Appendix 19. Complaints Procedure

(Next review by July 2029)

Policy number	19	Current policy version	4
Original policy approved	July 2020	Previous review date	June 2026
Current policy reviewed by CEO	CC	Current version approved by Committee of Management on	July 2026
Responsible person	CEO	Scheduled review date by	July 2029

Complaints and Feedback

Assisi Aid Projects (Assisi) welcomes feedback from supporters. Complaints and feedback provide an opportunity to improve the quality of work, build the trust and confidence of stakeholders, identify areas that require improvement, and learn from feedback provided.

Assisi recognises the importance of being transparent and accountable and recognises the right of every individual connected to its programs and its staff to raise issues of concern about other participants, staff or the services and programs provided. A clear and visible complaint handling procedure ensures stakeholders are able to express their concerns with the assurance that issues will be addressed.

Assisi commits to providing appropriate assistance, including referrals to relevant services, to support survivors. The provision of assistance might, for example, include medical, social, legal and financial assistance or referrals to related services based on the needs and wishes of the survivor.

Definitions

- Complaint means an expression of dissatisfaction or concern made to or about Assisi, our services, personnel or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected or legally required.
- Complainant means 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 services of the organisation.

- Stakeholder or interested party means Individuals or groups that can affect or are affected by an organisation's policies and/or actions.
- PSEAH means prevention of sexual exploitation, abuse and harassment.
- SEAH means sexual exploitation, abuse and harassment.
- Safeguarding means actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.

Who can make a complaint?

Anyone who participates in Assisi's development activities, including partners and all other stakeholders, has the right to expect good service from Assisi projects.

A complaint or dispute can be made by an external body, party or individual. This includes participants, partners, members of the public, donors, or external agencies.

Assisi ensures partner organisations inform project stakeholders (program participants, donors, funders, partners) about their right to make a formal complaint about Assisi's program, partners and/or ways of working, and the process to do so.

Education of the Complaints Procedure

Assisi personnel are provided with the Complaints Procedure as part of the induction process, this includes, but is not limited to, all staff members, volunteers, and Committee of Management members.

Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation.

Assisi's Complaints Procedure is provided to partners in Project Orientation at the commencement of every project.

Publicising the Policy

Assisi values the submission of concerns and complaints, and endeavours to ensure that the complaint process is easy to understand and smooth to implement. Assisi's Complaints Procedure can be found on Assisi's website, on the footer of every web page and in the 'Our Policies & Guidelines' tab. Assisi's contact details are readily accessible in relevant communications, including Assisi's Annual Reports and Newsletters.

As outlined above, Assisi's Complaints Procedure is provided to partners in Project

Orientation at the commencement of every project.

Making a complaint

Reports can be made in person (by appointment) or by telephone, post or email. Reports can be made within business hours or outside business hours. Complaints can be made in person, with an appointment. If you prefer, you can discuss the issue with a person you trust, and this person can make the complaint on your behalf. If, at any time, you are not sure about whether to make a protected disclosure, you can get independent legal advice. Any discussions you have with a lawyer will be protected under this procedure and under law.

If you need help and wish to remain anonymous, Assisi will assist you to make a complaint by providing access to a third party or staff member not associated with your complaint. Please refer to the Privacy Policy regarding confidentiality.

When making a complaint, provide as much detail as possible about the complaint and if you can, explain the outcome you are seeking to rectify this matter.

Once your feedback or complaint has been received, it will be dealt with internally for consideration and resolution. This Complaints Procedure details Assisi's approach to acknowledging and resolving a complaint.

Please address your complaint to the Chief Executive Officer (CEO):

Assisi Aid Projects,

247-251 Flinders Lane,

Melbourne,

Victoria 3000

Australia.

Tel: 0419 316 296.

Email: assisi@assisi.org.au

If the complaint is related to the Chief Executive Officer (CEO), please address your complaint to the President of Assisi Aid Projects: elizabeth.morris@assisi.org.au

Complaints related to Assisi partner organisations can also be lodged at assisi@assisi.org.au or in-country, as below:

Nepal Programs

Federation of Business and Professional Women Nepal

77 Bhrigu Marg

Buddhanagar - 10

Kathmandu

Nepal

Tel: +977 9841814928

Contact: President: Kamalesh L. Rajbhandary

Email: kamalesh@bpwnepal.org.np

FBPW Email: fbpwn@bpwnepal.org.np

Indonesia Programs

Dreamdelion Indonesia

Rumah Sejati Dreamdelion

Jl. Jogorogo, Gentong, Kec. Paron, Kabupaten Ngawi

Jawa Timur, Indonesia

Postal Code: 63253

Tel: +62 81286069639

Contact: Alia Noor Anoviar

Email: alia@dreamdelion.com

India Programs

SAFA Society

Light House, 2nd Floor

Opp. Balshetty Keth Ground

Noorkhan Bazar, Darul Shifa

Hyderabad, 500024

Tel: +91 9866174665

Contact: Rubina Nafees Fatima

Email: rubina@safaindia.org

Whistleblower Policy

If you suspect serious misconduct related to the disclosure, or witness of fraudulent, corrupt or unethical behaviour by Assisi, or if you feel unable to raise a concern through the standard feedback channels because of fear of identification or reprisal, you may use the process outlined in Assisi's Whistleblower Policy. Please refer to the Privacy Policy regarding confidentiality.

Safeguarding of Children

For complaints and concerns regarding child safeguarding, please refer to Assisi's Child Protection Policy for advice on appropriate action.

Sexual Exploitation, Abuse and Harassment

For complaints and concerns regarding sexual exploitation, abuse and harassment, please refer to Assisi's Protection from Sexual Exploitation, Abuse and Harassment Policy and the PSEAH Reporting Form for advice on appropriate action.

ACFID Code of Conduct

Assisi is a signatory to the ACFID Code of Conduct, a voluntary, self-regulatory code that sets out an organisation's commitment to conducting its activities with integrity and accountability.

If your complaint is concerning Assisi not complying with the ACFID Code of Conduct, please lodge a complaint directly to Assisi, and if you are not satisfied with the response, you can lodge a complaint with the ACFID Code of Conduct Committee directly as outlined here: https://acfid.asn.au/content/complaints

Receiving a complaint

Complaints received are taken very seriously and complainants are treated with respect. Staff receiving complaints will listen, accept the complaint, and be courteous and committed to solving the complaint. The intention is to always resolve a complaint to the satisfaction of all parties.

If a complaint is made regarding Assisi personnel, the personnel identified in the complaint will not be involved in any way with the handling of the complaint.

If Assisi receives a complaint, Assisi will:

- Seek from the complainant the outcome/s they are expecting
- Make an initial assessment of the complaint and the urgency of action. Assisi uses a triage system when initially assessing complaints to ensure that complaints are appropriately classified, prioritised and managed within the organisation. If complaints can be solved immediately then staff must be encouraged (and managed) to do so.
- Clearly explain to the complainant the course of action that will follow, e.g.,:
  - If the complaint is out of Assisi's jurisdiction;
  - If Assisi may exercise a discretion not to investigate;

- If preliminary enquiries need to be made, or further consideration needs to be given; or
- If the complaint is to be investigated.

Furthermore, in the event that a complaint is deemed to be unreasonable the complainant will be advised in writing of this, and no further communication will be entered into in regard to that complaint.

- Not create false expectations but will assure the complainant that the complaint will receive full attention.
- Give an estimated timeframe or date by which Assisi will next contact them.
- Acknowledge receipt of a complaint in writing within three working days.

Initial assessment of a complaint

To determine how a complaint should be managed, Assisi's initial assessment of a complaint will assess the complaint and the level of seriousness using the following criteria:

a. Is action required immediately?
b. What is the severity of the situation? For example, has there been a breach of the law, ACFID Code of Conduct, Assisi's policies?
c. Are there health and safety implications of the complaint?
d. Are there financial implications?
e. What impact / risk does the complaint have on the individual, the public, and Assisi?
f. Is there potential for the situation to escalate and are there systemic implications?

If Assisi assesses the complaint as significant in terms of one or more of these criteria, Assisi will classify the complaint accordingly.

Responding to and closing a complaint

- All complaints will be resolved in a timely manner locally, the CEO shall be informed, and the matter shall be referred to the President of the Committee of Management if unresolved.
- If the complainant does not accept the resolution or proposed course of action, Assisi and the complainant may refer to an external investigative body such as the Ombudsman's Office.
- If the complainant disputes an assessment that a complaint should not be investigated, and if such a dispute is unresolvable, Assisi will refer the complaint to the Code Committee of the Australian Council for International

Development (ACFID).

Recording and resolution process for complaints

If complaints are not immediately resolved, they need to be recorded on the Assisi Complaints register. This register is stored securely to protect the sensitive and confidential content. Complaints may remain anonymous at the request of the complainant or survivor. Assisi will not reveal a complainant's name or personal details to anyone in or outside the organisation other than personnel involved in handling the complaint without obtaining the complainant's permission.

The CEO presents all received complaints to the Committee of Management at the next Committee of Management meeting. There may be instances where the CEO presents the complaint to the Committee of Management immediately. At any time, a complainant may request that the CEO or Committee of Management member deal with their complaint.

Depending on the nature of the complaint, the CEO and/or the Committee of Management will devise an action plan to investigate and respond to the complaint. The action plan may include the following actions, which will be implemented or undertaken based upon outcomes of the investigation:

- Reporting the matter/incident to the relevant authority; and/or
- Ensure referral to relevant services and support for the survivor; and/or
- Manage internally in accordance with Assisi's Human Resources procedures if not a criminal matter; and/or
- Report the matter/incident to DFAT and/or ACFID; and/or
- Take no further action; and/or
- Record the incident in the confidential incident log.

Assisi will inform the complainant of the outcome by phone and/or writing or email in a timely manner. The CEO and/or Committee of Management will undertake a reflective learning process to identify the origins of the issue/s raised and any potential improvements to Assisi's practices.

Outcomes of complaints

Assisi will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.

Assisi will take all required remedial action. Assisi will be prepared to change the way in which it operates and improve or undertake further training of staff. Where needed Assisi will counsel or discipline staff or volunteers.

Where appropriate Assisi will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

Continuous improvement in complaint handling

On a continuous basis Assisi will monitor the effectiveness of our complaint handling and make improvements as appropriate.

Assisi's Complaint Procedure is reviewed by the CEO and approved by the Committee of Management every three years.

If Assisi receives a complaint, the CEO will conduct a review of Assisi's Complaints Procedure to ensure the policy is effective and make improvements as appropriate.

Related Documents

Assisi – Code of Conduct

Assisi – Child Protection Policy

Assisi – Human Resources section of the Good Practice Manual

Assisi – Programs Guidelines

Assisi – Risk Management Procedures outlined in Good Practice Manual

Assisi – Whistleblowing Policy and Procedure

Assisi – Privacy Policy

Assisi – PSEAH Policy

Assisi – PSEAH Reporting Form

Reference List

ACFID – Guidance for the development of a Complaints Handling Policy

https://acfid.asn.au/wp-content/uploads/2022/05/ACFID-Guidance-Complaints_2019_Final-1.pdf

ACFID – Guidelines for the Development of a Complaints Policy

https://acfid.asn.au/sites/site.acfid/files/resource_document/Complaints-Handling-Policy-Guidelines-and-Template.pdf