

Feedback and Complaints Policy



1. Purpose

AFAO values feedback and complaints and recognises these as an essential part of our quality assurance and accountability to our members, partners, stakeholders and donors.

2. Responsibilities

All AFAO staff, volunteers, contractors (including consultants) and grantees are required to comply with this policy.

AFAO's Deputy Chief Executive Officers acts as AFAO's complaints officer.

3. Application of policy

This policy applies fully to all AFAO's operations, including its international activities and the AFAO Foundation. References in this policy to AFAO include the AFAO Foundation.

Where this policy is contradicted by contractual obligations to funders, the contractual obligations must be adhered to. Exceptions to such obligations should be sought from funders prior to entering contracts and any substantive areas of difference must be drawn to the attention of the Chief Executive Officer.

This policy does not relate to concerns that arise within the workplace between staff and/or volunteers. For these issues, staff and volunteers should refer to AFAO's Equal Employment Opportunity, Discrimination and Bullying Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, Grievance Policy or Performance Counselling and Disciplinary Policy.

All AFAO staff and volunteers abide by AFAO's Code of Conduct.

AFAO will extend this policy to grantees through its contracts and require that grantees adopt the commitments of this policy. AFAO incorporates the requirements of this policy in its capacity assessment processes with grantees and provides training and support to grantees to support their upholding of these policy commitments.

Orientation to this policy will be provided to all AFAO staff during their induction by their manager and regularly during the course of their employment through all-staff training.

4. Definitions

For the purpose of this policy:

Policy number: 034

Date approved: 22 January 2021

Review date: January 2023

Approved by: AFAO Chief Executive Officer

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- a *complaint* is an expression of dissatisfaction made to AFAO, related to our work or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.
- a *complainant* is a person, organisation or its representative, making a complaint
- an *enquiry* is a request for information or an explanation
- *feedback* is opinions, comments, suggestions and expressions of interest in the work of AFAO
- a *stakeholder* or *interested party* is a person or group having an interest in AFAO's work.

A complaint is not:

- a general query about AFAO's work
- a request for information
- a contractual dispute
- a request to amend records, such as to correct an address
- a request to unsubscribe from an AFAO email list.

The processes for dealing with these issues is different and separate to that of AFAO's Feedback and Complaints Policy. Stakeholders wishing to raise issues such as these may do so via their AFAO focal point or by emailing enquiries@afao.org.au.

Examples of complaints covered by this policy include:

- a person is concerned about the way we have conducted a fundraising campaign
- a person has concerns about one of AFAO's programs
- a person is concerned about the behaviour of an AFAO staff member, including harassment or child abuse
- a person believes fraud involving AFAO has occurred.

5. Principles

AFAO is guided by the following principles in its handling of complaints.

Accountability	AFAO values feedback and complaints and recognises these as an essential part of our quality assurance and accountability to our members, partners, stakeholders and donors.
Accessibility	This policy is available on our website. Complainants may raise concerns with us in ways that work best for them – by phone, in writing or in person. A person's age, language, culture or disability will not be a barrier to providing feedback.
Confidentiality	Stakeholders can make complaints to AFAO in a safe and confidential manner. Records of complaints will be de-identified at the request of complainants.
Fairness	We will strive to consider all complaints impartially and justly, without bias or favouritism.
Responsiveness	We will acknowledge receipt of complaints and handle them in a timely way. We will let complainants know how we are handling the complaint and the expected timeframes for each stage of the process.
Person-centred	Our approach to complaints will consider the needs and circumstances of the complainant. This includes considering the complainants preferences for how we handle the complaint. We will

also consider the practical and support needs of the person and provide referrals where appropriate.

Equality	AFAO celebrates the diversity of its staff, volunteers, stakeholders and communities. We strive to be inclusive, advance gender equality and affirm people of diverse gender, sexuality and bodies.
Respect	AFAO will afford all complainants dignity and respect.

AFAO has zero tolerance for misconduct, sexual exploitation and abuse of power. This is reflected in our approach to complaints on these issues.

6. How to make a complaint

Complaints can be made to AFAO in a variety of ways, including in writing, by phone or in person.

To make a complaint, you can contact AFAO's complaints officer:

Heath Paynter, Deputy Chief Executive Officer
Email: complaints@afao.org.au
Phone: +61 (2) 9557 9399
Address: Level 3, 414 Elizabeth Street, Surry Hills NSW 2010, Australia

If preferred, you can also contact:

Inga Olesky, SKPA Program Manager
Email: complaints@afao.org.au
Phone: +66 (0)2 023 0966
Address: 138/8 Sukhumvit 33 (Phrom Chit), Klongton-nua, Watthana, Bangkok 10110 Thailand

Alternatively, you can make a complaint to any AFAO staff member or to an AFAO Board member. In doing so, it is important that they understand you are wishing to have your concerns treated as a complaint and investigated.

To help us to assess and respond to your concerns, we encourage you to provide as much information as possible. If you are sharing information in writing, this can include:

- your name
- a way to contact you, such as an email address or phone number
- your address or general location (such as your city or country)
- details of your concerns
- if the complaint relates to an incident, when the incident occurred and the people involved
- how we can resolve your concerns.

If you call or meet with us to make a complaint, we will ask you for this information.

If you make an anonymous complaint to AFAO, we will assess and investigate the matter to the extent possible however we may be limited in doing so by having only the information you share with us. We will not be able to respond to anonymous complainants.

7. Process for handling complaints

7.1 Receipt and acknowledgement of complaints

AFAO staff or Board members who receive a complaint must immediately advise AFAO's complaints officer of the complaint.

AFAO's complaints officer will write to the complainant within five working days to acknowledge that the complaint has been received.

The acknowledgement will include:

- confirmation that AFAO has received the complaint
- information on how the initial review will be undertaken
- the timeframe for a response to be provided to the complainant on the outcome of the initial review
- a copy of this policy.

If the complainant has made the complaint verbally, the written acknowledgement will include AFAO's understanding of the concerns raised and how the complainant hopes they can be resolved.

If the complainant does not wish to receive written communications from AFAO, this and subsequent steps will occur in the form preferred by complainant (for example, in person or by phone).

If the matter relates to AFAO's complaints officer, or they may not be able to handle the complaint fairly, AFAO's Chief Executive Officer will nominate an alternative person to handle the complaint.

7.1.1 Handling of serious allegations

Where a complaint involves serious allegations, AFAO's complaints officer will immediately advise the Chief Executive Officer of the complaint for guidance in its appropriate handling.

Serious allegations include any relating to:

- sexual exploitation, abuse or harassment of vulnerable people including children
- fraud or money laundering
- serious misconduct by AFAO personnel
- matters that may involve criminality.

AFAO's complaints officer will consider risk in assessing all complaints, including:

- risk to the complainant
- risk to others
- risk to the agency
- risk to the wider sector.

A serious allegation may be evident at the time of the initial complaint or may become apparent when the matter is being investigated.

At any stage it becomes aware of a serious allegation, AFAO will consider referral of the matter to appropriate authorities, including police, in addition to conducting its own investigation of the allegations.

Under these circumstances, AFAO will also assess its reporting obligations to donors and regulators and act to ensure its obligations are met.

AFAO's Chief Executive Officer will advise AFAO's President of serious allegations and agree with the President the appropriate reporting of the matter to the AFAO Board (see also section 8).

7.1.2 Assistance and support for the complainant

In receiving a complaint, AFAO will consider the assistance and support needs of the person raising the matter. This will include consideration of AFAO's duty of care to the complainant commensurate with the nature of the matters raised.

Where a complainant makes serious allegations, especially of sexual abuse or exploitation, AFAO will consider the support and other needs of the survivor and any appropriate referrals. This may include medical, social, legal and financial assistance.

AFAO's support for the survivor will in no way influence the nature of AFAO's response to the matters raised.

7.2 Initial review

AFAO's complaints officer will undertake an initial review of the complaint within 15 working days following acknowledgement of the complaint.

The purpose of the initial review is to make an assessment of relevant issues and to determine how the matter is best handled. This includes:

- determining whether the matter will be treated as a complaint and handled under this policy
- if the matter is not to be treated as a complaint, determining whether another AFAO policy applies to the matter
- assessing the nature of the matter against criteria including:
 - severity
 - health (including mental health) and safety implications
 - financial implications for the complainant or others
 - complexity
 - impact on the individual, public and organisation
 - potential to escalate
 - systemic implications
 - the need for and possibility of immediate action
- considering options for how an investigation of the matter will proceed
- considering how the confidentiality of the matter will be protected
- communicating with the complainant at the end of this initial review to
 - advise of the outcome of the initial review including whether the matter will be handled as a complaint
 - proposing options for how an investigation might proceed
 - seeking the complainants views on the handling of the matter
 - advising of the process by which a determination will be made
 - advising of timeframes for the investigation
- where the outcome of the initial review is not to handle the matter as a complaint, advising the person of the alternative handling of the matter and how they can appeal the decision if they wish to do so (see section 7.4).

In some circumstances, a complaint may be resolved at the initial review stage. This includes situations where a misunderstanding has occurred or where additional information or other actions immediately satisfy the complainant.

There may also be circumstances where the complaint is treated as a complaint under this policy, but rejected at this initial stage for being frivolous, capricious or vexatious. Complainants whose complaints are rejected on these grounds may appeal the determination (see section 7.4).

Where an initial review determines a complaint is outside AFAO's jurisdiction, AFAO will advise the complainant of that and provide assistance in identifying a more appropriate organisation or authority for the handling of the matter. This may include police or other authorities or another organisation to which the complaint more directly relates.

7.3 Investigation and determination

AFAO's complaints officer will investigate the issues raised by the complaint within 30 working days following the initial review.

In some instances, the complaints officer may arrange for another person to undertake the investigation. This may be to ensure sufficient time and attention is able to be given the issues if the matters are more serious, or to ensure sufficient expertise and independence is available to investigate the issues.

AFAO will ensure sufficient resources are available to investigate complaints.

AFAO's complaints officer will approach the investigation based on the approach determined in the initial review and with regard to the preferences of the complainant for how the matter is to be handled.

This will include any person who is the subject of a complaint having an opportunity to respond to the issues raised.

Steps in the investigation may include mediation of the issues or other strategies to resolve the matter to the satisfaction of the complainant.

Once the complaints officer has identified the issues involved in the matter, obtained all relevant information and taken any steps toward resolution with the complainant (if appropriate at this stage), they will make a determination of the outcome of the complaint.

In making this determination, the complaints officer will consider:

- the complaint
- the preferred resolution of the complainant
- relevant information obtained through the investigation
- the outcomes of any steps taken toward resolution with the complainant
- other relevant considerations.

AFAO's complaints officer will be guided by AFAO's values and its commitment to fairness in all aspects of the complaints handling, including in making a determination.

AFAO's complaints officer will confirm the determination in writing to the complainant, providing relevant information obtained during the investigation and the reasons for their determination. AFAO will also advise the complainant of the option to appeal the determination (see section 7.4).

7.4 Appeals

AFAO will handle any appeal of a matter under this policy within 30 working days of a complainant making an appeal.

A complainant can advise the complaints officer of their wish to appeal a determination. The complaints officer will refer all such requests to the Chief Executive Officer for consideration.

Alternatively, the person may directly approach AFAO's Chief Executive Officer to appeal:

Darryl O'Donnell, Chief Executive Officer
Email: complaints@afao.org.au
Phone: +61 (2) 9557 9399
Address: Level 3, 414 Elizabeth Street, Surry Hills NSW 2010, Australia

At any stage of the process, including based on an appeal outcome, a complainant may also approach the Australian Council for International Development (ACFID) for assistance in resolving the matter. AFAO is a member of ACFID and a signatory to its Code of Conduct.

Complaints to ACFID should be marked 'confidential' and sent to:

Chair, ACFID Code of Conduct Committee
Email: code@acfid.asn.au
Address: Private Bag 3, Deakin ACT 2600, Australia

Information about ACFID's handling of complaints is available at: <https://acfid.asn.au/content/complaints>

8. Quality assurance, record-keeping and reporting

A complaint can alert AFAO to serious misconduct or failures, shortcomings in its work or issues in how we interact with others.

For these reasons, AFAO values complaints as an opportunity to learn and make improvements.

AFAO's complaints officer will review and analyse complaint information to determine how AFAO can improve its systems, processes and practices. This will include through discussion with relevant AFAO staff, utilising de-identified summary information from complaints, and implementation of improvements.

AFAO's Finance and Audit Committee will receive a summary report of any complaints received at each meeting and advise AFAO's Board of the matters, including any changes that will be made on the basis of investigations.

AFAO's complaints officer will maintain a complaints register and monitor patterns in complaints over time as an additional quality assurance strategy.

All complaints will be treated confidentially. AFAO's complaints officer will ensure records of complaints are securely stored. For paper records, this includes in a locked cabinet. For electronic files, this includes in restricted access areas of AFAO's network.

AFAO's complaints officer will de-identify complaint records at the request of complainants.

9. Breach of this policy

Any staff member or volunteer who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment or volunteer engagement.