
Australian Alpaca Association Ltd

General - Complaint Handling Policy

1. The Scope

The Australian Alpaca Association Ltd (**AAA**) understands that from time to time an individual or group of individuals may be dissatisfied or have a concern or complaint that they want to bring to the AAA's attention.

Where possible the AAA encourages such concerns to be identified and resolved speedily and informally and this Complaint handling policy (**Policy**) is designed to apply where informal avenues have been exhausted or are not appropriate and a formal process is required.

This Policy does **not** relate to:

- Complaints of Sexual Harassment, Discrimination or Bullying, all of which are addressed under the Unacceptable Conduct – Complaint Handling Policy; or
- Complaints of a Commercial Nature involving one or more AAA Members except where an Australian court or tribunal has made an adverse finding against one or more AAA Members who are a party to that commercial dispute.

(Excluded Complaints)

This Policy relates to complaints or concerns raised in relation to any breach of the AAA Code of Conduct or other rule or policy of the AAA (other than Excluded Complaints) with respect to the actions or inaction of one or more of the following:

- AAA employees, contractors and sub-contractors;
- AAA officeholders, directors, committee and board members (including but not limited to regional committees and board appointed committees);
- AAA judges (including apprentice judges) stewards and convenors;
- Organisers of AAA events and volunteers assisting them;
- AAA managers of social media platforms;
- AAA members participating in (or whose actions arise in connection with) sanctioned AAA activities or events; and
- other persons authorised by the AAA to act on its behalf.

(Relevant Individuals).

This Policy does not form part of any contract of employment or contract for services, whether express or implied.

2. Your rights and responsibilities

The AAA counts on you to speak up if there is reason to suspect that a Relevant Individual has violated this policy and to report any activity that you consider a breach of the Code of Conduct or that could damage the AAA's reputation.

The AAA expects all Relevant Individuals to ensure they do not gossip or victimise anyone involved in a complaint or investigation.

2.1 Victimisation

Victimisation is subjecting or threatening to subject someone to a detriment because they have asserted their rights under this policy, made a complaint, helped someone else make a complaint, or refused to do something because it would contravene a rule, policy or the Code of Conduct of the AAA. Victimisation is against the law and will not be tolerated by the AAA.

It is also victimisation to threaten someone (such as a witness) who may be involved in investigating a concern or complaint.

Victimisation is a very serious breach of this Policy and is likely (depending on the severity and circumstances) to result in formal discipline against the perpetrator.

2.2 Gossip

It is unacceptable for any Relevant Individual to talk with others about any complaint made under this policy.

Breaching the confidentiality of a formal complaint investigation or inappropriately disclosing personal information obtained in a professional role (for example, as an office bearer) is a serious breach of this Policy and may lead to formal discipline.

3. Reporting

If you believe you or someone else has been, or are being, subject to conduct or behaviour potentially in breach of AAA rules, policies, procedures or the AAA Code of Conduct, you should:

3.1 Tell the person/s to stop:

If you feel comfortable doing so, tell the other person/s that their behaviour is unacceptable. If you prefer, you could tell that person in writing.

3.2 Make an informal complaint:

If you do not want to approach the other person yourself or if their behaviour does not stop (and provided you feel comfortable doing so) you should inform:

- If the other person is a Youth Member – the member who is for the time being the chairperson of the AAA Australian Youth Education Committee (**AYE Chair**);
- If the other person is a Judge - the member who is for the time being the chairperson of the AAA Showing and Judging Committee (**SJC Chair**);;
- If the other person is a Regional President – the AAA President;
- If the other person is a Board Member – the AAA President;

- If the other person is any other member – the president of the Region to which the other person belongs,

unless the person you would otherwise inform is the other person, in which case you should inform the Company Secretary.

Additional assistance to prepare a formal written complaint may be sought from an appropriately qualified professional if additional support is required due to disability, literacy, literacy issues or for translation from another language into English.

(Relevant Office Bearer).

Your Relevant Office Bearer can then discuss options for resolving the situation with you.

3.3 Make a formal complaint:

If the situation is unable to be resolved informally in the manner set out above, you should submit a written complaint to the AAA Company Secretary.

If you do not feel safe or confident to take such action you may seek assistance from:

- if you are a Youth member – the AYE Chair;
- if you are a Judge – the SJC Chair;
- if you are a Regional President – the AAA President;
- otherwise your Regional President

unless the person you would otherwise seek assistance from is the other person, in which case you should seek assistance from the Company Secretary (cosec@alpaca.asn.au).

4. Complaint Process

The Company Secretary shall direct all written complaints to the Board. The Board must consider how best to resolve any such complaint and may;

- Determine that your complaint is an Excluded Complaint because it is a complaint of a commercial nature and notify you accordingly;
- Determine that your complaint is an Excluded Complaint because the Unacceptable Behaviour – Complaints Handling Policy applies to the behaviour complained of and give you the opportunity to have your complaint addressed under the Unacceptable Behaviour – Complaints Handling Policy instead;
- Appoint a panel comprising three people drawn from:
 - The Company Secretary;
 - Another Board Member;
 - A Regional President;
 - A Regional Vice-President;
 - A member of the Finance Audit and Risk Committee;

- The SJC Chair; and
- The AYE Chair

(Integrity Panel) to consider your complaint, give the person complained of the opportunity to respond, seek any further evidence that it believes is relevant to the complaint, seek technical guidance from other members where it is appropriate to do so and make written recommendations to the Board concerning your complaint; or

- Consider your complaint itself, give the person complained of the opportunity to respond, appoint external investigators or legal advisers where appropriate, seek any further evidence that it believes is relevant to your complaint, seek technical guidance from other members where it is appropriate to do so and determine your complaint.

Where the Board refers your complaint to an Integrity Panel, the Board must consider the recommendations received from the Integrity Panel and may (but is not obliged to) act on those recommendations to determine your complaint.

Where the Board decides not to act on the recommendations of the Integrity Panel the Board must consider and determine your complaint itself as though it had not referred your complaint to the Integrity Panel.

5. Disciplinary action

If your complaint is substantiated, possible outcomes range from an apology being made to disciplinary action being taken against the person/s the subject of the complaint.

If your complaint is unsubstantiated and it is found that you made the complaint vexatiously or you knew it was false, disciplinary action may be taken against you.

Disciplinary action, whether it is taken and what it will comprise, will be at the discretion of the AAA and may include suspension or termination of membership or employment/services (as appropriate).

The AAA take breaches of its policies and procedures seriously and the AAA may, by way of Board resolution, suspend or terminate your membership, if you:

- breached, failed, refused or neglected to comply with, amongst other things, the AAA's policies and procedures;
- acted in a manner in breach of the AAA Bullying Policy and/or the AAA Discrimination and Harassment Policy, unbecoming of an AAA member and/or prejudicial to the objects and interests of the AAA; or
- prejudiced the AAA or brought the AAA into disrepute.

If the AAA is considering passing a resolution to terminate or suspend membership, no less than 10 days prior to passing any such resolution, the member concerned must be given written notice setting out:

- the grounds upon which the AAA relies upon in seeking to terminate or suspend the membership; and
- the member's right to, either orally or in writing, give the AAA Board any explanation or defence of his, her or its actions giving rise to liability to suspension or termination of membership.

Where the AAA Board passes a resolution to terminate or suspend a member's membership, the AAA must give that Member notice in writing of the termination or suspension within ten business days of the resolution passing.

6. Confidentiality

Any AAA-initiated investigation will be handled as confidentially as possible and information will only be shared on a need-to-know basis. However, strict confidentiality cannot be promised, as doing so may compromise the quality and thoroughness of the investigation. If information is learned that requires personnel or legal action, disclosure of information may occur in that process.

Participants must maintain confidentiality during the investigation process. This confidentiality obligation excludes one's right to report misconduct to the AAA and/or a government authority.

7. Other relevant policies

Relevant Individuals must read this Policy in conjunction with other relevant AAA policies, including:

- Code of Conduct
- Mission, vision and values statements
- Service and membership agreements

8. More information

If you have a query about this Policy or need more information please contact the AAA Company Secretary (cosec@alpaca.asn.au).

9. Review details

This Policy was adopted by the AAA on July 2022.

This Policy was last updated on July 2022