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| **Procedure:** | **Complaints Procedure** | **Version 2** |  **May 2021** |

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 IWDAs policies and definitions.

# HOW TO MAKE A COMPLAINT

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

* + 1. **For general complaints**, including regarding communications or fundraising, the complaint can be made to:
	+ In person: At our office, or to an IWDA staff member; or
	+ Website: <https://iwda.org.au/who-we-are/contact-us/>
	+ Telephone: +61 3 8373 2500
	+ Email: complaints@iwda.org.au
	+ Post:Complaints, International Women’s Development Agency,

 PO Box 64, Melbourne, Vic 8009, Australia

1. **For safeguarding concerns** relating to possible breaches of IWDA’s Child Protection Policy or Preventing Sexual Exploitation Abuse and Harassment Policy, the report should be made to an IWDA Safeguarding Focal Point or responsible person as per those policies to:
* In person, website, telephone, or post as per i. above
* By email to [ethics@iwda.org.au](ethics%40iwda.org.au)
1. **If suspected misconduct**, fraud, theft, misappropriation of funds, or other improper state of affairs a formal whistleblowing report under IWDA’s Whistleblower Policy. IWDA’s Whistleblower Policy and Procedure gives further details of who can and how to make such a report. This includes reporting to the IWDA CEO confidentially:
	1. In person, website, telephone, or post as per i. above.
	* By email to ethics@iwda.org.au

**Partner staff** who wish to make complaint can, in addition to the above methods, raise their concern directly with their IWDA Program Manager or Senior Program Manager when they are in country as part of regular monitoring trips or:

* By email to partnerfeedback@iwda.org.au

**Beneficiaries** of projects in which IWDA is a participant or partner who wish to make complaint can, in addition to the above methods:

1. communicate directly with the IWDA Program Manager or Senior Program Manager directly when they are in country as part of regular monitoring trips or:
2. approach the partner organisation directly, who may then pass on the complaint to IWDA in any of the methods detailed above.

Complaints may be made by a friend or advocate of the complainant on their behalf.

**Anonymity**: When making a complaint or disclosure, the complainant may do so anonymously. 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. If they do not share their identity, IWDA will assess the disclosure in the same way as if the complainant had revealed their identity. However, there may be some practical limitations in conducting the investigation.

**Employee complaints** and personal work-related grievance reporting procedures are addressed in the IWDA Grievance and Conflict Resolution Policy.

# MANAGING COMPLAINTS

## Investigation Procedure

Following receipt of a complaint:

1. The IWDA representative receiving the complaint will record information on the complaints form, and submit this via email to complaints@iwda.org.au. The complaint form (Appendix 1 in the Complaints Procedure) can be accessed at <https://iwda.org.au/complaints-procedure/>
2. The Executive Assistant monitors the Complaints inbox on a daily basis and enters all complaints onto the Complaint Register.
3. The Executive Assistant will assess and prioritise every complaint in accordance with its urgency and seriousness as described in clause 2.2.
4. The Executive Assistant 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 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.
* The provisions of IWDA’s Child Protection Policy and PSEAH Policy will apply throughout, including that survivors of sexual exploitation, abuse and harassment will have their rights, needs, wishes and empowerment prioritised. IWDA will provide appropriate assistance and referrals to survivors (e.g. referrals to services including medical, social, legal and / or financial assistance).
* All relevant stakeholders will be informed of the outcomes of complaints, including the complainant and the organisations / people implicated in the complaint.
1. Any notifications required under law, DFAT or other donor agency policy will be made as required.
2. 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 her 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. The partner organisation’s Complaints Policy will be followed.
3. 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. At a minimum, this will include referral to relevant authorities, safeguarding focal points, and 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.
4. 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.
5. 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.

## Procedure for assessment and triaging of complaints

1. All complaints will be assessed through an initial review by the Executive Assistant. Upon receipt of the complaint, the Executive Assistant will assess and triage complaints in accordance with the nature, urgency and /or seriousness of the issues raised. This must be recorded in the Complaints Register.

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.

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. The Executive Assistant will take immediate action to escalate and manage such complaints to ensure immediate protection of vulnerable people and prompt handling of the complaint as set out in IWDA’s Child Protection Policy or Preventing Sexual Exploitation Abuse and Harassment Policy where applicable
5. Any complaints classified as warranting an investigation or serious will be expeditiously escalated to the CEO, who will advise the 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 she considers appropriate in the circumstances.
* If the CEO is implicated in a disclosure, then the Director of Business Transformation will manage this.
1. Any complaints classified as *not warranting an investigation* will be referred to the Director Business Transformation for confirmation of the decision, or reclassification.

## 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 Australian Council for International Development (ACFID) Code of Conduct Committee or the Fundraising Institute of Australia, as described in the complaints policy.

# REVIEW AND AMENDMENT

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

# REFERENCES & RELATED DOCUMENTS

IWDA Anti-Discrimination, Bullying and Harassment Policy

IWDA Complaints Policy

IWDA Complaints Form

IWDA Complaints 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

**Appendix 1: IWDA Complaints Form**

**IWDA Complaints Form**

You can find IWDA’s Complaints Policy and Procedure at <https://iwda.org.au/complaints-procedure/>. You can make a complaint to IWDA in the following ways:

**For general complaints**, including regarding communications or fundraising, the complaint can be made:

* In person: At our office, or to an IWDA staff member
* Website: <https://iwda.org.au/who-we-are/contact-us/>
* Telephone: +61 3 8373 2500
* Email: complaints@iwda.org.au
* Post:Complaints, International Women’s Development Agency,

 PO Box 64, Melbourne, Vic 8009, Australia

**For safeguarding concerns** relating to possible breaches of IWDA’s Child Protection Policy or Preventing Sexual Exploitation Abuse and Harassment Policy, the report should be made to an IWDA Safeguarding Focal Point or responsible person as per those policies to:

* In person, website, telephone, or post
* By email to ethics@iwda.org.au

**If suspected misconduct**, fraud, theft, misappropriation of funds, or other improper state of affairs a formal whistleblowing report under IWDA’s Whistleblower Policy. IWDA’s Whistleblower Policy and Procedure gives further details of who can and how to make such a report. This includes reporting to the IWDA CEO confidentially:

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**Partner staff** who wish to make complaint can, in addition to the above methods, raise their concern directly with their IWDA Program Manager or Senior Program Manager or:

* By email to partnerfeedback@iwda.org.au

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| --- | --- |
| **Date** |  |
| **IWDA Staff Member Taking Complaint** **(If applicable)** |  |

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| **Details of the person making the complaint**You can make a complaint anonymously. However, if you provide your details it will make it easier for IWDA to address your complaint. IWDA will assess anonymous complaints in the same way as if the person making the complaint reveals their identity. However, there may be some practical limitations in conducting the investigation. |
| **Name** |  |
| **Address** |  |
| **Email** |  |
| **Mobile** |  |
|  **OR: I wish to remain anonymous □** |

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| **Complaint Details**Include as much detail as possible, including: times, dates, who was involved, what happened, any impact on you. |
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