



# COMPLAINTS HANDLING POLICY

**APPLICABILITY:** ACCI Missions & Relief Staff, Volunteers, all categories of ACCIM Field Workers, Strategic Partners & Representatives (See Scope)

**VERSION:** 3 (December 2022)

**AUTHORISED BY:** ACCI and ACCIR Boards

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# CONTENTS

|   |    |
|---|----|
| INTRODUCTION .....  | 3  |
| PURPOSE .....   | 3  |
| RELATED POLICIES .....  | 5  |
| GUIDING PRINCIPLES.....   | 3  |
| SCOPE.....  | 4  |
| DEFINITIONS & COMPLAINT CATEGORIES .....                            | 5  |
| RESPONSIBILITY AND AUTHORITY .....                                  | 7  |
| INTERNAL STAFF RESPONSIBILITIES .....                               | 7  |
| INTERNAL FIELDWORKERS AND PARTNER STAKEHOLDERS RESPONSIBILITES..... | 8  |
| ACCI COMPLAINTS HANDLING PROCEDURES.....                            | 9  |
| MAKING A COMPLAINT .....  | 9  |
| RECORDING COMPLAINT DATA.....                                       | 10 |
| INITIAL ASSESSMENT OF A COMPLAINT .....                             | 10 |
| INVESTIGATING A COMPLAINT.....                                      | 11 |
| RESPONDING TO AND CLOSING A COMPLAINT.....                          | 12 |
| APPEALS .....   | 13 |
| COMMUNICATING & DISSEMINATING THE POLICY .....                      | 13 |
| REVIEW AND ONGOING IMPROVEMENT.....                                 | 14 |
| APPENDIX 1: HOW TO MAKE A COMPLAINT GUIDANCE DOCUMENT.....          | 15 |

# INTRODUCTION

## PURPOSE

ACC International Missions Ltd and ACC International Relief Inc (collectively referred to as “ACCI”) recognises that listening to and responding to feedback, concerns and complaints is integral to our commitment to achieving high standards ensuring 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. This Complaints Handling Policy outlines ACCI responsibilities and response to feedback and complaints and the principles that underpin our approach.

## GUIDING PRINCIPLES

ACCI’s Complaints Handling Policy is guided by the following principles:

### **Principle 1: Visibility and Accessibility**

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. We will take measures to ensure that accessible and safe points of contact are made available for people to make complaints or provide feedback including children.

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.

### **Principle 2: Responsiveness**

We will respond to complaints and feedback effectively, appropriately and with professionalism.

### **Principle 3: 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. We will seek to ensure the protection of all parties involved in the complaint or concern.

### **Principle 4: Confidentiality**

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

### **Principle 5: Stakeholder-focused approach**

The interests and wellbeing of our stakeholders are foremost in our approach to complaints handling. When a vulnerable person (complainant or individual) is involved, their needs are prioritised. We seek to ensure child friendly reporting mechanisms.

Sexual exploitation, abuse or harassment and child safeguarding complaints will be handled in a manner that balances respect for due process with a survivor-centered approach in which the survivors' wishes, safety, and well-being remain a priority in all matters and procedures. All actions taken will be guided by respect for the safety, choices, wishes, rights and dignity of the survivor. For survivors who require additional support or protection, the Safeguarding Officer will coordinate with and make referrals to relevant social services organisations.

We also seek feedback from our primary stakeholders in the design of complaints reporting mechanisms in our local communities and have formal mechanisms for primary stakeholders to contribute their ideas feedback and ownership of their own development.

#### **Principle 6: Accountability**

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

We are accountable to comply with all relevant legislation including mandatory reporting following the processes outlined in our ACCI Child Safeguarding Policy.

#### **Principle 7: Continual improvement**

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

### **SCOPE**

This policy applies to the handling of feedback and complaints relating to all ACCI personnel, programs, advocacy initiatives, fundraising and campaign activities, whether implemented in Australia or overseas by ACCI or our partner organisations. Complaints may be received from both internal and external stakeholders but internal stakeholders hold responsibility for responding to complaints.

Where the subject or nature of the complaint lays completely outside the scope of ACCI's scope as defined above (e.g. relates to an employee of another organisation), we will endeavour to refer the complainant onto the appropriate contact for submitting their complaint.

#### Internal Staff Stakeholders:

- All ACCI **Staff**.
- All ACCI **Contractors and Consultants**.
- All ACCI **Volunteers** including but not limited to office and event-based volunteers.
- All ACCI **Board Members**.

#### Internal Field Workers or Partner Stakeholders:

- All ACCI **Field Workers**.
- All ACCI **Associates**.
- All ACCI **Relief and Missions Partners**

#### External stakeholders:

- All ACCI **Beneficiaries** of projects and programs.
- All ACCI **Supporters and Donors**.
- Members of the **public**.

## RELATED POLICIES

Based on the nature of the complaint, it could be directly or indirectly related to other ACCI policies such as:

- ACCI Child Safeguarding Policy
- ACCI Prevention of Sexual Exploitation, Abuse and Harassment Policy
- ACCI Standards Policy
- ACCI People Policy, including the Dispute Settlement and Performance Improvement sections
- ACC Grievance Policy and ACC Ministers Code of Conduct (for those who hold Ministers Credentials)
- ACCI Whistleblowers Policy

Where a complaint involves an ACC Credentialed Minister and a breach of the ACC Ministers Code of Conduct, it will be necessary to initiate the ACC Grievance and Disciplinary process in tandem with this policy.

## DEFINITIONS & COMPLAINT CATEGORIES

### 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.

*Third Party Program:* Overseas Activities carried out by Partners, Associates and Field Workers. ACCI pursues its charitable purposes in part through collaborating with third parties to deliver programs overseas and we have a responsibility to monitor complaints made to, about and by third parties who we formally collaborate with. This policy allows for any beneficiaries, employees, volunteers or Board members of a third party to make a complaint directly to ACCI.

### CATEGORIES:

Complaints will be classified as either an:

*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.

*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.

*Safeguarding complaint* - Any complaints relating to breaches the ACCI Child Safeguarding Policy or the ACCI Prevention of Sexual Abuse, Exploitation and Harassment Policy (PSEAH), and any incidents involving sexual misconduct, including child-related incidents. A safeguarding allegation always necessitates an investigation and resolution. Depending on the severity of the allegation, relevant authorities will be notified who may take over the investigation process.

*Major complaint* - A non-safeguarding complaint that is assessed as being serious in its nature will be recorded as a major complaint. As a guide, the following types of complaints should always be categorised as major:

- Complaints that include allegations of financial misconduct, fraud, corruption, theft, bribery, money laundering and terrorism financing.
- Human Resources misconduct incidents such as bullying, discrimination or ministers code of conduct breaches; and
- Concerns regarding the quality of project delivery or beneficiary treatment for any ACCI Relief programs.

The following considerations will also be referred to when categorising complaints:

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

Providing timely responses to complaints will often require making an initial category assessment based on the information available at the time. The classification of the complaint may change in the light of new information ascertained during the investigation process.

# RESPONSIBILITY AND AUTHORITY

## INTERNAL STAFF RESPONSIBILITIES

|   |  |
|---|--|
| National Director                             | <ul style="list-style-type: none"> <li>• Ensuring relevant staff receive appropriate training in implementing this policy.</li> <li>• Receiving major complaints, either by referral or directly. Implementing the required investigation and resolving the complaint according to this and other relevant policies. This includes ensuring the Safeguarding Officer is involved in responding to any safeguarding complaints.</li> <li>• Referring any complaints on to relevant external bodies in Australia.</li> <li>• Ensuring all complaints are resolved appropriately and resolutions are communicated to all parties involved in this complaint.</li> <li>• Identifying and resolving any systemic issues underlying complaints.</li> <li>• Informing the board of major complaints under investigation and their resolutions where required by other ACC or ACCI policies.</li> <li>• Ensuring learning is incorporated into policy review, amendment, and adaptation with respect to organisational practices.</li> </ul> |
| ACCI Staff Member                             | <ul style="list-style-type: none"> <li>• Directly receiving, -complaints. Referring minor complaints to the ACCI Management Team Representative. Referring major complaints to the Director and/or safeguarding complaints to the Safeguarding Officer.</li> <li>• Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms.</li> </ul>   |
| ACCI Staff – Program Managers/ Field Managers | <ul style="list-style-type: none"> <li>• Directly receiving, complaints. Referring minor complaints to the ACCI Management Team Representative. Referring major complaints to the Director and/or safeguarding complaints to the Safeguarding Officer.</li> <li>• Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms.</li> <li>• Ensuring Field Workers and Missions and Relief Partners have sufficient awareness and capacity to implement this policy in the context of their field work.</li> <li>• Ensuring programs meet the expectations outlined in this policy.</li> </ul>   |
| ACCI Management Team Representative           | <ul style="list-style-type: none"> <li>• Responsible for registering and managing minor complaints</li> </ul>  |
| ACCI Safeguarding Officer                     | <ul style="list-style-type: none"> <li>• Responsible for ensuring safeguarding complaints are responded to in alignment with ACCI’s Child Safeguarding Policy and Prevention of Sexual Exploitation, Abuse and Harassment Policy.</li> </ul>   |
| ACCI and ACCIR Boards                         | <ul style="list-style-type: none"> <li>• Holding the National Director accountable for implementing the policy.</li> <li>• Periodic review of ACCI Complaints Register and processes reviews.</li> <li>• Involvement in major investigations or appeals where appropriate.</li> </ul>  |

## INTERNAL FIELDWORKERS AND PARTNER STAKEHOLDERS RESPONSIBILITIES

Due to the diverse nature of ACCI fieldworkers, partners and activities, responsibilities and authorities have been divided below based on levels of risk. Please make note of your risk rating before working through the below responsibilities table. If unsure, please contact ACCI for clarification.

| Low Risk  | Medium Risk   | High Risk  |
|---|---|--|
| <p>ACCI Field Workers working under a non-ACCI established organisation or ministry as an employee, volunteer or in a training, consultancy or capacity building role.</p> <p>ACCI Field Workers outworking informal grassroots strategies.</p> | <p>Small - Medium Relief Partners</p> <p>PBI Projects</p> <p>Church Programs or other ministries</p> <p>Small – Medium Missions Partner</p> | <p>Large Relief Partners</p> <p>Large Missions Partner</p> |

Small – Medium ACCIR Partner = < \$250,000 (AUD) yearly program budget  
 Large ACCIR Partner = > \$250,000 (AUD) yearly program budget

*Please note:* This is a general guide. In certain circumstances, ACCI may rank you differently based on your level of risk. Please consult with an ACCI program manager if unsure.

| RESPONSIBILITIES  | Low                                | Med | High |
|---|------------------------------------|-----|------|
| <b>Policies &amp; Procedures</b>  |                                    |     |      |
| Uphold ACCI’s Complaints Handling Guiding Principles in their third-party programs  | ✓                                  | ✓   | ✓    |
| Develop or ensure your organisation and ministry has their own complaints handling policy and procedures including adopting the ACCI complaint categories or developing similar categories for severity   | ❖                                  | ❖   | ✓    |
| If your organisation does not have their own policy, adapt and translate the ‘How to make a complaint’ guidance document (see Appendix 1)   | ❖                                  | ✓   | -    |
| Maintain child safeguarding complaint handling processes in line with ACCI Child Safeguarding Policy  | See CSP for more details.          |     |      |
| Maintain SEAH complaint handling processes in line with ACCI Prevention of Sexual Exploitation, Abuse and Harassment Policy   | See PSEAH Policy for more details. |     |      |
| Commit to providing support for survivors and complainants  | ✓                                  | ✓   | ✓    |
| <b>Accessibility of Policy</b>  |                                    |     |      |
| Ensure accessible context specific complaints and feedback mechanisms are developed and communicated to all stakeholders, in particular project beneficiaries   | ✓                                  | ✓   | ✓    |
| <b>Responding to Complaints</b>   |                                    |     |      |
| Directly receive, register, and respond to minor complaints pertaining to your direct field work  | ✓                                  | ✓   | ✓    |
| Refer major complaints to the National Director   | ✓                                  | ✓   | ✓    |
| Notify ACCI of all safeguarding and major complaints  | ✓                                  | ✓   | ✓    |
| Keep appropriate records of complaints  | ✓                                  | ✓   | ✓    |
| If required, report complaints to in-country external bodies/authorities where required by law, and/or at the direction of the National Director<br>(Note: This should be done by the most senior field worker if there is internal structure within organisations or in alignment with local laws or procedures) | ✓                                  | ✓   | ✓    |
| Communicate outcomes of a major complaint (at the direction of the National Director) to the complainant where the complainant is in their region or jurisdiction   | ✓                                  | ✓   | ✓    |

✓ Requirements  
 ❖ Recommended



# ACCI COMPLAINTS HANDLING PROCEDURES

## MAKING A COMPLAINT

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

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

Complaints can be made orally in person or by telephone, and in writing by letter, email or other electronic means. Complaints can be submitted to a field worker, missions or relief partner, or another ACCI employee where the complainant has access to or a working relationship with those personnel, and the complainant is comfortable to do so.

Consideration will be given where additional accessibility requirements or support is needed to enable someone to make a complaint, for example providing this information in alternative format or arranging a translator.

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 can be submitted to ACCI through the following contact details.

|  |   |
|--|---|
| ACCI Office<br>Email: <a href="mailto:complaints@acci.org.au">complaints@acci.org.au</a><br>Phone: +61 3 8516 9600 or 1300 997502<br>Mail: 44 Lakeview Drive, Suite 525, Scoresby VIC 3179 | ACCI National Director<br>Email: <a href="mailto:director@acci.org.au">director@acci.org.au</a><br>Phone: +61 3 8516 9600 or 1300 997502<br>Mail: 44 Lakeview Drive, Suite 525, Scoresby VIC 3179 |
|--|---|

If your concern relates to child safety or the sexual exploitation, abuse or harassment (SEAH) of an adult, reports can also be made to our Safeguarding Officer:

ACCI Safeguarding Officer (SO)  
Email: [childprotection@acci.org.au](mailto:childprotection@acci.org.au)  
Phone: +61 3 8516 9600 or 1300 997502  
Mail: 44 Lakeview Drive, Suite 525, Scoresby VIC 3179

If the allegation is against the SO, reports can be made to the National Director at the above contact details.

Complaints regarding an alleged breach of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee via the following contact details

The Australian Council for International Development  
Phone: +61 2 6285 1816  
Email: [main@acfid.asn.au](mailto:main@acfid.asn.au)  
Mail: Private Bag 3 Deakin ACT 2600

## RECORDING COMPLAINT DATA

The ACCI Complaints Register will record and document:

- All ACCI Minor, Safeguarding and Major complaints; and
- All Third Party Major and Safeguarding Complaints

ACCI staff responsible for registering 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.

The ACCI Complaints Register Summary will be reviewed by the ACCI Missions and Relief Board at each board meeting.

## INITIAL ASSESSMENT OF A COMPLAINT

When receiving any complaints we will:

- Assess whether in scope for ACCI (See scope for more information) If not in scope – proceed to referral process below
- 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 is dependant on:
  - if the complaint is in our scope;
  - if preliminary enquiries need to be made, or further consideration needs to be given; or
  - if the complaint is to be investigated or not.
- 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 also seek to avoid any other conflicts of interest in handling the 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;
  - a. Oral complaints immediately;
  - b. Written complaints within 7 days of receiving the written complaint; and
  - c. Safeguarding complaints within 2 working days of receiving the complaint.

- Follow up where necessary, and monitor whether the complainant is satisfied; and
- We will register all complaints, except inquiries.

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,

The ACCI personnel handling the complaint will conduct an initial assessment to determine how a complaint should be categorised (inquiry, minor, safeguarding, major, referral) and managed. If there is more than one issue raised in the complaint, it may be appropriate to categorise and handle separately.

As a general guide:

- *Inquiries* – can be handled and resolved by any ACCI Personnel, with advice from their supervisor or the Safeguarding Officer as appropriate.
- *Minor Complaints* – must be overseen by a member of the ACCI Management Team , with advice from the National Director as appropriate.
- *Safeguarding and Major Complaints* – will always include both the Safeguarding Officer, and National Director with advice from the ACCI and ACCIR Boards as appropriate.

### Referral Process

Where the subject or nature of the complaint lays completely outside the scope of ACCI's scope (e.g. relates to an employee of another organisation), we will endeavour to refer the complainant onto the appropriate contact for submitting their complaint.

ACCI commits to providing appropriate assistance and referrals to survivors (e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services).

## INVESTIGATING A COMPLAINT

ACCI is committed to the principles of fair and natural justice and allegations are not proof of breach and parties are innocent until proven guilty. 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 provided by the complainant. As appropriate, we will:

- Ensure the immediate safety of the victim/survivor;
- Gather and document information, possibly including consultation with relevant individuals involved;
- Ensure confidentiality for complainant, victim/survivor and alleged perpetrator, including being able to de-identify complaints at the request of the complainant or survivor.
- Inform/engage law enforcement authorities, (if applicable);
- Complete formal incident report forms (if applicable); and
- Consult and take advice from ACFID and/or other relevant external, regulatory or enforcement bodies in planning and carrying out an investigation (if applicable).

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

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.

## RESPONDING TO AND CLOSING A COMPLAINT

After a complaint is assessed and/or investigated, ACCI will determine an outcome and communicate to the complainant:

- the outcome of the complaint and any action taken;
- the reason/s for the outcome;
- the remedy, resolutions or fixes that have been put in place; and
- options for appealing the outcome.

ACCI will communicate the decision on a complaint within 7 days, unless there are exceptional circumstances. This 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. Where communication is required with multiple parties or cross-cultures, a longer period of time to respond and close may be necessary.

ACCI 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, they may appeal the decision, including providing any additional information they may wish to have considered.

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.

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.

## APPEALS

If a complainant is not satisfied with the resolution offered after a formal investigation they may make an appeal, which will escalate to either the Missions Director or Board Chairperson. They may then either choose to investigate the matter further, or inform the complainant that no further action can be taken.

If the complaint requires further investigation the complainant will be notified as such and offered a resolution at the end of the investigation, within 30 days.

If the complainant is not satisfied with the outcome of an appeal, they may be encouraged to pursue other means of airing their grievance, including ACFID or the ACC National Office.

|  |   |
|--|---|
| The Australian Council for International Development<br>Mail: Private Bag 3 Deakin ACT 2600<br>Phone: +61 2 6285 1816<br>Email: <a href="mailto:code@acfid.asn.au">code@acfid.asn.au</a><br>Web: <a href="https://acfid.asn.au/code-of-conduct/complaints/">https://acfid.asn.au/code-of-conduct/complaints/</a> | ACC National Office<br>Mail: PO Box 8093 Norwest NSW 2153<br>Phone: +61 2 8853 5150<br>Web: <a href="https://www.acc.org.au/contact/">https://www.acc.org.au/contact/</a> |
|--|---|

## COMMUNICATING & DISSEMINATING THE POLICY

ACCI is committed to ensuring both internal and external stakeholders, especially primary beneficiaries, are aware that they are encouraged to report complaints and know how to do so. We seek to provide this information in a clear and easily understandable form through a variety of accessible channels.

Information is provided to primary stakeholders on the expected behaviour of ACCI staff and volunteers, and access to its local complaint's mechanism including but not limited to:

- Local versions of 'how to make a complaint' (See Appendix 1) available in community locations and ensuring partners translate and make available these documents at community sessions and meetings.
- Complaints handling training on monitoring visits.

We are also committed to work closely with our partners and field workers to develop active measures to remove barriers that may discourage or prevent complaints being made, especially for vulnerable and marginalised community members including children. This includes but is not limited to, encouraging each partner to have a child safeguarding focal person that children can access in the event of making a complaint.

Strategies include:

- Accessing the Policy
  - The Complaints Handling Policy is easily accessible via:
    - ACCI Missions and Relief website
    - Annual Reports, and
    - Other relevant publications.
- Dissemination to all Internal Stakeholders
  - Online induction training program upon commencement of engagement with ACCI.
  - Online policy training program completed once per year.
  - Updated versions are provided to all stakeholders upon approval.

- The Complaints Handling Policy is also referenced in Partnership Agreements, ACCI People Policy, and in staff policies.
- ACCIR Partner Feedback Survey.
- Training key personnel
  - Personnel involved in implementing the Complaints Handling procedures are trained in all aspects of implementation.
- Coaching partners and fieldworkers
  - During onboarding and monitoring processes, ACCI’s program managers and field coaches will work with our partners and field workers to ensure their responsibilities related to Complaints Handling are understood and outworked.
  - Supporting implementing partners and field workers to disseminate their complaint handling policies and work towards removing barriers to reporting.
  - Provision of a ‘How to Make a Complaint’ information, including strategies for adapting to local contexts and making this information accessible within local communities and among beneficiaries.

## REVIEW AND ONGOING IMPROVEMENT

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

1. Monitor the effectiveness of our compliant handling procedures on an ongoing basis and appropriately update our policy and procedures based on organisational 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 National Director and in consultation with relevant staff and stakeholders; and
3. Provide ongoing staff training and retraining regarding our complaints handling policy and procedures.

| Version   | Date | Key Changes   |
|-----------|------|---|
| Version 1 |      |   |
| Version 2 | 2021 |   |
| Version 3 | 2022 | <ul style="list-style-type: none"> <li>- Added appendix for creating a complaints document</li> <li>- Referenced out of scope complaints</li> <li>- More clarity around responses to complaints.</li> <li>- Removed General Manager from reporting lines</li> </ul> |
| Version 4 | 2025 |   |

## APPENDIX 1: HOW TO MAKE A COMPLAINT GUIDANCE DOCUMENT

For Partners and Fieldworkers who do not have their own complaints handling procedures, we recommend you adapt and translate the below 'How to Make a Complaint' information.

Strategies should also be outworked to ensure beneficiaries, supporters, donors and members of the public can easily access this information. This could include:

- translating this document into a local language,
- reviewing and editing the content of this document to ensure it can be understood in the local culture and context,
- making this document accessible on your website,
- displaying information about making complaints at your office or project sites, or
- notifying program participants that they are able to provide feedback or complaints and how.

We recommend seeking the input of local stakeholders as part of the process of adapting this information, particularly minority or disadvantaged groups, and passing this feedback on to ACCI for ongoing learning and improvement.

*Please delete this text box before providing this document to others.*

## HOW TO MAKE A COMPLAINT?

### OUR COMMITMENT

If you have feedback, concerns or a complaint, we are committed to listening and responding to you as an important part of maintaining high standards and being accountable to those we work with and for, as well as the general public.

We are always happy to hear from people who are willing to take their time to provide feedback and help us improve.

Seven core principles inform and support our commitments related to complaints handling.

1. Visibility and Accessibility
2. Responsiveness
3. Objectivity
4. Confidentiality
5. Stakeholder-focused approach
6. Accountability
7. Continual improvement

If you would like to read our full ACCI Complaints Handling policy, please visit the ACCI website or request from an ACCI staff member.

### HOW TO MAKE A COMPLAINT

You can contact ACCI to make a complaint using the following details:

Email: [complaints@acci.org.au](mailto:complaints@acci.org.au) or [director@acci.org.au](mailto:director@acci.org.au)

Phone: +61 3 8516 9600 or 1300 997502

Mail: 44 Lakeview Drive, Suite 525, Scoresby VIC 3179

If your concern relates to child safety or the sexual exploitation, abuse or harassment of an adult, reports can be made to the ACCI Safeguarding Officer:

Email: [childprotection@acci.org.au](mailto:childprotection@acci.org.au)  
Phone: +61 3 8516 9600 or 1300 997502  
Mail: 44 Lakeview Drive, Suite 525, Scoresby VIC 3179

If the allegation is against the Safeguarding Officer, reports can be directed towards ACCI's National Director via [director@acci.org.au](mailto:director@acci.org.au).

## HOW LONG WILL THE COMPLAINT PROCESS TAKE?

You will receive a response in the following timeframes:

- Oral complaints: immediately.
- Written complaints: within 7 days of receiving the written complaint.
- Safeguarding complaints: within 2 working days of receiving the 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 you of progress and keep you 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 you for progress reporting.

## HOW WILL WE HANDLE YOUR COMPLAINT?

### RECEIVING A COMPLAINT

We will:

- Seek from you the outcome/s you are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action; and
- Clearly explain to you the course of action including estimated timeframes or date of next contact.

### INITIAL ASSESSMENT OF A COMPLAINT

We will conduct an initial assessment to determine how the complaint should be categorised and managed. As a general guide:

- *Inquiries* – handled by any ACCI Personnel, with advice from their supervisor or the Safeguarding Officer as appropriate.
- *Minor complaints* – handled by a [member of the ACCI management team](#), with advice from the National Director as appropriate.
- *Safeguarding and Major complaints* – will include the National Director, with advice from the ACCI or ACCIR Boards as appropriate.

Where the subject or nature of the complaint lays completely outside the scope of ACCI's jurisdiction (e.g. relates to an employee of another organisation), we will endeavour to refer you onto the appropriate contact.

### INVESTIGATING A COMPLAINT

The level of investigation will be based on the nature of the complaint including the level of evidence or information provided. As appropriate and applicable, we will:

- Ensure the immediate safety of the victim/survivor;
- Gather and document information, possibly including consultation with involved individuals;
- Ensure confidentiality for you, the victim/survivor and the alleged perpetrator;
- Complete formal incident report forms;
- Consult and take advice from ACFID and/or other relevant external, regulatory or enforcement bodies; and



- Report or cooperate or refer complaint to an external body.

## RESPONDING TO AND CLOSING A COMPLAINT

After a complaint is assessed and/or investigated, ACCI will determine an outcome. This outcome will be communicated to you including information regarding the actions taken, fixes that have been put in place and options for appealing the outcome.

ACCI will also review if any further actions are required. This may include making organisational changes, providing counsel or discipline to internal stakeholder, or reporting further to external regulatory bodies or enforcement authorities.

## IF YOU'RE NOT HAPPY WITH OUR RESPONSE?

We hope that we are able to resolve your complaint and move towards a positive outcome. However, if you are not satisfied with the resolution offered after a formal investigation you may make an appeal, which will escalate to either the Missions Director or Board Chairperson. They may then either choose to investigate the matter further, or inform you that no further action can be taken.

If you do not feel completely satisfied by our response, you can also contact the following organisations:

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| <p>The Australian Council for International Development<br/>         Mail: Private Bag 3 Deakin ACT 2600<br/>         Phone: +61 2 6285 1816<br/>         Email: <a href="mailto:code@acfid.asn.au">code@acfid.asn.au</a><br/>         Web: <a href="https://acfid.asn.au/code-of-conduct/complaints/">https://acfid.asn.au/code-of-conduct/complaints/</a></p> | <p>ACC National Office<br/>         Mail: PO Box 8093 Norwest NSW 2153<br/>         Phone: +61 2 8853 5150<br/>         Web: <a href="https://www.acc.org.au/contact/">https://www.acc.org.au/contact/</a></p> |
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## MORE INFORMATION

For more information please refer to the following policies or contact us for more information.

- ACCI Child Safeguarding Policy
- ACCI Prevention of Sexual Exploitation, Abuse and Harassment Policy
- ACCI Standards Policy
- ACCI People Policy
- ACC Grievance Policy and ACC Ministers Code of Conduct
- ACCI Whistleblower Policy