

COMPLAINTS HANDLING POLICY

INTRODUCTION

HFC are committed to working according to or above the standard required by the Code of Conduct of the Australian Council for International Development (ACFID).

As part of our commitment to fair treatment for all representatives, partners and people who come into contact with our organisation, especially those most vulnerable, both in Australia and overseas, Hope for Children Organisation Australia limited (HFC) has developed a complaints handling process. The document outlines different paths to make a complaint to ensure safety and accessibility regardless of who is filling a concern and where the complaint is made.

We address complaints in a fair, equitable, objective, and unbiased manner and we are committed to handling all complaints with transparency, responsiveness and confidentiality.

We are committed to the values of fairness and justice and strive to achieve the highest possible standard in all areas of our work therefore this policy not only meets our legal and regulatory obligations, but it is aligned with HFC Code of Conduct.

HFC recognised that many complaints may occur because of some services failures, personal misconduct or wrongdoing, relevant information is not readily available or difficult to understand, incomplete or misleading, does not appropriately address common concerns, therefore we see complaints as one of the ways to identify, address and report on any fraudulent, illegal or unethical conduct (including any sexual exploitation, abuse or harassment) and a source of continues improvement of how the organization operates.

We promote a view that anyone can make a complaint or express a concern. Complaints can be made by individuals or organisations in relation to any aspects of our work and operations.

Any issues of conflict of interest will be managed in accordance with HFC Conflict of Interest Policy.

HFC acknowledges that the handling of complaints is very sensitive in the countries in which we operate, in that they have different cultural expectations to those of Australia. However, as part of our role, HFC will continue to work closely with partners in those countries to devise ways to promote transparency and encourage local people to voice their concerns and grievances directly to HFC and without fear of reprisal.

Receiving complaints and feedback from participants is important. It helps both our partners and us. It is also part of the monitoring and evaluation of programs or projects. We will continue to work with our partners to strengthen their own feedback and complaints mechanisms.

PURPOSE AND SCOPE

Purpose

This policy aims to ensure that any person or organisation that is associated with HFC or is affected by our projects overseas is treated justly and fairly, by providing a straightforward process for dealing with complaints of any nature.

Scope

This policy applies to all HFC office bearers, staff members, volunteers, and other representatives and to any person that has a grievance about the conduct of HFC or its office bearers, staff members, volunteers, and other representatives.

Definitions

Complaint is an expression of dissatisfaction, grievance, suspicion, allegation, concern about someone's behaviour or report about an incident related to organization products or services. Complaint is also the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

Complaints include general complaints, sensitive complaints or anonymous complaints.

General complaint is a complaint from anyone who has observed, heard about or been directly impacted by the actions of HFC or its partners, or who believes that HFC or its partners have failed to meet a specific commitment or obligation.

Sensitive complaint is a complaint that needs to be treated urgently and confidentially by senior employees within the organisation. A sensitive complaint can be made by anyone who has observed, heard about or been directly affected by the actions of HFC or its program partners. Sensitive complaints may include case of a breach of Child protection and safety policy or PSEA policy, bullying and harassment between employees, or unlawful discrimination, risk to health and safety, fraud, corruption, etc.

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

Enquiry means a request for information or an explanation

Feedback means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process

POLICY STATEMENTS

Policy Principles

Confidentiality: access to information regarding a complaint shall be limited to people directly involved in that complaint. Details will be kept completely confidential unless disclosure is required by law, or with permission of all parties involved. Records of the investigation will be kept confidential and if requested, personal details of complainant or survivor will be removed from the documents.

Impartiality: all parties affected by a complaint will be given the opportunity to share their perspective; no assumptions will be made and all relevant information will be gathered and considered prior to any decisions being made or any actions taken.

Good faith: no person will be victimised or suffer consequences in lodging or assisting with information concerning a complaint.

Self-resolution: there is potential for affected parties to be provided with the opportunity to resolve the complaint without direct intervention from representatives of HFC.

Accessibility: the mechanisms for making a complaint will be made visible, accessible and transparent to all stakeholders, and all complaints will be subject to the same processes and principles of fairness irrespective of the parties submitting them.

Sensitivity: all complaints will be dealt with appropriately, with seriousness and sensitivity.

People-focused and victim/survivor-centred: the process of handling complaint is people-focused, prioritising the safety, rights, needs and wishes of all people whilst ensuring procedural fairness to all parties. HFC especially recognise the needs of those who are vulnerable or may be victims/survivors of harm. HFC treat everyone with dignity and respect therefore the decision making process is transparent and inclusive with comprehensive information being given to all parties; HFC protects privacy and confidentiality and where required provides assistance to access other support services including health or psychological services and address any immediate protection assistance and or rehabilitation.

Timeliness: all complaints will be handled as quickly as possible, prioritising cases where personal safety and security is at risk; If not urgent, the investigator will discuss the issue with the complainant within five working days of the complaint being lodged and, where possible, the complaint process will be completed within seven working days.

Continuous Improvement and Review: complaints can be a source for improvement for organisations, helping them to understand areas where they might better improve their services operates and the effectiveness and efficiency of the complaint management system. HFC understands this and commits to reflecting on and learning from complaints as and where appropriate. In keeping with this commitment and to ensure our responses to complaints reflect emerging good practice, HFC will also review this policy should be conducted annually or more frequent if required.

COMPLAINTS PROCEDURE

All complaints will be recorded and treated respectfully and with appropriate urgency according to how urgent or serious they are. If personal safety or security is at risk, HFC will respond immediately and will escalate appropriately.

If complaint is not classified as an urgent HFC will respond within 2 working days that complaint has been received.

HFC will respond to the complaint in line with this policy and any relevant standards and legislation. HFC will aim to resolve complaints within 30 days. If a complaint is not resolved within this timeframe, we will let the relevant parties know and continue to keep them informed until the complaint is resolved (subject to legal and regulatory requirements or guidance including the ACFID Code of Conduct).

Steps to take if you have a complaint:

Step 1: Work out the best way to handle the situation. If you are unsure, seek advice and guidance from others, including HFC management, local In-Country Representative or a member of the Board.

Step 2: If you feel comfortable with your relationship with the other party involved, try to resolve the situation directly with that person. Sometimes situations arise unintentionally and the matter can be resolved with an explanation and an apology. This should be done soon after the incident of concern to avoid confusion.

Step 3: If you feel you cannot handle the matter yourself you can utilise any of the following avenues:

In Ethiopia:

- Approach HFC Head Office or Managing Director
- Approach the local Line Manager/Headmaster, HR Manager or if neither of these avenues is appropriate, the In-Country Representative
- Approach Community representatives

In Australia:

- Approach the Managing Director
- Approach a Member of the Board

Step 4: Lodge a formal complaint.

Lodging a formal complaint with HFC

To use the complaints mechanism the complainant can:

In Australia

- (a) send an email to info@hopeforchildren.org.au detailing the complaint
- (b) telephone on +61 8 6460 4949
- (c) contact Managing Director- Jacqui Gilmour, directly on jgilmour@hopeforchildren.org.au
- (d) address the issue in writing to

HFC Organization Australia
PO Box 919, Claremont
Western Australia, 6910

In Ethiopia

- (e) Utilise one of the Suggestion and Feedback boxes at any program location
- (f) telephone on +25118688620
- (g) visiting office in Yeka Sub-city, Woreda 1, House No.1415
- (h) email directly SSY principal on principal@schoolofstyared.com
- (i) email directly HFC Country Representative on crethiopia@hopeforchildren.org.au
- (j) Inform The Parents Committee representative
- (k) Inform HFC staff during house/community visits

Lodging a Complaint Anonymously or on Behalf of Someone Else

We recognise that in some circumstances complainants may wish to remain anonymous. Because such complaints can alert us to problems that need fixing we will accept them though due to the anonymous nature our ability to investigate them may be limited because of this and therefore it may not be possible to provide a remedy to an individual.

HFC also welcomes the submission of complaints by a friend or advocate of the complainant, in the instance that a complainant does not feel confident raising the complaint themselves.

Lodging a complaint with the Industrial Relations Commission WA

If the complaint arises from a grievance related to the way in which an officer or volunteer of HFC has been treated by HFC, a complaint can be lodged at any stage of the process with the Industrial Relations Commission, Western Australia.

Lodging a Complaint with ACFID

If HFC is thought to be guilty of a breach of the Code of Conduct of the Australian Council for International Development (ACFID), a complaint can be lodged at any stage of the process with ACFID.

More information on the process for lodging a complaint with ACFID can be accessed <https://acfid.asn.au/content/complaints>

Lodging a Complaint with MOLSA (Ministry of Labour and Social Affairs Federal Democratic Republic of Ethiopia)

If the complaint arises from a grievance related to the way in which an employee or volunteer of HFC has been treated by HFC Ethiopia, a complaint can be lodged at any stage of the process with the MOLSA. The only way to lodge a complaint is to submit a written letter to the MOLSA representative.

MOLSA Office

Kirkos Sub-City Kebele 18
Addis Ababa, Ethiopia

Lodging a Complaint with ACSO (Agency for Civil Society Organizations Federal Democratic Republic of Ethiopia)

If HFC is thought to be guilty of a breach of the Code of Conduct of ACSO and/or to be guilty of a breach of condition of the Ethiopian charitable licence , a complaint can be lodged at any stage of the process with ACSO by submitting written letter of complaint to the agency.

ACSO Office

UNIC-ETHIOPIA 4th - 8th Floor, Arada,
Addis Ababa, Ethiopia

INTERNAL COMPLAINTS MANAGEMENT PROCEDURE

1. Obtain a written complaint if possible. If this is not possible, record the details of the complaint. If receiving an oral complaint and recording details, the person receiving the complaint should ensure that they,

- Identify themselves and their role with HFC
- Listen to the information provided, record the details, and confirm what the complainant wants
- Confirm that they have received all of the information the complainant wants to communicate, and that everything has been properly understood.
- Show empathy for the complainant, but make sure not to take sides, become defensive or lay blame.

2. Appoint an investigator; this will generally be the Managing Director of HFC or, if the complaint is about the Director, another member of the Board or Chairperson. In Ethiopia this will be handled by the school principal, HR Manager and In-Country Representative. Serious complaints must be in writing and will be handled by a person trained in investigation techniques; this may be a person appointed from outside HFC if necessary. If personal safety or security is at risk additional arrangements should be made immediately.

3. The investigator will, wherever practical, within two working days:

- speak with the complainant to obtain full details concerning the complaint and determine how they wish the complaint to be resolved;
- Explain the process required to continue towards a resolution of the issue; this includes:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given
 - if the complaint is to be investigated.
- Decide the most appropriate way to handle the complaint, inform the complainant of this, ensuring that false expectations are not created but providing assurances that the complaint will receive full attention. Give an expected timeframe and check whether the complainant is satisfied with the proposed action.
- Refer the complainant to people who could provide further advice if necessary.
- Gather information from the other party or parties allegedly involved in the complaint. This involves:
 - speaking to all witnesses that may have information relevant to the issue;
 - where a contradiction in accounts of the issue exists, seeking more information from all parties; and
 - explaining to all parties the process required to continue towards a resolution of the issue.

4. Make a decision on how to resolve the issue and inform all parties. If the outcome is not acceptable to all parties, ensure that an appeal can be made to another member of the Board to review the complaint.

When the complaint involves an allegation of a less serious nature (e.g. breach of code of behaviour) and the main facts are not in dispute, the situation will be mediated. This means a joint decision will be made on how to resolve the issue. A confidential record of the issue will be kept and the matter will go no further.

When the complaint involves an allegation of a more serious nature (e.g. harassment, discrimination) the investigator will recommend remedial action through a representative from the Board.

When the complaint involves malpractice or a criminal activity, the issue will be referred to the appropriate State or National Board or Authority.

Enquiries, Minor Complaints and Complaints Outside of the Scope of this Policy

Determining whether or not a complaint should be investigated is often not easy. If it is based on a misunderstanding or insufficient information it might be that provision of information immediately satisfies the complainant and thus the complainant becomes an enquirer and the complaint can be recorded as an enquiry.

A complaint may be frivolous or capricious. With care it may be possible to negotiate its early withdrawal.

A complaint may be vexatious. That is it is made without sufficient grounds or it is not necessary for the pursuit of a legitimate end, but is made with the intention, or inevitable effect, of causing distress, trouble and annoyance to the person or body who has to deal with it. Again careful negotiation at the outset might achieve withdrawal, but often it will be necessary to take the matter further and ultimately refer it to the external complaint entity that is the ACFID's Code Committee.

A complaint may be about a matter that is outside the jurisdiction of your organisation perhaps because it relates to the actions of another organisation or an individual who is unconnected with your organisation.

In certain circumstances HFC will report to relevant authorities such as law enforcement agencies, DFAT or ACFID. Such notifiable matters include those that appear to involve criminal offences for example, assault and/or explanation , sexual or otherwise, abuse and harassment, fraud, theft and severe damage to property. HFC will consider whether it is safe to do so, and take into consideration the wishes of the victims/survivors.

Civil matters such as defamation may also be outside jurisdiction.

If HFC receives a complaint that does not fall within the scope of this policy, for example, a complaint against an employee of another organisation or government department, HFC will determine this early within the investigation process. The investigator will then inform the complainant that HFC is not the appropriate place for them to refer their complaint.

The investigator will then determine whether the complainant would like support determining the appropriate place to refer their complaint to, and wherever practical and desired, will provide the necessary support to ensure the complaint is referred to the appropriate mechanism or authority.

In some cases, we will assess any immediate needs for protection or assistance (such as counselling or medical services). We will also take reasonable steps to ensure you are safe and not exposed to further harm even if the complaint is classified as outside the jurisdiction of your organisation.

If complaints relate to program partners and/or their personnel in the countries where they work, HFC will work with the partner to address the complaint in line with their responsibilities under the contract with HFC , cultural, social, program and local contexts.

Learning and Continuous Improvement

It is important that HFC have processes in place to ensure that the organisation is able to learn from the receipt and investigation of complaints, and make adjustments and improvements wherever necessary and practicable.

To foster an environment of continuous improvement, HFC commits to the following:

1. Maintaining a secure, centralised database that includes the necessary details of complaints received, actions determined and taken, the dates on which these actions occurred, and the outcomes or status of the complaint. Kept records allow for continuous improvement of the complaint handling policy, enable review of processes and decisions, enable consistency and continuity in the organization. They also tell us who was involved and under what authority. They provide evidence of management and individual activity and promote accountability and transparency.
2. Including a standing Agenda item at all Board meetings to report and review complaints, in line with the following process:
 - i. Ahead of each Board Meeting, the Managing Director will review and analyse the status of all complaints received within the relevant time period.
 - ii. The Managing Director will provide a brief summary of complaints received within the period, and the status or outcome of these complaints in accordance with the Hope for Children Privacy Policy.
 - iii. Where learnings or potential changes are identified as a result of the analysis or complaint investigation process, these will be reported on and/or opened for discussion
 - iv. Where further action is identified, this will be recorded and the appropriate action owners notified. (in accordance of legal and regulatory requirements or guidance including the ACFID Code of Conduct)
3. Any complaints identified throughout the investigation process as requiring reporting to other bodies will be communicated to the relevant stakeholders in accordance with the HFC Privacy Policy, legal and regulatory requirements or guidance including the ACFID Code of Conduct)
4. Learnings and adjustments arising from complaints investigations and resolution processes will be shared within Hope for Children's annual reports. Each complaint should be assessed to determine whether the circumstances are likely to arise again and if there is a better way to deal with the matter. This may involve identifying training needs or making amendments to procedural manuals.

Communicating this Policy

HFC value receiving concerns and complaints and this is reflected in all relevant communications. We have physical points in all program locations encouraging feedback and a dedicated section on the "Contact Us" page of our website and all our publications, encouraging people to submit any complaints or feedback they may have.

Understanding of a complaint processes and tools available is a part of our induction process for all employees and volunteers. Every employment contract has clearly explanation of this process. Feedback from HFC employees is always encouraged and HFC Ethiopian staff have opportunity to raise their concerns, complaints, or feedback during monthly staff meeting.

We also provide a HR related training once a year, where all HR matters are explained and our staff has opportunity to raise any concerns and feedback. Additionally, there are special staff meetings organised with HFC managing Direct during her visits to Ethiopia. HFC complaint policy is a part of volunteer engagement pack and it's a requirement to acknowledge the content by sign it.

We recognise that not all people HFC works with or comes into contact with will feel comfortable or confident submitting a written complaint, and so we will orally invite expressions of concern and complaint on a regular basis. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint.

We will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. We have simplified complain making policy translated in our community language and we trained our community enjoyment staff on using it sensitively and meaningfully. If required, we will make use of pictorial means of communication. We ensure that making a complaint to us is as easy as possible. As per the procedures above, we will take complaints orally in person, over the phone and by any written means. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can. All our school parents are informed about the complaint policy and they focal person to address their concerns is a representative of the parents committee. Parents and family members are also encouraged to raise concerns or share their feedback during quarterly parents meeting. All is recorded as per the policy.

REFERENCES

Associated Documents

- ACFID Code of Conduct
- HFC Policy - Human Resource Management
- HFC Whistle-blower Policy
- HFC Child Protection Policy
- HFC PSEAH Policy
- HFC Transparency Policy
- HFC Conflict of Interest Policy

Acknowledgements:

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