

Complaint & Feedback Handling Policy	Effective date	April 2024
	Next review date	March 2026
	Sponsor	Executive Manager Corporate Operations
	Board committee	FARM
Level / Class Corporate Organisation	Approval / authorisation	CEO

1. PURPOSE

The purpose of this policy is to articulate the intent and approach of Australian Volunteers International (AVI) in relation to the receiving and handling of feedback and complaints from external and internal stakeholders and to establish an explicit framework for the management of any complaints.

This policy is intended to ensure that AVI handles complaints transparently, fairly, efficiently, and effectively. This policy provides guidance to AVI's internal and external stakeholders who may wish to make a complaint on AVI's key principles and the approach of our complaints management system.

2. SCOPE / PERSONS AFFECTED

This Policy covers the management of feedback (which includes compliments and suggestions for improvement) as well as complaints (expressions of dissatisfaction) regarding such things as:

- service provision
- customer service
- operating procedures
- organisational performance
- environmental and safety hazards and breaches
- organisational accountability to values and principles of operation
- website and communications
- safeguarding concerns including how reporting has been managed
- external stakeholders or visitors experience of AVI staff, contractors or subcontractors conduct or performance

Feedback and complaints can be made from external and internal stakeholders which can include staff.

The AVI Complaints and Feedback Management Process [Link inserted when policy is approved] details in full how designated AVI Complaint Officers are responsible for triaging complaints and

assigning investigation of these to the relevant designated officials within AVI. If a complainant's safety or security is at risk, AVI will respond immediately and will escalate appropriately.

During the initial receipt of the complaint, AVI's Complaints Officer/s will:

- acknowledge the complaint to the complainant within 24 hours, on its receipt.
- triage the complaint and send it to the relevant personnel as nominated by AVI.
- seek further information where required from the complainant so that the matter can be satisfactorily resolved.
- Log the complaint into AVI's Incident Management System, in line with AVI's Incident Reporting Policy and AVP Register.
- determine whether the complainant wishes to remain anonymous and whether the nature of the complaint meets the Whistleblowing definition of a 'protected disclosure'.
- determine whether the complaint is categorised as a serious incident and needs to be escalated to the CEO, the Australian Volunteers Program - Program Director and/or other relevant designated personnel.
- consult with the CEO regarding the most appropriate person to manage the complaint if it is not deemed a serious incident or falls outside the scope of the Complaint and Feedback Handling Policy. If the CEO is unavailable, delegation applies to the acting CEO.

A complaint may be allocated to another nominated person within AVI to manage, where:

- The Complaints Officer is the subject of the complaint or there is a conflict of interest in their involvement.
- Another party is better situated to manage it because of the position they hold, or their knowledge and experience means they are better able to skilfully resolve the issue.

Serious incidents include complaints with regards to:

- Child Protection and Safeguarding
- Sexual Exploitation and Abuse
- Harassment, Abuse, Violence

Designated personnel include:

- Child Protection and Safeguarding: Child Protection & Safeguards Advisor
- Sexual Exploitation and Abuse: People & Culture Manager
- Harassment, Abuse, Violence: People & Culture Manager

If the complaint concerns a child or child safeguarding, the nominated Child Protection Liaisons will provide advice.

The CEO or AVI Board may appoint an external Investigator for complex matters, where there are internal conflicts and/ or where legal client privilege is required. If the incidents could constitute an alleged criminal act, it will be reported to the Police in the jurisdiction applicable. Please note that this may not preclude an internal investigation or process also running in parallel.

This Policy does not cover interpersonal staff grievances (including bullying, harassment, and discrimination allegations), matters that relate to the employment relationship, or conduct or performance issues between staff. These matters are covered by Bullying, Harassment and Anti-Discrimination Policy, AVI Code of Conduct, AVI Enterprise Agreement 2022 and Country Office Staff Policy.

This Policy does not cover WHS incident reporting for AVI staff. These incidents are covered in the AVI WHS Policy.

The scope of this Policy covers all AVI stakeholders within Australia and overseas, including: the AVI Board, members of Organisational Leadership Team, employees, contractors, subcontractors, office volunteers, partner organisations, program participants including on the Australian Volunteers Program, supporters of AVI and any other interested members of the public.

Complaints that do not fall within the scope of this Policy, such as complaints against employees of other organisations, will be escalated to AVI's CEO. Depending on the severity of the incident, matters include those that appear to involve alleged criminal offences will be referred to the Police.

3. PRINCIPLES

This policy is based upon the principles underpinning AVI Code of Conduct, the ACFID Code of Conduct, certain principles specified in the ACFID Code of Conduct in relation to complaint handling (section 7.3.3) and AVI's articulated values of equity, social justice, diversity, inclusion, partnership, and respect for human rights. AVI is accountable to our internal and external stakeholders and is committed to enabling stakeholders to make complaints to AVI in a safe and confidential manner. AVI is accountable to its stakeholders and is committed to clearly communicating complaints management processes to staff, partners, vulnerable people, and their communities, in languages and formats they understand.

AVI acknowledges the value and importance of feedback and complaints and is committed to learning from complaints, and operating under the principles of continuous quality improvement. AVI will provide and manage a responsive, timely, objective, and procedurally fair and lawful feedback and complaints management system.

Complaints handling is a key mechanism in the prevention of sexual exploitation, abuse, and harassment. Incidents of sexual exploitation, abuse and harassment are chronically under-reported. For further information about how complaints related to sexual exploitation, abuse and harassment can be reported, are received and responded to please see the [AVI Prevention of Sexual Exploitation, Abuse and Harassment Policy](#). This policy extends to providing support to survivors and a consistent with a survivor-centred approach. All complaints of sexual exploitation, abuse and harassment are investigated sensitively and confidentially by a SEAH investigator with primary concern for the safety of the survivor and any response is both robust and sensitive to the wishes and protection of survivor(s).

4. POLICY

AVI acknowledges its accountabilities to its various stakeholders and is committed to stakeholder engagement and responding to complaints and feedback in an effective and clearly defined manner. Accordingly, AVI will:

- ensure this policy is available to all stakeholders via the AVI website and internal communication channels for all staff.
- ensure stakeholders are aware of AVI confidential reporting tool [Stopline](#)
- provide accessible, responsive, safe, and discreet points of contact for stakeholders in Australia and countries where AVI works.
- ensure fairness is prioritised when engaging and responding to complaints and feedback.
- commit to providing appropriate assistance and referrals to survivors – for example, supporting complainants to access services including medical, social, legal, and financial assistance, or referrals to such services.

- keep records of all misconduct complaints (complaints that may involve harassment, fraud, sexual misconduct, child safeguarding and any other complaint involving behavioural misconduct) with the ability to de-identify complaints at the wishes of the complainant or survivor.
- ensure confidentiality, with information about the complainant only being available where needed to deal with the complaint within the organisation. Complaints are actively protected from disclosure unless the complainant expressly consents to its disclosed.
- records of complaints are maintained and details of the process for reviewing and analysing complaint information including reporting to management teams are outlined within AVI's Complaints Management Process [Link inserted when policy is approved].

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

5. WORKING WITH PARTNERS

In the countries where we work, complaints can be made to AVI personnel in-country, through email or via the [Stopline](#) portal. AVI works with partners and personnel to ensure:

- AVI partners are aware and can access AVI's Complaint Handling Policy, AVI Complaint Handling Process, AVI Complaint Management Flowchart [links inserted when policy is approved] through multiple modes of communication.
- Complaints are handled (where relevant) in line with AVI's requirements
- Complaints are recorded and reported where required to AVI

Where support is requested, AVI will consider and may work with partner organisations to support the development and implementation of complaint investigation processes within their organisation.

Receiving complaints and feedback from program participants and stakeholders is important to AVI. It forms part of the monitoring and evaluation of our programs and projects. AVI will continue to work with our partners to strengthen their own feedback and complaints mechanisms where relevant.

6. TRAINING

AVI is committed to providing an induction on complaints handling to all personnel and partners to ensure they are equipped to understand and implement the policy. Ongoing and refresher training will be provided in line with any contractual obligations or as needed for all personnel and partners.

Communications materials about complaints handling, expected staff behaviours, and complaints processes for communities in appropriate language and media can be provided.

7. RESPONSIBILITIES

The AVI Board 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's Organisational Leadership Team (OLT) and managers are responsible for ensuring this policy is effectively communicated and followed. Employees of AVI are responsible for carrying out their duties in line with this or any other AVI policy.

The designated AVI Complaints Officers are the Chief Finance Officer and the People and Culture Manager. They are responsible for triaging complaints and assigning investigation of these to the relevant designated officials within AVI. They are also responsible for managing the timeframe of complaint handling in line with the ACFID requirements.

8. GUIDELINES

- 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 can be followed as set out in the Complaints Handling Process [Link inserted when policy is approved].
- The Complaints Handling Process [Link inserted when policy is approved] guides stakeholders as to acceptable timeframes for responding to a complainant, acknowledging receipt of the complaint, and provide information as to how the complaint will be investigated, or otherwise followed up.
- AVI informs stakeholders that if they are unhappy with the outcome of a complaint made to AVI they are able to make a complaint to the [ACFID Code of Conduct Committee](#).
- If any complaint entails an alleged breach of the ACFID Code of Conduct, the complainant will be advised of their ability to lodge a complaint with the [ACFID Code of Conduct Committee](#).

9. 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.

10. DEFINITIONS

Complaint: an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

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

Enquiry: a request for information or an explanation.

Feedback: opinions, comments, suggestions, and expressions of interest in the products or services of the organisation.

Stakeholder or interested party: a person or group having an interest in the performance or success of the organisation.

PSEAH: Prevention of sexual exploitation, abuse, and harassment.

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Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

Sexual abuse: any verbal or physical conduct or any conduct of a sexual nature that is unwelcome, uninvited, or not reciprocated in circumstances in which a reasonable person, having regard to all the circumstances would have reasonably anticipated the possibility that the person harassed would be offended, humiliated, or intimidated. This can include unwelcome sexual advances or unwelcome requests for sexual favours or displaying or sending sexually explicit images or asking intrusive questions about someone's personal life, including their sex life. Sexual harassment can take various forms. It can be direct and/or indirect, physical and/ or verbal, repeated or one-off instances and perpetrated by any person of any gender towards any person of any gender. Sexual harassment can be perpetrated against beneficiaries of AVI's programs, program participants, community members, citizens, as well as employees and workers.

Safeguarding: Actions, policies, and procedures that create and maintain protective environments to protect people from exploitation, harm, and abuse.

11. RELATED POLICIES

- AVI Code of Conduct
- AVI Enterprise Agreement 2022 (Section 35: Dispute and Grievance Resolution)
- AVI Country Office Staff Policy
- AVI Privacy Policy
- AVI Whistle-blowers Policy
- AVI Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- AVI Child Safeguarding Policy and Child Safeguarding Code of Conduct
- Equal Opportunity and Diversity Statement
- AVI Fraud and Corruption Control Policy
- Australian Volunteers Code of Conduct
- Australian Volunteers Program Guidebook
- AVI Social Media Policy

12. REFERENCES

- ACFID Code of Conduct
- ACFID Code of Conduct Implementation Guidance
- ACFID Guidance for the Development of a Complaints Handling Policy
- AVI Complaint and Feedback Handling Process

- AVI Complaint and Feedback Flowchart

13. 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	-
6 Dec 2018	1.4	Updated sections and word amendments	3, 6, 7, 8, 9
August 2020	2.0	Re-write to include feedback in general.	
July 2021	2.1	Addition of new ACFID Code of Conduct Verifier Addition of section 'Working with Partners'	3 5
March 2024	All	Review by OLT – due under policy schedule	