

Complaints Policy and Procedure

Global Association of Excellence in Health & Wellness (GAEHW)

1. Purpose

GAEHW sets professional standards and may provide membership, certification and accreditation services. A credible standards framework requires a practical mechanism for receiving, assessing and resolving complaints.

This Policy covers two distinct categories:

- Part A — complaints about a member, certified practitioner, accredited programme or service, or Country Representative.
- Part B — complaints about GAEHW itself, including its procedures, personnel, communications or service.

Part A concerns professional conduct or compliance with GAEHW requirements. Part B concerns how GAEHW conducts itself.

2. Principles

Fairness. A person or organisation complained about will be informed of the substance of the complaint and given a reasonable opportunity to respond before a final decision is made.

Impartiality. No person will assess or decide a complaint where they have a personal, commercial or professional interest. No person involved in the original determination may decide an appeal.

Proportionality. The process used will reflect the seriousness and complexity of the matter. Not every complaint requires a formal investigation.

Timeliness. GAEHW will aim to deal with complaints within the indicative timeframes in this Policy and will advise the parties if additional time is reasonably required.

Confidentiality. Complaint information will be disclosed only where reasonably necessary to manage the matter and will be handled in accordance with the GAEHW Privacy Policy.

No detriment. A person will not be disadvantaged for making a complaint in good faith.

3. Scope

What this Policy covers

- Breach of the GAEHW Code of Ethics or applicable professional requirements.
- Misrepresentation of membership, certification or accreditation status.
- Unauthorised or improper use of the GAEHW name, logo or mark.
- False or misleading information provided in an application or review process.
- Professional conduct that may cause harm to a client or materially bring the profession or GAEHW into disrepute.
- Failure to maintain applicable conditions of membership, certification or accreditation.

- Dissatisfaction with a GAEHW procedure, communication or service.

What this Policy does not cover

- Fee disputes between a practitioner or provider and their client, unless the matter also raises a relevant professional-conduct issue.
- Matters outside professional practice that are unrelated to the person's or organisation's standing with GAEHW.
- Criminal conduct. Where a complaint indicates possible criminal conduct, GAEHW may refer the matter to the appropriate authority and may pause its own process where appropriate.
- Matters requiring medical or clinical adjudication. GAEHW is not a healthcare regulator and does not assess clinical treatment decisions. Such matters should be directed to the appropriate regulator or authority in the relevant jurisdiction.

GAEHW membership, certification or accreditation does not replace any licence, registration or regulatory approval required in the relevant country or jurisdiction.

PART A — Complaints about members, certified practitioners, accredited programmes or services, and Country Representatives

4. Who may complain

A complaint may be submitted by a client, member of the public, GAEHW member, employer, training provider, partner organisation or other person with relevant information. GAEHW may also initiate a review where it becomes aware of a matter that may fall within this Policy.

5. How to complain

Complaints must be submitted in writing through GAEHW's official complaints or contact channel published on the website. A complaint should include, where available:

- the complainant's name and contact details;
- the name of the person or organisation complained about;
- a clear factual description of what occurred, including relevant dates;
- any supporting evidence; and
- the outcome the complainant is seeking.

Anonymous complaints may be recorded but will not normally be investigated where fairness requires the respondent to know the substance and source of the allegations. GAEHW may consider an anonymous complaint where it raises a serious risk to public safety or integrity and can be independently verified.

Complaints should normally be submitted within twelve (12) months of the relevant events. GAEHW may accept a later complaint where there is a reasonable explanation for the delay or where the seriousness of the matter warrants consideration.

6. Stage 1 — Acknowledgement and initial assessment

GAEHW will normally acknowledge a complaint within five (5) business days.

An initial assessment will normally be completed within forty-five (45) business days. GAEHW will determine whether the matter should be:

Outcome	When it may apply
No further action	The matter is outside scope, lacks sufficient substance, or is more appropriately dealt with elsewhere.
Informal resolution	The matter is relatively minor and may be resolved through clarification, correction, apology or an undertaking.
Formal investigation	If substantiated, the matter could amount to a breach warranting a formal outcome or sanction.
Referral	The matter should be dealt with by a regulator, professional body, consumer authority or law-enforcement agency.

The complainant will be informed of the initial assessment and, where appropriate, the reasons for the proposed course of action.

Interim measures. Where a complaint indicates a serious and immediate risk, GAEHW may impose a temporary restriction or suspension of relevant GAEHW status while the matter is considered. An interim measure is precautionary and is not a finding of wrongdoing.

7. Stage 2 — Investigation

7.1 The respondent will be notified in writing of the substance of the complaint and given the material reasonably necessary to respond, subject to appropriate redaction to protect third parties or confidential information.

7.2 The respondent will normally have twenty (20) business days to provide a written response.

7.3 GAEHW may request further information from either party, relevant witnesses or an independent expert where reasonably necessary.

7.4 GAEHW will aim to complete a formal investigation and reach a final determination within ninety (90) business days after receiving the respondent's response, or after the response deadline if no response is received.

7.5 If additional time is reasonably required because of complexity, availability of evidence, external proceedings or another material reason, GAEHW will notify the parties and provide a revised indicative timeframe.

7.6 A respondent's failure to participate does not prevent GAEHW from proceeding on the available information.

8. Stage 3 — Determination

8.1 The person or group appointed by GAEHW to determine the complaint must be impartial and free from relevant conflicts of interest.

8.2 The determination will be made on the balance of probabilities, having regard to the available evidence and the applicable GAEHW requirements.

8.3 The determination will be communicated in writing to the parties, with reasons appropriate to the circumstances.

8.4 Where a complaint is substantiated, GAEHW may impose one or more proportionate outcomes or sanctions under Clause 9.

9. Outcomes and sanctions

Sanctions are applied proportionately, taking into account the seriousness of the conduct, risk of harm, prior substantiated complaints, corrective action, cooperation and any relevant mitigating or aggravating circumstances. The examples below are guidance rather than automatic outcomes.

Possible outcome	Typical use
Written caution	A first substantiated complaint of a minor nature.
Written reprimand	A substantiated complaint of a more serious nature; recorded on file.
Conditions	Required corrective action, supervision, additional CPD, training or another remedial measure.
Suspension	A repeated complaint or a single serious breach where temporary removal of status is proportionate.
Withdrawal of certification or accreditation	A serious breach, repeated breaches, or failure to maintain required conditions.
Termination of membership	Repeated substantiated complaints or conduct fundamentally inconsistent with continued membership.

A final sanction will normally take effect after the appeal period has expired or any appeal has been determined, unless an interim measure is required because of serious and immediate risk.

Where GAEHW status is suspended, withdrawn or terminated, the person or organisation must stop representing themselves as holding that status and must cease any use of GAEHW marks or references that are no longer authorised.

10. Publication and public register

10.1 GAEHW may record relevant current status in its public register, including active, suspended, withdrawn or expired status, where applicable.

10.2 GAEHW will not ordinarily publish the details of individual complaints.

10.3 GAEHW may publish an anonymised summary of a determination where this serves a legitimate public-interest, educational or standards-improvement purpose.

10.4 Where an outcome is under appeal, GAEHW may indicate that the matter is under review where this is relevant to the accuracy of the public register.

Publication and register practices will be handled consistently with the GAEHW Privacy Policy and applicable register specifications.

PART B — Complaints about GAEHW

11. Scope

Part B applies to complaints about:

- the handling of an application for membership, certification or accreditation;

- the conduct of GAEHW personnel, appointed reviewers, committee members or Country Representatives acting in that capacity;
- the standard of GAEHW service, communication or timeliness; and
- the application of GAEHW's own published policies or procedures.

Where a complaint is, in substance, a request to challenge a professional determination or sanction, the appeal provisions in Clause 15 apply.

12. Stage 1 — Direct resolution

12.1 Complaints must be submitted in writing through GAEHW's official complaints or contact channel published on the website.

12.2 GAEHW will normally acknowledge receipt within five (5) business days.

12.3 GAEHW will aim to provide a substantive response within forty-five (45) business days. If more time is reasonably required, the complainant will be informed and given a revised indicative timeframe.

12.4 Where appropriate, matters may be resolved at this stage by explanation, correction, apology or another practical remedy.

13. Stage 2 — Formal review

13.1 If the complainant remains dissatisfied with the Stage 1 response, they may request a formal review within thirty (30) calendar days of receiving it.

13.2 The review must be conducted by a person who was not materially involved in the matter complained of. Where internal separation is not practicable because of GAEHW's size, GAEHW will appoint an independent external reviewer for the purpose.

13.3 The reviewer will aim to issue a written response, with reasons, within ninety (90) business days. If additional time is reasonably required, the complainant will be notified and given a revised indicative timeframe.

13.4 The Stage 2 decision concludes GAEHW's internal complaints process, subject to any external rights available under applicable law.

14. External escalation

Where relevant, a complainant may have rights to approach an external regulator or authority. For example, where a complaint concerns personal information and Australian privacy law applies, the complainant may be entitled to approach the Office of the Australian Information Commissioner (OAIC). Consumer-protection or professional-regulatory matters may be directed to the appropriate authority in the relevant jurisdiction.

GENERAL PROVISIONS

15. Appeals

15.1 A respondent may appeal a determination or sanction under Part A within thirty (30) calendar days of receiving the written decision.

15.2 An appeal may be considered where:

- the published process was materially not followed;
- the determination was not reasonably open on the available evidence;
- the sanction is materially disproportionate; or
- significant new evidence has become available that could not reasonably have been provided earlier.

15.3 An appeal will be heard by an Appeals Panel of three (3) to five (5) independent persons convened when required.

15.4 No person who participated in the original determination, or who has a personal, commercial or professional interest in the outcome, may sit on the Appeals Panel.

15.5 GAEHW must identify and maintain an internal pool of eligible independent persons before the complaints and appeals framework becomes operational, so that a panel can be convened without compromising independence.

15.6 The Appeals Panel may uphold, vary or overturn the determination or sanction, or return the matter for reconsideration.

15.7 The Appeals Panel will aim to decide the appeal within ninety (90) business days of receiving the complete appeal material. If more time is reasonably required, the parties will be notified and given a revised indicative timeframe.

15.8 The Appeals Panel's decision is final within GAEHW's internal process.

16. Conflicts of interest

16.1 Any person involved in assessing, investigating, reviewing or deciding a complaint or appeal must disclose any personal, commercial or professional connection to the parties or the subject matter.

16.2 A person with a relevant conflict must not participate in the matter.

16.3 Where GAEHW cannot manage a conflict internally because of its size, an independent external person will be appointed.

17. Vexatious, repetitive and knowingly false complaints

17.1 A complaint that is frivolous, vexatious or made for an improper purpose may be dismissed at initial assessment.

17.2 Knowingly providing materially false information, or knowingly making a false complaint, may itself constitute a breach of GAEHW requirements where the complainant is subject to those requirements.

17.3 A matter already determined will not normally be reconsidered unless significant new evidence or a material procedural issue is identified.

18. Confidentiality and personal information

18.1 Complaint information will be disclosed only to persons who reasonably require it to assess, investigate, determine, review or administer the matter.

18.2 The respondent will be informed of the substance of the complaint and, where fairness reasonably requires it, the identity of the complainant. If anonymity is requested, GAEHW will explain any resulting limitations on its ability to proceed.

18.3 Complaint records will be held securely and handled in accordance with the GAEHW Privacy Policy.

18.4 Complaint records will be retained only for as long as reasonably necessary for complaint management, legal or regulatory obligations, audit, dispute management and legitimate record-keeping. Specific retention periods will be confirmed in GAEHW's records-retention arrangements following legal review.

18.5 Where a sanction or status change must remain part of GAEHW's official records, the relevant record may be retained for as long as reasonably necessary to maintain the integrity of those records and meet applicable obligations.

19. Support, accessibility and Country Representatives

19.1 GAEHW will aim to make the complaints process reasonably accessible. Where practicable, assistance may be provided to a person who requires support to submit a complaint.

19.2 A complainant may be assisted or represented by another person, subject to reasonable identity, authority and confidentiality requirements.

19.3 Country Representatives may receive or forward complaints only to the extent permitted by their agreement with GAEHW. They have no authority to independently assess, investigate, determine or promise the outcome of a complaint unless expressly authorised in writing by GAEHW.

19.4 Personal information handled in connection with a complaint must be managed consistently with the GAEHW Privacy Policy and applicable Country Representative data-handling requirements.

20. Records, monitoring and improvement

20.1 GAEHW will maintain an internal record of complaints received, their general category, progress and outcome.

20.2 Complaints information may be reviewed periodically to identify recurring issues, improve standards, procedures and guidance, and support governance oversight.

20.3 As GAEHW grows, formal reporting arrangements may be expanded to reflect its governance structure and operational capacity.

21. Review of this Policy

This Policy will be reviewed periodically and may be updated as GAEHW's services, governance structure, legal obligations and operational capacity develop.

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