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| AVI Complaint Handling Policy | Effective date | Feb 2017 |
| | Next review date | Mar 2019 |
| | Sponsor | Executive Manager, Operations |
| | Board committee | FARM |
| Level / Class Corporate Organisation | Approval / authorisation | CEO |

1. REVISION HISTORY

| Date | Revision Number | Change(s) | Reference Section(s) |
|-------------|-----------------|--|----------------------|
| 12 Sep 2012 | 1.0 | New policy | |
| 28 May 2014 | 1.1 | Minor wording amendments | 3, 5, 6.2 |
| 6 Feb 2015 | 1.2 | Definitional updates; clarification of awareness, training and in-country aspects; procedural update | 5, 6, 8 |
| 7 Feb 2017 | 1.3 | Sponsor and Board committee update | - |

2. PURPOSE

The purpose of this policy is to articulate the intent and approach of Australian Volunteers International (AVI) in relation to the handling of complaints and establish an explicit framework for their management.

3. SCOPE / PERSONS AFFECTED

The scope of this policy covers all AVI stakeholders within Australia and overseas, including: the Board, the President (when appointed), Members, Executives, Employees, partner organisations, AVI program participants, supporters of AVI and any other interested members of the public.

Appropriate consultation (tick for 'yes', otherwise leave blank)

4. PRINCIPLES

This policy is based upon the principles underpinning the ACFID Code of Conduct, certain principles specified in the ACFID Code of Conduct in relation to complaint handling (sections D.6 and E.3) and AVI's articulated values of equity, social justice, diversity, inclusion, partnership and respect for human rights.

5. POLICY

5.1 AVI acknowledges its accountabilities to its various stakeholders and is committed to stakeholder engagement and responding to complaints in an effective and clearly defined manner.

5.2 Accordingly, AVI will:

- ensure this policy is available to all stakeholders via the AVI website and appropriate formats in the Melbourne and in-country offices;
- provide clear and easily understandable information to all stakeholders about how to make complaints, both in Australia and countries where it works;
- include in its induction and orientation processes for Directors, employees, program participants and Australian and in-country partners, appropriate references to its complaint-handling policy and application;
- ensure that personnel directly involved in complaint handling, in Australia and overseas, are fully trained in the policy and associated processes;
- ensure complaint handling processes are responsive, thorough and fair;
- provide accessible, safe and discreet points of contact for stakeholders in Australia and countries where it works;
- at its discretion, only consider anonymous complaints if sufficient information is provided;
- in cases where a person or entity is making a complaint on behalf of a stakeholder, need to contact the stakeholder for permission to communicate with the person or entity;
- aim to resolve complaints at the initial point of dissatisfaction or concern, quickly and efficiently - if a complaint cannot be resolved immediately, AVI will acknowledge the complaint within 5 business days;
- assess the nature of any complaint; and may reject it if it is deemed to be frivolous, vexatious, not made in good faith, misconceived or lacking in substance;
- ensure confidentiality of all personal details and expects all other parties involved in the process to do the same;
- ensure the handling of a complaint takes into account the needs of the most vulnerable and considers minority and disadvantaged stakeholders;
- review a complaint on appeal or claim of dissatisfaction with respect to an outcome;
- advise complainants of their ability to make a complaint regarding an alleged breach of the Code of Conduct by the organisation to the ACFID Code of Conduct Committee.

5.3 In the event of a complaint being lodged with the ACFID Code of Conduct Committee, AVI will:

- comply with the complaints handling process as set out in the ACFID Code of Conduct Guidance;
- comply with Code of Conduct Committee requests for information within all reasonable time limits set;
- comply with any corrective and disciplinary action agreed with the Code of Conduct Committee, in the case of a breach of the Code;
- comply with requirements set by the Code of Conduct Committee to put in place measures to minimise the risk of the breach recurring.

6. DEFINITIONS

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| ACFID | Australian Council for International Development |
| ACFID Code of Conduct | A voluntary, self-regulatory sector code of good practice that aims to improve international development outcomes and increase stakeholder trust by enhancing the transparency and accountability of signatory organisations. AVI is a signatory to the Code and is therefore obligated to meeting all Code requirements. |
| Complainant | A person or party making a complaint. |
| Complaint (grievance) | An expression of dissatisfaction or concern relating to a decision, action or activity of the organisation or one or more of its representatives in the course of their duties. |
| Complaint handling | The process of dealing with complaints with a view to their resolution in a way that satisfies all parties concerned (although this may not be possible in all cases). Also known as dispute resolution or dispute settlement. |
| Interest | Relevance, significance or consequence. This is a subjective term, which must be considered from the interested party's perspective and means that concerns or complaints could come from anyone. The source of these should not be discounted; however, the nature of a concern or complaint may lead to it being rejected if it is deemed to be frivolous, vexatious, not made in good faith, misconceived or lacking in substance. |
| Representative | An Officer, Employee or any other agent engaged by AVI to undertake certain duties for, or otherwise represent, the organisation. |
| Stakeholder | An organisation or person within Australia or overseas with an interest in AVI. Stakeholders include: the Board, the President (when appointed), Members, Executives, Employees, partner organisations, AVI program participants, supporters of AVI or any other interested members of the public. |

7. RESPONSIBILITIES

The Board of Directors has ultimate responsibility for ensuring AVI's compliance with federal and state laws and any contracts, agreements or other mechanisms that are binding upon the organisation.

This policy reflects certain ACFID Code of Conduct requirements to which AVI, through its officers and employees, is duty-bound.

AVI executives and managers are responsible for ensuring this policy is effectively communicated and followed. Other employees of AVI are responsible for carrying out their duties in line with this or any other AVI policy.

7.1 GUIDELINES

7.1.1 For Employees, the Formal Dispute/Grievance Procedure should be followed, as specified in the AVI Enterprise Agreement 2014 and individual employment contracts.

- 7.1.2 For program participants, the relevant complaint/grievance handling or dispute settlement processes should be followed, according to the program-specific code of conduct, handbook or agreement; otherwise AVI's general complaint handling procedure (see section 8 below) can be followed.
- 7.1.3 For other stakeholders, AVI's general complaint handling procedure (see section 8 below) should be followed. AVI has a designated Complaints Officer who has responsibility for receiving and acting on complaints.
- 7.1.4 If any complaint entails an alleged breach of the ACFID Code of Conduct, the complainant should be advised of their ability to lodge a complaint with the ACFID Code of Conduct Committee (refer to <http://www.acfid.asn.au/code-of-conduct/complaints>).
- 7.1.5 A complainant may also contact DFAT directly.

8. PROCEDURES / GUIDELINES (OPTIONAL FOR POLICY DOCUMENTS)

The following procedure relates to general complaint handling.

- a) A complaint should be lodged in a standard format, using a form (see recommended Complaint Form at Attachment A), where possible. The AVI website and Reception in Melbourne and all country offices have the Complaint Form readily available (country offices may also wish to use a country-specific language variant).
- b) A formal lodgement of a complaint is made directly to the Complaints Officer at:

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| In-person | 88 Kerr Street, Fitzroy, Victoria | Country office *location address |
| Web | www.australianvolunteers.com (About us Contact us Making a complaint) | |
| Email | complaint@australianvolunteers.com or country office *email | |
| Letter | PO Box 350, Fitzroy, 3065, Australia or country office *postal address | |
| FAX | + 61 3 9419 4280 | |

* Refer to list of country offices and their contact details on the AVI website.

- c) In cases where the complainant is present in-person or on the phone, the AVI Complaints Officer shall ask the complainant to complete the Complaint Form or complete it on their behalf.
- d) Assistance with translation and completing the form may be required for some complainants and should be provided whenever required and possible.

- e) Where the complainant is present in-person, a copy of the completed form shall be given to the complainant, together with a copy of the Complaints Handling Policy; otherwise these may be posted, Faxed or emailed to the complainant.
- f) The completed complaint form or details shall be directed to the Complaints Officer.
- g) Any complaint deemed to be a concern regarding fraud or corruption will be managed in accordance with AVI's Fraud and Corruption Control Policy.
- h) The Complaints Officer shall record the complaint details in the AVI Event Register.
- i) Other than for the exceptions listed hereafter, the Complaints Officer will be the person responsible for handling the complaint and shall record the complaint details in the AVI Event Register. If the complaint is about the Complaints Officer or there could be a perceived conflict of interest for the Complaints Officer it shall be referred to the CEO who will be the person responsible for handling the complaint. If it is about the CEO, it shall be referred to the Board Chair, or a Director nominated by the Chair, who will be the person responsible for handling the complaint.
- j) The person responsible for handling the complaint shall acknowledge the complaint within 5 business days and (with assistance, if required) shall assess the validity of the complaint (i.e. test that it is made in good faith and not frivolous, vexatious, misconceived or lacking in substance).
- k) The person responsible for handling the complaint shall take or delegate, where necessary and appropriate, required action to resolve or reject the lodged complaint (which could take some time depending on the nature of the complaint and any further investigative work required). Where a complaint is to be resolved such action shall include giving the complainant and the subject of the complaint the opportunity to be heard, either orally or in writing, before a decision is made. The person investigating must keep a record of the main points made by each party.
- l) The outcome (resolution or rejection) of the complaint shall be communicated to the complainant by the person responsible for handling the complaint, within 5 business days of the outcome being decided.
- m) In the case where a complainant is not satisfied with the outcome, the CEO or the Board Chair, or a Director nominated by the Chair, as appropriate to the circumstances shall, within 30 days, review the complaint, make a decision and the final outcome shall be communicated within 5 business days of the outcome being decided.
- n) The person responsible for handling the complaint shall ensure a review of the complaint, outcome and associated risk factors, along with any measures to mitigate the recurrence of the causes of the complaint.

- o) As with other events entered in the Event Register, complaints shall be reviewed, analysed and reported to the Board's Finance, Audit & Risk Management Committee (FARM) and then the Board through the minutes of FARM.

9. RELATED POLICIES

- AVI Enterprise Agreement 2010 (Section 33: Dispute and Grievance Resolution)
- AVID Handbook
- AVI Privacy Policy
- Child Protection Policy
- Equal Opportunity and Diversity Policy
- Fraud and Corruption Control Policy
- Staff Code of Conduct
- PACE International Code of Conduct for Participants
- PACTAM Procedures Manual and Deployee Service Agreements

10. REFERENCES

- ACFID Code of Conduct
- ACFID Code of Conduct Implementation Guidance

11. EVALUATION AND PERFORMANCE MEASUREMENT

Compliance with this policy will be assessed annually as part of the annual compliance self-assessment process under the ACFID Code of Conduct requirements.

Criteria for assessment will include:

- verification of appropriate systems and procedures across AVI to ensure policy compliance
- review of any relevant compliments or complaints.

Any risks of non-compliance with this policy are primarily in terms of AVI's reputation and brand; other disciplinary actions may follow relating to AVI's signatory status under the ACFID Code of Conduct and financial penalties associated with breaches of certain laws.