Complaint & Feedback Handling Policy		
	Effective date	October 2026
	Next review date	September 2028
	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

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 and the communities with which AVI works.

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 employees', contractors' or subcontractors' conduct or performance.

Feedback and complaints can be made by external and internal stakeholders, which can include employees.

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

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

This policy does not cover complaints related to Fraud, Bribery and Corruption, SEAH or Child Safeguarding. Any complaint that is deemed to relate to these issues must be immediately managed through AVI's Incident Management and Reporting Policy and any other policy that applies to that domain (e.g. AVI Child Safeguarding Policy).

3. PRINCIPLES

This policy is based upon the principles underpinning the 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 its internal and external stakeholders and is committed to enabling stakeholders to make complaints to AVI in a safe and confidential manner. AVI is committed to clearly communicating complaints management processes to employees, partners 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.

If the complaint involves the conduct or performance of an AVI employee, People and Culture will be advised. Where there is an internal investigation involving an employee, People and Culture will assist in managing the process to raise the issue with them, to act as an organisational witness, and to ensure a procedurally fair process is followed and the principles of natural justice are applied as appropriate. Where there is a conflict of interest, or the complaint relates to a staff member within the People and Culture team, the matter will be referred to the CEO.

Different types of feedback and complaints will be handled differently, aligned to the severity of each:

- General feedback will be managed informally, through the business unit.
- A general complaint about staff, product or service dissatisfaction will be managed through the complaints process.
- A complaint related to misconduct, including issues related to Privacy, SEAH, Child Protection or Fraud and Corruption will be handed in line with the Incident Management Policy as well as the relevant specific policies, including reporting timeframes.

The AVI Complaints and Feedback Management Process 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.

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. Severe incidents and matters including those that appear to involve alleged criminal offences will be referred to local Australian State Police,

country law enforcement or Australian Federal Police.

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

Where a complaint is considered to be vexatious, malicious, repetitive, or without reasonable grounds, AVI reserves the right to limit, decline to investigate further, or close the matter, and will notify the complainant in writing of this decision and the reasons for it.

These categories of feedback or complaint received will be handled, and logged in the appropriate register based on their severity and alignment with other AVI Policies, including AVI's Incident Management Policy & procedure:

Category	Register	Lead Area
Feedback	N/A	Business Unit
General Complaint	JIRA Complaint Register	Complaints Officers
Staff Conduct Complaint	JIRA Incident Register	People & Culture
Child Safeguarding	Refer to AVI Child Safeguarding Policy	Refer to AVI Child Safeguarding Policy
PSEAH	Refer to AVI PSEAH Policy	Refer to AVI PSEAH Policy
Fraud & Corruption	Refer to AVI Fraud, Bribery & Corruption Policy	Refer to AVI Fraud, Bribery & Corruption Policy
Incident-Related Complaint	Refer to AVI Incident Management & Reporting Policy	Refer to AVI Incident Management & Reporting Policy

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.
- ensure that an email channel is available for complaints: complaints@avi.org.au.
- 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 complainants to access services including medical, social, legal, and financial assistance, or referrals to such services.
- keep records of all misconduct complaints - noting that complaints that may involve harassment, fraud or corruption, sexual exploitation, abuse and harassment, child safeguarding and fraud will be handled under those policies - with the ability to de-identify complaints at the wishes of the complainant.
- in line with AVI's Privacy policy, 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.
- ensure that, where a complaint is submitted anonymously, it is addressed as far as possible within the information required.
- ensure that 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.

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 incident could constitute an alleged criminal act, it will be reported to the police in the jurisdiction applicable.

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.

General complaints will be handled to the following timeframes:

- **Triage:** Immediate to determine any mandatory reporting requirements or referrals, with these to be undertaken in line with policy guidelines.
- **Acknowledgement of complaint:** 5 working days
- **Initial review:** 15 working days
- **Investigation process and determination**: 30 working days
- **Appeals process:** 30 working days

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 AVI works, complaints can be made to AVI personnel in-country, through email or via the Stopline portal. AVI works with partners and their personnel to ensure:

- AVI partners are aware and can access AVI's Complaint and Feedback Handling Policy, AVI Complaint and Feedback Handling Process, AVI Complaint and Feedback Management Flowchart through multiple modes of communication.
- Complaints are handled (where relevant) in line with AVI's requirements, policies and the Privacy Act 1988.
- Complaints are recorded and reported where required to AVI.

- Partner organisations have in place a transparent complaints-handling process. This is checked as part of the partner due diligence process.
- Contractor contracts include relevant complaints clauses.

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 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. The People and Culture Committee is responsible for monitoring complaints and trends through the governance meeting cycle.

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 Executive Manager Corporate Operations and the People and Culture Manager. They are responsible for triaging complaints and assigning investigation of these to the relevant designated officials within AVI, including engaging with the relevant parties for feedback or serious matters. 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.
- The Complaints Handling Process 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.

The following documents operate as guidelines:

- AVI Complaint and Feedback Management Process
- AVI Complaint and Feedback Management Flowchart

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

Complainant:	a person, organisation, or its representative, making a complaint.
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.
Enquiry:	a request for information or an explanation.
Feedback:	opinions, comments, suggestions, and expressions of interest in the products or services of the organisation.
PSEAH:	Protection from sexual exploitation, abuse, and harassment.
Safeguarding:	Actions, policies, and procedures that create and maintain protective environments to protect people from exploitation, harm, and abuse.
SEAH:	Sexual exploitation, abuse, and harassment.
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.
Child:	a person under 18 years of age
Child safeguarding:	a shared responsibility to prevent and respond to the risks, suspicions and incidents of child abuse, neglect and exploitation.
Stakeholder or interested party:	a person or group having an interest in the performance or success of the organisation.
Vexatious Complaint	A complaint may be considered vexatious where it is repetitive, pursued in an unreasonable manner, made with the intent to harass rather than resolve a genuine issue, or persists after the matter has already been fully investigated and responded to.

11. RELATED POLICIES

- AVI Child Safeguarding Policy and Child Safeguarding Code of Conduct
- AVI Code of Conduct
- AVI Complaint and Feedback Management Process
- AVI Complaint and Feedback Management Flowchart
- AVI Country Office Staff Policy
- AVI Enterprise Agreement
- AVI Equal Opportunity and Diversity Statement
- AVI Fraud, Bribery and Corruption Policy
- AVI Media Policy
- AVI Privacy Policy
- AVI Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- AVI Whistleblowers Policy
- Australian Volunteers Code of Conduct
- Australian Volunteers Program Guidebook

12. REFERENCES

- ACFID Code of Conduct
- ACFID Code of Conduct Implementation Guidance
- ACFID Guidance for the Development of a Complaints Handling Policy
- Australian Government Investigation Standards. https://www.afp.gov.au/sites/default/files/2023-09/Australian-Government-Investigations-Standard-2022.pdf

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	2.2	Review by OLT – due under policy schedule	
September 2026	2.3	Full review – due under policy schedule.	All