

INTERNATIONAL NEEDS AUSTRALIA

Board of Directors Policy

Title: 1.9 Policy on Complaints

Date of Adoption: 28th May 2014

Amended 13th August 2014

Amended 30th August 2017

This Policy is to be reviewed no later than 30th August 2020

Purpose

International Needs Australia (INA) expresses our commitment to providing high quality programs, and operating in an open and accountable manner. We realise that there may be occasions when we do not meet the reasonable expectations of all stakeholders at all times. Our stakeholders have a right to complain when this occurs. All complaints are taken seriously, and will be handled in an effective and confidential manner. INA commits to maintaining a fair, accessible and transparent complaints system both in Australia and in country, and to training staff in its implementation.

Definitions

A “complaint” is a formal expression of dissatisfaction or discontent about someone or something. INA is committed to a transparent and efficient process of handling complaints.

This policy addresses complaints regarding:

- (a) Actions of INA.
- (b) Actions of an INA partner organisation.
- (c) Behaviour of INA staff and volunteers.

This policy does not address complaints:

- (a) Which are offensive, abusive or malicious: such claims will not be considered.
- (b) Received as part of a bulk mail or an email to multiple organisations: such claims will not be considered.
- (c) Which involve breaches of the criminal code: these will be referred to the Police for further action.

Policy

Lodging a Complaint

Complaints should be lodged as soon as possible after the complainant becomes aware of the concern. Complaints made more than 24 months after the event will not be considered unless they are of a serious nature.

Complaints should be directed to the Chief Executive Officer, or to the Board Chair (contact details below) where the CEO is the subject of the complaint. Complaints may also be lodged via the INA website at: <https://www.ina.org.au/footer-links/international-needs-australia/complaints>.

Chief Executive Officer

Ph: 1300 731 550

Email: ceo@ina.org.au

Board Chair

Email: boardchair@ina.org.au

Lodging a Complaint Overseas

INA acknowledges that all beneficiaries and stakeholders have the right to make complaints but that INA does not have the capacity to communicate with everyone. As such, partners are required to implement a complaints handling mechanism in compliance with this Policy and ACFID and DFAT standards. These mechanisms must be suitable to the cultural context, advertised to all stakeholders in appropriate ways and made accessible (including being able to make complaints orally or confidentially) to all people.

Complaints received by partners which concern INA funded staff or projects will be forwarded to the Australian office to be addressed in agreement with the relevant partner CEO. Minor complaints or complaints about partner programs which do not concern INA may be handled solely by the partner, but in all cases should be reported to INA.

Complaint format

Complaints should include; details of the concern (including the time, date and place it occurred if relevant) and contact details of the complainant in case INA needs further information or clarification of the concern. If possible, the complainant should suggest what they think is an appropriate course of action to resolve the complaint. A complaint format can be found and submitted on the International Needs Australia website. Alternatively a complaint can be made by phone, fax, mail, email or in person.

See Complaints Handling Procedures for more information on complaint investigation procedures.

As a signatory to the ACFID Code of Conduct, complaints can also be made regarding any issues of compliance with the Code. A link to ACFID complaints procedures can also be found on the INA website.

Complaints will be handled with the highest level of confidentiality possible without affecting the investigation.

Cross Reference

Procedures Manual – Vol. 1, Section 6.0: Complaint Handling Procedures

ACFID Code of Conduct Complaints processes - <https://acfid.asn.au/content/complaints>

INTERNATIONAL NEEDS AUSTRALIA Procedures

5.0 Complaint Handling Procedures

5.1 Promoting Complaints Procedures

In acknowledgment that appropriate complaints handling systems will result in better systems and standards of work, International Needs Australia undertakes to ensure all stakeholders are aware of our procedures and feel comfortable making complaints. In Australia, complaints procedures will be promoted on the website, on selected communications materials and in any other appropriate manner. In country, partners will disburse complaints handling information however they deem most appropriate to the local context. This may include: advertisement on communications materials, a complaints section on their website or passing the information on orally at community meetings and training days.

Normal partnership procedures such as partner agreements, capacity assessments and appraisals will verify whether complaints handling systems are adequate, and reporting, monitoring and evaluations will ensure they are being appropriately promoted and employed.

5.2 Receiving Complaints

Complaints made to INA should be directed to the Investigation Manager: the CEO - or the Board Chair if the complaint is concerning the CEO- in the first instance. If the complaint is received by someone else (field partner staff or other INA representatives) the recipient will record the date, time and method it was received. If the complaint is made over the phone or in person the recipient will write down as many details as possible using the complaint form format. The complaint should be passed on to an Investigation Manager as soon as possible, who will immediately determine the most appropriate course of action: i.e. will a formal investigation be undertaken, or will they attempt to resolve the complaint in conversation with the complainant?

The Investigation Manager will provide the complainant with confirmation of receipt of the complaint within a week. This will be conducted by email, letter or phone call and include the following information:

- When and how the complaint was received
- How INA has responded to the complaint so far
- Further action INA is planning to take
- Contact details of the Investigation Manager for any questions or feedback on the handling process.

5.3 Complaints Made to Field Partners:

Complaints by participants or other local stakeholders in INA projects will be made to the relevant partner's CEO, Board Chair or other appropriate representative. All Partners will implement a complaints handling mechanism which:

- Is compliant with the ACFID Code of Conduct and DFAT regulations.
- Is compliant with INA's Policy on Complaints.

- Ensures the responsibility to pass full details of relevant complaints to INA immediately.
- Responds to all complaints fairly and within a reasonable time period.
- Is advertised to all local stakeholders in a variety of ways (information brochures, orally at meetings or training sessions, on their website etc.).
- Is accessible to all stakeholders, including providing people with the ability to make complaints orally or confidentially.

If a stakeholder makes a complaint to a partner organisation which directly relates to an INA project or representative, or which makes allegations of serious misconduct within or the partner agency (including sexual abuse, money laundering etc.); partners must immediately pass on the complaint either in its original form (as a letter, email or voice recording) or as a full written record made by the relevant staff member (if the complaint was made orally).

If a field partner receives a minor complaint, or a complaint which is related to aspects of their work that INA is not involved with, they may handle it without the involvement of INA. However, in all cases, complaints and how they are being addressed must be reported to INA.

5.4 Handling Complaints

It is preferable for complaints to be resolved in conversation with the complainant until they are happy with INA's response. If a solution cannot be resolved, or in the case of a serious complaint (including allegations of harassment or bullying, sexual exploitation and abuse, fraud and corruption or other gross misconduct) a formal investigation will be conducted.

The Investigation Manager should aim to undertake and complete a formal investigation within 30 days after receipt of the complaint and submit a report 14 days after the investigation ends. Any risks to the complainant should be assessed and appropriate protection provided.

The Investigation Manager will engage two suitable people to make up the investigation team with them. This team will:

1. Determine how policy or procedure has been breached
2. Collect background information and evidence
3. Interview the complainant and any witnesses, and then the subject(s) of the complaint (where it is in relation to the behaviour of a particular person/people)
4. Instigate rectifying procedures.

Upon receiving a complaint from a field partner, the INA Investigation Manager will discuss all potential courses of action with the CEO or other management staff of the partner agency involved. Rectifying actions to be taken by INA and the partner agency will be agreed by both parties. The field partner will be responsible for passing on communications to the complainant to keep them updated on how their complaint is being addressed. This communication must be undertaken in an appropriate manner; e.g. if a complaint was made orally the response should be given orally.

All complaints should be filed in the complaints register (which can be found at: [..\..\VA CORRESPONDENCE\A4 COMPLAINTS\Complaints register.xlsx](#)) to ensure proper follow up occurs. The Investigation Manager is responsible for ensuring the register is up-to-date and accurate.

5.5 Follow up

The findings of a formal investigation will be reported to the International Needs Australia Board, and the Board of the relevant partner agency if applicable.

The preliminary outcome of an investigation will be communicated to the complainant(s) no more than 60 days after acknowledgment of the complaint. If the investigation cannot be concluded within this time frame, the complainant will be informed as to why, and be updated with the outcome of the Investigation at its conclusion.

INA will follow up on how partner agencies have responded to and rectified sources of complaint through regular reporting procedures, field visits, and/or evaluations.

INA will keep a record of all complaints received, including what the complaint was and how it was handled. These files will be maintained in a confidential manner.

5.6 Learning from complaints

Efficient and transparent complaints handling procedures can help improve the ways INA and partners conduct work. As such, complaints should be considered not as a one-off issue to be dealt with but the basis of systems reviews and improvements to programs. Changes deemed necessary on the basis of a complaint should be regularly monitored to ensure that they are implemented effectively, whether it be within INA or a partner agency.

Depending on the outcomes of a complaint, INA may alter operating procedures, undertake staff training, implement capacity building measures or take other appropriate action to prevent the situation reoccurring.