.

The young person must be given the opportunity to speak to the manager (or other staff member) that day, or as soon as practicable.

Complaints to the Chief Executive

Any correspondence marked confidential and addressed to the Chief Executive must be forwarded, unopened, to the Chief Executive.

Only the Chief Executive, or a person authorised by the Chief Executive, may open and read the correspondence.

The Chief Executive may delegate investigation of the complaint as appropriate and in accordance with this procedure.

How long should the complaint resolution process take?

Not all complaints can be resolved to the satisfaction of all parties. However, the complaints process must be followed within a reasonable time frame.

If the complaint is minor or can be resolved immediately, ensure that it is closed within 24 hours.

You must inform your supervisor immediately if the complaint is expected to take longer than ten working days to be closed.

All formal complaints should be closed within 21 days of being registered. If there are complaints that take longer than this to resolve the complainant, your manager and Director must be informed of the reasons for the delay.

All formal reviews of complaints should be finalised within 10 days. If the review will take longer than this, the complainant and the reviewer's manager must be informed of the reasons for the delay.

3.1 Procedure for managing a complaint

When you receive a complaint follow these steps:

1. **Determine if you are eligible to handle the complaint:**
    a. Is the complaint within your area of responsibility?
    b. Can the complaint be resolved of immediately?
    c. Do you have any conflict of interest?
    d. Are you a higher grade than the staff member being complained about?

If you are not eligible, immediately refer the complaint to your supervisor.

- If your supervisor is the subject of the complaint immediately inform the complainant that the complaint will be referred to the Manager, Area Manager or Centre Manager for resolution. Explanation must be given to the complainant about why the complaint has been referred and to whom.
- The Manager, Area Manager or Centre Manager must allocate an appropriate complaint handler to resolve the complaint. You must make a record of the referral on the Complaint Resolution Form. Inform the complainant about who has been allocated as the Complaint Handler (Note: This can be referred to an external complaint handler in another JJ location.)

2. **Identify key facts** of the complaint, the outcome the complainant expects, and ensure the complaint is valid. This does not need to be recorded unless the complainant would like to proceed to a formal complaint. See *What is a complaint and who can complain?* at section 2.1.

3. **Review the complaint** to ensure this is the appropriate resolution process. If the complaint relates to a matter or conduct outside of this policy (see *2.2 Matters that will NOT be dealt with under this policy)* refer the complainant to the relevant process, providing appropriate assistance. Such complaints should be registered on a complaint resolution form, with information provided detailing the relevant referral. The matter can then be immediately closed.

4. **Ask the complainant if they wish to lodge a formal complaint**. Provide the complainant with information on the supports available to them should they wish to lodge a formal complaint (i.e. interpreters, support persons, advocates, external complaint avenues) and advise the complainant that resolving a complaint formally requires following the complaint process, creating records of the complaint and staff being responsible for completing the process.

Note: Complaint handlers must ensure that all reasonable steps are taken to provide an interpreter when the young person makes a complaint in either or both of the following circumstances:

- the young person has difficulty communicating because of an intellectual or physical disability or impairment,
- the young person has difficulty communicating in English.

5. **Does the complainant wish to make a formal complaint?**

- **if yes**, go to step 6.
- **if no**, go to step 7 to resolve the complaint informally.

6. Dealing with informal complaints

An informal complaint can include matters relating to day to day activities that can easily be resolved without complication.

All staff should complete the following actions to resolve the complaint informally:

- tell the complainant how you intend to proceed and ensure they understand
- hear everyone's perspective on the issues
- resolve the complaint - minor expressions of dissatisfaction should be dealt with informally at the local level as promptly as possible

- ensure everyone involved is informed and understands the outcome of the complaint
- remind the complainant that they can still make a formal complaint at any time
- if a complainant chooses not to proceed with a formal complaint, and you consider the complaint to be serious, exercise your duty of care. This may involve a confidential discussion with the Regional Director to determine whether it is appropriate to take action under other policy or procedure, such as lodging an incident report.

Dealing with formal complaints

6. For a formal complaint, complete all details in the Complaint Resolution Form. The form can be filled out online via CIMS and or downloaded from CIMS or the Intranet in print format.
7. Ask the complainant to record the details of the complaint. If necessary, assist the complainant to write out the complaint details. If you record the details of the complaint, it must be in plain language, easily understood by the complainant and checked for accuracy by the complainant.
8. Is the complaint about staff misconduct, a breach of staff discipline, incorrect use of Juvenile Justice resources or corrupt conduct, or about another agency?

- **if yes**, see:
  - *Managing complaints about staff behaviour* Section 3.3
  - *Managing complaints about other agencies* Section 3.5
- **if no**, continue to the next step.

10. Ask the complainant the details of the complaint and what or how they see the complaint being resolved. Manage expectations by explaining the process.

11. Complete the Complaint Resolution Form which includes:

- the complainant's preferred outcome
- any persons to be consulted or interviewed
- list of any files or documents to be reviewed
- expected date for completion of planned actions.

12. **Give the form and any attachments to your Manager**, who must immediately allocate a TRIM number to the complaint and place the documents on the Dedicated Complaints File. See *what to file and where* Section 4.1
13. **Decide what to do to resolve the issue**. This may include reconciling the parties, resolving the conflict or changing a work practice. In some cases a formal written and or verbal apology may be required.

You must maintain an open mind during the process of handling the complaint and avoid forming premature judgements before you have heard all sides of the matter. The complaint handler must maintain impartiality at all times.

If the complainant asks for a support person to assist them in the process, the complaint handler must nominate a person who, in the complaint handlers opinion, is appropriate to act as a support person for the young person.

After looking into a complaint, you may find that a complaint was vexatious (see Section 5 for a definition of *vexatious complaint*). If you consider a complaint vexatious and are not going to continue dealing with the matter, you must notify the complainant of that decision, as well as recording the decision on the Complaint Resolution Form.

14. **Keep the complainant informed**, either in writing or verbally throughout the process. Make sure the complainant understands that your aim is to resolve the complaint and file note each discussion or action.
15. **Advise the complainant of your decision.**
16. **Advise the complainant that they may seek a review** of your decision by your manager (or a more senior officer) or refer the matter to an external body. This request may be made verbally or in writing.
17. **Clearly enter the final outcome on the Complaint Resolution Form**.

The complainant must, wherever practicable, indicate on the form their level of satisfaction, or otherwise, with the process and outcomes of the complaint.

18. **Was the complainant satisfied with the process and the outcome**?

- **if yes**, go to step 19
- **if no**, go to step 20

19. **Sign and date the form.**
20. Have your **Manager check and sign the complaints documents**. All documents relating to the complaint should be attached to the file before the matter is closed. Each complaint should have its own separate file. This should be done within 48 hours of recording the outcome of the complaint.

If a review of a decision is sought by the complainant, it must not be dealt with by the person who originally dealt with the complaint. The Manager or Regional Director must assign a new complaint handler.

Following a decision or resolution of a complaint, a request to review the decisions may be made if:

- The complainant has evidence that the complaint resolution process was not in accordance with this procedure;
- There is evidence that the outcome was unresolved / unjust / unfair.

To request a review, the complainant must be informed that they can contact an independent representative to assist in resolving the complaint at a more senior level of the agency. The representative in consultation with the complainant must outline the reasons for requesting the review including evidence for the above.

The person lodging the review will be informed of the outcome within ten working days or as soon as practicable.

Following this process, if the person who lodged the review is dissatisfied with the outcome, they may seek advice and assistance from any relevant external agency. See *Complaints referred to, or made directly to, external bodies* Section 3.6.

Note: If you decide not to take further action, record your reasons on the Complaint Resolution Form.

3.2 Managing complaints about staff and staff behaviour

Depending on the nature of the complaint, if it involves a Regional Director or Director the complaint must be forwarded to the Chief Executive.

If the complaint is about the Chief Executive, the usual process is for it to be referred to the Director General before approaching an external body such as the Ombudsman or the Minister.

Complaints about staff conduct must be dealt with under existing policies, guidelines and procedures. These include:

- *Code of Conduct*
- *Guidelines for Managing Conduct and Performance*
- *Dignity and Respect Policy, Guidelines and Procedure*
- *Internal Reporting Policy*
- *Fraud Control and Corruption Prevention Policy*

Those matters dealt with as disciplinary matters should **not** be recorded as complaints.

The rights and responsibilities of staff the subject of a complaint are detailed in the above policies.

If in doubt about the appropriate procedure to follow in relation to staff conduct matters, you should contact the Human Resources for advice.

3.3 Managing complaints alleging loss of property

Complaint about loss of property

Complaints from young people regarding property stored by Juvenile Justice which has been lost or damaged should be managed in conjunction with the procedure on *Personal Property of Detainees*.

Check whether there was a record of the stored item and commence complaint procedure.

Allegations made by young people in the community regarding stolen property can be referred to police if appropriate.

Allegation of theft made by someone else

Someone other than the person who suffered the property loss may tell you about the theft or damage.

In this case, discuss the matter with the young person who has lost the property before contacting the police.

When to register a loss of property complaint

When the complaint meets all of the complaints' criteria and cannot dealt with by any other process, register the matter as a complaint if the complainant wants it recorded. If a police investigation is being conducted into the stolen/lost property, staff should register the complaint and note that the matter has been referred to Police, using the Complaint Resolution Form. This will close the complaint.

3.4 Managing complaints about other agencies

Receiving a complaint about another agency

All complaints involving another agency or its employees (e.g. Justice Health, the Department of Education and Communities or the NSW Police Force), should be referred to the Centre or Area Manager for assessment as to whether the complaint can be dealt with locally or needs to be referred to the Regional Director for handling at a more senior level.

The Centre or Area Manager must refer any reportable or criminal conduct to the Regional Director and to Human Resources (if appropriate), as well as following the procedures outlined below.

Allegations regarding agencies funded or contracted by Juvenile Justice are to be forwarded to the relevant Regional Director or Director for resolution.

Managers are responsible for facilitating appropriate support for young people and if necessary, assisting the young person to document their complaint.

Complaints about abuse, criminal offences or the NSW Police Force

If the complaint is about abuse / physical or sexual assault, the matter **must** be reported to the police, in accordance with the Client Protection Policy.

If the complaint is about an alleged criminal offence **notify** the NSW Police immediately.

If the complaint is about the NSW Police Force act in accordance with the Client Protection Policy or refer the complainant to the NSW Ombudsman.

Role of Juvenile Justice in supporting the complainant

Staff will support a young person to have a matter heard and resolved by another agency, as long as there is no conflict of interest on the staff member's behalf. It is up to the Manager to determine the extent of this support (e.g. phone calls, letter writing, and emotional support).

While young people are to be kept informed of Juvenile Justice's actions, staff are not required to deal with the complaint under this policy's procedures. However, staff should register the complaint and note that the matter has been referred to another agency, using the Complaint Resolution Form.

See also *Support for the complainant during the complaints process* section 3.9.

3.5 Complaints referred to or made directly to external bodies

People can make complaints about Juvenile Justice directly to a range of external bodies (see Section 5 *External Bodies*).

Juvenile Justice will refer a complaint to a relevant organisation, for example referring a case of theft to the police. The complaint handler is responsible for making the referral. The decision to refer to an external agency must be made in conjunction with the complaint handler's Manager.

A complainant may approach an external body about their dissatisfaction with the complaints process or outcome of a complaint investigated by Juvenile Justice.

Complainants do not need to inform Juvenile Justice

A complainant making an initial complaint directly to an external body does not need to disclose the complaint or reveal the intention to complain to Juvenile Justice staff.

Actions by the external organisation

An external body that directly receives a complaint will normally forward that complaint to the Chief Executive.

Unless special circumstances exist, the Chief Executive will refer the complaint to the appropriate area in Juvenile Justice to be dealt with, in accordance with the procedures in this policy. The area in Juvenile Justice charged with dealing with the complaint will be required to provide a report on the outcome of the process, together with a draft letter to the referring body and copy for the complainant, which will be prepared for the Chief Executive within a designated timeframe.

Refer to *What to do when a young person makes a complaint* at Section 3.1 and *Resolving a complaint* at Section 3.2.

Complaints made to the Ombudsman

Staff receiving a request from a detainee or young person on community supervision to complain to the Ombudsman must:

- assist the young person to make the complaint
- send any correspondence, unopened, directly to the Ombudsman
- for detainees, ensure the detainee has access to a representative of the Ombudsman's office, when they are visiting centres.

Complaints made to official visitors

Staff should facilitate detainee access to Official Visitors.

Official Visitors are to determine whether the complaint should be dealt with formally or informally. If the complaint is to be made formally, then the Official Visitors are to complete the Complaint Resolution Form and follow the standard complaints procedures. Completed forms and associated paperwork should be provided to the Centre Manager (or appropriate delegate) to be placed on a Complaints file dedicated to that complaint.

3.6 Protecting letters between detainees and external bodies

Protecting the contents of letters to or from external bodies

Division 2 of the *Children (Detention Centres) Regulation 2010* refers to privileged letters. A privileged letter is a letter that the young person has addressed to any of the following external bodies:

- New South Wales Ombudsman
- Commonwealth Ombudsman, the Judicial Commission
- Australian Crime Authority
- New South Wales Crime Commission
- Independent Commission Against Corruption
- Anti-Discrimination Board
- Human Rights and Equal Opportunity Commission
- Administrative Decisions Tribunal
- Privacy Commissioner
- Legal Aid Commission of New South Wales
- Legal Services Commissioner
- Member of Parliament
- Legal Practitioner or Police Officer

If a detainee delivers a letter to a Juvenile Justice staff member that is addressed to an exempt body, the staff member must immediately send the letter to the person or organisation to which it is addressed.

The letter must not be opened, inspected or read by anyone except the person to whom it has been addressed, or by a person authorised by that person.

Letters from external bodies to young people

Any letter addressed to a young person from any of the external bodies listed above must not be opened, inspected or read by anyone except the young person to whom it is addressed, or someone authorised by that young person.

Letters from a Member of Parliament, barrister or solicitor

A Member of Parliament, a barrister or a solicitor may send a letter to a young person in a sealed envelope. It may be accompanied by a letter addressed to the Area Office Manager/Juvenile Justice Centre Manager claiming privilege in respect of the letter in the sealed envelope.

The sealed envelope and letter must not be opened, inspected or read by anyone except the young person, or someone authorised by the young person.

Exception - suspected contraband or security risk

If a Juvenile Justice Centre Manager is of the opinion that a sealed envelope may contain contraband or any item or matter that is likely to adversely affect the security, safety or good order of the detention centre, the Juvenile Justice Centre Manager may require the young person to open the sealed envelope in their presence.

If the letter does contain anything that arouses suspicion, or may affect the safety and security of staff or young people, the Centre Manager may take the envelope and its contents and deal with them according to the risk presented.

3.7 What happens if the young person has been transferred?

Original office or unit still responsible for complaint resolution

If, during the process of handling a complaint, a young person is transferred from one centre to another, from custody to community, or is no longer under the supervision of Juvenile Justice, it is still the responsibility of the complaints handler to satisfactorily resolve it, complete the necessary documentation and advise the young person of the outcome.

Negotiating a transfer of responsibility for the complaint

The original complaint handler may, with the complainant's consent, negotiate the transfer of responsibility for resolving the complaint to a new complaint handler that is assigned by the supervisor.

The original complaint handler has responsibility to keep the complainant informed of the resolution process, until formal transfer has been negotiated.

3.8 Support for the young person during the complaints process

Duty to support young people making complaints

A young person may experience distress or fear when making a complaint.

Staff have a duty to support a young person to make a complaint and to ensure that the young person does not suffer any harassment or retribution because they have complained.

Staff who are the subject of a complaint must not directly discuss the complaint with the complainant.

Only the complaint handler is able to discuss the complaint with the young person.

Staff suspected of harassment

Any staff member who is suspected of harassing a complainant in response to a complaint being made may face disciplinary measures as outlined in the Juvenile Justice *Code of Conduct* and the *Dignity and Respect Policy, Guidelines and Procedures.*

In accordance with the *Code of Conduct,* all staff are responsible for reporting or taking action if a breach of the Code occurs.

Proven breaches of the Code, which constitute misconduct, may result in remedial action or disciplinary action ranging from a caution through to dismissal.

Young person's rights to a support person

A young person has the right to a support person when making a complaint. Some young people, such as those with a disability or mental illness, Aboriginal and Torres Strait Islander persons or those from culturally or linguistically diverse backgrounds, are more likely to require support when they make a complaint.

A support person may:

- provide communication and emotional assistance for the person making the complaint
- act to ensure that the young person's complaint is heard and resolved fairly and promptly
- act to ensure that the young person understands the process and the outcome of the complaint.

What is a support person?

A support person is someone providing communication or emotional assistance for the individual making a complaint. A support person can be:

- a young person's authorised visitor
- a family member, carer, partner, community worker, or significant other
- a Chaplain or Official Visitor
- a lawyer
- a staff member (such as a Juvenile Justice Officer, Youth Officer or delegated officer) who consents to the role
- an individual of their choice.

A support person cannot be a young person currently the subject of a youth justice conference or other Juvenile Justice intervention.

A support person does not answer for the complainant.

Assistance to facilitate a support person

If the complainant is a young person, it is the Centre or Area Manager's responsibility to decide what type of assistance will be provided to facilitate the involvement of a support person.

For example, assistance may take the form of basic travelling and accommodation costs for support persons during the resolution of a complaint.

This decision should be based on:

- the nature of the complaint, its seriousness and complexity
- the client’s individual needs
- the availability of resources
- the degree of assistance requested
- the benefits of having the requested support

- the existence of alternative options for support.

Young person's right to an advocate

A young person has the right to have an advocate complain on their behalf. A young person may have both an advocate and a support person, depending on their needs.

Juvenile Justice will not pay any costs associated with having an advocate present, except for reasonable telecommunication costs. Where there are exceptional circumstances additional reimbursement may be considered at the discretion of the Manager. Exceptional circumstances may include reasons such as mental health and disability issues, or language and cultural differences.

3.9 Overcoming concerns of bias

Staff responsible for a complaint's resolution must not be biased

A complaint will be dealt with by a person who is not biased and could not reasonably be seen to be biased against or towards the complainant or the subject of the complaint.

Examples of possible bias include:

- if the person's actions are linked to the complaint, including if the person witnessed the alleged incident
- if personal beliefs or attitudes could influence impartiality
- if the person has a personal relationship with staff or complainants, their families or close associates or anyone they are investigating, that go beyond the level of a professional working relationship
- if there is a conflict of interest (either real or perceived).

Bias from management

In some circumstances a complainant may feel that management will side with the staff or the service.

Managers should reassure the complainant that their investigation and resolution of the complaint will be free from bias.

If complainants are in doubt, staff can inform and assist the complainant to refer the complaint to a more senior staff member or an external organisation or person, including the Ombudsman.

The complainant must detail their concern of actual or perceived bias.

4.1 What to file and where

Complaints Register

A complaints register is to be kept:

- by the Chief Executive (regarding complaints made to the Chief Executive or to officers of the agency, other than staff of a juvenile justice centre or juvenile justice community office)
- by the Manager of each juvenile justice centre
- by the Director of Court Logistics, Classification and Intelligence
- by Area Managers
- by Regional Directors
- Coordinator Strategic Projects Unit (complaints summaries)

The complaints registers are to be made available for inspection by the NSW Ombudsman, the Chief Executive and Regional Directors for quality assurance purposes.

The complaints register kept by the Manager of each juvenile justice centre should also be made available for inspection by the Official Visitor assigned to that centre.

Complete history

An accurate record must be kept of each complaint, detailing the history of a complaint from registration to resolution. The file must include the Complaint Resolution Form plus any attachments.

Information to be recorded in the Complaints Register

The following information must be included in the complaints register:

- the date on which the complaint was made
- the identity of the complainant
- the nature of the complaint
- the identity of the person who has had the complaint referred to them for resolution (complaint handler)
- brief particulars of the procedures followed by the complaint handler in dealing with the complaint
- the decision made regarding the complaint
- whether the complaint was resolved to the complainant's satisfaction
- whether the complaint has been referred to another office, unit, centre or external persons
- the date on which the complainant was informed of the complaint handler's decision about the complaint
- if the complaint was not resolved within 21 days of being made, the reason it was not resolved within that timeframe
- if an appeal against the decision was lodged, and if so, with whom
- outcome of the appeal
- other information relevant to the complaint.

Each complaint to have a dedicated file

Each complaint requires a dedicated file on which all documentation must be kept, including forms, emails, file notes and other relevant information.

Where paper files are kept

The registered complaints file must be securely stored to ensure people to not have general access to the files.

The Strategic Projects Unit is responsible for maintaining a file of complaints summaries. This Unit is responsible for collating the state complaints information for inclusion in the annual report.

Complaints and young people's files

No record is kept of a young person's complaint on his/her file but a completed Complaint Resolution Form should be placed in a sealed envelope and given directly to the young person and/or stored in the young person's property.

Complaints and staff personnel files

No record of a complaint is kept on a staff member's personnel file.

Complaints Forms

The complaints policy, forms and posters should be readily available and placed in locations that are obvious to young people e.g. reception areas, visiting rooms and counselling rooms.

4.2 Access and security of registered complaints files

Managers responsible for each area's complaints file

Managers may access all of the registered complaints files within their area of responsibility.

They must also supervise access to the files to ensure they remain secure and confidential.

The Manager may nominate a person to be responsible for supervising access to the registered complaints file in his/her absence.

Access by the supervisor who registered the complaint

The supervisor who filed the complaint in the register should only view the individual file(s) relating to that specific complaint.

Access by the complainant and the subject of the complaint

The complainant and the subject of the complaint may not read the file but have a right to be kept informed of the details of the allegations, resolution process and outcomes. It is the responsibility of the staff member in charge of resolving the complaint to keep the complainant and the subject of the complaint informed.

Security of the file during the resolution process

The complaint handler is responsible for the secure and confidential storage of the Complaint Resolution Form and any attachments while they are in their possession. After the complaint has been closed the paperwork must be kept in a secure area in the Centre Manager's office or the Manager of the Juvenile Justice Community Service office.

Access to the registered complaints file of Central Support Office

Only the Chief Executive or their delegate have access to Central Office's registered complaints file.

If the Chief Executive or delegate are the subject of a complaint, their access to the registered complaints file containing that complaint is suspended until the satisfactory resolution of the complaint.

Access to the registered complaints file of a region

Only the Regional Directors and the Chief Executive can access the registered complaints file of a region.

4.3 Monitoring and reporting on complaints

Managers must monitor complaints unresolved after ten days

Managers are responsible for monitoring all complaints being investigated within their office or unit that have not been resolved within ten days. It is the responsibility of the complaint handler to inform a manager if a complaint is unresolved after 10 days.

Summary reporting responsibility

The following staff are responsible for reporting on complaints in their area of responsibility to the Coordinator Strategic Projects Unit:

- Area and Centre Managers (including delegated officers in detention centres)
- Regional Directors

Strategic Projects Unit

The Strategic Projects Unit is responsible for monitoring the types of complaints received.

Regional Directors

Regional Directors are responsible for completing the six monthly regional reports and submitting the report to the Coordinator Strategic Projects. The Regional Director is also responsible for assessing the effectiveness and fairness of the complaints management procedures to determine where improvements in service delivery can be made.

When to report

The list below describes the types of reports required, to whom the report is submitted and the timeframe for submission:

- Managers' reports cover a summary of their area's complaints, identify any policy or operational issues that arise and are submitted to their Regional Director every quarter
- Regional Directors' reports are a compilation and analysis of the quarterly summary reports and are submitted to the Strategic Projects Unit every six months
- The Strategic Projects Unit collates each region's six monthly complaints summary to provide a state wide overview for inclusion in the annual report.

Standard forms

There are two standard forms to use for summary reports:

- Manager's Quarterly Summary of Complaints
- Complaints Six Monthly Summary Report

5. Common terms

Advocate

Someone making a complaint on behalf of a young person. An advocate may include:

- an eligible support person
- a specialist disability worker or mental health support worker – refer to www.pwd.org.au for disability advocacy services in NSW
- a barrister or solicitor (or solicitor's clerk)
- a doctor
- an official visitor
- a field officer of the Aboriginal Legal Service, or similar approved organisation

Agency

Juvenile Justice

Chaplains

Chaplains are responsible for facilitating detainees' access to religious ministry, spiritual supports and worship within juvenile justice centres.

Complaint

A complaint is an expression of dissatisfaction with Juvenile Justice and can include complaints about:

- the conduct of staff
- the conduct of young people under the supervision of Juvenile Justice
- a service offered or funded by Juvenile Justice
- the lack of, or difficulty in gaining access to, a service offered by Juvenile Justice
- the manner in which a service is provided.

A complaint can also be a statement by the complainant that Juvenile Justice should provide a service that it does not currently provide, where the complainant wants the statement formally recorded as a complaint.

Complainant

The person making the complaint. A complainant can be:

- a young person who is in contact currently or previously been under the supervision of Juvenile Justice or subject to a YJC
- the family or carers of a young person who receives or has received a service from Juvenile Justice
- a victim or victim support person participating in a Youth Justice Conference
- an Official Visitor
- the Ombudsman
- a support person or advocate of a young person including but not limited to:
  - Official visitors
  - the Ombudsman, or another authorised person conducting an inspection of the centre
  - the young person's Department of Family and Community Services caseworker
  - a member of staff, such as a Youth Officer or a delegated officer
  - a Mentor or Sessional Supervisor
  - a community support worker (eg youth services)
  - the young person's partner, if both are over the age of 16
  - the young person's barrister, solicitor, solicitor’s clerk and/or legal agency
  - a doctor
  - a field officer of the Aboriginal Legal Service, or similar approved organisation.

Complaint Handler

Staff member assigned responsibility for resolving a complaint.

Conflict of Interest

A conflict of interest arises when a member of staff could be influenced, or could reasonably perceived to be influenced, by a private interest whilst performing official duties.

Examples of possible bias include:

- if the person's actions are linked to the complaint, including if the person witnessed the alleged incident
- if personal beliefs or attitudes could influence impartiality
- if the person has a personal relationship with staff or complainants, their families or close associates or anyone they are investigating, that go beyond the level of a professional working relationship
- if there is a conflict of interest (either real or perceived).

Director

Central Office Directors and Regional Directors

External bodies

Organisations (other than Juvenile Justice) that complaints can be made or referred to include:

- New South Wales Ombudsman
- Commonwealth Ombudsman
- NSW Commission for Children and Young People
- Official Visitor
- Judicial Commission
- National Crime Authority
- New South Wales Crime Commission
- Police Integrity Commission
- Independent Commission Against Corruption
- Anti-Discrimination Board
- Human Rights and Equal Opportunity Commission
- Administrative Decisions Tribunal
- Privacy Commissioner
- Legal Aid Commission of NSW
- Legal Services Commissioner
- Member of Parliament
- Barrister or solicitor
- Police officer
- Chaplain.

Fee for Service

Payment of providers for individual services rendered, as opposed to salaries.

Formal complaints

All details of the complaint are recorded and a formal process is followed to reach a resolution, which is recorded in the complaints file.

Incident

An incident or event that may affect the normal functioning of a Juvenile Justice service include alleged criminal activity, assault, attempted escape, contraband, death, escape, fire, media/public interest, medical/hospital treatment, natural disaster, property damage/loss, security breach, injury/accident, self harm, staff professional conduct, threat to worker, incorrect legal mandate.

Informal complaints

Not registered or recorded. Handling a complaint informally is useful for minor complaints at a local level and can result in a speedier resolution.

Juvenile Justice Centre (JJC)

Detention centre as defined in the *Children (Detention Centres) Act 1987*, or *premises the subject of an order in force* under section 5 (1) of the *Children (Detention Centres) Act 1987*

Juvenile Justice Community Services (JJCS)

Services provided from Juvenile Justice Community offices include:

- youth justice conferencing
- assessment reports prepared to assist courts in determining sentences
- court-directed supervision of young offenders placed on good behaviour bonds, probation, community service or parole orders and suspended sentences
- support for young people with problems seeking bail or remanded in custody
- the provision of counseling with a focus on alcohol and other drug misuse, generalist counseling, group work, living skills and the provision of forensic and other psychological testing and assessment
- specialist programs including a Sex Offender Program and Violent Offender Program.

Official visitor
Appointed by and reports to the Minister. Official visitors are able to enter and inspect centres at any reasonable time and speak privately with detainees and staff.

Ombudsman
The NSW Ombudsman is an independent and impartial watchdog who ensures that agencies fulfil their functions properly and improve their delivery of services to the public.

Other Juvenile Justice Services
Other services relevant to this policy are services provided to young people through the Youth on Track project, Joint Support Services, HAP Housing, the Bail Assistance Line and ad hoc brokered services.

Staff
An employee or employees of Juvenile Justice, including, persons employed on a casual or temporary basis and statutory appointees (Conference Convenors and Official Visitors).

Support person
Someone providing communication or emotional assistance for the individual making the complaint.

For a detainee, a support person can be an individual of the detainee's choice, where that person is:

- an authorised visitor of a detainee (such as a family member, carer, partner, community worker, lawyer, but not co-offender or other young person under Juvenile Justice supervision), or
- a staff member (such as a delegated officer, Chaplain, Youth Officer) who consents to the role.

For a young person under community supervision or previously under supervision, a support person can be an individual of the young person's choice, where that person is:

- the young person's family member/carer or significant other, or
- a staff member (such as Juvenile Justice Officer) who consents to the role.

For a victim or offender involved in a Youth Justice Conference a support person can be an individual of their choice who is not an offender.

For a family member/carer a support person can be a staff member (such as delegated officer, Chaplain, Youth Officer) of their choice who consents to the role of being a support person.

A support person **cannot** be an offender or co-offender.

See also *Support for the complainant during the complaints process* section 3.9.

Vexatious complainant
Complainants (and/or anyone acting on their behalf) may be deemed to be habitual or vexatious where previous or current contact demonstrates that they have done some of the following:

- Complaints made maliciously to damage a persons career or reputation

- Complainants threaten or take violent action against themselves, staff or property

- Complaints made without evidence or instituted without sufficient grounds

- Complainants persistently changing the substance of a complaint or continually raise new issues or seek to prolong contact by continually raising further concerns or questions

- Complainants are repeatedly unwilling to accept documented evidence given as being factual or deny receipt of an adequate response in spite of correspondence specifically answering their questions, or do not accept that facts can sometimes be difficult to verify when a long period of time has elapsed

Young person

A young person is either currently under the supervision of Juvenile Justice, or who has previously been under the supervision of Juvenile Justice.

A young person is also someone who has been referred to a Youth Justice Conference or is involved in the Youth Justice Conference process.

Youth Justice Conference (YJC)

Brings together young offenders, their families and supporters and the victims of their offences and their supporters, to allow all participants to talk freely to each other about what happened at the time of the offence, who was harmed and how, and what needs to be done to make up for the harm caused.

6.1 Complaint Registration Form

Juvenile Justice
Attorney General & Justice

JJ ref

Complaint form

Please use this form to tell us about your complaint.

The complaint and your identity will be treated as strictly confidential.

(Is an interpreter required?)

Y/N – what language/s

Your details

Surname	
First name(s)	

Which Juvenile Justice service were you using at the time of the complaint?

(Tick as many boxes as you need to).

☐ **Transport**	☐ **Youth Justice**	☐ **Juvenile Justice Community Services**	
☐ **Conference**	☐ **Court Intake**	☐ **Central Office**	☐ **Programs**
☐ **Juvenile Justice Centre**		☐ **Bail Assistance Line**	☐ **Other**

1. Please describe what the complaint is about

2. What you would like done to fix the complaint

Did someone help you to fill in this form?

☐ No
☐ Yes - Who? _____

_____ _____
Signature date

_____ _____
Signature of person who helped you date

office use only

Complaint type (tick as many as applicable)

- ☐ Staff misconduct
- ☐ Staff corrupt conduct
- ☐ Staff misuse of resources
- ☐ Advice and Information
- ☐ Smoking policy
- ☐ Diet/food
- ☐ Physical surroundings
- ☐ JJC rules/points system
- ☐ Visits to centres
- ☐ Confidentiality/privacy
- ☐ Welfare / Safety
- ☐ Access to Services (e.g. Medical, Educat
- ☐ Appointments and Interviews
- ☐ Background report
- ☐ Appraisal/assessment
- ☐ Bias/discrimination
- ☐ Transfers between centres
- ☐ Arunta System
- ☐ Other behaviour
- ☐ Other
  please specify:

Complaint taken by …
Name:
Position:

complaint referred to …
Name:
Position:

6.2 Advocate Complaint Form

Juvenile Justice
Attorney General & Justice

JJ ref

Advocate Complaint Form

A complaint and the complainant's identity will be treated as strictly confidential by those involved in the complaint resolution process.

You can download this form off our website (www) to complete by hand.
Or you can fill it in on screen – then print it off and post it back to us.

1. Please give us the young person's details

Surname		title	
First name(s)			
Address (include postcode)			
Daytime phone		mobile	
Home phone		email	

2. Please give us your details (eg are you a solicitor or relative of the young person?)

Your name		Young person's relationship to you
Was/is this person under the supervision of Juvenile Justice?	☐ Yes ☐ No ☐ Not sure	
Address (include postcode)		
Daytime phone		mobile
email		fax

Please give us details on

Which service was accessed when the complaint arose:

Tick as many boxes as you need to).

☐ **Transport**	☐ **Youth Justice**	☐ **Juvenile Justice Community Services**	
☐ **Conference**	☐ **Court Intake**	☐ **Central Office**	☐ **Programs**
☐ **Juvenile Justice Centre**		☐ **Bail Assistance Line**	☐ **Other:**

3. Please tell us what the complaint is about

4. Please tell us what you and/or the complainant would like done to resolve the issue

Did someone help you to fill in this form?

☐ No

☐ Yes - Who? _____

Please sign your statement

signature date Witness signature date

post to …

fax to …

Office Use Only

Tick as many as applicable

- ☐ Staff misconduct
- ☐ Staff corrupt conduct
- ☐ Staff misuse of resources
- ☐ Advice and Information
- ☐ Smoking policy
- ☐ Diet/food
- ☐ Physical surroundings
- ☐ JJC rules/points system
- ☐ Visits to centres
- ☐ Confidentiality/privacy
- ☐ Welfare / Safety
- ☐ Access to Services (e.g. Medical, Education)
- ☐ Appointments and Interviews
- ☐ Background report
- ☐ Appraisal/assessment
- ☐ Bias/discrimination
- ☐ Transfers between centres
- ☐ Arunta System
- ☐ Other behaviour
- ☐ Other, please specify:

office use only

Complaint taken by …

Name:

complaint referred to …

Name:

Position:

6.3 Complaint Resolution Form

Juvenile Justice
Attorney General & Justice

COMPLAINT RESOLUTION PLAN

CONFIDENTIAL

Complaint ID

Who should be consulted/interviewed?
Which documents or files need to be reviewed?
What is the expected date for completion or planned actions:

ACTION TAKEN

Initial action:
Any further action:
Referral required? Yes☐ ☐No If yes, tick which agency the complaint was referred to and why: ☐ Police, _____ _____ date: / / ☐ Family and Community Services_____ _____ date: / / ☐ Ombudsman _____ _ _____ date: / / ☐ Employment Relations & Conduct _____ date: / / ☐ Other _____ date: / /

Incident Advice required? ☐**Yes** ☐**No**	**Reported:** ☐**Yes** ☐**No** **Position :**_____
Attachments: ☐**Yes** ☐**No**	

OUTCOME

Resolved to the satisfaction of the complainant? ☐Yes ☐No

Date complaint resolved / /

I understand the outcome of my complaint. Complainant Signature: Date:	The complaint has been dealt with fairly and properly. The complainant has been kept informed of the progress of the complaint and has been informed of the outcome of the complaint. Staff signature: Name and Position: Date:

MANAGER'S COMMENTS

Manager's signature:
Name and position:
Note: If complainant unsatisfied note action taken.

6.4 Manager's monthly summary of complaints

This form is to be completed by a manager every month and forwarded to their Regional Director

MANAGER'S MONTHLY SUMMARY OF COMPLAINTS

JJC/JJCS/Rural area:

Region/Directorate: …… Period: ……

1. Complaint numbers	Total	2. Complainant Details	Total
No. of complaints received		No. made by a young person	
No. resolved within 48 hours		No. made by a family member or carer	
No. resolved within 48 hours to satisfaction of complainant		No. made by and/or investigated by the Ombudsman	
No. resolved within 3 weeks		No. made by and/or investigated by Official Visitors	
No. resolved within 3 weeks to satisfaction of complainant		Total no. made by people/agencies on behalf of a young person	
No. not resolved within 3 weeks		For YJC: no. made by young offender	
No. resolved at region/directorate level		For YJC: no. made by victim	
No. resolved at central support office		For YJC: no. made by other non family conference participant	

2. Complaint types (note a complaint can be made up of more than one issue)

Type	Number	Type	Number
Staff misconduct		Welfare	
Staff corrupt conduct		Medical care	
Staff misuse of resources		Appointments and Interviews	
Another staff problem		Background report	
Smoking policy in centres		Appraisal/assessment	
Diet/food in centres		Bias/discrimination	
JJC physical surroundings		Transfers between centres	
JJC rules/points system		Other behaviour	
Confidentiality/privacy		Other, please specify:	

MANAGER'S MONTHLY SUMMARY OF COMPLAINTS

3. Are there any trends in the types of complaints made?	5. Do you have any suggestions for the improvement of service delivery to young people based on your assessment of the complaints?
4. Are there any trends in the resolution of complaints?	**6. Any other comments?**

Manager's Name:	**Regional Director's Name :**
Signature:	**Signature:**
Date:	**Date:**

Regional Director's Comments:

Original: Manager's Complaints Registration file Copy: Regional Director's file

6.5 Complaints six monthly summary report

Form to be completed by Regional Director and Director Programs every six months and forwarded to the Coordinator Strategic Projects for analysis and report to the next available Executive Committee meeting. Reporting periods will be Jan - Jun and Jul - Dec.

Due 1 month after closing period.

SIX MONTHLY SUMMARY REPORT

Region/Directorate: **Period:**

1. Complaint numbers

Centre/JJCS/management area/directorate							**Total**
No. of complaints received							
No. resolved within 48 hours							
No. resolved with 48 hours to satisfaction of complainant							
No. resolved within 3 weeks							
No. resolved with 3 weeks to satisfaction of complainant							
No. not resolved within 3 weeks							
No. which had to be resolved at region/directorate level							

2. Complainant details

Centre/JJCS/management area/directorate							**Total**
No. made by young person							
No. made by family member/carer							
No. made by and/or investigated by the Ombudsman							
No. made by and/or investigated by Official Visitors							
Total no. made by people/ agencies on behalf of a yp							
For YJC: no. made by victim							
For YJC: no. made by other non family conference participant							

3. Complaint types (note a complaint can be made up of more than one issue)

Type	Number	Type	Number
Staff misconduct		Welfare	
Staff corrupt conduct		Medical care	
Staff misuse of resources		Appointments and Interviews	
Another staff problem		Background report	
Smoking policy in centres		Appraisal/assessment	
Diet/food in centres		Bias/discrimination	
JJC physical surroundings		Transfers between centres	
JJC rules/points system		Other behaviour	
Confidentiality/privacy		Other, please specify:	

4. Are there any trends in the types of complaints made?	**6. Do you have any suggestions for the improvement of service delivery to young people based on your assessment of the complaints?**
5. Are there any trends in the resolution of complaints	**7. Any other comments?**

Director's Name:	**Coordinator Strategic Projects**
Signature:	**Signature:**
Date:	**Date:**

Strategic Projects Unit comments:	
Original: Director's Complaints Registration file	Copy: MPS file