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## Introduction

Reledev Australia Limited ("Reledev") encourages employees, volunteers, partner organisations, beneficiaries, donors, members of the public etc. to inform Reledev of any complaints, issues or concerns against Reledev that they may have at the earliest opportunity.

Reledev does not tolerate any form of wrongdoing. Should there be a complaint against an employee or partner organisation either internally within Reledev or from an external source, immediate action will be taken.

Reledev has a complaints procedure to support the implementation of this policy and ensure that making a complaint is easy and accessible to all stakeholders.

This policy and the supporting procedures facilitate a fair process for handling concerns and complaints that may arise from the work of Reledev. Procedures provide an efficient, clear, non-threatening, fair and accessible mechanism for dealing with any allegation of conduct in breach of the Australian Council For International Developments (ACFID) Code of Conduct. This policy and its procedures cover concerns and complaints made about employees or partner organisations, as well as any stakeholder involved in Reledev activities.

Any person who has dealings with Reledev can make a complaint through the complaints procedure (below). This includes: members, committee members, reference group members, advocates, consumer representatives, service providers, agencies and any other people who rely on Reledev for services or advice.

## Scope

This policy deals solely with complaints made regarding the work of Reledev or its projects which are run through partner organisations.

To raise a concern related to any of the following issues, please refer to and follow the following relevant policies:

- Child protection (Child Protection Policy)
- Sexual exploitation and abuse (Preventing Sexual Exploitation, Abuse and Harassment policy)

- Human Resources Policy (for workplace and employment related complaints)
- Fraud and/or corruption (Anti-Fraud and Anti-Corruption Policy)
- Whistleblowing (Whistleblowing Policy)

## The Complaints Procedure

### 1. Publicising this Complaints Policy

This policy including information on how to make a complaint is available to the public through the Reledev website.

### 2. How a complaint is lodged

Making a complaint to Reledev should be as easy as possible. Reledev will accept complaints verbally in person, over the phone and by any written means. Where complaints are made verbally, Reledev will ensure that the complaint is put in writing and contains all the information the complainant wishes to provide.

Reledev will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. Reledev will ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

The ordinary way of lodging a complaint is

- a. Email: addressed to the Manager [email@reledev.org.au](mailto:email@reledev.org.au)
- b. Post: Reledev Australia PO Box 224, Kingsford NSW 2032

A secondary option if lodging a complaint with Reledev's Manager is not appropriate is to email [board@reledev.org.au](mailto:board@reledev.org.au).

This will allow a Board Member rather than Reledev staff to receive the complaint.

### 3. Informal complaints handling procedure

Most complaints should be resolved informally and dealt with promptly by staff. An informal approach should be used as often as possible. Staff to whom a complaint is made can offer solutions in accordance with their level of authority.

The person receiving the informal complaint will do so in a positive manner and will record the following details:

- The name of the person/s making the complaint;
- The date, time and location the complaint is received; and
- A brief description of the complaint.

The Manager (or other appropriate person, if the complaint relates to the Manager) will follow the general guidance on dealing with complaints outlined below.

#### **4. Formal complaints handling procedures**

A formal complaint will generally be made in writing, but formal complaints can be received verbally and -will be documented as a formal complaint. Formal complaints will be marked confidential, and addressed to the Manager of Reledev, or the Board if the complaint relates to the Manager or if it is otherwise inappropriate to lodge the complaint with the Manager.

The Manager or other Reledev staff or Board member shall acknowledge the complaint in writing within five (5) business days of receiving the complaint. Normally responses to a complaint should be timely and not span more than 3 days in response time.

#### **General guidance on proceeding with a complaint**

##### *1. Preliminary advice to the complainant*

The Manager or other member of Reledev's staff or Board shall assist the person by sensitively and carefully understanding the complaint, explaining the options available and helping the person decide with Reledev how they will proceed depending on the details and nature of the complaint.

##### *2. Record keeping*

An organisational record must be kept of all complaints. These records will be kept confidential and de-identified at the request of the complainant or survivor for anonymity/privacy purposes.

All confidential records must be kept in a secure, locked place. Electronic records must be password protected.

##### *3. Assess the most appropriate procedure based on the nature of the complaint.*

Any complaint should be taken seriously and regarded as important. The gravity of the complaint needs to be duly considered as well as the particular circumstances of the individual and their context. The following factors should be assessed:

- The nature of the complaint;
- The level of vulnerability for reasons of disability, significant disadvantage, age or low levels of education;

- The type of Reledev related stakeholder making the complaint (for example, whether the person is a member of staff, a volunteer/participant in a service project, a project partner, etc);
- Whether the complaint relates directly with Reledev staff or indirectly through a project partner; and
- The level of seniority of the person who is the subject of the complaint (e.g. whether the complaint is about a Reledev staff or board member or a volunteer or participant in a program).

## Resolving a Complaint – general guidelines

The following are key principles to uphold in resolving a complaint:

1. All parties have the right to have any complaint addressed.
2. Any complaint can be addressed by either the formal or informal options under this procedure.
3. There is a guarantee of timeliness, confidentiality and objectivity when an issue is raised.
4. Avoid conflicts of interest.
5. The principles of natural justice will be given to both the person making the complaint and the person or persons who are subject of the complaint.
6. The procedures for investigation and record keeping are clear to all parties involved in the complaint.
7. No person making a complaint will be disadvantaged for making a complaint.
8. When a complaint of a serious nature is lodged, the employment or partnership of a person or organisation will be temporarily suspended while investigations are underway as a precautionary measure.

### Conciliation or Investigation

**Option 1 - Resolution between the parties through conciliation.** If the person chooses to seek resolution through an internal conciliation process, then the following steps are appropriate:

1. The complainant may approach the other party directly or ask the Manager to approach the other person or persons on their behalf. If a second party is to be involved in resolution, it is recommended that a trained conciliator be involved to assist the parties.
2. If person who is the subject of the complaint admits to the behaviour or the acts complained about, and an agreement between the parties is reached, the complaint is resolved.

3. Even if the person does not admit to the behaviour or acts complained about, the parties may agree to an outcome that is acceptable to the complainant and the other parties.
4. If an acceptable outcome is reached, the Manager will be responsible for ensuring that the correct people who need to know about the outcome are appropriately informed so that the outcome is implemented and followed. As matters handled this way are usually minor, resolution would generally include an apology and agreement not to repeat the behaviour or actions complained about.

**Option 2 - Resolution through an internal investigation.** If the person chooses to seek resolution through the internal and formal investigation process the following steps will be followed:

1. The investigator will interview the complainant and the allegations will be particularised in writing. During this interview and in any consequent stages of the process an appropriate support person may accompany the complainant.
2. The investigator will put the allegations in full to the other party or parties.
3. If there are any disputes over facts, the investigator will interview any witnesses and gather evidence that will assist in making a finding and gather any other relevant evidence that will assist in making a finding. Based on the facts of the matter the investigator will make a finding as to whether the complaint has substance.
4. A report documenting the investigation process, the evidence, the findings and a recommended outcome will be made to the Manager. The Manager will assess the report, consult with any appropriate parties (not the parties to the complaint) and implement an appropriate outcome.
5. The Manager will advise the direct parties to the complaint and any other relevant parties of their decision.

If the complaint is about the Manager, a Board member will undertake the role of the Manager outlined in the above process.

### **Complaints from Australian beneficiaries of an Australian partner or project**

The appropriate channel for a complaint to be made by an Australian resident participating in a Reledev connected activity is by contacting Reledev directly as outlined in this policy.

If the complaint relates to an issue of Child Safeguarding or Sexual Exploitation, Abuse and Harassment it is mandatory to inform DFAT where the incident related to Reledev's participation in the ANCP.

If the complaint is an incident of fraud and found to be substantiated. Reledev will proceed to ensure all donor funds are recuperated and any damages to individuals

are recovered. If any ANCP funds were involved, then it is mandatory for Reledev to report the Incident to DFAT and return any mishandled funds to DFAT.

If after investigation any employee or partner are found to have seriously breached any of Reledev's policies or procedures and/or are found to be in serious breach of the ACFID code of conduct (refer to final paragraph of procedure) they will be promptly dismissed, or partnership terminated.

### **Complaints from overseas beneficiaries regarding an Overseas Partner**

Beneficiaries and participants overseas are able to complain to Reledev Australia via the email provided and can access this through the website 'contact us' page. Beneficiaries should be periodically made aware of Reledev Australia as a supporter and sponsor of their program.

The normal way a complaint is made by overseas beneficiaries is directly to the Overseas Partner. Reledev's Partner must have robust complaint procedures and make their participants aware of the safe steps to take in lodging a complaint.

Reledev's partners must report to Reledev of any serious complaints they receive from any stakeholders connected with the projects funded through Reledev.

Reporting is mandatory and immediate if it relates to a Child Safeguarding or a Sexual Exploitation, Abuse and Harassment issue or an instance of Fraud or connected even remotely with Terrorism.

Reledev must in turn report any such instance to DFAT and work with DFAT and the Partner to reach a resolution.

### **Complaints by survivors**

Reledev is committed to providing assistance and/or referral for survivors who have had any form of wrongdoing committed against them, including but not limited to; sexual harassment, abuse or exploitation, harassment, bullying and any form of discrimination. Assistance includes referral to medical, social, legal and financial assistance.

### **Where else can a complaint be lodged?**

Reledev is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, Reledev is committed to the ACFID Code of Conduct and fully adheres to its principles. Reledev conducts their work with transparency, accountability and integrity.

Complaints against Reledev upon breach of the ACFID Code of Conduct can be addressed to the ACFID Code of Conduct Committee at [code.acfid.asn.au](mailto:code.acfid.asn.au)

Complaints that do not fall within the scope of this policy, such as complaints against a Government department or another NGO are to be referred to ACFID

and/or the Australian Charities and Not-for-profit Commission (ACNC), the contact details are as follows:

ACFID: complaints should be marked 'confidential' and emailed to:

Chair, ACFID Code of Conduct Committee – [code@acfid.asn.au](mailto:code@acfid.asn.au)

OR by post:

Chair, ACFID Code of Conduct Committee

Care of ACFID

Private Bag 3

Deakin ACT 2600

ACNC: go to: <https://www.acnc.gov.au/raise-concern/concerns-about-charities/how-raise-concern>