



MEMBERSHIP, GROWTH & DIGITAL TRANSFORMATION

Member Complaints: The Policy Most Associations Don't Have

A national guideline exists for this. Many associations have a discipline process but no policy for complaints about the association itself

Many associations have a discipline process in their constitution for handling member misconduct, the procedural fairness topic this series covered earlier. Far fewer have an equivalent policy for the opposite direction: a member unhappy with the association's own service, a decision, or how a specific situation was handled. This gap deserves the same deliberate attention.

Which rules apply to your association?

The law depends on how your association is set up. A **company limited by guarantee** follows the Corporations Act 2001 (Cth) and its constitution. An **incorporated association** follows its state or territory associations Act and its rules. A **registered charity** also follows the ACNC Act and the ACNC Governance Standards, and some Corporations Act rules are replaced for charities that are companies. Check your own governing documents, and get advice before decisions with legal consequences.

In this resource

1. [A National Benchmark Worth Consulting](#)
2. [The Same Natural Justice Principles, Applied More Broadly](#)
3. [Why This Should Never Disappear Entirely Into Administration](#)

A National Benchmark Worth Consulting

Australia has a published standard specifically addressing this, AS 10002:2022, Guidelines for complaint management in organizations, an Australian adoption of ISO 10002:2018. It is a voluntary guideline that any organisation, including a small association, can use as a benchmark. It is not a legal requirement unless a contract, funding agreement or code makes it one. Better-practice complaint guidance, including the Commonwealth Ombudsman's Better Practice Guide to Complaint Handling, treats fairness as applying in both directions: to the person making the complaint, and to any staff member or volunteer the complaint concerns. An association building a complaints process focused entirely on satisfying the complainant, without a fair process for the person or decision being complained about, has built half a system.

The Same Natural Justice Principles, Applied More Broadly

This series established the core elements of procedural fairness in the specific context of member and director discipline: the right to be heard, an unbiased decision-maker, and a decision based on relevant evidence. These same principles apply to general member complaints handling, not only formal disciplinary matters. A member complaining about a decision affecting them is entitled to a fair process for how that complaint is investigated and resolved, even where no misconduct or discipline is involved at all. The Commonwealth Ombudsman's better-practice guidance is specific on a detail many complaints processes skip: a complainant should be told the actual reasons if their complaint is not upheld, and informed of any avenue for further review. A complaints process that simply says no, without explaining why or where to go next, has not actually completed the process, regardless of how quickly it was closed.

Why This Should Never Disappear Entirely Into Administration

Better-practice guidance on complaint handling identifies leadership commitment as an essential element, not a nicety. The chief executive's personal, visible endorsement of the complaints process, and a clear line of senior accountability for how complaints are handled, meaningfully affects whether a complaints system functions well in practice or exists only as an unused policy document. A board should ask whether member complaints handling has this kind of visible ownership, or whether it has quietly become an entirely administrative function with no senior accountability at all.

- Build a member complaints policy distinct from your disciplinary and misconduct policy, addressing complaints about the association's own service, decisions, and actions specifically.
- Check whether your constitution or rules already contain a grievance or dispute-resolution procedure, align the complaints policy with it, and record how complaint information is stored and who can see it.
- Apply the natural justice principles this series established for disciplinary matters to general complaints handling as well, a fair hearing, an unbiased decision-maker, and a decision based on the relevant facts.
- Ensure your process explains actual reasons when a complaint is not upheld, and informs the complainant of any further review avenue, rather than closing the matter with a bare no.
- Confirm your complaints process is fair to the staff member or volunteer being complained about as well as the complainant, consistent with the balance better-practice complaint guidance describes.
- Maintain visible senior leadership accountability for complaints handling, rather than allowing it to become a purely administrative function with no meaningful oversight from the chief executive or board.

A member complaint, handled well, is an opportunity to demonstrate the fairness and accountability your association asks its own members to extend to it. Handled poorly, or left without any real policy at all, it becomes exactly the kind of grievance that erodes trust quietly, one unresolved complaint at a time.

This is one of the practical governance topics built into our Association CEO course, alongside the papers, tools and frameworks that turn the principle into your board's actual practice. [Explore the course](#)

Annie Gibbins

Founder and CEO, Nexus Leadership

BOARDROOM ACTION WORKSHEET

Member Complaints: The Policy Most Associations Don't Have

Turn the resource into evidence, a decision and an accountable next step. Keep the completed record in your association's approved board records system.

1 What is the issue or decision?

State the governance question in one clear sentence.

2 What evidence do we already have?

Record the facts, source documents and stakeholder evidence available now.

3 What evidence is still needed?

Identify the legal, regulatory, financial, member or operational information still required.

4 What is the agreed next action?

Capture the owner, timeframe and how the matter will return to the board.

Action owner	Review date	Board decision or resolution

General education, not legal, financial, tax, clinical or governance advice. Confirm specifics at the relevant primary source or with your own qualified adviser. Nexus Leadership is operated by Lipstick Consulting Pty Ltd · ABN 15 619 120 482.

CONTINUE YOUR LEARNING

Turn governance principles into practical board action.

Self-paced courses, editable resources and practical support for association boards and CEOs at nexusleadership.com.au.