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CR 000 611 Complaints Policy - General

1. PURPOSE AND SCOPE

ADRA Australia recognises the importance and value of listening and responding to concerns and complaints about the organisation, its work or its personnel. ADRA Australia is committed to an effective complaints handling procedure that reflects the needs, expectations and rights of complainants and provides the mechanisms for complaints to be addressed in an efficient, fair and timely manner. This policy and the following procedures are intended to ensure that ADRA Australia has full accountability to its stakeholders by providing a responsive, fair and timely mechanism for responding to concerns or complaints. This policy is intended to encourage all stakeholders to disclose any unethical conduct they become aware of and will allow ADRA Australia to rectify its mistakes.

2. POLICY STATEMENT

A. Complaints Officers

ADRA Australia's EXCOM will designate a person to act as the Complaints Officer. This person will be responsible for the implementation of this policy and procedures and for handling any complaints brought against ADRA Australia. The Complaints Officer will also be responsible for developing training materials for ADRA Australia and its partners and for providing guidance and support as requested to staff and volunteers from ADRA Australia or its partners regarding the implementation of these policies and procedures.

The ADRA Australia Board will also designate a person to act as the Board Complaints Officer. This person will provide advice and support to the Complaints Officer and will take responsibility for handling any complaints that are deemed serious enough to warrant engagement by the Board or which involve either the CEO or the Complaints Officer.

B. What can be complained about?

The key areas of possible complaint may include, but are not limited to, the items below. These items are defined more fully in Appendix 1 at the end of this document.

- Inappropriate conduct of ADRA Australia Personnel
- Inappropriate conduct of other stakeholders involved in programs
- Infringements of privacy
- Fraudulent acts
- Discrimination
- Harassment
- Victimisation
- Vilification
- Bullying
- Child abuse

C. Who can make a complaint?

ADRA Australia will receive complaints from –

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1. ADRA Australia Personnel. (Refer CR 000 615 Complaints Policy and Procedures – Personnel)
2. Personnel from one of ADRA Australia’s partner organisations.
3. Any stakeholders affected by ADRA Australia funded projects/programs.
4. Any supporter, donor or volunteer of ADRA Australia.
5. Any member of the public with a concern about ADRA Australia.

D. ADRA Australia Personnel

Complaints by ADRA Australia Personnel that are about a workplace relations issue between two or more staff members should be first addressed by the concerned staff member(s) through ADRA Australia’s CR 000 615 Complaints Policy and Procedures - Personnel. Only when these procedures have been exhausted without a satisfactory result should ADRA Australia Personnel seek to address a workplace relations issue through the general Complaints Policy (CR000 611). Other types of complaints, such as fraudulent acts or failure to comply with policy, that have been identified by an ADRA Australia staff member may be addressed directly through the process outlined in point F below.

E. Making a complaint

Complaints should be directed to the ADRA Australia Complaints Officer who can be reached in the following ways:

- a. Email to complaints.officer@adra.org.au
- b. Mail to
ADRA Australia Complaints Officer
ADRA Australia
PO Box 129
WAHROONGA NSW 2076
- c. Telephone on +612 9489 5488 and ask for the Complaints Officer
- d. Through a private and confidential interview with a visiting ADRA Australia staff member who will document the complaint and forward it immediately to the ADRA Australia Complaints Officer
- e. Writing down details of the complaint and giving it to a staff member of the project implementation partner who should immediately forward the complaint to ADRA Australia and the ADRA Australia Complaints Officer. (See Appendix 4 for an example form).
- f. Direct request to the Complaints Officer.
- g. More Child friendly complaint handling techniques are in Appendix 3.

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F. Making safe complaints

ADRA Australia undertakes that complaints will be treated in strictest confidence. ADRA Australia undertakes that persons making a complaint will not experience discriminatory treatment or retribution by ADRA Australia as a result of making the complaint. People who make complaints may choose to give their personal information or they may wish to remain anonymous. ADRA Australia Personnel talking to communities and other stakeholders must make it clear that there is no obligation to provide personal information. However, if people wish to be informed of the outcome of their complaint they will need to provide their contact details.

G. Timeframe in managing the complaint

ADRA Australia undertakes to, as far as possible, investigate all complaints and have a draft response within 1 month from the date of receipt of the complaint. Where an investigation requires more time and ADRA Australia needs to revise the timeframe they will, where possible, inform the parties who have made the complaint.

H. How ADRA Australia will manage the complaint

All complaints will be taken seriously. The complaint may be dealt with internally or externally. Where appropriate, ADRA Australia may seek more information from people who have made the complaint, the partner organisation involved or other stakeholders. If the Complaints Officer decides it is not possible to resolve the complaint within ADRA Australia, they may refer the complaint to external processes such as mediation, or statutory complaints handling bodies. Where possible, the person who has made the complaint will be advised in writing of the reasons for this decision, and of the proposed strategy for dealing with the complaint. The overall process will generally be the following:

- The Complaints Officer is to review the materials supporting the complaint on hand and determine the appropriate manner of investigation.
- The Complaints Officer will decide whether they will investigate the misconduct themselves, delegate to another person more appropriate, or form a committee of investigation.
- The Complaints Officer is to determine what resources are needed for the investigation and secure access to those resources including the assistance of other employees or external professional help (including lawyers, accountants, forensic analysts or operational experts). Where the complaint involves fraudulent acts, the Complaints Officer should refer to the procedures outlined in ADRA Australia's Financial Wrongdoing FN-700-061.
- The Complaints Officer will prepare an Investigation Report and forward to the Chief Executive Officer (or the Chairman of the Board if the CEO is party to the Complaint) and the designated Board Complaints Officer. The CEO in consultation with the Board Complaints Officer has final responsibility for the resolution of the complaint.
- The CEO or the Board Complaints Officer will then write to the parties involved to identify the findings of the investigation and notify the resolution to all those involved.
- The CEO or the Board Complaints Officer will provide a summary of the issue and resolution to the Board.
- All documentation is to be stored in the confidential People and Culture Complaints File in SharePoint.

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I. Outcomes of the investigation of the complaint

The outcomes of the investigation of the complaint may be;

- Change in policy and/or procedures; if required,
- Personnel training, counselling and/or disciplinary proceedings;
- Reports to relevant authorities and potential legal action if crimes are alleged;
- Further investigation if systemic problems are revealed,

J. Monitoring

The Complaints Officer and relevant managers will continue to monitor the environment under which the complaint occurred until recommendations have been implemented. Feedback on the process will be sought from the parties to identify where any improvements can be made. Complaints will be monitored over time to identify if any trends are emerging that indicate further action is required.

K. Compliance with ACFID Code of Conduct

ADRA Australia is a member of the Australian Council for International Development (ACFID) and adheres to their Code of Conduct. If a complaint relating to ADRA Australia’s compliance or non-compliance with the ACFID Code of Conduct is not resolved satisfactorily by ADRA Australia, then the complainant is encouraged to raise the matter with ACFID. The process for making a complaint to ACFID can be found on their website at <https://acfid.asn.au/code-of-conduct/complaints/> and a statement to this effect appears on the ADRA Australia website.

L. International Program Partners and Complaints

To ensure continuity between ADRA Australia and our major stakeholders, ADRA Australia includes a requirement in all new “Exchange of Letters” with International Program partners that they have an appropriate Complaints Policy consistent with ADRA Australia’s.

3. AWARENESS AND TRAINING REGARDING OUR COMPLAINTS POLICY

A. General Awareness

This Complaints Policy is shared with all interested parties in the work of ADRA Australia, including staff and volunteers, partners nationally and internationally and all those representing and investing in ADRA’s purpose. It is shared publicly through our website to make it accessible and provide transparency into the processes ADRA follows in dealing with complaints.

B. Partner support

During programmatic design and inception workshops, ADRA Australia works with our partners to support development of appropriate feedback mechanisms (including complaints), information sharing and training opportunities in dealing with complaints, in order to enact ADRA’s policies. This will include but is not limited to:

- Support to develop contextualised complaints policy specific to the implementing office/region including local contact/complaints officer and the process for escalating complaints

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- Building capacity in developing mechanisms for providing appropriate community awareness, including translation of material
- Child friendly and vulnerable persons complaint processes training through the Church Agency Network
- Support with risk analysis and PSEAH implementation to ensure communities are informed of the standard of practise
- Identifying the local contact or complaints officer.

4. RELATED POLICIES

CR 000 600 ADRA Australia Code of Conduct

CR 000 615 Complaints Policy and Procedures – Personnel

CR 000 710 Child Protection Policy

CR 000 749 Prevention of Sexual Exploitation and Harassment Policy

CR 000 749 Attachment: ADRA Australia Safeguarding Code of Conduct

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Appendix 1. Definitions

Fraudulent Acts may be defined as, but are not limited to:

- Impropriety in the handling or reporting of money or financial transactions.
- Misappropriation of funds, supplies, or other assets (e.g. use of agency vehicles for personal purposes such as shopping by individuals not entitled to do so).
- Profiteering as a result of insider knowledge of agency activities.
- Disclosing confidential and proprietary information to outside parties.
- Misrepresentation in a job application (e.g. falsifying qualifications or credentials).
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the agency.
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related irregularity.

Discrimination occurs where a person treats someone less favourably on the basis of any of the following grounds; sex; race; colour; ethnic origin; religious belief; marital status; pregnancy or potential pregnancy; disability; family or carer’s responsibilities; age; sexual preference or orientation or transgender identity.

Harassment is discriminatory behaviour that offends; intimidates; humiliates or targets another person and that person does not want that behaviour.

Victimisation occurs when a person is threatened or harmed for discriminatory reasons.

Vilification occurs through a public act that could incite or encourage hatred towards, or serious contempt; or severe ridicule of a person or group for discriminatory reasons.

Bullying is behaviour that is usually repeated, that is inappropriate, unreasonable and possibly aggressive that creates a risk of physical and /or psychological harm.

Infringements of Privacy are any act by ADRA Australia or its representatives that breach the Australian Privacy Principles (APPs) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

ADRA Australia Personnel are the organisation’s employees (including Conference ADRA Directors), volunteers, contractors and company directors.

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Appendix 2: Complaints Record Form

All complaints should be recorded on a separate form. Forms should then be saved in one central, safe and secure location. People may submit a complaint on another piece of paper or they may give a verbal complaint to a staff member. The staff member should then write that complaint on this ‘Complaints Record Form’ and submit it to the appropriate person.

Date: Date complaint is received	
Staff member/volunteer who received the complaint: Which staff member or volunteer first heard or collected this complaint?	
Personal details of complainant (person making the complaint): Name, contact details, if appropriate. If the complainant wishes to remain anonymous, no detail is to be recorded here.	
Nature of complaint: What issue is this complaint related to?	
Details of complaint: A detailed description of the complaint the person has made	
Who dealt with it: Name of person who is or has responded to the complaint	
How it was dealt with: Action taken to handle the complaint	
Outcome: Outline of what has happened as a result of the complaint	
Follow-up required: Any action required as a result of the complaint. This may include a change to your organisation’s procedures and policies	

Written by:

Viewed by (Executive staff member):

Name

Signature

Name

Signature

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Appendix 3: Guide to a Child Friendly Complaint Handling Processes

There is a need for an approach, that allows children the means to appropriately voice a complaint and for ADRA Australia to develop appropriate ways to listen, to be more responsive and accessible for children.

GUIDELINES

Children communicate in a different way to adults and need to know that:

1. the complaint is treated with respect
2. the process is clear and accessible for children
3. the procedures are responsive and flexible
4. there is an advocate available
5. there will be action taken
6. there will be a timely response

The main elements of the child friendly mechanism is access and response, here are some suggestions that can facilitate this:

- It's important to ensure that complaints can be made in a number of different ways (face-to-face, telephone, online, in writing).
- Allow complaints to be made anonymously when complainant sends it through a friend or the beneficiary reference group
- Children and young adults feel more comfortable with face-to-face complaints, and are heard by someone with a respectful and patient person.
- Make sure the child or young person's comments are wanted and ensure a relaxed open environment
- Telephone/email complaint mechanism should have someone answering them immediately.
- Make sure the person dealing with the child or young person's complaint is an active listener who is helpful, understanding and responsive.
- Make sure that you respond to the child or young person as soon as possible, even just to acknowledge receipt of the complaint.
- Give the child or young person the option to choose how and whether they will be kept informed of the progress of their complaint.
- Let the child or young person choose how often they would like to be kept up to date.

PARTNERS

- Have a complaints officer who is appropriately trained to facilitate child friendly complaint handling procedures and to raise awareness with local community stakeholders and children of the procedures and how to implement them.
- Local staff have trainings in the proposed child friendly processes and procedures, interviewing children, facilitating feedback sessions with children and adults and recording of complaints. Regular refresher trainings, meetings are also held with them from time to time to equip them with new skills and share experiences.
- Ensure a conducive environment that guarantees confidentiality of any complainant.

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Appendix 4 – Example of a Template to be used to record a Complaint

Complaint Details Template

(for electronic completion)

To be completed by ADRA Team member to record details of a complaint

1. Details of Complainant			
Name	(Complainant may wish to remain anonymous)		
Address			
Phone number			
Date of Incident		Date of Recording	
Supporting documentation attached:			
<ul style="list-style-type: none"> • Pictures/sketches • Witness statements • Other documents 			
2. Complaint			
Details of Complaint:			
3. Other Details			Comments
<i>(use the following questions as prompts -all questions will not apply to every circumstance)</i>			
<ul style="list-style-type: none"> • Location including address if required 			
<ul style="list-style-type: none"> • Who was involved? 			
<ul style="list-style-type: none"> • Other Factors? 			
What would the complainant like to see happen?			
Next steps?			
Details of person completing this form			
Name			
Workplace			
Phone			
Email Address			

Return the completed report to the ADRA Australia Complaints Officer