

Complaints Handling Policy

COMS 3.2

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Responsible Office	Communications
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Scope / Short description	This policy is part of the Asian Aid Organisation (AAO) Policy Framework and is included within the Communications (COMS) Policy Manual
Related Asian Aid Documents	<p>AAO HRM 1.0 Code of Conduct</p> <p>AAO HRM 1.2 Child Safe Code of Conduct</p> <p>AAO Child Safe and SEAH Allegation Management SOP</p> <p>AAO PRO 3.3 Prevention of Sexual, Exploitation, Abuse and Harassment (PSEAH) Policy</p> <p>AAO HRM 3.4 Gender Equality, Disability and Social Inclusion (GEDSI) Policy</p> <p>AAO HRM 3.5 Privacy Policy</p> <p>AAO HRM 3.13 Performance Counselling and Disciplinary Policy</p> <p>AAO HRM 3.3 EEO, Discrimination and Harassment Policy</p> <p>AAO COMS 3.3 Ethical Communications Policy</p> <p>AAO COMP 6.0 Whistleblower Policy</p> <p>AAO Partnership Guidelines</p> <p>AAO Partnership Agreement</p> <p>AAO Child Focused Development (CFD) Framework and Project Guidelines</p> <p>AAO Safeguarding Committee Terms of Reference</p>
Related Legislation and External Documents	<p>United Nations Convention on the Rights of the Child (CRC)</p> <p>Department of Foreign Affairs and Trade (DFAT) Child Protection Policy 2017 and Guidance Notes</p> <p>ACFID Code of Conduct (2019 revisions) ACNC External Conduct Standards</p>
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1. PURPOSE

The purpose of this policy is to outline the means by which Asian Aid Organisation (“**AAO**”, “**the organisation**”, “**we**”, “**our**”, “**us**”) manages complaints relating to its operations. It seeks to make clear the mechanisms available for making a complaint, how they will be handled and resolved.

We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies especially to delivery of services, seeking donations and accountability to stakeholders generally. We are committed to working according to or above the standard required by the Code of Conduct of the Australian Council for International Development (ACFID). Receiving concerns and complaints is one of the most important avenues for learning what we need to do to improve our work.

This policy will be reviewed annually, and as required.

2. SCOPE

The guiding principles contained in this policy are intended to apply to any complaint and take precedence except where to do so may interfere with legal requirements. This policy establishes the framework for AAO’s handling of complaints and applies to staff (employees and volunteers), program partners, suppliers, and people we work with to deliver AAO’s programs as well as any other person directly engaged by AAO who is informed of this policy.

Complaints may relate to, but are not restricted to:

- concerns about conduct
- criticism about a fundraising campaign or action
- concern over inappropriate use of funding
- any breach of the ACFID Code of Conduct
- organisational practices, policies, or procedures
- complaints about AAO supported development programs and/or operations of partners.

Depending on how AAO receives a complaint and the nature of the complaint, different mechanisms may direct our approach to complaint handling. Annex I provides general guidance including related policies that give effect to our complaints handling framework, including contact information and process for how to make a complaint to ACFID in relation to a breach of the ACFID Code of Conduct. This information is further included on the AAO website.

3. GUIDING PRINCIPLES

AAO has adopted the following principles for our complaints handling policy, procedures, and activities.

Principle 1: Visibility

We ensure through our publications and online presence that we value receiving concerns and complaints in all relevant communications. We advise a copy of this policy may be obtained and we provide clear information on how complaints may be made.

Principle 2: Accessibility

We will ensure that our complaint handling process is as accessible as we can practically make it to all complainants. Complaints can be made by telephone, in writing or by email to the head office in Australia.

Principle 3: Responsiveness

We will acknowledge the receipt of the complaint and respond to complaints in a timely manner.

Principle 4: Objectivity

We will address all complaints in an equitable, fair, and unbiased manner using evidence submitted by both the complainant and our personnel making reasonable inquiries through the complaint handling process. Where the complaint handling response requires investigation, all parties to a complaint will have the opportunity to be heard and respond to the substance of the complaint.

Principle 5: No Charges

Access to the complaint handling process is free of charge to complainants.

Principle 6: Confidentiality

We will observe strict confidentiality in complaint handling.

Principle 7: Consumer/client-focused approach

The interests of our consumers/clients are foremost in our approach to complaint handling.

Principle 8: Accountability

We will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.

Principle 9: Continual improvement

Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives.

4. DEFINITIONS

There are several relevant key terms used in this Policy and applicable in the work of implementing and monitoring this Policy by AAO and all its partner organisations. These are defined below.

Word/Term	Definition⁵
Complaint	means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.
Complainant	means a person, organisation, or its representative, making a complaint.
Confidentiality	relative to complaints handling, confidentiality is where only those people who need to be made aware of the complaint for the purposes of investigation or response. Parties to a complaint should not discuss the matter with any other person other than appropriate support persons.
Inquiry	means a request for information or an explanation.
Feedback	means opinions, comments, suggestions, and expressions of interest in the products or the complaint handling process.
Stakeholder or interested party	means a person or group having an interest in the performance or success of the organisation.

5. POLICY IN ACTION

Educating the organisation and training personnel

Our Complaints Handling Policy is distributed to our employees, volunteers, partners, contracted service providers and all others acting on our behalf at induction. We require all those who may be involved in any way with a complaint to formally signify their commitment to this policy.

To familiarise stakeholders with this policy AAO runs induction programs for our governing board members and all relevant personnel. Personnel directly involved in handling complaints are trained in all aspects of this policy and its implementation. We take care to train our field personnel to encourage, receive and handle complaints taking account of language barriers and cultural sensitivities.

Training and/or communication will also be provided via face-to-face meetings and internal, written communication following an update or change to the policy.

Publicising the policy

We make clear the value we place on receiving concerns and complaints in all relevant communications. Through the 'Contact Us' tab on our company website, there are clear instructions on how to submit a complaint and a link to our Complaints Handling Policy. We ensure that making a complaint is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can. All relevant communications (i.e. website, newsletters, annual report, partnership agreements, staff policies) explain this and explain our procedures for handling complaints including:

- where or to whom complaints can be made
- information to be provided by the complainant
- the process for handling complaints
- time periods associated with various stages in the process
- the complainant's options for remedy, including external means
- how the complainant can obtain feedback on the status of the complaint

As an expectation included in our partnership agreements, we will support our program partners to ensure care is taken in facilitating complaints from our program beneficiaries, including children and marginalised groups (refer to the Child Safeguarding Policy and Child Safe and SEAH Allegation Management SOP for details on submitting and managing complaints from child beneficiaries). This may include the use of oral or pictorial means of communication where literacy is a constraint.

Complaints handling procedure (general)

Our complaints procedure outlines the process by which a complaint can be made, the process for assessing and managing it as well as ways to escalate those where a resolution has not been reached.

This process has been outlined in a procedural flowchart included in Annex 2.

Complaints handling procedure (staff)

We recognise that speaking up about concerns at work or in connection with AAO program activities will depend on the nature of the concern. AAO's people and culture policies and procedures apply to complaints received by employees and volunteers or in relation to the workplace.

Making and receiving a complaint

We are able to receive complaints orally in person or by telephone and in writing by post, email or online via our website. Where complaints are made orally, we will ensure our write up of the complaint contains all the information the complainant wishes to provide. Complaints may be made by a friend or advocate of the complainant on their behalf. Complaints can be made, verbally, in writing or in person via the following channels:

- Directly: by speaking with any AAO staff member or relevant manager
- Phone: by calling our Supporter Services team on +61 2 6586 4250
- Email: contact@asianaid.org.au
- Letter/feedback form (head office): mailed to Asian Aid Organisation, PO Box 333, Wauchope NSW 2446

Anonymous complaints can be made, however complaints lodged in this manner may limit our capacity to respond or investigate them.

AAO views its accountability to our program beneficiaries (marginalised communities in our program locations) in the context of partnership with the local organisation(s) we support to work in those communities. For this reason, complaints processes for use by beneficiaries of our program locations will be developed by AAO's partner organisations and may provide for other avenues for making a complaint or raising a concern. AAO will support the development of such processes and will seek to ensure that they adhere to the principles outlined in this policy while recognising the autonomy of each agency.

Complaints received from program beneficiaries directly to AAO's head office will be referred to the Director of the relevant partner office. Serious complaints of misconduct will be made to the designated authority and managed in accordance with AAO's relevant policies (i.e. Code of Conduct, Child Safeguarding Policy, Whistleblower Policy, etc.) as well as relevant legislation.

Who can receive a complaint?

Any of AAO's staff can receive a complaint. However once received, complaints must be submitted to identified personnel trained on handling complaints. When taking a verbal complaint, they must clarify the person's concerns and document the details on the Client Complaint Form (Annex 1). Complaints from children require a different approach and procedural steps for this process are outlined in the Child Safe and SEAH Allegation Management SOP document.

Should a complainant wish to remain anonymous, the complaint can still be taken however it may limit the effectiveness of the investigation/resolution. After taking the complaint, the recipient should advise the complainant of the next steps which are outlined in the Complaints Handling Procedural Flowchart included in Annex 2.

These will generally involve:

- escalation to the relevant manager for investigation and determination; and
- communicating the process/proposed outcome to the complainant within an agreed timeframe.

Investigating a complaint

To conduct an investigation, the person handling the complaint will:

- establish the facts and gather the relevant information, and if necessary and/or practicable, interview those involved. Once the investigation is completed, the person handling the complaint will recommend a course of action to the Senior Management Team.

- if the outcome of the investigation is that there should be action taken in relation to an employee or volunteer, then the appropriate disciplinary or other organisational policies and procedures will be followed (refer to Annex 2).
- where the substance of the complaint is addressed under more than one AAO policy, we will take a practical approach to how this Policy is applied. This may include applying the relevant Policy to respond to the complaint.

Confidentiality and privacy

Any complaint raised with us will be treated confidentially. Complainants will not be penalised in any way for genuinely raising a concern with us. Some information may need to be shared on a strict 'need to know' basis with the Supporter Services team or a member of the Senior Management Team, particularly if there is a risk to the health and safety of anyone at AAO or involved in our programs.

AAO will ensure that information obtained throughout the complaint process is handled in accordance with the Privacy Policy. Limitations apply to privacy and confidentiality:

- where risks to health and safety are present,
- in matters involving persons under 18 years of age, or
- in circumstances where information is otherwise permitted or required to be shared by law.

Continuous improvement

All staff and volunteers are required to be familiar with this policy and support continuous improvement initiatives relevant to their work area and role. Those with specific responsibilities are trained in the application of this Policy.

Complaints and feedback form a valuable part of AAO's continuous improvement process. Where complaints and their subsequent investigations identify the need for systemic or procedural improvements, the recommendations will be referred to the relevant manager to investigate/implement as required.

The process will include:

- assess and report on whether the existing system/procedure is adequate;
- if it could be improved, make recommendations, and implement;
- provide feedback to the Senior Management/relevant manager responsible for handling the complaint so they can inform the complainant; and
- implement changes once approved.

Responsibilities

The primary personnel responsible for receiving, handling, and resolving (where possible) complaints are the Supporter Services team. Following that, the first point of escalation for the complaint(s) is to the Supporter Services Manager, who is responsible for:

- initial assessment of complaints and identifying those which can be dealt with informally and those which are clear, serious, or complex complaints to be addressed according to the relevant complaints handling procedures;
- ensuring complaints are referred to the appropriate organisational area, are resolved and that follow up actions have taken place; and
- maintaining the Complaints Log.

The Supporter Services Manager may choose to refer complaints to the Senior Management Team to be resolved, or directly through to the CEO. If further assistance is required from the CEO, complaints are then referred to the Chair of the Board.

The CEO is responsible for reporting substantiated complaints, status, and outcomes to the Board when they arise.

General timeframes

As a general guide, AAO will:

- acknowledge written complaints within 5 days of receipt.
- acknowledge oral complaints immediately.
- endeavour to resolve complaints within 30 days unless there are exceptional circumstances such as where a formal investigation or complex enquiry is required.
- if a complaint is not resolved within 30 days, we will inform the complainant of progress and keep them informed of progress every two weeks.

Closing out and escalation of complaints

Resolutions imposed or introduced as an outcome of any complaint resolution under this Policy may include a wide variety of non-disciplinary actions. A complaint cannot be closed until the complainant has been informed about steps taken to address the complaint and is satisfied that it has been addressed appropriately.

Where a complainant is unhappy with the response or its implementation, the complaint may be escalated depending on the nature of the complaint and the applicable policy.

In the first instance this should be to the Senior Management Team. If the complaint involves a member of this team or has failed to have been resolved by this team, it should be escalated to the CEO. From the CEO it should be escalated to the Chair of the Board to review the process followed in handling the complaint and reasonableness of the decision or outcome.

Complaints of serious misconduct will be made to the authorised delegate and managed in accordance with AAO's relevant policies (Code of Conduct, Child Safeguarding Policy, Performance Counselling and Disciplinary Policy) as well as any applicable legislation.

6. OTHER MATTERS

This policy takes effect from May 2024 and replaces any previous policy in this regard. Any amendments to this policy must be approved by the Board.

The Supporter Services Manager will communicate any amendments to staff and stakeholders as appropriate. For questions about this policy, contact the Supporter Services Manager.

Policy Amendment Table

Version #	Date	Short description of amendment	Approved by:
4.0	29/04/2024	Table of amendments included; minor edits to include removal of complaints handling procedures for staff, to be managed through Asian Aid's people and culture policies (Grievance Policy and Performance Counselling and Disciplinary Policy) and softening of timelines under 'General timeframes'; inclusion of Annex I 'Complaints Handling at Asian Aid', to include schedule and application of linked policies.	CEO/Board
5.0	26/06/2024	Reference to complaints concerning breach of ACFID Code included under section '2. Scope'. ACFID contact information included under Annex I.	CEO

ANNEX I:

Complaints Handling at AAO

AAO has developed this Annex to assist staff, volunteers, partners we work with to deliver AAO programs and the public to identify appropriate avenues for submitting a complaint and mechanisms in place for complaint handling. AAO will review this Annex periodically and the Supporter Services Manager may make updates as required.

Child Safety

Complaints concerning child abuse or incidents involving child safeguarding.

- Child Safeguarding Policy; <https://www.asianaid.org.au/about-us/policies/child-safeguarding-policy/>

Sexual exploitation, abuse, and harassment (SEAH)

Complaints or incidents concerning SEAH in relation to all organisations, companies, institutions, non-government, and government partners AAO has a relationship with and our supporters and Board of management.

- Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy; <https://www.asianaid.org.au/about-us/policies/prevention-of-sexual-exploitation-abuse-and-harassment-pseah-policy/>

Employees and Volunteers

For complaints or concerns by employees or volunteers relating to breaches of AAO Codes of Conduct, unacceptable conduct, and/or complaints relating to aspects of employee experience and volunteer engagement with AAO.

- Grievance Policy (available upon request).

Partner Organisation

For any person directly working with or engaged by an approved AAO partner organisation.

- Refer to the applicable partner complaints policies and procedures (available upon request).

Protected disclosures

For anyone to report concerns they may have about illegal, unethical, or improper conduct involving AAO, Board member and employees, protections are provided to the person making the report. Whistleblower reports can be anonymous.

- Whistleblower Policy; <https://www.asianaid.org.au/about-us/policies/whistleblower-policy/>

Privacy

Complaints about use or misuse of personal information AAO holds about an individual.

- Privacy Policy; <https://www.asianaid.org.au/about-us/policies/privacy-policy/>

Third Party and members of the Public

To submit a complaint directly with AAO where other specific policies do not apply including for appropriate referral or escalation by AAO.

- Complaints Handling Policy; <https://www.asianaid.org.au/about-us/policies/complaints-handling-policy/>

ACFID Code of Conduct

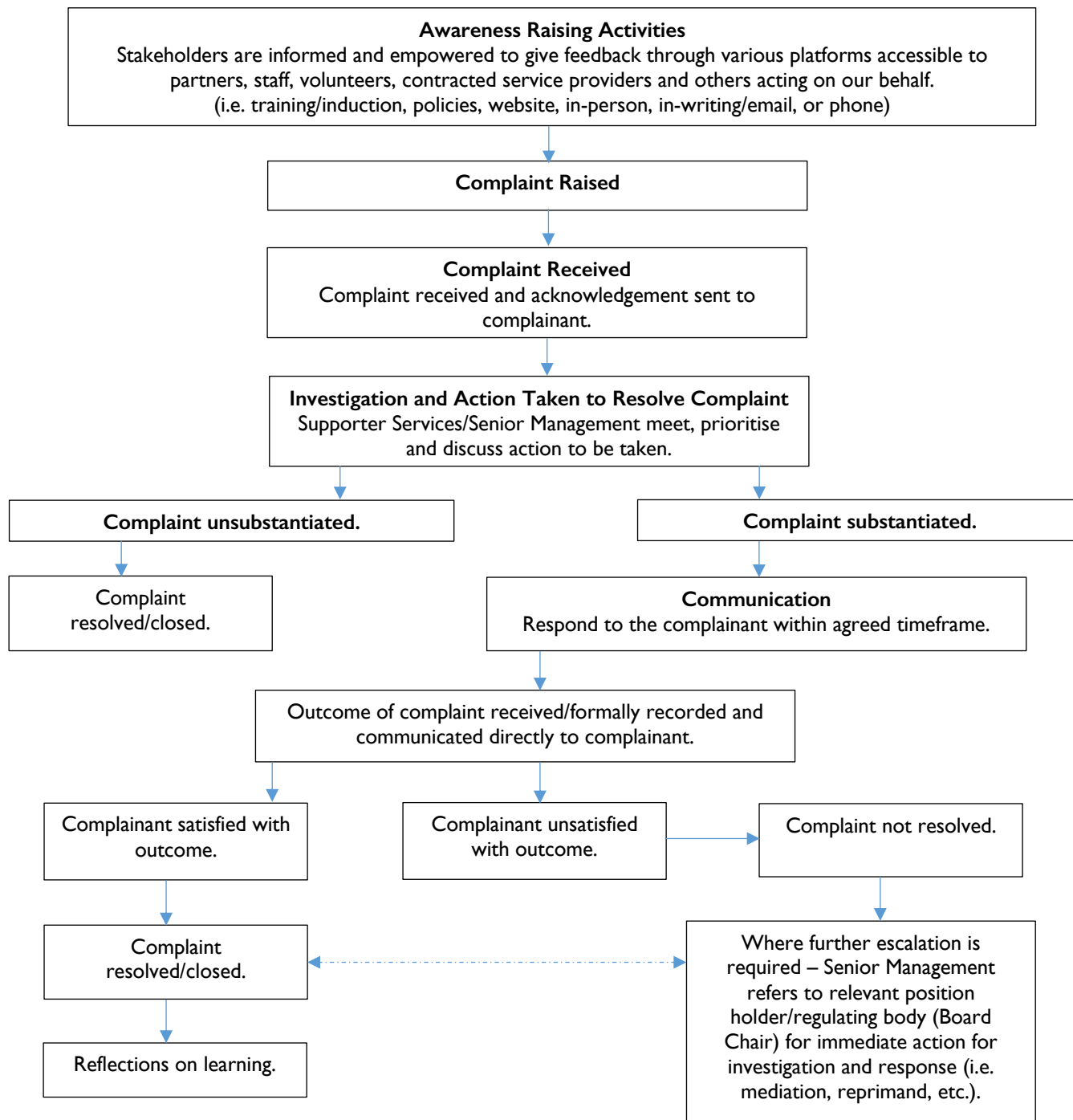
Should the complaint involve a breach of the ACFID Code of Conduct, the complainant may refer the matter to the ACFID Code of Conduct Committee.

Australian Council for International Development
Private Bag 3, Deakin, ACT 2600
Phone. +61 2 6285 1816
Email. main@acfid.asn.au

ANNEX 2:

Complaints Handling Procedure Flow Chart

Below is an illustration of how stakeholder complaints/feedback are received and addressed through internal processes at AAO.



Note: The 'relevant position holder' may vary depending on the action/or escalation point required to resolve the complaint in a timely manner. The 'regulating body' may include but not limited to program partners, in-country external review body, etc.

ANNEX 3:

Client Complaint Form

We are sorry that one of our actions or processes has been less than acceptable for you. Thank you for letting us know about it. At Asian Aid we take every complaint seriously and will endeavour to use the complaint as a means for improvement.

We will endeavour to respond to your complaint within 5 working days and do our very best to have a full resolution to the complaint within 30 days.

I. Your details

Title (Mr, Mrs, etc)	Name	Donor Id Code (if applicable)	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Street Address		Suburb	Postcode
<input type="text"/>		<input type="text"/>	<input type="text"/>
Home Phone	Business Phone	Mobile Phone	
<input type="text"/>	<input type="text"/>	<input type="text"/>	
Email	What method of contact works best for you?		
<input type="text"/>	<input type="text"/>		

2. Details of what your complaint is about

3. Your suggestions on how this issue should be resolved

Office use only:

Received by:	<input type="text"/>		
Signature:	<input type="text"/>		
Date Received	<input type="text"/>	Investigation assigned to:	<input type="text"/>
Immediate action taken:	<input type="text"/>		
Further comments:	<input type="text"/>		
Resolution:	<input type="text"/>		
Client notified:	Y/N	<input type="text"/>	Contact Date: <input type="text"/>

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