

Internal document name:	Reledev Australia Complaints Policy	
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Introduction

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

Reledev Australia Limited has a complaint procedure to ensure that making a complaint is easy and accessible to all stakeholders.

The policy and 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 Code of Conduct.

All complaints will be handled in an equitable, fair and unbiased manner. Reledev will work to ensure that the process is as accessible as possible to all complainants.

Definitions

Complaint is an expression of concern or dissatisfaction made to Reledev related to its activities or personnel who are directly or indirectly part of Reledev's activities. Personnel are employees of Reledev or volunteers who are part of Reledev activities.

Complaint handling is a process where a response or a resolution is explicitly or implicitly expected.

Complainant is any person, organisation, or its representative, making a complaint.

Policy principles

Visibility Reledev will clearly publicise information about how and where to complain.

Accessibility Reledev will ensure the complaints handling process is made practically accessible and easy to locate.

Responsiveness Reledev will respond to complaints according to the timeframe allocated in the policy.

Objectivity Reledev will address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through our complaint handling process.

Confidentiality Reledev will observe strict confidentiality in complaint handling.

Accountability Reledev will ensure that accountability for and reporting on the actions and decisions with respect to complaint is clearly established.

Continual Improvement, maintaining the objective to review and seek improvement in the complaint handling process.

Scope

This policy applies to complaints made by a person or organisation about any aspect of Reledev's operations or activities which related directly to Reledev's portfolio of projects.

The policy and its procedures cover external complaints made about Reledev's operations or personnel including; Board members, employees', volunteers' working directly with Reledev or our partner organisations where they are undertaking a project of Reledev.

A complaint may come from any community members or volunteer affected by our activities and programs, including children and youth, members of the public, local organisations, supporters, and donors.

Anonymous complaints can be made, but obviously our ability to investigate them may be limited because of this.

Complaint referral

This policy does not cover in detail the process and procedures for the following types of complaints as these are covered in other related Reledev policies

1. Internal complaints relating to the workplace, by Reledev's employees and Board of Directors. The process for these complaints and grievance resolution are governed by the Reledev Whistleblowing policy and Human Resources policy.
2. Safeguarding of children or sexual exploitation and abuse concerns. The process and procedures specific to this type of complain are found in Reledev's Child Safeguarding Policy and for a case involving an adult, Reledev's "Prevention of Sexual Exploitation and Harassment Policy".
3. Complaints which are not directly connected with Reledev's activities or projects but may involve another partner organisation with Reledev. Reledev will work with the complainant to establish an appropriate avenue for their complaint to be addressed by the relevant partner.

Making a complaint

1. Publicising this policy

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

Where Reledev has activities not carried out by Reledev staff or recruited volunteers the procedure for making a complaint will be listed with the implementing partner . Reledev therefore requires the partner to also have clearly publicised and accessible complaint procedures for all participants and related stakeholders.

Making publicly accessible the ability to lodge a complaint must bridge the barriers of language, literacy and internet/technology access which are likely to be present in developing countries.

Reledev will ensure that a complainant is not required to express their complaint to a person implicated in their complaint, nor will the person implicated in a complaint be involved in any way with the handling of that complaint.

2. How a complaint is lodged

The complaint may be made in the following ways

1. Normally a complaint should be made in writing, either electronically via
 - a. email: email@reledev.org.au
 - b. Addressed to Reledev Australia and Posted to PO Box 224, Kingsford NSW
 - c. Via a phone call to Reledev's mobile number 0422 368 876
2. If the complainant feels the need to lodge their complaint with a member of the Board directly they may email: board@reledev.org.au addressing the email to the current Chair person, whose details are listed on Reledev's website.

The Manager or other staff or Board member shall acknowledge the complaint in writing within 3 days (allowing a maximum of 5 business days) after receiving the complaint.

Complaint handling procedures

Receiving feedback, concerns, and complaints

Positive and negative feedback is recorded, reviewed and responded to by a Reledev staff member, it is acted on and reviewed for continuous improvement.

When a Reledev person receives a verbal complaint, they will:

- a. identify themselves, listen, record in writing and confirm the details with the complainant and determine what action or response the complainant expects;
- b. remain impartial and not attempt to take sides or lay blame; and

- c. discuss the matter with relevant personnel to assess type, sensitivity and seriousness of the complaint as well as the level of urgency.
- d. If it is regarded as sensitive or serious it will be escalated and dealt with as part of the formal complaint process.
- e. Reply back to the complainant within 3-5 business days to clearly explain to the complainant what will happen next; and give an estimated timeframe for a response to the complaint or, if that is not possible, a date by which Reledev will contact them again.

Confidentiality and record keeping

Reledev will ensure that operational feedback and complaints are reported, recorded and confidentiality maintained as appropriate. For these complaints, to the extent possible, the complainant and/or respondent's identity will be kept confidential and only disclosed to those who need to know to respond.

A complainant request for anonymity must be observed and their person de-identified in records for this purpose.

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

Complaint assessment

Initial assessment

To determine the sensitive and seriousness and urgency of the complaint the following is considered

- Does immediate action need to be taken?
- What is the severity—i.e. does it relate to the breach of any law, ACFID Code of Conduct, Reledev policy, and/or health and safety implications?
- Is there enough information to investigate should this be required?
- What are the financial implications for the complainant and/or others?
- What is the impact on the individual, the public and the organisation?
- What is the potential for the situation to escalate or any systemic implications?

A complaint may require escalation after the initial assessment and the re-assessment will involve more than 1 qualified person to be engaged to handle the complaint.

Any complaint should be taken seriously and regarded as important, there are 2 avenues; informal or formal which determine the type of procedure undertaken in handling of the complaint.

Serious cases with referral to other procedures

The following policies cover potential areas of serious or criminal misconduct

- a. Child safeguarding policy
- b. Prevention of Sexual Exploitation and Harassment Policy
- c. Fraud and corruption policy
- d. Terrorism policy

For all serious allegations which are verified on investigation it is mandatory for Reledev to report the Incident to DFAT and return any mishandled funds to DFAT.

Complaint level and escalation

1. Informal complaints

When the nature of the complaint is not regarded as serious and appears easily resolvable with the normal process of conciliation and the use of normal level of management authority.

Where solutions appear to require involvement from a higher authority, or if requested by the complainant the matter can be escalated to a Board member for reassessment.

If complaints cannot be satisfactorily resolved with the normal procedures and use of authority, the matter may be escalated to a formal complaint.

2. Formal complaints

Arise where a formal investigation is required either internally or externally. The following categories apply

1. An informal standard complaint which has not been resolved with the normal method of conciliation between parties.
2. Child safeguarding complaints – all complaints are formal and due to the specific procedures for complaint investigations and process for resolution are outlined within Reledev's Child Safeguarding Policy.
3. Sexual Exploitation and Harassment complaints - all complaints are formal and due to the specific procedures for complaint investigations and process for resolution are outlined within Reledev's Child Safeguarding Policy.
4. Complaints from beneficiaries or stakeholders of partner organisations which are raised with Reledev or which partner organisation have brought to the attention of Reledev.

5. Complaints that have implications for other organisations including Reledev partner organisations.
6. Complaints which potentially refer to criminal misconduct and may need to be reported to the relevant civil authority.

Further escalation of a complaint

If a complainant believes there has been a breach of the ACFID Code of Conduct, they have the option to make their complaint directly to the ACFID Code of Conduct Committee (refer to ACFID's website)

Serious complaints that have reporting requirements attached and/or are of a criminal nature will be reported to the relevant civil authority. Further detail is provided in the relevant policies.

Complaints against Reledev upon breach of the ACFID Code of Conduct can be addressed to the ACFID Code of Conduct Committee marked 'confidential' and emailed to: code@acfid.asn.au

OR by post: Chair, ACFID Code of Conduct Committee, Care of ACFID, Private Bag 3 Deakin ACT 2600

The Charitable Organisations Authority is known as the ACNC. To issue a formal complaint go to: <https://www.acnc.gov.au/raise-concern/concerns-about-charities/how-raise-concern>

Resolving a Complaint

General guidelines

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

- All parties have the right to have any complaint addressed.
- Any complaint can be addressed by either the formal or informal options under this procedure.
- There is a guarantee of timeliness, confidentiality, and objectivity when an issue is raised.
- 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.
- The procedures for investigation and record keeping are clear:
- No person making a complaint will be victimised or disadvantaged for making a complaint.
- When a complaint is lodged if it is of a serious nature as a precautionary measure the employment or partnership of a person or organisation will be temporarily suspended while investigations are underway.

Informal complaint procedures

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 the other person or persons admit 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 be able to 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.

Formal complaint procedures

Complaints which have not been resolved informally with conciliation between parties or where conciliation is not sufficient due to the nature of the complaint will follow a formal complaints procedure.

1. Standard formal complaint procedure

All complaints regarded as formal and requiring some form of investigation will follow the following procedures unless they fall into the classification of complaints in relation to Child Safeguarding or PSEAH which have their own procedures and are detailed under these policies.

- a. Written account is lodged by the complainant.
- b. Reledev staff are required to notify the Chair or Secretary of the Board regarding the nature of the complaint.
- c. An appropriate person who has not direct connection with either side of the complaint are appointed by Reledev's Board to conduct the internal investigation. Reledev's Board are to be informed of the progress regarding the complaint.
- d. The appointed investigator or contact person for the complainant meets the complainant with another independent staff or board member to achieve the following:

- clarifies the details of their complaint and required a signature regarding their statement.
 - confirms that the complainant chooses to seek resolution through the internal and formal investigation process.
- e. Investigation process will have the following steps:
1. The investigator with another representative will interview the complainant and any further 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 including any disciplinary action is required will be made to the Manager. If appropriate, the Manager will assess the report, consult with any appropriate parties (not the parties to the complaint) and implement an appropriate outcome.
 5. A member of the Board will advise the direct parties to the complaint and any other relevant parties of their decision.
 6. If any disciplinary action is required to be taken against any personnel/others this will also be communicated and actioned accordingly with accountability to Reledev's Board.

3. Complaints from beneficiaries of an overseas partner

Should a participant from an overseas partner lodge a complaint directly with Reledev, the following additional steps are taken:

- a. A written account is lodge by the complainant with their signature. This should be in their language of origin if they are not proficient in English.
- b. Reledev requests agreement to raise this with the relevant staff or Board members of the organisation in question and discusses if the complainant wants to remain anonymous or are willing to cooperate directly with an organisation investigation in country.

- c. Reledev arranges to disclose to the in-country partner details of the claim as appropriate and discuss the procedures of investigation and resolution following similar steps listed above.

4. Complaints from Australian participants of a partner project

Australians participating in a Reledev connected activity implemented by a third party organisation are encouraged to raise any concerns with either Reledev or the implementing partner.

Should a complaint be lodged with either organisation the steps taken will be the same as those mentioned for overseas partners.

Reledev's reporting to government authorities.

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

Reporting is mandatory and immediate if it relates to a Child Safeguarding of SEAH 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.

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 the partnership terminated.

Reledev is committed to providing appropriate assistance and referrals to victims/survivors (e.g. protection, medical, counselling, social, legal and financial assistance, or referrals to such services) in relation to complaints within the scope of this policy.