

Policy	Complaints Policy	Version 3	May 2021
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1. PURPOSE

IWDA is committed to upholding the highest ethical standards and to providing appropriate avenues for complaints to be made and issues raised if these high standards are not met.

This policy sets out how IWDA meets its commitment to accountability and to actively responding to complaints in a timely, effective, fair and clearly defined manner.

2. SCOPE

This policy applies to any complaint made by a partner, program beneficiary, supporter, member of the public, government, or other organisation.

All employees, volunteers, board directors, representatives, contractors and partners are expected to comply with the principles and requirements specified in this policy.

3. DEFINITIONS

Complaint means an expression of dissatisfaction or concern made to IWDA related to its activities, programs, services, communications, fundraising, personnel or partners or the handling of a complaint, where a response or resolution is implicitly or explicitly expected or required.

A complaint can be about any of the following issues (not an exhaustive list):

- concern from a member of the public or supporter about a particular fundraising approach or campaign;
- concern from someone with whom we work about the quality of program delivery;
- misconduct by an individual involved in the work of IWDA, including employees, volunteers, and contractors of IWDA, partner organisations;
- exploitation or abuse of children, vulnerable adults or any other person; or
- misuse of funds or fraud (including terrorism financing).

A complaint is not:

- a general query or feedback about IWDA's work;
- a request for information;
- a contractual dispute;
- a request to amend records e.g. to correct an address, cancel a donation;
- a request to unsubscribe from an IWDA communication, e.g. a newsletter or email; or
- work-related grievances or concerns by internal personnel. Such matters should be raised as per IWDA's Grievance and Conflict Resolution Policy, Anti-Discrimination, Bullying and Harassment Policy or other policy as applicable.

Complainant means a partner, program beneficiary, supporter, member of the public, government or other organisation or any of their personnel, making a complaint pursuant to this policy.

Feedback means opinions, comments, suggestions and expressions of interest in the products or services of IWDA.

Safeguarding means actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.

SEAH means sexual exploitation, abuse or harassment.

4. POLICY

IWDA recognises the importance and value of listening and responding to concerns and complaints, and to providing appropriate avenues for complaints to be made and will apply the following principles to its complaint handling processes.

- **Communication and Accessibility:** IWDA will provide information to the public, partners and program beneficiaries about how to make a complaint. IWDA will make it as easy as possible to communicate with IWDA about a complaint, and will provide a variety of ways to do so, taking into consideration the needs of all of its various stakeholders.
- **Responsiveness:** IWDA will acknowledge and respond to complaints in a timely and fair manner.
- **Confidentiality:** IWDA respects the needs of complainants who wish to remain anonymous. IWDA will make all reasonable endeavours to keep the identity of a person making a complaint confidential unless that disclosure is authorised by them or required by this policy and procedure or the law.
- **Objectivity:** IWDA will address complaints in an equitable, fair and unbiased manner. Responsibility and accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established, and in accordance with IWDA values and policies. Vexatious or frivolous complaints can detract our resources and may significantly affect the progress and efficiency of our work.
- **Person and Survivor Centred Approach:** IWDA will keep the needs of all individuals involved foremost in its approach to complaint handling. IWDA aims to remove systemic and cultural barriers to making a complaint, and ensure that complaints are handled appropriately and sensitively with proper regard to the needs of the vulnerable, and minority and disadvantaged stakeholders. IWDA is committed the safeguarding of survivors of SEAH, through a survivor-centred approach, ensuring that our accessible mechanisms to make such a complaint are designed with their needs in mind, that any such complaint is investigated sensitively with processes contextualised, culturally and gender appropriate, complying with the requirements of IWDA's Child Protection Policy and PSEAH Policy, and with primary concern for the survivor.
- **Accountability, Learning and Improvement:** IWDA is accountable for the actions and inactions of staff and the activities we undertake, or which are undertaken on our behalf. IWDA commits to continuous learning and improvement of the complaint handling process, through maintenance of a complaints register, reporting, review and keeping abreast of best practices.

5. MAKING & INVESTIGATING A COMPLAINT

IWDA has provided a number of different ways anyone wishing to make a complaint can notify IWDA. Complainants can use whichever of these ways best fits their individual needs and concerns. Following receipt of a complaint, IWDA will review and undertake, as appropriate, a prompt, impartial and suitable investigation to determine what if any action should be taken in the circumstances.

The various ways a complaint can be made, and the investigation procedure which will be utilised, are detailed in the [Complaints Procedure](#).

People are encouraged to share their identity when making a disclosure, as it will make it easier for IWDA to address the disclosure, but they are not required to do so and may choose to make a report anonymously.

6. RIGHT TO APPEAL

IWDA is a signatory to the Australian Council for International Development (ACFID) Code of Conduct and the Fundraising Institute of Australia Code of Conduct. If a complainant is dissatisfied with how IWDA has responded to a complaint and believes it is a breach of one of these Codes of Conduct the complainant may refer the matter to:

- a) the ACFID Code of Conduct Committee (Private Bag 3, Deakin ACT 2600, Tel: +61 2 6285 1816 Email: main@acfid.asn.au) – details of the Code and how to make a complaint available at <https://acfid.asn.au/content/complaints/>; or
- b) the Fundraising Institute of Australia via <https://fia.org.au/fiacode/complaints/> - details regarding the Code and making a complaint are available at www.fia.org.au.

7. RESPONSIBILITIES

Board	<ul style="list-style-type: none"> • Oversight of this policy
CEO	<ul style="list-style-type: none"> • Overall implementation, monitoring and review of this policy and procedures • Determining investigation procedures as per the Complaints Procedure • Reporting to the Board
Director of Systemic Change and Partnerships	<ul style="list-style-type: none"> • Ensuring compliance with clause 8.3 regarding appropriate procedures being put in place with program partners
Director Business Transformation	<ul style="list-style-type: none"> • Confirming classification of complaints not warranting an investigation, as per the Complaints Procedure
Executive Assistant	<ul style="list-style-type: none"> • Maintaining a Complaints Register • Reviewing complaints received and supporting the classification and escalation of complaints, as per the Complaints Procedure • Reviewing and analysing complaint information and reporting to the Leadership Team
All staff	<ul style="list-style-type: none"> • Complying with the principles and requirements in this policy and the Complaints Procedure.

8. IMPLEMENTATION

8.1. Policy onto website

The Complaints Policy and Procedure are published on the IWDA website. This includes information about how to make a confidential complaint by email, post, telephone or in person. A printed copy is also available upon request.

8.2. Communication and Training

The Complaints Policy and Procedure are communicated to staff, volunteers, Board members and consultants as part of their induction. Refresher trainings will also be provided as needed. Training will focus on understanding how IWDA approaches and manages complaints, and the

roles and responsibilities at IWDA.

8.3. Partners, suppliers and contractors

At the start of a new partnership or agreement with supplier / contractor, or during the inception phase of a new project/program with an existing partner, IWDA will inform stakeholders of the complaint mechanism and the stakeholder's responsibilities related to it. Requirements will also be included in Funding Orders to:

- have an appropriate complaints policy and procedure;
- provide feedback to IWDA to assist IWDA to learn and improve support;
- encourage beneficiary communities & participants to provide critical feedback.

IWDA works with partners to ensure that they understand their obligations to receive and manage complaints, and that they handle complaints in line with relevant organisational policies and procedures.

8.4. Complaints Register

All complaints are recorded on a confidential Complaints Register. Complaints can be de-identified at the request of the complainant or survivor.

8.5. Reporting

Summary data on complaints will be reported to the Leadership Team and Board on a not less than quarterly basis, with any matters classified as serious reported expeditiously to the CEO and chair of the board.

8.6. Monitoring and Learning

We will analyse, report on and learn from all complaints received in order to learn and improve on the service provided, enhance internal processes and/or procedures, identify any training or briefing requirements, get a complete and holistic view of what complaints we are receiving in order to identify any trends and ensure supporter satisfaction and loyalty.

8.7. Failure to comply

Failure by any person or organisation to comply with this policy may result in disciplinary action, up to and including termination.

9. REVIEW AND AMENDMENT

This policy will be reviewed every three years to ensure it remains compliant with law and the ACFID Code of Conduct, and is relevant, effective and takes into account stakeholder feedback.

The Chief Executive Officer, in consultation with the Leadership Team, is responsible for the administration, interpretation, application and review of this policy. This policy may be amended at the discretion of the Board.

10. REFERENCES & RELATED DOCUMENTS

IWDA Anti-Discrimination, Bullying and Harassment Policy
IWDA Complaints Procedure
IWDA Complaint Form
IWDA Complaint Register
IWDA Grievance and Conflict Resolution Policy
IWDA Whistle Blower Policy
IWDA Whistle Blower Procedure
IWDA Child Protection Policy

IWDA PSEAH Policy
IWDA Code of Conduct
IWDA Conflict of Interest Policy
IWDA Fraud and Counter-Terrorism Policy
IWDA Partner Agreements and Funding Orders
IWDA Supporter Promise
ACFID Code of Conduct
Fundraising Institute of Australia Code of Conduct