

## Nusatenggara Association Incorporated

# Complaints and Complaints Handling Policy

v2.0 July 2018

### Preamble

The NTA recognises the importance and value of listening and responding to concerns and complaints. 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 ways of learning what we need to do to improve our work.

### Definitions

- **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.
- **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

### Scope of the policy

This Policy is intended to apply to any complaint, regardless of who it is made by.

We will accept complaints relating to our paid staff, our volunteers, our partner organisations, our contracted service providers and anyone else acting on our behalf.

A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation with which we work, our staff, volunteers, donors or a member of the public.

### Related Policy – NTA Whistleblower Policy

NTA has a Whistleblower Policy which provides an additional pathway for reporting of corruption, fraud, bribery and other financial impropriety.

The purpose of this policy is to:

1. Encourage the reporting of matters that may cause harm to individuals or financial or non-financial loss to the NTA or damage to its reputation;
2. Enable NTA to deal with reports from whistleblowers in a way that will protect the identity of the whistleblower as far as possible and provide for the secure storage of the information provided;
3. Establish policies for protecting whistleblowers against reprisal by any person internal or external to the entity;
4. Provide for the appropriate infrastructure; and
5. Help to ensure NTA maintains the highest standards of ethical behaviour and integrity.

The Whistleblower Policy is a stand-alone document and published on NTA's website.

## **Where and How Complaints may be made**

We are able to receive complaints orally in person or by email, telephone and in writing by post.

Complaints may be made by a friend or advocate of the complainant on their behalf.

Concerns of a general nature can be raised with any member of the NTA Board or with the Executive Officer.

Regular monitoring trips are conducted to our implementation sites and active consultation is undertaken with in-country implementing partners and employees and with community representatives. Complaints can be raised directly with NTA members of the monitoring trips.

Complaints of a serious nature should be directed to either the Chief Executive Officer or the Chair of the Board.

We recognise that in some circumstances complainants may wish to remain anonymous. As such complaints can alert us to problems that need fixing we will accept them though clearly it may not be possible to provide a remedy to an individual.

Contact addresses for complaints:

Postal address:

**NTA East Indonesia Aid  
P.O. Box 677  
Jamison Centre ACT 2614  
Australia**

Email address:

[enquiries@nta.org.au](mailto:enquiries@nta.org.au)

A complainant may also refer a complaint alleging a breach of the ACFID Code of Conduct directly to the ACFID Code of Conduct Committee.

## **Educating our organisation on the complaints policy and complaints handling**

Our Complaints Policy is provided on our webpage and we ensure all our paid staff, our volunteers, our partners, our contracted service providers and all others acting on our behalf are made aware of the policy.

## **Publicising the Policy**

We make clear the value we place on receiving concerns and complaints in all relevant communications. We use the word “complaint” or its equivalent in relevant languages other than English. Our website contains information on how to make a complaint. Where literacy is a constraint we will orally invite expressions of concern and complaint on a regular basis. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint.

We ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can.

We will monitor how effectively we are publicising our complaints policy on a continuing basis.

## **How complaints are handled**

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.

For all complaints we will:

- Ensure that the complaint is appropriately acknowledged;
- 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 (including referral to the relevant authorities if the complaint is of a criminal nature; further investigation; or non-investigation);
- 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;
- Follow up where necessary, and monitor whether the complainant is satisfied; and
- Register and record the complaint.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

1. Severity;
2. Health (including mental health) and safety implications;
3. Financial implications for the complainant or others
4. Complexity;
5. Impact on the individual, public and organisation;
6. Potential to escalate; and
7. The need for, and possibility of immediate action.

If we assess the complaint as significant in terms of one or more of these criteria we will classify the complaint accordingly.

## **Inquiries, minor complaints and jurisdiction**

We will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, that is during the initial phone call or meeting.

On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable we will refer the complainant to the ACFID Code of Conduct Committee.

## **How complaints are investigated**

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness of the complaint.

## **Timeframes**

We will acknowledge written complaints within five days of receipt of the complaint. We will acknowledge oral complaints immediately.

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 two weeks.

## **Responding to and closing a complaint**

Our CEO, the Chair of the Board, or another member of the NTA Board delegated by the CEO, will normally make the decision on a complaint that has required investigation (that is not a minor complaint).

We will communicate our decision to the complainant as soon as is practical. Written complaints will be responded to by email or letter. 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.

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 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.

## **Outcomes of complaints**

We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.

We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of staff. Where needed we will counsel or discipline staff or volunteers.

Where appropriate we will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

## **Confidentiality**

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainant's permission.

## **Recording complaint data**

We will appropriately record all inquiries and complaints. We will ensure that the following information is recorded:

- Date of receipt;
- A description of the complaint and relevant supporting data;
- The requested remedy;
- The product, practice or procedure complained about;
- The due date for a response;

- Immediate action taken (if any) to resolve the complaint; and
- Any subsequent action taken.

### Reporting about complaints

We will immediately escalate complex and/or major complaints to our CEO, the Chair of the Board or their delegate.

Any major complaints will then be reported to the Board. Major complaints will be reported in detail. Minor complaints will be reported in summary form.

### Continuous improvement in complaint handling

We will continually monitor the effectiveness of our complaint handling and make improvements as appropriate.

We will conduct an internal review of the effectiveness of our complaint handling every year.

We will commission an independent review of the effectiveness of our complaint handling every five years.

### Version control

Version	Date	Approved by Board	Details
1.0	15 November 2014	2014	Complaints/Complaints Handling Policy issued.
2.0	31 July 2018	31 July 2018	Policy reviewed and updated to reference new Whistleblower Policy and minor editing.