

Complaints Policy and Procedure

Contents

Introduction	2
Policy Statement	2
Objectives.....	3
Definitions	3
Policy Principles.....	3
Policy in Action.....	4
Related Policies and Procedures	4
Document Control.....	4
Procedure Statement	5
Making a complaint.....	5
Assessing a complaint	5
Managing a complaint.....	5
Handling a complaint informally	6
Handling a complaint formally	6
Responsibility for complaints	7
Complaints relating to managerial staff.....	7
Complaints in Australia	7
Complaints in ChildFund Program Countries	7
Publication of the Policy.....	8
Other bodies.....	8
Sponsor and other donor refunds.....	8
ChildFund Australia Complaints Form.....	10
Key Contact Details	11

Introduction

ChildFund recognises that receiving and responding to complaints is an important part of being held accountable by our stakeholders, and improving the quality of our performance and operations.

This policy sets out the way in which we will approach and manage complaints, and is intended to ensure that we handle complaints fairly, efficiently and effectively.

We are also committed to the continual improvement of our complaints handling process. This commitment is supported by the analysis and reporting of complaints trends through our incident reporting mechanisms.

Policy Statement

ChildFund will ensure that stakeholders, including children and youth, have clear and accessible means to make a complaint.

We will respond to complaints in a fair and timely manner.

Every person raising a complaint will be treated respectfully, kept informed and be supported in exercising their right to make a complaint without fear of discrimination or detrimental action.

We respect the right of stakeholders to make an anonymous complaint.

Scope

Complaints may be made by any person affected by our programs. This includes children and youth, members of the public, partners and supporters (including child sponsors and other donors).

This policy applies to all such complaints.

Exclusions

This Policy does not apply to complaints by Childfund staff, volunteers or interns. These are covered by the Whistleblower Policy and Procedure or the Grievance Policy and Procedure.

The following diagram shows the relationship between these policies.

'Whistleblowing' means the reporting of suspected misconduct, illegal acts or failure to act according to Our Code.

The aim of this Policy is to **encourage employees and others** who have **serious** concerns about any aspect of our work to come forward and voice those concerns where they feel other reporting mechanisms are not appropriate.

The **Grievance Policy** enables **staff, interns and volunteers** to lodge a claim **with regard to** any **employment matter** or if h/she feels adversely affected by the misinterpretation or misapplication of any of our ChildFund policies.



A **complaint** is an expression of dissatisfaction, related to the standards of service, actions or lack of action by ChildFund Australia.

Anybody affected by our programs, including children and youth, members of the public, partners and supporters, child sponsors and other donors may raise a Complaint.

Objectives

- Complaints are handled fairly, efficiently and effectively
- Complaints can be made safely and in a way that best suits the needs of the complainant and their communities
- Complaint mechanisms are appropriate for children, youth and other vulnerable stakeholders
- Complainants and/or affected victims/survivors are supported throughout the process, including with appropriate community-based assistance as required
- Staff understand their roles and responsibilities, and accept that complaints are a legitimate part of the continual improvement process.

Definitions

A complaint is an expression of dissatisfaction about the standards of service, actions (including behaviour) or lack of action by ChildFund. It could be:

- a criticism relating to one of our development programs
- dissatisfaction about an aspect of service
- criticism about a fundraising action or campaign
- concern about the behaviour of anyone working for or acting on ChildFund's behalf.

Child/Children is any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

Intern refers to any person who is undertaking work activities at the direction of ChildFund and who has in place a current Intern Agreement.

Partners refers to organisations that ChildFund works with in the delivery of project or country services.

Staff refers to permanent and contract employees of ChildFund

Stakeholders are all external parties including ChildFund supporters, children, youth and their families, contractors, consultants, partners, suppliers, and service providers.

Volunteer refers to any person who is undertaking work activities at the direction of ChildFund and who has in place a current Volunteer Agreement.

To avoid doubt, reference to **this policy** includes the procedures at Annexure A as well as any and all Schedules and/or Attachments.

Policy Principles

- All stakeholders have a right to complain
- Children and youth are key stakeholders, and complaints procedures need to recognise their situation and context
- Complaints provide feedback that can help identify areas that may need improvement, and will be treated in a positive manner
- Complaints handling procedures are to be used as an opportunity to enhance our relationships with stakeholders
- Complainants should be treated with respect
- Complaints will be managed fairly and confidentially, recognising the need to be fair to both the complainant and the organisation or person being complained about.
- Complaints will be dealt with as quickly as a proper consideration of the matter requires
- Complaints will be assessed upon their receipt, and immediate appropriate action will be taken in cases where this is deemed warranted (e.g. child exploitation suspicions, serious fraud suspicions)

- If a complaint is not resolved to the satisfaction of the complainant, they have a right to escalate the matter for review and must be informed of this right
- A key contact will be identified in each Childfund office, and will ultimately responsible for the management of relevant complaints in line with this policy.
- This policy will be well publicised and be accessible to all stakeholders in an appropriate language, including through our website and internally via BambooHR
- Regular training (at least annually) of this policy and its procedures will be undertaken across ChildFund offices A complaints register will be kept in each country office.

Policy in Action

See the Procedures at Annexure A.

Related Policies and Procedures

- Whistleblowing Policy and Procedure
- Grievance Policy and Procedure
- Organisational Inclusion Policy
- Child Safeguarding Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy

Document Control

Version number	2.0
Date approved	July 2023
Approved by	CEO
Revision period	Every three years
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Version control				
Version No.	Date	Author	Authorised By	Remarks
1.0	21/11/18		Board	Refresh of initial Policy
1.1	20/8/2021	Nina von Stebut	CEO	Review
1.2	12/10/2022	Nina von Stebut	Deputy CEO	Incorporated ACFID feedback
2.0	14/07/2023	Nicky Batt	CEO	Reformatted in line with Policy and Procedures template. Key contact details added.

Procedure Statement

These procedures detail the way in which a complaint can be made and how it will be managed. They apply to all complaints covered by this policy.

Making a complaint

Complaints can be made in any manner that is practical and safe for the complainant. This can include:

- By telephone, letter, facsimile or email
- in person
- through social media or the Childfund website
- through comments and feedback on surveys.

A complaint can be made to the key contact point identified at Schedule 2, or to any member of staff.

All staff are responsible for assisting a complainant to make their complaint. This includes taking reasonable steps to clarify the complaint and obtain additional information that will assist in the assessment and ultimate resolution of the complaint. Interpreters, particularly in program countries, might be required.

Complaints can be made anonymously. To facilitate such complaints, the [anonymous complaints mechanism](#) can be used, or the complaint can be made through a third party or organisation.

In certain circumstances a complaint might also be made through or to relevant bodies of which Childfund is a member. This is covered under 'Other Bodies' below.

Assessing a complaint

When a complaint is first received, it must be initially considered as quickly as possible to determine whether the circumstances warrant immediate and appropriate remedial action. This might occur where eg there is an allegation of child exploitation, or serious fraud or corruption.

Where there is a suspicion of criminal offence, the matter should be reported to the appropriate law enforcement agency, and further action guided by such an agency.

Persons receiving a complaint must escalate all such matters to the key contact as a matter priority and seek such further advice as is required.

Managing a complaint

The Childfund person dealing with the complaint will explore options and solutions that may help to resolve the concern.

At all times the complainant will be treated respectfully.

If the complainant is a child of youth, or vulnerable in some way, particular care and attention will be given in managing the complaint. This should include appropriate support (and for affected victims/survivors), including community-based assistance if required.

Each party to the complaint will have the opportunity to present their account of the circumstances relevant to the complaint. No assumptions will be made, and (except where immediate remedial action is required) no action will be taken until all relevant information has been collected and considered.

All complaints will be dealt with in a timely manner, as quickly as a proper consideration of the matter requires.

The complainant will be advised as soon as possible of the expected timeframe for consideration of the complaint, be kept informed of progress on a regular basis, and be advised of the reasons for any delay.

Confidentiality will be maintained to the fullest extent possible, and will be managed on the basis of ‘need to know’. In that regard:

- when a matter is investigated it may be necessary to reveal its substance to people such as other ChildFund personnel, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies.
- in the interests of fairness it may be necessary to disclose the fact and the substance of a report to the person who is the subject of the complaint
- ChildFund will take reasonable precautions to store any records or files relating to a complaint securely and to permit access by authorised only.

A brief record of all discussions and any agreed actions will be made. The complaints form at Schedule 1 can be used.

Handling a complaint informally

Many complaints will be raised informally and can be dealt with quickly by staff. An informal approach is usually appropriate and should be used as often as possible.

Staff to whom a complaint is made can offer solutions consistent with their normal level of authority. Where the likely solutions appear to require approval from a higher authority, or if requested by the person who raises the complaint, the matter can be referred to a higher staff level.

Handling a complaint formally

The formal complaint handling procedure will be used when:

- The complaint cannot be satisfactorily resolved informally
- The complainant requests a formal response
- The person receiving the complaint determines it to be of a very serious nature.

The following table sets out the formal procedure.

What	Action	Who
Complaint Lodged	Take Record of (the complaints form can be used) → Name of the person/s making the complaint (unless anonymous) → Date, time and location the complaint is received → Brief description of the complaint → Decide who should handle the complaint (staff encouraged to handle the complaint themselves within their level of authority and if they feel able dealing with it. If not, refer to next level manager).	Staff Member
Complaint Handling	Actions will occur in a timely manner and a brief record will be kept of the actions taken. The complainant will be notified of actions being taken as appropriate. → If the complaint is resolved, relevant information will be shared with involved parties and case closed. → If the complaint is deemed to be of a serious nature it will be reported and / or escalated within 24 hours. For example, a child-safeguarding and PSEAH complaint would be deemed serious.	Staff Member or Manager
Escalation	Complaints that have not been resolved to the satisfaction of complainant	Country or

1 st level	<p>will be referred to the next level for review. The review may:</p> <ul style="list-style-type: none"> → reconsider the original decision and take additional corrective action. → overturn previous decisions and institute new measures considered necessary. → endorse the action that has already been taken with no further action required. <p>If complaint is resolved, relevant information will be shared with involved parties as appropriate, and case closed.</p>	Sydney Management Team
Escalation 2 nd level	<p>If the escalation remains unresolved to the satisfaction of the complainant, escalation to the CEO is available. The CEO may:</p> <ul style="list-style-type: none"> → reconsider the original decision and take additional corrective action. → overturn previous decisions and institute new measures considered necessary. → endorse the action that has already been taken with no further action required. → Consider option to refer the matter to an external mediator or alternative dispute resolution (ADR) agency. <p>At the completion of this escalation, not further internal review rights exist, and the matter will be considered completed by Childfund. Relevant information will be shared with involved parties as appropriate, and the case closed.</p>	CEO

Depending on the nature of the complaint, variable to the above procedure may apply.

Responsibility for complaints

While all staff have a role to play, the following are the primary points responsible for ensuring that complaints are properly and appropriately dealt with:

- In Childfund program countries, the key contact in Schedule 2 with respect to complaints about operations in their respective country
- Childfund’s Supporter Relations Department (SRD) in Sydney with respect to complaints made in Australia.

Complaints relating to managerial staff

If a complaint relates to staff in management positions, the following escalation will apply:

- for managers of staff, volunteers or interns, the complaint will be directed to the next level manager.
- for Country or Regional Program Directors, it will be referred to the relevant Global Programs Director in Sydney.
- for the CEO, the complaint will be referred to the Chair of the Board.

Complaints in Australia

To ensure consistency of response and to manage complaints effectively, complaints made in Australia will be referred in the first instance to the SRD. The SRD will either deal with the complaint or refer it to the relevant manager or department.

Complaints in ChildFund Program Countries

Due to the specific nature and/or geographical location of their activities, the following applies in program countries:

- Country Offices may develop additional procedures to fulfil the objectives and principles of this policy , where those additions or variations are considered more appropriate for the community and context in which work is taking place.

- local mechanisms (including how to receive complaints) must consider and take into account and be appropriate for the needs of children, youth, minorities and other vulnerable groups
- Country Offices are responsible for ensuring that partners we work with have adequate complaint mechanisms in place
- Country Offices and their partners will use their best endeavours to ensure that primary stakeholders have been engaged in the development of local complaints mechanisms.

Complaints about programs and/or staff ways of working in Country Offices may not be able to be resolved easily in-country, and support from, or referral to, the Sydney office may be required.

Publication of the Policy

This policy will be made available:

- to the public through the [Childfund website](#)
- by verbally informing stakeholders of the policy where appropriate
- by providing copies of the policy on request.

Copies of the policy will be made available in Country Offices in relevant local languages, and explained in local language and shared in operational locations (at community centres and schools etc.).

Other bodies

ACFID

ChildFund is a signatory to the Australian Council for International Development (ACFID) Code of Conduct. If a person believes that ChildFund has breached the Code, they should raise a complaint with the ACFID Code of Conduct Committee (for more information, visit [ACFID website](#) or email to code@acfid.asn.au).

FIA

ChildFund is a member of the Fundraising Institute Australia (FIA) and is committed to the Principles & Standards of Fundraising Practice. If a complaint arises in Australia and the complainant believes that ChildFund has breached the Principles & Standards of Fundraising Practice they raise a complaint to the FIA.

ACNC

ChildFund is a registered charity with the Australian Charities and Not for Profits Commission (ACNC). The ACNC encourages an individual to resolve any issue or complaint with the charity directly, without the ACNC needing to be involved. (If unsure visit [ACNC website](#) for further information).

Depending on the nature of the complaint, variations to the above procedures may apply. ChildFund is committed to ensuring that stakeholders who raise a complaint and/or affected victims/survivors receive appropriate community-based assistance if needed.

Sponsor and other donor refunds

A request for a refund of contributions already donated to ChildFund by a sponsor/donor will be considered and determined on a case-by-case basis.

When a request for a refund is received, an assessment of the reason given for the refund request is undertaken. The following reasons will usually be considered favourably:

- an error has been made by ChildFund

- a sponsor/donor decides within the first 21 days of providing contributions that they have changed their mind and providing the funds have not already been remitted overseas
- a sponsor/donor banking details are fraudulently obtained and used
- the sponsor disputes agreeing to allocation of an additional child through ChildFund's marketing programs
- sponsor/donor contributions are paid in advance.

The following reasons will not usually be grounds for a refund to be given:

- the financial circumstances of the sponsor/donor;
- disagreement by the sponsor/donor with the nature of the programs provided by ChildFund.

To make a request for a refund you can contact the Supporter Relations team by phone on 1800 023 600 or in writing via email at info@childfund.org.au or the below address:

Supporter Relations
ChildFund Australia
Level 8 162 Goulburn St
Surry Hills NSW 2010

If it is agreed that a refund is to be made, the sponsor/donor will receive the refund within 10 working days of the decision.

Refunds will be credited to the bank account or card originally debited. If it is decided that a refund will not be made, the issue is to be resolved using the steps in the Complaint Procedure.

We can provide replacement of your Gifts for Good card(s) if they arrived damaged or get lost in the post. To request a replacement or make a general enquiry about your order, please contact the Supporter Relation teams using the above contact and quoting your Gifts for Good order number.

ChildFund Australia Complaints Form

1.	Please state <ul style="list-style-type: none"> ▪ Your full name ▪ Your contact details 	
2.	Date and Time the complaint is lodged	
3.	Brief description of the complaint and relevant details	
4.	Decision about complaints handling and next steps <i>(for internal use)</i>	

Key Contact Details

ChildFund Australia

Level 8 162 Goulburn St
Surry Hills NSW 2010
Ph: 1800 023 600
info@childfund.org.au

ChildFund Vietnam

Level 5, Vinafor Building,
127 Lo Duc Street
Hanoi, Vietnam
Lien Nguyen Thi Bich
LienNB@childfund.org.vn

ChildFund Papua New Guinea

PO Box 671
Gordons NCD
Papua New Guinea
Anand Das
ADas@childfund.org.pg

ChildFund Cambodia

#30, Street 228, Sangkat Chaktomuk
Phnom Penh
Cambodia
Prashant Verma
prashantverma@childfund.org.kh

ChildFund Laos

House No.598, Unit 26
Sisattanak District Vientiane
Lao PDR
Vilasai Thammavong
vilasai@childfund.org.la

ChildFund Myanmar

No. C-4, Haling Yadanar Housing
Thazin Street
Near G.E.M.S Condo
Hliang Township
Yangon Myanmar
Win May Htway
winmayhtw@childfund.org.au

ChildFund Sport for Development

c/- PO Box 761
Sisattanak District Vientiane
Lao PDR
Chris Mastaglio
chris@childfunds4d.org

ChildFund Timor-Leste

Rua De Loriku 6 Colmera Municipio de Dili
Timor-Leste
Erine Dijkstra
edijkstra@childfund.org.au

ACFID

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ACNC

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