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| Document Owner  | PFO        | Version        | 3         |
| Supporting Team | SC&P & RGC | Issue Date     | July 2025 |
| Approved By     | CEO        | Review By Date | July 2028 |

## 1. PURPOSE

This procedure details how complaints can be made to IWDA and how IWDA will deal with those complaints. It supports the Complaints Policy, which outlines IWDA's policies and definitions.

## 2. SCOPE

This procedure applies to any complaint made by a partner, program participant, supporter, member of the public, government, or other organisation. For employee grievances or concerns please refer to the Resolving Issues in the Workplace Policy.

## 3. DEFINITIONS

See Complaints Policy.

## 4. IMPLEMENTATION

### Making a Complaint

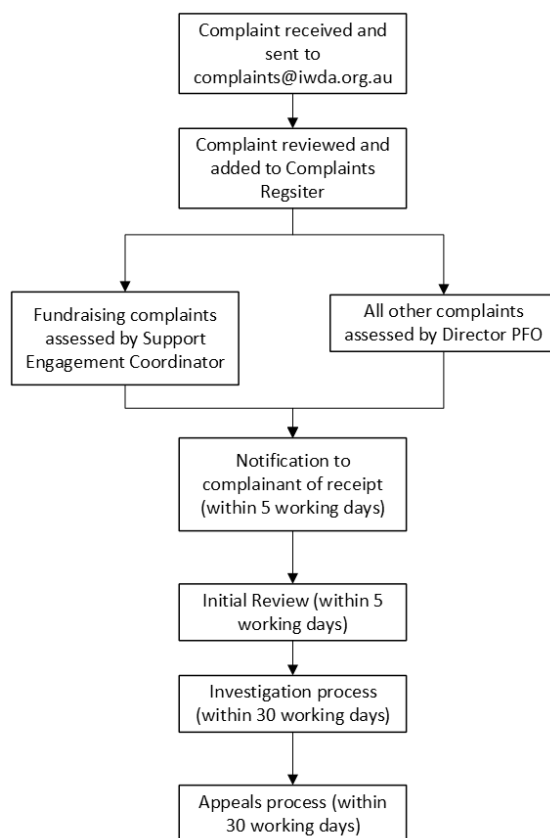
Anyone wishing to make a complaint to IWDA can use one of the following methods:

- Telephone: +61 3 8373 2500
- Website: <https://iwda.org.au/who-we-are/contact-us/>
- Email: [complaints@iwda.org.au](mailto:complaints@iwda.org.au)
- Post: Complaints, IWDA, PO Box 64, Melbourne, Vic 8009, Australia

IWDA practices a 'no wrong door' approach to complaints and if a complaint is received through any other means than listed above it will be forwarded to the above email address and assessed as per the process outlined below.

Additionally, please refer to IWDAs Safeguarding Reporting Procedure and Whistleblower Procedure if required.

## Process flow



### 4.1 Investigation Procedure

1. The IWDA representative receiving the complaint will document the complaint and send via email to [complaints@iwda.org.au](mailto:complaints@iwda.org.au).
2. The Supporter Engagement Coordinator monitors the Complaints inbox at least 3 days per week and enters all complaints onto the Complaint Register.
3. The Supporter Engagement Coordinator will assess and prioritise fundraising complaints, all other complaints will be forwarded to the Director People Finance and Operations (PFO) to be assessed and prioritised in accordance with its urgency and seriousness as described in clause 4.2 of this Procedure.
4. The Supporter Engagement Coordinator or Director PFO will issue a notification to the complainant that their complaint has been received, and informing them of the process and anticipated time of resolution. Complaints made anonymously or without any contact information will not be provided with this notification.
5. If a complaint is not assessed as warranting a full investigation, the complainant will be notified including the reason for closing out the complaint without an investigation. The reason to close out the complaint may be that the complaint is not within the scope of the Complaints Policy. The complainant will be provided referral information for alternative options to make the complaint and / or obtain advice or support in relation to the nature of their complaint.
6. Where the initial assessment of the complaint determines that further investigation is warranted, a prompt, impartial and appropriate investigation will be undertaken, to determine what action, if any, should be taken in the circumstances. The investigation will be guided by the principles set out in the Complaints Policy and in accordance with the below.

- Any such investigation shall observe the rules of natural justice and the provisions of procedural fairness.
  - Any such investigation shall comply with the Australian Council for International Development (ACFID) Code of Conduct requirements, relevant IWDA policies (including in particular those set out in section 4) and applicable legislation.
  - Before any adverse finding, the subject of the report shall be informed of the allegations against them and provided with an opportunity to reply to the allegations.
  - At an appropriate time, the person making the report may be asked to comment on any additional evidence obtained and/or the need to be a witness.
  - All relevant stakeholders will be informed of the outcomes of complaints, including the complainant and the organisations / people implicated in the complaint.
7. Any notifications required under law, DFAT, or other donor agency policy will be made as required.
  8. If the complaint or concern relates to a person employed by an IWDA partner organisation, subject to obligations of confidentiality, IWDA's Chief Executive Officer, or their delegate, will discuss the allegations with the partner organisation's Chief Executive Officer and work with the other organisation where possible in order that communication with the person making a complaint and / or their representative is clear and coordinated and the complaint appropriately addressed.
  9. If, following investigation, the complaint is found to fall outside the scope of the Complaints Policy, the complaint will be assigned to an IWDA staff member to decide the correct process for referring on a complainant. This may include referral to relevant authorities, safeguarding focal points, or IWDA's Board. The complainant will be provided referral information for alternative options to make the complaint and / or obtain advice or support in relation to the nature of their complaint.
  10. If at the conclusion of the investigation the allegations disclosed are considered to be substantiated, effective remedial action commensurate with the severity of the offence will be taken.
  11. Throughout the process IWDA will conduct itself in a fair and timely manner. IWDA will endeavour to work within the following timeframes:
    - Acknowledgement of receipt of complaint: 5 working days
    - Initial review: 15 working days
    - Investigation process and (if practicable) decision: 30 working days
    - Appeals process: 30 working days.
    - In the event that a complaint cannot be resolved within these timeframes the complainant will be kept informed regarding the progress and when they can expect to receive a response.

#### **4.2 Procedure for assessment and triaging of complaints**

1. All complaints will be assessed and triaged through an initial review by the Supporter Engagement Coordinator for fundraising complaints and Director PFO for all other complaints.
2. All complaints will be triaged based on the following criteria:
  - urgency
  - health and safety implications
  - financial implications
  - complexity (including if other organisations are involved)
  - impact on IWDA
  - impact on people (including the complainant)

- systemic implications
  - potential for the situation to escalate
  - the need for, and possibility of, immediate action.
3. The complaint will then be classified as either:
    - 1) not warranting an investigation
    - 2) warranting an investigation, or
    - 3) serious.
  4. All complaints that involve an immediate risk to safety or security or any allegations relating to the sexual exploitation, abuse or harassment of vulnerable persons, including children, are automatically classified as serious and will be responded to as per IWDA's Safeguarding Reporting Procedure.
  5. Any complaints classified as warranting an investigation or serious will be expeditiously escalated to the CEO, who will advise the Co-Chair of the Board, nominate the person who will oversee the investigation process and agree with that person the investigation process, including how a determination is to be reached, and how the determination will be communicated back to the complainant.
    - In making these decisions, the CEO will have regard to the nature of the complaint, the factors described above, the appropriateness of the involvement of expert or independent external professionals, and any other factors they consider appropriate in the circumstances.
    - If the CEO is implicated in a disclosure, then the Director of People, Finance and Operations will manage this.
  6. Any complaints classified as *not warranting an investigation* will be referred to the Director of People, Finance and Operations for confirmation of the decision, or reclassification.

#### 4.3 Appeal

1. Complainants who have launched a well-founded complaint and who are dissatisfied with IWDA's response to that complaint have the right to appeal. Appeals can be made to the person delivering the outcome of the initial complaint, or by any other channel as outlined in this procedure.
2. Any internal reviews of how a complaint was managed will be conducted by the immediate superior of the original decision maker.
3. After the internal appeal, there is no further internal process. However, a complaint can still be filed with the ACFID Code of Conduct Committee or the Fundraising Institute of Australia (FIA), as described in the Complaints Policy.

## 5. REVIEW AND AMENDMENT

This procedure will be reviewed every three years and any amendments approved by the CEO.

## 6. REFERENCES/RELATED DOCUMENTS

- IWDA Resolving Issues in the Workplace Policy
- IWDA Complaints Policy
- IWDA Complaints Register
- IWDA Respect & Dignity in the Workplace Policy
- IWDA Whistleblower Policy
- IWDA Whistleblower Procedure

- IWDA Child Protection Policy
- IWDA PSEAH Policy
- IWDA Safeguarding Reporting Procedure
- IWDA Code of Conduct
- IWDA Conflict of Interest Policy
- IWDA Anti-Fraud and Corruption Policy
- IWDA Funding Orders
- IWDA Supporter Promise
- IWDA Donation Acceptance and Refusal Policy
- ACFID Code of Conduct
- FIA Code of Conduct