

# Complaints Handling Policy

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## 1. Purpose

This Complaints Handling Policy (CHP) aims to establish a permanent system for processing feedback from The 40K Foundation Australia Limited (40K) stakeholders, one that stipulates clear processes on how to lodge, register, triage, investigate and finalise feedback.

The purpose of this policy is to:

- enable Staff, including management, contractors and volunteers of 40K, Partner Organisations, or any individual associated with programs managed or funded by 40K, to bring to the attention of the 40K CEO or Board, a complaint against the organisation or any individual(s) associated with it;
- provide protection for persons who disclose misconduct or bring forward a complaint including allowing complainants to de-identify themselves;
- establish a documented investigation procedure that keeps an organisational record of all complaints; • establish a triage system for classifying the severity of complaints raised;
- provide appropriate assistance and referrals to complaints that fall outside the scope of this policy.

The CHP is the first point of contact for all complaints brought to the attention of 40K, including but not limited to those related to child safeguarding concerns, sexual exploitation, abuse and harassment (SEAH), organisational misconduct, breaches of the ACFID Code of Conduct and supporter concerns. It should be read and used in conjunction with 40K's other policies including

- Child Protection policy
- Counter-terrorism and Anti-money laundering policy
- Fraud control policy
- HR policy
- Protection from Sexual Exploitation and Abuse policy
- Whistleblowing policy

## 2. Scope

This policy applies to all implementing partners, staff, volunteers, and anyone that officially represents the services of 40K ('personnel') receiving or managing complaints from the public made to or about us, regarding our products, services, staff and complaint handling. Implementing partners acting on behalf of 40K are obligated to follow this policy.

Staff grievances, code of conduct complaints and public interest disclosures are dealt with through separate mechanisms.

If a complaint is received which is not within the scope of 40K's policy or is not directly related to 40K, its representatives or its work, then the complaint must be handled as an out-of-scope complaint as outlined in section 9.

Upon completion of an investigation, the complainant (and, if applicable, the person who is the subject of the complaint) should be given:

- Adequate reasons for any decision made;
- Any changes or action that have resulted from the complaint;
- A remedy, where appropriate; and
- Information on where to seek independent internal and external review

### 3. Organisational commitment

This organisation expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
CEO of 40K	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> <li>• Report publicly on 40K's complaint handling.</li> <li>• Provide adequate support and direction to key staff responsible for handling complaints.</li> <li>• Regularly review reports about complaint trends and issues arising from complaints.</li> <li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</li> <li>• Encourage staff to make recommendations for system improvements.</li> <li>• Recognise and reward good complaint handling by staff.</li> <li>• Support recommendations for product, service, staff and complaint handling improvements arising from the analysis of complaint data.</li> </ul>
Manager responsible for complaint handling	Establish and manage our complaint management system.	<ul style="list-style-type: none"> <li>• Provide regular reports to CEO of 40K on issues arising from complaint handling work.</li> <li>• Ensure recommendations arising out of complaint data analysis are reported to the CEO of 40K and implemented where appropriate.</li> <li>• Train and empower staff to resolve complaints promptly and in accordance with 40K's policies and procedures.</li> <li>• Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.</li> <li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</li> <li>• Recognise and reward good complaint handling by staff.</li> </ul>
Staff whose duties include complaint handling	Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Assist people in making a complaint, if needed.</li> <li>• Comply with this policy and its associated procedures. Keep informed about best practices in complaint handling.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve the organisation's complaints management system.</li> <li>• Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</li> </ul>

All staff, volunteers and implementing partners	Understand and comply with 40K's complaint handling practices.	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Understand and abide by 40K's complaint handling policies and procedures.</li> <li>• (In the case of partners) Have their own complaint handling policy that is aligned to 40K's</li> <li>• Assist people who wish to make complaints access 40K's complaints process.</li> <li>• Be alert to complaints and assist staff handling complaints resolve matters promptly.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</li> </ul>
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## 4. Terms and Definitions

### Complaint

Expression of dissatisfaction made to or about 40K, its products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances [see our HR policy]
- public interest disclosures made by our staff [see our internal reporting policy]
- responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback' below]
- service requests [see definition of 'service request' below], and
- requests for information.

### Complaint management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

### Dispute

An unresolved complaint escalated either within or outside of our organisation.

### Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our products, services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### Grievance

A clear, formal written statement by an individual staff member about another staff member or a work related problem.

### **Misconduct**

In this policy 'misconduct' is classified as:

- corrupt conduct;
- a substantial mismanagement of 40K resources;
- a serious breach of 40K policy;
- conduct involving substantial risk to a child or children, public health or safety, or to the environment that would, if proved, constitute either a criminal offence or reasonable grounds for dismissing or terminating the services of a manager, staff member, or volunteer of 40K or Partner organisation who engaged in that conduct.

### **Policy**

A statement of instruction that sets out how we should fulfil our vision, mission and goals.

### **Procedure**

A statement or instruction that sets out how our policies will be implemented and by whom.

### **Public interest disclosure**

A report about wrong doing made by a public official in New South Wales that meets the requirements of the Public Interest Disclosures Act 1994.

## **5. Facilitating complaints**

### **5.1 People focus**

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame. People making complaints will be:

- provided with information about our complaint handling process
- provided with accessible ways to make complaints
- listened to, treated with respect supported by staff in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redressal or review.
- Overseas: Complaints should be made to the program officers in writing, who will in-turn notify the country manager who will notify the CEO: Swetha Prakash on (+91 9686647788) – who will ask you to complete the Complaints Form and then assess and investigate the nature of the complaint and provide reasons for decision. However, complaints can be made directly to the CEO over voice calls or written format.
- In Australia: Complaints should be made to the CEO: Swetha Prakash on (+91 9686647788).

### **5.2 No detriment to people making complaints**

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

### **5.3 Anonymous complaints**

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

### **5.4 Accessibility**

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance. We will ensure that the program officer translates the procedures of complaints handling to all the stakeholders in their convenient languages on signing a MOU.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

### **5.5 No charge**

Complaining to us is free.

## **6. Responding to complaints**

### **6.1 Early resolution**

Where possible, complaints will be resolved at first contact with 40K.

### **6.2 Responsiveness**

- We will promptly acknowledge receipt of complaints within 5 days.
- We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.
- We are committed to managing people's expectations, and will inform them as soon as possible (within 10 days of the complaint raised), of the following:
  - the complaints process
  - the expected time frames for our actions
  - the progress of the complaint and reasons for any delay
  - their likely involvement in the process, and
  - the possible or likely outcome of their complaint.
- We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).
- We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### **6.3 Objectivity and fairness**

- We will address each complaint with integrity and in an equitable, objective and unbiased manner.
- We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.
- Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

### **6.4 Responding flexibly**

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

### **6.5 Confidentiality**

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by 40K as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## **7. Manage the parties to a complaint**

### **7.1 Complaints involving multiple agencies**

- a. Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.  
  
oSubject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.
- b. Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.
- c. Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

### **7.2 Complaints involving multiple parties**

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

### **7.3 Empowerment of staff**

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

### **7.4 Managing unreasonable conduct by people making complaints**

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

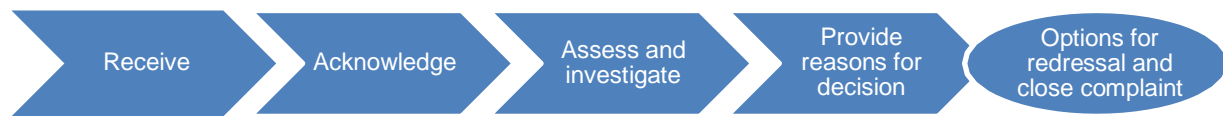
- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

For further information on managing unreasonable conduct by people making complaints please see the [Ombudsman's Managing Unreasonable Complainant Conduct Model Policy 2013](#).



## 8. Complaint management system



### Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

a) Overseas: Complaints should be made to the program officers in writing, who will in-turn notify the country manager who will notify the CEO: Swetha Prakash on (+91 9686647788) – who will ask you to complete the Complaints Form and then assess and investigate the nature of the complaint and provide reasons for decision. However, complaints can be made directly to the CEO over voice calls or written format. Complaints can also be lodged to secondary contacts, including the implementing partner lead or Board members, when the complaint concerns the CEO or other staff members.

b) In Australia: Complaints should be made to the CEO: Swetha Prakash on (+91 9686647788). Complaints can be send to [info@40k.com.au](mailto:info@40k.com.au).

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

### 8.1 Receipt of complaints

Unless the complaint has been resolved informally, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information and
- any additional support the person making a complaint requires.

### 8.2 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 2 working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

### 8.3 Initial assessment and addressing of complaints

#### 8.3.1 Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

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When determining how a complaint will be managed, we will consider:

- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

40K uses a triage system to classify the level of the complaint. Its purpose is to

- determine whether a complaint falls within or outside the scope of this policy;
- determine whether a complaint concerns a high-risk incident (issues of CS, PSEA, whistleblowing, terrorism or fraud);
- guide the 40K CEO of the appropriate response to varying levels of risk;
- ensure that more urgent complaints are processed to the front of the 'queue' and are addressed with greater immediacy than those that pose a lower risk.

The objective of the Complaints Triage Framework is to allocate a risk level to each lodged complaint. Guidelines for how to allocate risk levels, with accompanying examples are included in the framework below:

#### Complaints Triage Framework

Risk level	Guidelines	Example
Insignificant	<ul style="list-style-type: none"> <li>- Able to be dealt with locally</li> <li>- No external implications</li> <li>- This includes compliments and incidents</li> </ul>	<ul style="list-style-type: none"> <li>- A supporter submits a compliment</li> <li>- A supporter advises 40K of their marketing and communications preferences</li> </ul>
Minor	<ul style="list-style-type: none"> <li>- Requires corrective action of individual activities</li> <li>- No external implications</li> </ul>	<ul style="list-style-type: none"> <li>- A supporter expresses dissatisfaction about a 40K fundraising event</li> <li>- A supporter submits advice about how to improve 40K's organisational activities</li> </ul>
Moderate	<ul style="list-style-type: none"> <li>- Requires corrective action at a Project or Program level</li> <li>- Concerns a breach of 40K policy / laws / regulations</li> <li>- Poses an impact on operations / financial implications</li> <li>- Risk of reputational damage, adverse PR or media attention</li> <li>- Potential interest from external regulatory authorities</li> </ul>	<ul style="list-style-type: none"> <li>- A Partner expresses dissatisfaction about the internal processes of a Project</li> <li>- A Partner expresses dissatisfaction about a 40K funding decision</li> <li>- 40K is made aware of a breach of policy, either from their own Staff or implementing Partners: one that can be rectified through corrective measures</li> </ul>
Major	<ul style="list-style-type: none"> <li>- The wellbeing or safety of a stakeholder is at risk</li> <li>- Requires corrective action at an organisational level</li> <li>- Concerns a breach of 40K Policy / laws / regulations</li> <li>- Poses a significant impact on operations / financial implications</li> <li>- Involves a case of financial wrongdoing</li> <li>- Risk of significant reputational damage, adverse PR or media attention</li> </ul>	<ul style="list-style-type: none"> <li>- A complaint is made regarding a beneficiary's wellbeing or safety</li> <li>- 40K is made aware of a major breach of policy or Staff misconduct, either from their own Staff or implementing Partners.</li> </ul>
Extreme	<ul style="list-style-type: none"> <li>- Poses a threat to the viability and future of 40K</li> <li>- The wellbeing or safety of a stakeholder is at risk</li> <li>- Requires corrective action at an organisational level</li> <li>- Concerns a breach of 40K Policy / laws / regulations</li> <li>- Poses a significant impact on operations / financial implications</li> <li>- Involves a case of financial wrongdoing</li> <li>- Risk of significant reputational damage, adverse PR or media attention</li> </ul>	<ul style="list-style-type: none"> <li>- A complaint is made regarding a beneficiary's wellbeing or safety</li> <li>- A 'high-risk' complaint is lodged (a complaint on cases of CP, PSEAH, whistleblowing, terrorism or fraud)</li> </ul>

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### **8.3.2 Addressing complaints**

The CEO is required to notify the Board of complaints that have been allocated a risk of major or extreme. The investigation process is then to be conducted by the Board and the CEO, with assistance from any other 40K Staff members as required.

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.
- provide appropriate assistance and referrals to survivors (e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services.)

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

### **8.4 Providing reasons for decisions**

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the Privacy and Personal Information Protection Act 1998 and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

### **8.5 Closing the complaint, record keeping, redressal and review**

We will keep comprehensive records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.
- misconduct complaints, noting the ability to de-identify complaints at the request of the complainant or survivor.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

## 9. Responding to out-of-scope complaints

When the conclusion of the review and analysis is that a complaint cannot be handled by the organisation or is considered to be optimally handled by another organisation, the complaint should be referred to the appropriate entity or person.

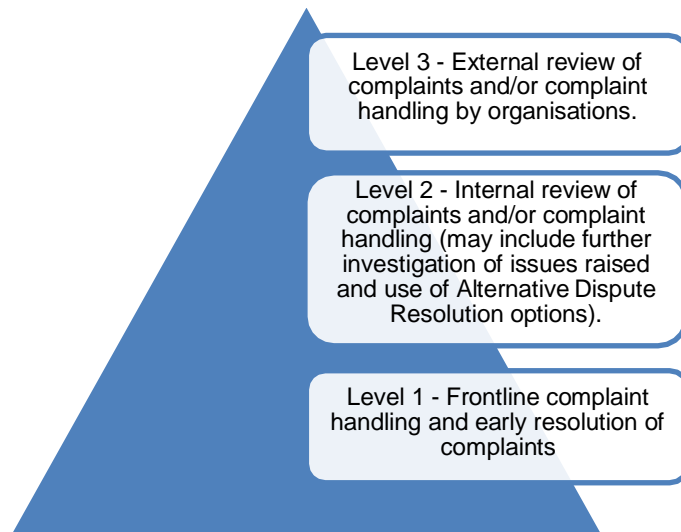
Process of referral should include:

- Discussing with the referral partner/organization whether and how they will take up the complaint and ensure compliance with principles such as confidentiality and protection against retaliation.
- Inform the complainant and seeking his/her consent for the referral, including explaining the referral decision and providing points of contact. Assure the complainant that they can contact the receiver of the complaint if they change their mind.
- Follow up regularly with the complainant (where appropriate) and the referral partner on the progress of the complaint resolution.
- Provide appropriate support to the referral partner to overcome any challenge in the resolution of the complaints, until the required trust has been established between the parties. This might include setting up confidential conversations or acting as a messenger between the complainant and the referral partner.

## 10. Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

The three levels of complaint handling are:



We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, we may decide to escalate the complaint to a more senior officer within 40K. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of 40K review of their complaint, they may seek an external review of our decision (by the Ombudsman for example).

If a complainant is dissatisfied with the outcome of the complaint and if it relates to a potential breach of ACFID's Code of Conduct, the complainant may also choose to make a complaint to ACFID's Code of Conduct Committee.

In such a case, the complaint should:

- include the complainant's name and contact details
- set out the basis of the complaint
- outline which aspects of the Code of Conduct they believe have been breached
- outline the outcome that they are seeking
- include all available supporting information.

Note that the complainant will be asked to provide any required information that was not submitted. Any complaints that cannot meet the above criteria may be dismissed. Information about the complaint will be made available to 40K.

Complaints should be marked 'confidential' and sent to either:

Email: Chair, ACFID Code of Conduct Committee at [code@acfid.asn.au](mailto:code@acfid.asn.au)

Post: Chair, ACFID Code of Conduct Committee c/- ACFID, Private Bag 3, Deakin ACT 2600

## 11. Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily

retrieved for reporting and analysis.

Reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to 40K's CEO and senior management for review.

## **12. Monitoring of the complaint management system**

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.

### 13. Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making of and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.