

AOP Complaints Handling Policy

1. Introduction:

Action on Poverty (AOP) believes receiving feedback and responding to complaints from stakeholders is an important part of improving AOP's accountability. To achieve this, a well-managed mechanism for handling external complaints is essential. This mechanism works to improve the quality of our work, enhance the trust and confidence of stakeholders, identify areas of work that need to be improved, and ensure AOP learns from the feedback provided through this process.

AOP staff and management therefore recognise and welcome the importance of complaints and regard them as an opportunity to rectify issues that have been identified through the people we work with: beneficiaries, members, partners, staff, volunteers, donors and the general public, with the aim to improve in the future.

In operationalising this policy all staff, volunteers, stakeholders, partners and any other parties associated with AOP should be made aware of this policy. The policy will be made available on AOP's website.

AOP will make it a priority for all staff, volunteers and partners to be educated on the use of the AOP Complaints Handling Policy and Procedures.

2. Policy Aims:

This policy aims to fulfil the following:

- To deal with complaints in a timely manner
- To provide the highest quality service to all our stakeholders and partners
- To use the feedback obtained through the complaints to identify areas of improvement
- To use the opportunity that an issue raises to enhance the relationship with our stakeholders and partners.

In recognising that informal complaints are dealt with in a shorter timeframe, the policy aims:

- To respond with the necessary information and offer an apology if necessary
- To resolve informal complaints in the shortest possible timeframe
- To effectively manage the communications surrounding the issues raised.

3. Definitions:

For the purpose of this policy, AOP defines a complaint as:

“an external grievance made against AOP or against one or more of its employees, consultants, suppliers, partners or anyone else acting on its behalf, where the organisation has allegedly failed to meet a requirement. That commitment might be related to AOP's activities, use of resources, mission and values, staff conduct/behaviour or a legal requirement”.

A complaint is **not**:

- A general query about AOP's work
- A request for information
- A contractual dispute
- A request to amend records eg. to correct an address, cancel a donation
- A request to unsubscribe from an AOP service eg. newsletter or email.

The processes for dealing with the above issues are different and separate to that of AOP's internal complaints processes and this Complaints Handling Policy. These are covered in the AOP Operations Manual and the AOP Partner Manual (available on request).

Examples of complaints that are covered in this policy include (but are not limited to):

- A member of the public contacts AOP to express their concern about the way in which we have conducted a fundraising campaign; or
- A local person or partner raising concerns with us about one of our programs and/or staff behaviour of one of our Australian or in-country partners.
- A government, NGO, partner or other actor brings criminal allegations of fraud, unlawful harassment or child abuse against AOP and/or its partners in relation to Australian laws and regulations, or local laws and regulations applying to communities supported by AOP and/or AOP's own policies and regulations. In such cases the most stringent standard will apply whether it be the local regulations or AOP's policies. For more information please refer to the AOP Whistleblowing Policy.

A complaint may be made by a person to whom AOP delivers programs (beneficiaries) or supports including a partner, a local organisation with which we work, a national government or other NGOs, as well as members of the Australian public, supporters, donors, the Australian Government, and trusts and foundations.

Anonymous complaints can be made, but our ability to investigate them may be limited due to their anonymity.

4. Principles:

The following principles will guide AOP in the handling of complaints and ensure, that as a signatory to the ACFID Code of Conduct, we comply with the standards relating to complaints handling as follows:

- We recognise the importance and value of listening and responding to concerns and complaints (Section D.6.1 – ACFID Code of Conduct);
- The feedback and complaints handling process is as **effective, safe, confidential and accessible** to all stakeholders as possible, irrespective of their gender, status or background and without prejudice to their future participation (Section D.6.2 – ACFID Code of Conduct);
- **Visibility:** Information about the process for making a complaint will be clear and well publicised to members, donors, partners participating in programs and other stakeholders.

- **Accessibility:** The complaints handling process is easily accessible to stakeholders (via the AOP website) where there is readily accessible information about the process of making and resolving complaints so that no complainants are disadvantaged. AOP will endeavour to ensure that flexibility is provided to complainants to phone, write and email complaints and/or to raise concerns in person. Acknowledging that not everyone has access to the Internet or is literate, AOP staff will also ensure there are opportunities for face-to-face meetings with project beneficiaries from time to time as part of usual monitoring and evaluation processes. Partners are encouraged to implement their own complaints handling processes accessible to project participants and local stakeholders.
- **Objectivity:** All complaints are addressed in a fair and equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified to ensure objectivity.
- **Confidentiality:** Confidentiality relating to the complaint will be safeguarded so far as reasonably practicable including the person(s) to whom the complaint is addressed.
- **Collaborative approach:** AOP takes a collaborative approach to its programs and actively welcomes feedback including complaints and compliments. As such AOP is committed to resolving all complaints through keeping people informed and where possible coming up with solutions that are satisfactory for all parties.
- **Responsiveness:** All complaints and constructive feedback will be taken seriously and handled as swiftly as practicable. All complainants will be treated courteously and kept updated on the progress of their complaint throughout the complaints handling process.
- **Accountability:** Accountability for handling complaints and reporting on the actions and decisions of AOP with respect to complaints handling will be clearly established. All complaints will be recorded through one central point before action is taken.
- **Continuous improvement:** AOP is committed to the continual improvement of the complaints handling process and the quality of AOP's work. This commitment is practically supported by the monitoring of the complaints handling processes; and the auditing/management reviews of the complaints handling process and refining of complaints handling in light of those reviews.
- **Organisational commitment to this policy:** AOP will ensure that sufficient resources and expertise are provided to handle complaints. Staff will be briefed on the nature and purpose of the policy and senior managers dealing with the complaints will be given training in handling complaints. Complaints will be handled in accordance with AOP's policies and procedures and in accordance with Australian laws and regulations. The CEO and COO will be the key people to receive external complaints.

5. Standards:

The handling of complaints at AOP will meet the following standards.

- All complaints will be acknowledged within 3 business days of complaints being received.
- All complainants will receive a copy of the AOP Complaints Handling Policy.

- Any persons implicated in a complaint will not be designated to handle the complaint.
- Under normal circumstances a complaint will be handled within 15 business days from receipt of acknowledgement of the complaint by AOP. If it cannot be resolved in this time frame notification in writing will be given outlining the ongoing process.
- All complainants will be appointed a point of contact within AOP that they can communicate with.
- All complainants will receive a response outlining the outcome of their complaint within 15 business days or 30 business days if it needs to be referred to a partner. If this deadline cannot be met and the matter is more complex, AOP will communicate this with the complainant, outlining what further investigation is required to resolve the complaint and the estimated timeframe.
- If necessary and depending on the severity of the complaint, it may be brought to the attention of the police.
- All complaints should be recorded on the AOP Complaints Handling Form and Report.
- All complaints will be treated respectfully, whether it is felt the complaint is justified or not.

6. Publicising our Policy:

AOP is very clear in the value that we place on receiving concerns and complaints in all relevant communications. The homepage of the AOP website has a link to the AOP Complaint Handling Policy, the Complaint Process and the AOP Complaint Form. Where literacy is a constraint, we will verbally invite expressions of concern and complaint on a regular basis through meetings and focus group discussions in the field. AOP will take care to approach these matters in a culturally appropriate way, recognising that in some cultures people require greater encouragement and an appropriate environment to raise concerns.

AOP takes special care to facilitate complaints from vulnerable populations including children and marginalised groups. Younger stakeholders are encouraged to engage with us using social media platforms such as Facebook where they can be directed to more formal methods or raising any issues of concern.

AOP endeavours ensures that making a complaint is easy and accessible to all.

7. Educating our organisation on our Complaint Handling Policy and training relevant personnel:

Our Complaint Handling Policy is made available to all staff, volunteers, partners, and contractors acting on our behalf.

8. Making a Complaint:

To ensure AOP can give fair and efficient consideration to your complaint as much information as possible should be provided. AOP complaint forms are available upon request and via the website, but for those who chose not to use it please provide:

- Your name

- Address
- Email
- Telephone number
- Details of the complaint
- Date of the complaint occurring
- Current date
- The remedy or outcome you would like to see as a result of your complaint

All complaints, no matter their severity, will be formally recorded.

Anonymous complaints are accepted, however the investigation of anonymous complaints may be hampered.

Confidentiality:

AOP will make all reasonable efforts to maintain the confidentiality of information provided.

Sharing Information:

Sharing information is dependent on the severity of the allegation and only ever entered into after gaining the consent from the complainant.

If you are making a complaint or enquiry on behalf of another party we will need to contact the other party to verify information provided. AOP requires permission of the person making the complaint to speak directly to the primary complainant, unless there is a safety or security concern related to doing so. The AOP Child Protection Policy, Prevention of Sexual Exploitation, Abuse and Harassment Policy, and Whistleblowing policy may also be relevant in some circumstances.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to the CEO for review. If such a dispute is unresolvable, AOP will refer the complainant to the Code of Conduct Committee of the Australian Council for International Development (ACFID).

How to make a complaint:

Complaints can be lodged online via our website www.actiononpoverty.org

Or directed to a staff member personally if this is more appropriate.

Complaints should be marked “Confidential” and under normal circumstances would be addressed to:

Chief Executive Officer (CEO)
Action on Poverty
PO Box 1206
North Sydney, 2059

Or

AOP COO at the same address, if the complaint is related to the CEO.

Or

Via email: info@actiononpoverty.org

Via telephone: 02 9906 3792

Complaints can be made in person by visiting the AOP Office:

Action on Poverty
50 Miller St
North Sydney NSW 2060
Australia

If the complaint relates to one of the countries where we support activities, the complaint can be addressed to the relevant AOP Country Director or partner Director, copied to our Sydney office if practicable.

If a complaint is related to the AOP Vietnam country office, they should be marked “confidential” and addressed to:

The AOP Asia Regional Director
No 30, Lane 12, Dang Thai Mai Street
Tay Ho District Hanoi
Vietnam

Via email: admin@actiononpoverty.org.vn

Via Telephone: +844 351 43538

With the exception of our Vietnam office, AOP works in partnership with local organisations. Complaints can be raised with these organisations about us, or with us directly if a complaint relates to one of our local partner organisations. Where this is the case, a complaint should be directed to the in-country partner office’s Director (or equivalent) who is required to raise the issue with AOP. Contact details for our partner organisations are available on our website or can be provided by our Sydney office by using the same contact details provided above.

If you believe AOP has breached the ACFID Code of Conduct, you can lodge a complaint on the ACFID website <http://www.acfid.asn.au/code-of-conduct/complaints>

9. When a complaint may be declined:

AOP reserves the right to decline a complaint deemed frivolous, vexatious, not made in good faith, misconceived or lacking in substance. Where a complaint is declined, AOP will provide feedback regarding why the complaint has not being taken further.

AOP strives to keep all parties involved during the process of the complaint and works to complete an investigation in a manner specific to the complaint.

10. AOP Complaint Process:

The process that any AOP staff member takes after receiving a complaint is as follows:

- Staff member receives a complaint, either in person, over the phone, by email or in a letter. The staff member will notify the AOP CEO that a complaint has been made, unless the complaint relates to the CEO in which case the COO will be notified.
- The CEO or COO will delegate responsibilities for handling the complaint accordingly. Personnel implicated in the complaint will not be involved in the investigation, irrespective of how the complaint is made.
- The CEO/COO or delegated AOP staff member then completes the AOP Complaints Handling Report outlining details of the complaint and the relevant contact details. Staff then send the complainant the along with the AOP Complaints Handling Policy and the AOP Complaints Form to complete and return. If the complainant requires assistance to complete the form, the delegated AOP staff member should help provide this support. This must occur for all people making a complaint, no matter the severity.
- The complainant will receive written notification within 3 business days of their complaint being received. The complainant will also be provided with the name and contact details of their AOP point of contact at this time.
- Upon receiving the completed complaint form, the CEO/COO or delegated staff member outline the best way to handle the complaint.
- The AOP Complaints Handling Report will remain a “living” document until the complaint has been dealt with.

Below is a list of AOP staff members who may assist in investigating complaints (depending on the nature of the complaint):

- Finance and Fraud: Chief Operating Officer, Finance Manager
- Program Related issues: International Program Director
- Programs and AOP Management: Chief Executive Officer
- Communications and fundraising: Head of Partnerships
- Board
- Ethics Committee

As noted above as general principle any staff member implicated in the complaint will not be involved in handling the complaint in any way.

- All complainants will receive a response outlining the outcome of their complaint within 15 business days. If the complaint needs to be referred to a partner then complainants will receive a response in 30 business days. If this deadline cannot be met and the matter is more complex, AOP will

communicate this with the complainant, outlining any further investigation required to resolve the complaint and provide an estimated timeframe.

- Depending on the severity of the complaint, an issue may be referred to the police.
- If the complaint is deemed to be addressing a more urgent and confidential issue it may fall under the AOP Whistleblowing Policy, the AOP Child Protection Policy and Procedures, the Prevention of Sexual Exploitation, Abuse, and Harassment Policy or the AOP Fraud Policy and Procedures.
- The Board will be notified of all active or recently resolved complaints at each Board meeting
- The complaint will be filed in AOP's HR folder or Irregularities folder once it has been resolved.

11. How AOP will respond to and close a complaint:

The AOP CEO or senior manager delegated by her/him is tasked with making decisions based on complaints that have required investigation (not a minor complaint). As mentioned above decisions on serious complaints may be referred to our Ethics Committee and/or Board.

AOP will communicate our decision on a complaint as soon as is practical and within 30 business days. Our communication will be in writing in the appropriate language, and either through email or by post.

AOP encourages the complainant to respond and advise as to 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 complainant may be referred to the Code of Conduct Committee of ACFID. We will provide all necessary information for the referral to the Code of Conduct Committee if such action is required.

12. Monitoring and Review of the Policy and Procedure:

AOP's Complaints Handling Policy is reviewed every three years. The review must address the efficiency of the Complaints Handling Process, and any revision must be submitted and endorsed by the Leadership Team.

As part of the participatory review and reflection process, AOP staff will reflect on the learnings from the complaints and constructive feedback they have received. This will feed into AOP's own learning and development practices. AOP is 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.

The AOP Complaints Handling Policy and Procedures will be reviewed by an external body every five years.

Review History:

Adopted by the Board: November 2013

Reviewed by AOP Communications, Marketing and Fundraising Manager: July 2015

Approved by AOP Executive Director: July 2015

Reviewed by AOP CEO: December 2016

Reviewed by ACFID Code of Conduct Committee: February 2017

Revised Policy electronically submitted to the AOP Board for approval: 3 March 2017

Revised: April 2021

Next External Review: February 2022