



EXTERNAL COMPLAINTS HANDLING POLICY & PROCEDURES

APPLICABILITY:	ACCI Missions & Relief Staff, Volunteers, all categories of ACCIM Field Workers, Strategic Partners & Representatives (See Scope)
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AMMENDED BY:	ACCI CEO of Operations ACCI CEO of International Programs
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SECTION 1: EXTERNAL COMPLAINTS HANDLING POLICY

1. PURPOSE

ACC International Missions and Relief recognises that listening to and responding to feedback, concerns and complaints is integral to our commitment to achieving the high standards and ensures accountability to all stakeholders. We further recognise that receiving and responding to complaints results in valuable learning and is aligned with our commitment to continuous improvement. The Complaints Handling Policy outlines ACC International's responsibilities and response to feedback and complaints and the principles which underpin our approach.

2. GUIDING PRINCIPLES

ACC International's External Complaints Handling Policy is guided by the following principles:

Principle One: Visibility

We will be proactive in providing clear and easily understandable information to our partners and stakeholders as to how and where to make a complaint or provide feedback (*See '6. Publicising the Policy'*).

Principle Two: Accessibility

We will take measures to ensure that accessible and safe points of contact are made available for people to make complaints or provide feedback (*See '6. Publicising the Policy'*).

Principle Three: Responsiveness

We will respond to complaints and feedback in a timely manner and according to the predetermined timeframes (*See '9. Timeframes'*).

Principle Four: Objectivity

All complaints will be addressed in a fair, equitable and unbiased manner, based on the evidence submitted and uncovered throughout the complaints handling process. Making a complaint will in no way result in prejudice with respect to an individual's future participation in any programs or activities.

Principle Five: Confidentiality

All complaints and the complaints handling process will be kept strictly confidential.

Principle Six: Accountability

Accountability for decision making and action pertaining to complaints will be clearly established and communicated.

Principle Seven: Continual improvement

ACC International is committed to ongoing improvement in all areas of the organisation's work, including our programs and organisational policies and procedures.

3. DEFINITIONS

- Complaint:** 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:** A person, organisation or its representative, making a complaint.
- Feedback:** The systems and process which enable an organisation to listen to their stakeholders and ascertain if agreed standards, requirements, expectations and needs are being met. Feedback is inclusive of suggestions, comments, opinions and complaints.
- Inquiry:** A request for information or an explanation.
- Beneficiary:** People directly engaged in a project or program, or benefiting from the activities and outcomes of a program or project.

4. SCOPE

This policy applies to the handling of feedback and complaints relating to all ACCIR and ACCIM personnel, programs, advocacy initiatives, fundraising and campaign activities, whether implemented in Australia or overseas. It equally applies to programs and activities implemented by ACCIR, ACCIM or our strategic partner organisations. This policy applies to complaints received from:

- **ACCIM Field Workers;** herein including career, fixed-term, partner and associates;
- **ACCI Missions & Relief Volunteers;** herein including but not limited to office and event based volunteers;
- **ACCIR and ACCIM Strategic Partners;** herein including those working in Australia or abroad in implementing development, emergency relief and/or non-development activities;
- **ACCIR and ACCIM Representatives;** herein including board members and state representatives;
- **Beneficiaries** of ACCIR and ACCIM projects and programs;
- **ACCIR supporters and donors;** and
- Members of the **public.**

The handling of internal complaints or grievances received from ACCI staff or management, including whistle blowing, are covered under ACC International's 'Internal Complaints Handling and Grievance Policy'.

5. EDUCATION AND TRAINING

ACC International's Complaints Handling Policy and Procedures are distributed to all staff, contractors, field workers, strategic partners upon their commencement with the organisation. Updated versions are provided to all stakeholders upon approval. Induction training, which includes the Complaints Handling Policy and Procedures is provided for all stakeholders listed above.

Personnel involved in implementing the complaints handling procedures are fully trained in all aspects of implementation.

Field workers are encouraged to develop mechanisms to receive and handle complaints on-field considering contextual issues and language barriers. Projects working directly with children are provided with training and support to ensure they develop child friendly complaints handling procedures and reporting mechanisms.

6. PUBLICISING THE POLICY

ACC International clearly communicates the value we place on receiving and responding to complaints in all relevant publications and communications and on our website. It is also communicated in partnership agreements, the Field Worker Handbook, and in staff policies.

The Complaints Handling Policy and Procedures is easily accessible and available for download on the ACCI Missions and Relief website.

We ensure that making a complaint is as easy as possible. Complaints can be made both verbally or in writing by email, telephone, in person or through other means necessary to ensure inclusivity for people with disabilities or to overcome language barriers. We will endeavor to assist a complainant to put their complaint in writing or write down a complaint provided to us orally as factually and faithfully as possible.

7. RESPONSIBILITY AND AUTHORITY

Accountable Person	Responsible for
Field Worker & Field Project Manager (IR/SPO)	<ol style="list-style-type: none"> 1. Directly receiving, registering, and responding to minor complaints pertaining to their direct field work and referring major complaints to the CEOs. 2. Ensuring this policy is adhered to in the context of their work. 3. Ensuring accessible context specific complaints and feedback mechanisms are developed and communicated to all stakeholders, in particular project beneficiaries 4. Reporting complaints to in-country external bodies/authorities where required at the direction of the CEOs (<i>Note: This should be done by the most senior field worker if there is internal structure within a ministry or project</i>) 5. Communicating outcomes of a major complaint (at the direction of the CEO) to the complainant where the complainant is a beneficiary.
ACCI Staff Person	<ol style="list-style-type: none"> 1. Directly receiving, registering and responding to minor complaints. Referring major complaints to the CEOs. 2. Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms.
ACCI Program Managers / Field Managers	<ol style="list-style-type: none"> 1. Directly receiving, registering and responding to minor complaints. Referring major complaints to the CEOs. 2. Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms. 3. Ensuring Field Workers and Strategic Partners have sufficient awareness and capacity to implement this policy in the context of their field work. 4. Ensuring programs meet the expectations outlined in this policy.
CEO/s	<ol style="list-style-type: none"> 1. Ensuring relevant staff receive appropriate training in implementing this policy. 2. Receiving major complaints, either by referral or directly. Implementing the required investigation and resolving the complaint according to this policy. 3. Referring any complaints on to relevant external bodies in Australia. 4. Ensuring all complaints are resolved appropriately and resolutions are communicated to the appropriate people. 5. Identifying and resolving any systemic issues underlying complaints. 6. Informing the board of major complaints under investigation and their resolutions where required by other ACC or ACCI policies. 7. Ensuring learning is incorporated into policy review, amendment, and adaptation with respect to organizational practices.
ACCIR or ACCIM Board	<ol style="list-style-type: none"> 1. Holding the CEO's accountable for implementing the policy. 2. Involvement in major investigations where requested by the CEOs.

8. HOW TO MAKE A COMPLAINT

Complaints can be made orally or in person or by telephone, and in writing by email, letter or online via our website. When a complaint is made orally, ACCI personnel receiving the complaint will ensure the complaint is documented and contains all the information the complainant wishes to convey.

Complaints can be made by a complainant or by a friend or advocate acting on their behalf.

In the case of specific projects and programs, suggestion boxes may be utilized to accept feedback and complaints. This however does not prevent an individual from making a complaint or providing feedback through the other means described above.

Complaints made anonymously will be accepted as they can alert us to legitimate problems which can be resolved and lead to organizational improvements. It is not however always possible to provide a remedy to the individual in the event of an anonymous complaint.

Complaints can be submitted to the CEO of Operations via the following contact details:

Email: complaints@acci.org.au

Phone: +61 3 8516 9600 or 1300 997 502

Post: 5/2 Sarton Rd, Clayton, Victoria, Australia

Complaints can also be submitted to a field worker, strategic partner, or another ACCI employee where the complainant has access to or contact with those personnel, particularly with respect to field-based complainants.

9. HOW COMPLAINTS ARE HANDLED

For all complaints we will:

- Seek from the complainant the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action;
- Clearly explain to the complainant the course of action that will follow dependant on:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given; or
 - if the complaint is to be investigated.

- We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint or that a person implicated in a complaint is involved in any way with the handling of that complaint.
- We will not create false expectations, but assure the complainant that the complaint will receive full attention;
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again.
- Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives;
- Ensure that the complaint is appropriately acknowledged;
- Follow up where necessary, and monitor whether the complainant is satisfied; and
- We will register all complaints (see section 1, item 10).

In addition to this, when we take an oral complaint we will:

- Identify ourselves, listen, record details, and determine what the complainant wants;
- Confirm that we have understood and received the details; and
- Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive;

9. TIMEFRAMES

We will acknowledge:

- Oral complaints immediately.; and
- Written complaints within 5 working days of receiving the written complaint.

We will aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every 30 days. However, where an external body is involved in a prolonged investigation, we will establish an appropriate alternative timeframe with the complainant for progress reporting.

10. CONFIDENTIALITY

All complaints will be treated as strictly confidential matters. Information will be shared on a needs basis only with those directly involved in the investigation. It is expected that all those involved in the investigation will also uphold strict confidentiality.

A complainant's name and personal details will not be disclosed to anyone other than those involved in handling the investigation without first obtaining the complainant's permission.

11. RECORDING COMPLAINT DATA

All complaints received by any means will be documented and registered. ACCI staff responsible for receiving a complaint will ensure that the following information is included:

- A date of receipt
- A clear description of the complaint and any relevant supporting data or evidence
- A requested solution
- A description of the project, program, campaign, event or initiative, practice, procedure or personnel that the complaint pertains to.
- Due date for a response
- Action already or immediately taken to resolve the complaint

If a written complaint is received which does not contain the above information, or in the case of an oral complaint, we will ensure that this information is documented by ACCI personnel.

12. REVIEWING AND ONGOING IMPROVEMENT

As part of our commitment to effective complaints handling and to ongoing improvement, ACC International will ensure that we:

1. Monitor the effectiveness of our complaint handling procedures on an ongoing basis and appropriately update our policy and procedures based on organizational learning and and/or updated notions of best practice with regard to complaints handling practices;
2. Review the policy every three years, managed by the joint CEO's and in consultation with relevant staff and stakeholders; and
3. Provide ongoing staff training and retraining regarding our complaints handling policy and procedures.

4.

SECTION 2: COMPLAINTS HANDLING PROCEDURES

1. INITIAL ASSESSMENT OF COMPLAINT

The staff member handling the complaint will conduct an initial assessment to determine how a complaint should be managed and whether it is of a serious nature, by considering whether one or more of these criteria apply:

- a. Severity;
- b. Health (including mental health) and safety implications;
- c. Financial implications for the complainant or others;
- d. Complexity, including whether there is more than one issue raised in the complaint and whether each needs to be separately addressed;
- e. Jurisdiction - multiple jurisdictions or requires reporting to an external body;
- f. Impact on the individual, public and organisation;
- g. Potential to escalate;
- h. Systemic implications;
- i. The need for, and possibility of immediate action; and
- j. Whether or not anyone else needs to be consulted in making an assessment.

Based on this initial assessment, the complaint will be classified as either an:

- a. ***Inquiry*** - A complaint that is based on a simple misunderstanding or insufficient information, that can be resolved by the provision of information that immediately satisfies the complainant, will be recorded as an inquiry, with the complainant becoming an inquirer.
- b. ***Minor complaint*** - A complaint that is not considered to be serious in its nature will be recorded as a minor complaint. Where appropriate, endeavour to resolve minor complaints immediately by correcting misunderstanding or providing missing information, then ensuring that the complainant is completely satisfied with the information and or resolution provided.
- c. ***Major complaint*** - A complaint that is assessed as being serious in its nature will be recorded as a major complaint and escalated to the CEO.

2. HOW COMPLAINTS ARE INVESTIGATED

All major complaint investigations require the oversight of the Joint CEO's.

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding all complaints. The level of investigation will be commensurate with the nature of the complaint including the level of supporting evidence or information provide by the complainant.

Where required, we will consult and take advice from ACFID and/or other relevant external, regulatory or enforcement bodies in planning and carrying out an investigation.

Where the complaint falls under the jurisdiction of an external body, it may be either appropriate or mandatory for ACCI to report or cooperate with that external body or for the investigation to be conducted by that external body. This includes, but is not limited to:

- ACC National Office - ACC Ministers Code of Conduct matters
- State or Federal Police - Criminal matters
- Other Australian regulatory bodies
- Other Overseas regulatory bodies

3. RESPONDING TO AND CLOSING A COMPLAINT

The staff member or field worker handling the complaint will normally make the decision on a minor complaint. A decision on major complaint will be made by a CEO or may be referred up to the appropriate ACCI Board.

We will communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language.

We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied we will be prepared to consider any additional information they may provide and to review our decision.

In all cases relating to ACCI Relief, we will advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for referral to the Code Committee and offer to assist in referral.

4. OUTCOMES OF COMPLAINTS

Based on the decision made in regards to the complaint, we will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes. In addition to this, it may be appropriate to:

- Take further remedial action, including changes to the way in which we operate and improve or undertake further training of staff;
- Counsel or discipline staff or volunteers;
- Review or terminate agreements; and/or
- Undertake further reporting to external regulatory bodies or enforcement authorities.

5. DISPUTES

The complaint will be referred by the member of staff handling the complaint to a more senior colleague or to the respective board for review if the complainant disputes any of the following:

- Our assessment that a complaint should not be investigated;
- The decision on their complaint; or
- The outcome of their complaint.

If such a dispute is unresolvable and relates to:

- ACCI Relief, we will refer the complainant to Code Committee of the Australian Council for International Development (ACFID).
- ACCI Missions, we will refer the complainant to the ACC National Office.