

# MANAGING RACISM COMPLAINTS

## 1. PURPOSE

This procedure supports the KYF Zero Tolerance Racism Policy by providing a clear step-by-step process for reporting, managing, and responding to racism complaints. It ensures that all concerns are handled promptly, fairly, and in a culturally safe way.

## 2. SCOPE

This procedure applies to all staff, volunteers, contractors, participants, families, and stakeholders involved in KYF programs, workplaces, and activities.

## 3. DEFINITIONS

**Racism** - Any behaviour, practice, policy, or structure that discriminates against, excludes, marginalises, or disadvantages people based on their race, ethnicity, culture, or skin colour. Racism may be overt (e.g., slurs, harassment), covert (e.g., exclusion, microaggressions), or structural.

**Direct Racism** - Intentional and obvious actions that demean, disadvantage, or exclude a person because of their race (e.g., racial insults, refusal of service).

**Indirect Racism** - Policies, rules, or practices that appear neutral but in effect disadvantage people of a certain race or cultural background (e.g., scheduling programs without considering cultural or religious observances).

**Systemic Racism** - The way racism is embedded within the structures, policies, and practices of an organisation or society. It occurs when institutional arrangements, norms, or procedures result in unequal opportunities or outcomes for people based on race, even if no individual intends to discriminate. Systemic racism could include:

- Failing to consult Aboriginal and Torres Strait Islander communities in program design.
- Recruitment or promotion practices that consistently disadvantage people of certain cultural backgrounds.
- Disciplinary or complaint processes that do not adequately protect victims of racism.

**Cultural Safety** - An environment where people feel respected, included, and free from racism and discrimination. Cultural safety requires ongoing reflection by individuals and organisations to challenge unconscious bias and systemic barriers.

**Discrimination** - Unfair or prejudicial treatment of a person or group based on characteristics such as race, ethnicity, religion, gender, disability, or sexual orientation.

**Harassment** - Unwanted behaviour that offends, humiliates, or intimidates a person, including repeated racist comments, jokes, or conduct.

**Microaggressions** - Subtle, often unintentional, comments or actions that convey prejudice or negative assumptions about a person based on their race or culture (e.g., questioning someone's "real" nationality).

## 4. RESPONSIBILITIES

- **Child Protection Contact Officer** (Impact & Operations Manager):
  - Lead on racism complaints relating to participants, families, or program delivery.
  - Ensure cultural safety and protective measures are in place.

- Escalate serious complaints to CEO and/or external authorities.
- **People & Processes Manager:**
  - Lead on racism complaints raised by or against staff, volunteers, contractors, or Board members.
  - Conduct impartial workplace investigations in line with HR and WHS standards.
  - Escalate systemic issues to CEO and/or Board.
- **CEO:**
  - Receive complaints if either designated manager is involved or there is a conflict of interest.
  - Provide governance oversight and ensure systemic responses.

## 5. PROCEDURE STEPS

### Step 1 – Complaint Lodgement

- Participant/program complaints: Report to Child Protection Contact Officer.
- Staff/workplace complaints: Report to People & Processes Manager.
- Conflict of interest or escalation required: Report directly to CEO or Board Chair.

Complaints can be lodged:

- Verbally (in person or by phone).
- In writing (email, letter, or Incident/Complaint Form).
- Through a trusted intermediary (another staff member or volunteer).

### Step 2 – Acknowledge and Record

- All complaints must be acknowledged within 2 working days.
- The receiving manager documents details in the Racism Complaint Register, noting:
  - Date/time of complaint
- Complainant details (confidentiality maintained)
  - Nature of complaint
  - Immediate safety or cultural safety concerns

### Step 3 – Assess and Allocate

- Determine whether the complaint is:
  - Low-level (minor incident): Addressed with mediation, education, or corrective discussion.
  - Serious (systemic or harmful): Requires formal investigation.
  - Critical (safety risk or unlawful discrimination): Escalated to CEO and referred to external authorities (e.g., police, anti-discrimination bodies).

### Step 4 – Investigation and Action

- Child Protection Contact Officer investigates participant/program complaints.
- People & Processes Manager investigates staff/workplace complaints.
- Investigations include:
  - Confidential interviews
  - Collection of evidence (emails, records, witness statements)
  - Risk assessment (safety, cultural harm, reputational risk)

### Step 5 – Outcome and Resolution

- Complaint outcomes must be communicated in writing to the complainant.
- Possible actions:
  - Mediation or facilitated resolution
    - Training or coaching

- Disciplinary action (warnings, termination, program removal)
- Referral to external authorities if required

### Step 6 – Documentation and Reporting

- All complaints are logged in the Racism Complaint Register.
- Managers submit quarterly reports to the CEO on complaints and trends.
- The Board receives a de-identified annual report on racism complaints and outcomes.

### Step 7 – Post-Complaint Support

- Provide support to those impacted, such as:
  - Counselling or Employee Assistance Program (staff)
  - Cultural support services (participants and families)
  - Debriefing and supervision (volunteers and staff teams)

## 6. FLOW OF REPORTING

### Pathway A – Participant/Program Complaint

Participant/Family → Child Protection Contact Officer → (if serious) CEO/External Authorities → Outcome & Support

### Pathway B – Staff/Workplace Complaint

Staff/Volunteer/Contractor → People & Processes Manager → (if serious) CEO/External Authorities → Outcome & Support

## 7. RELATED DOCUMENTS & REFERENCES

This procedure aligns with:

- KYF Zero Tolerance Racism Policy V1-2025
- KYF\_RISK\_POLICY\_Child Protection and Risk Management Strategy V2-2025
- KYF Complaints Management Procedure

## 8. APPROVALS & AUTHORISATION

Version	Approved By	Approval Date	Review Date
1	CEO	7 October 2025	31 October 2026