Feedback & Complaint Handling Policy

1. INTRODUCTION

Hagar Australia is committed to the highest standards of conduct and accountability. In seeking to be open and transparent in all aspects of its operations, Hagar Australia places value on its stakeholders at every level being able to express their feedback, concerns or complaints in a safe and trustworthy manner.

Hagar Australia acknowledges that a system for dealing with complaints in a timely and transparent manner is vital to support its value of Integrity. Furthermore, Hagar Australia is committed to creating an environment where stakeholders feel supported in making a complaint, knowing it will be investigated fairly and objectively, and determined in a timely and professional manner.

Hagar Australia is committed to ensuring there are mechanisms for all stakeholders in program countries, particularly those that are vulnerable, marginalised or excluded (such as girls, boys, women and men with and without disabilities), to be able to raise concerns or make complaints about Hagar Australia, its work, personnel, partners and/ or complaints mechanism.

2. PURPOSE

This policy is intended to:

- ensure Hagar Australia handles feedback and complaints fairly, efficiently and effectively.
- provide guidance on the key principles and concepts of Hagar Australia's feedback and complaint management system.

3. SCOPE

This policy applies to:

- Hagar Australia personnel (as defined)
- Contractors engaged by Hagar Australia
- Hagar Australia-funded partners (as defined)

Hagar Australia management will take steps to ensure that all Hagar Australia personnel, contractors and partners are made aware of their obligations under this policy.

This policy applies to receiving or managing feedback and complaints from the public, clients and other stakeholders made to or about Hagar Australia or its partners, regarding their work, personnel and/ or feedback and complaint handling process.

Approved by: Hagar Australia Board	**Date Policy Took Effect:** 28th May, 2021
Review Date: 28th May, 2024	**Responsible Person:** HAUS Board Secretary

4. HOW TO PROVIDE FEEDBACK OR MAKE A COMPLAINT

Hagar Australia has two main methods for capturing feedback, complaint or incident reporting information-

- *Website:* https://hagar.org.au/reporting/ (Google Chrome can assist with webpage translation)
- *Phone:* +61 3 9416 1960

If the feedback/ complaint is about the Executive Director, Hagar Australia's Board Secretary can also be contacted through the 'Whistleblowing' form on the website. Complainants may choose to remain anonymous but this may hinder Hagar Australia's ability to investigate.

Where a complaint does not fall within the scope of this Policy, for example the complaint is about an employee of another organisation or government department, Hagar Australia will make every reasonable effort to direct the person to the appropriate recourse or reporting avenue.

For an alleged breach of the Australian Council For International Development's (ACFID) Code of Conduct, a complainant may make a complaint directly to the ACFID Code of Conduct Committee (https://acfid.asn.au/content/how-make-complaint).

To report serious concerns or alleged incidents that may relate to child safeguarding, sexual exploitation, abuse and harassment; fraud and corruption (including conflict of interest and terrorism financing), or a whistleblowing report, please visit Hagar Australia's website (https://hagar.org.au/reporting/) and select the relevant category, or refer to Hagar Australia's Incident Reporting Procedure.

4. PRINCIPLES

An effective feedback and complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.

5. ROLES AND RESPONSIBILITIES

Hagar Australia expects personnel and contractors at all levels of the organisation to be committed to fair, effective and efficient feedback and complaint handling. The following table outlines the nature of the commitment expected at different levels and the way that commitment should be implemented:

Who	*Commitment*	*How*
Executive Director & Board Chair	Promote a culture that values complaints and their effective resolution	• Report to the Board on Hagar Australia's feedback and complaint handling. • Encourage all personnel to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Regularly review reports about feedback and complaint trends, and

		issues arising from feedback/ complaints. • Encourage personnel to recommend system improvements.
Personnel whose duties include complaint handling (including Executive Director or Board Chair)	Demonstrate exemplary complaint handling practices	• Treat all people with respect, especially people who provide feedback/ make complaints. • Assist people to make a complaint, if needed. • Comply with Hagar Australia's Policy and associated procedures. • Provide regular feedback to the Board on issues arising from complaints. • Implement changes arising from individual feedback and complaints, and from review of trends.
All personnel	Understand and comply with Hagar Australia complaint handling practices	• Treat all people with respect, especially people who provide feedback/ make complaints. • Be aware of Hagar Australia's Feedback & Complaint Handling Policy and procedures. • Assist people who wish to make a complaint to access Hagar Australia's complaints process. • Be alert to complaints and assist personnel handling complaints to resolve matters promptly.

6. POLICY

6.1 Facilitate feedback and complaints

People focus: Hagar Australia is committed to seeking and receiving feedback and complaints about its work, systems, practices, procedures and complaints handling. Any concerns raised will be dealt with within a reasonable time frame (AS/NZ 10002). People making complaints will be:

- provided with information about Hagar Australia's complaint handling process and how to access it;
- listened to, treated with respect by Hagar Australia people and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for Hagar Australia's decision(s) and any options for redress or review.

No detriment to people making complaints: Hagar Australia will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints: Hagar Australia accepts anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where enough information has been provided.

Accessibility: Hagar Australia will ensure that information about how and where complaints may be made to or about the organisation or its partners is well-publicised on Hagar Australia's website in accessible language.[1] Hagar Australia will ensure that its systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, Hagar Australia will communicate with them through their representative if this is requested. Anyone may represent a person wishing to make a complaint with their consent (for example, an advocate, family member, legal or community representative, member of Parliament, another organisation).

Charges: Providing feedback or making a complaint to Hagar Australia via the organisation's website or social media page is free. Phoning Hagar Australia, however, may incur call costs.

6.2 Acknowledge and respond to feedback and complaints

Hagar Australia understands that the following elements are the basis for acknowledging and responding to feedback:

- *Early resolution* – resolved at first contact; an appropriate explanation or apology may be required.
- *Responsive* – within five business days of receipt for ordinary matters. For more urgent/ serious matters, escalation will be immediate and appropriate, commensurate with the urgency and/ or seriousness of the matter.

Hagar Australia is committed to managing people's expectations and will inform them as soon as possible of the following:

- the complaints process
- the expected timeframes for action
- the progress of the complaint and reasons for any delay
- the need for referral/ redirection, if deemed appropriate
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

Hagar Australia will also advise people as soon as possible if the timeframe for responding to their complaint is unable to be met and the reason for the delay.

[1] The language readability level of the https://hagar.org.au/reporting/ webpages is at a 13-15 year-old reading level to particularly support reporting of incidents, feedback and complaints from children, people with learning difficulties/ intellectual disabilities and speakers of languages other than English.

6.3 Manage and resolve the complaint

Hagar Australia commits to the following in managing and resolving complaints:

- *Objectivity and Fairness* – the application of integrity in an equitable, objective and unbiased manner. This includes conflict of interest (actual or perceived) and process reviews, conducted by a person other than the original decision-maker.
- *Flexible Response* – personnel empowered to resolve complaints promptly, flexible approaches to work or problem-solving that enhance accessibility, and seeking to consult and collaborate with people and/ or representatives making complaints.
- *Confidentiality* – protecting identities where practical and appropriate, and disclosing information only as permitted under privacy laws, secrecy provisions and/ or any relevant confidentiality obligations.

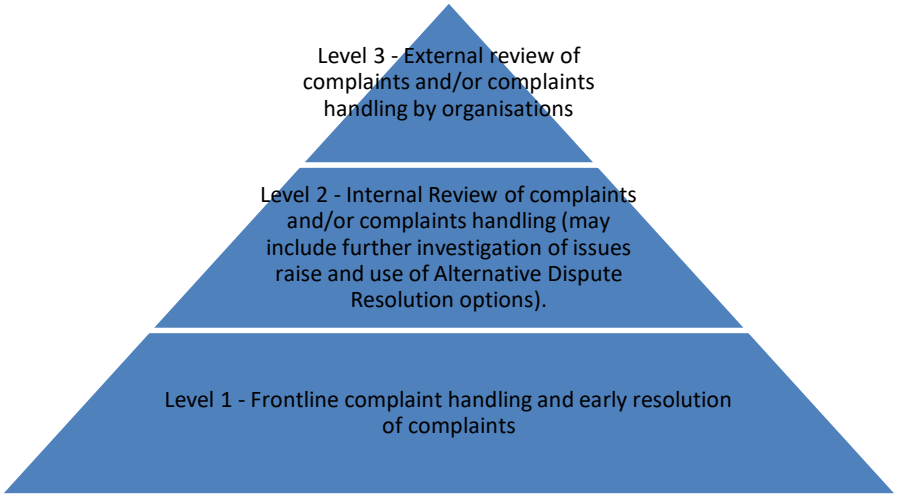
6.4 Manage the parties to a complaint

Hagar Australia's management of complaints is guided by the following principles:

- *Complaints Involving Multiple Parties* – where multiple organisations are involved, work with all parties to ensure clear and coordinated communication. Subject to privacy/ confidentiality considerations, information-sharing and communication between organisations will be facilitated to ensure a timely response.
  Note: Contracted or partnership work requires the partner/ contractor to have an accessible and comprehensive complaints mechanism but Hagar Australia may also receive complaints concerning partners/ contractors.
- *Empowerment of Personnel* – Hagar Australia personnel are empowered to implement the complaint management system, commensurate with roles and responsibilities, with feedback encouraged on system effectiveness and efficiency.
- *Alternative Avenues for Resolution* – complainants will be informed of internal and external review options (including relevant Ombudsman and/ or regulatory authority).
- *Managing Unreasonable Conduct by Complainants* – Hagar Australia aims to be accessible and responsive to all people providing feedback or complaints but success depends on:
  - Hagar Australia's ability to do its work and perform its function in the most effective and efficient way possible;
  - The health, safety and security of Hagar Australia personnel and contractors, and
  - Hagar Australia's ability to allocate resources fairly across all complaints it receives.

When people behave unreasonably in their dealings with Hagar Australia, their conduct can significantly affect the progress and efficiency of the organisation's work. As a result, Hagar Australia will take proactive and decisive action to manage any conduct that negatively and unreasonably affects the organisation and will support Hagar Australia personnel to do the same, in accordance with this Policy.

The three levels of complaint handling



Level 1- Hagar Australia aims to resolve complaints at the first level, the frontline. Wherever possible, personnel will be adequately equipped to respond to complaints, including being given appropriate authority and supervision.

Level 2- Where this is not possible, Hagar Australia may decide to escalate the complaint to the Executive Director (if the complaint has not been received by this person). This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision(s) already made, and/ or
- facilitated resolution, where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties.

Level 3- Where a person making a complaint is dissatisfied with the outcome of Hagar Australia's review of their complaint, they may seek an external review of this decision by, for example, the Australian Charities and Not-for-profits Commission (ACNC).

7. ACCOUNTABILITY & LEARNING

7.1 Analysis and evaluation of complaints

Hagar Australia will ensure that complaints are recorded in its Complaints Register so that information can be easily retrieved for regular reporting and analysis by management and the Board, including:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests the organisation receives for internal and/ or external review of its complaint handling.

This will be used to make improvements. Both reports and their analysis will be provided to the Board for review, at least annually.

7.2 Monitoring of the complaint management system

Hagar Australia will regularly monitor its complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.

7.3 Continuous improvement

Hagar Australia is committed to improving the way it operates, including management of the organisation's complaint management system. To this end, it will:

- support the making and appropriate resolution of complaints
- work towards best practice in complaint handling
- recognise exemplary complaint handling by personnel
- regularly review the complaint management system and complaint data, and
- implement appropriate system changes arising out of this review.

8. ORGANISATIONAL IMPLEMENTATION

8.1 Internal Operations

Hagar Australia's internal controls are to:

- Provide Hagar Australia's Feedback and Complaints Handling Policy to all Hagar Australia personnel and contractors, and take steps to ensure they understand the Policy.
- Make Hagar Australia's Feedback and Complaints Handling Policy available on the 'Reporting' page of the organisation's website.
- Include 'Complaints Register Review' as a standing Board bi-monthly meeting agenda item to monitor complaints.

8.2 Hagar Australia Funded Partners and Programs

All Hagar Australia funded partners are expected to act in accordance with the principles outlined in this policy. Non-compliance may lead to suspension or termination of funding arrangements.

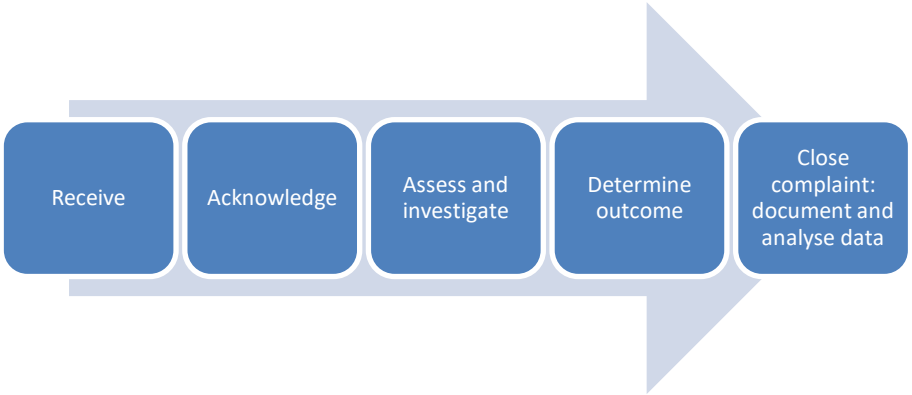
Hagar Australia's programmatic controls are to:

- Forge partnerships that promote accountability and transparency, supported by partnership agreements that reflect the principles and requirements in this policy, and are discussed with partners.
- Ensure that Hagar Australia-funded partners develop and implement their own Hagar Australia-compliant feedback and complaints handling policy with clear reporting and investigation procedures, or formally adopt Hagar Australia's Feedback and Complaints Handling Policy. The reporting procedure should be displayed in local languages in each office and discussed with clients and communities, within 6 months of signing a partnership agreement with Hagar Australia.

- Support partners in their compliance with complaints handling requirements, including regularly assessing capacity, explaining partnership and personnel obligations, as well as regular monitoring and review by Hagar Australia.

9. PROCESS FOR HANDLING FEEDBACK AND COMPLAINTS

This diagram provides an overview of the system:



In line with the above diagram, Annex 2 provides the process that Hagar Australia follows for all information received through its various reporting channels, including phone, email, Hagar Australia's website, mail and in person.

10. DEFINITIONS

Term	Definition
Hagar Australia personnel	Hagar Australia's Board of Directors, employees (full time, part-time and casual) and volunteers.
Hagar Australia-funded partners	This includes Hagar International, its Program Offices and other entities engaged to perform any part of a Hagar Australia-funded activity. These entities have agreed roles and responsibilities monitored by Hagar.
Complainant	A person, organisation or its representative making a complaint.
Complaint	An expression of dissatisfaction made to or about Hagar Australia, its work, personnel or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required (AS/NZ 10002:2014). As well as complaints being made directly to Hagar Australia, remember that some complaints (or at least negative comments) may be made on social media.
Complaint handling/ management system	All policies, procedures, practices, personnel, hardware and software used by Hagar Australia in the management of complaints.
Dispute	An unresolved complaint escalated either within or outside of Hagar Australia.
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Hagar Australia, its work, personnel or complaint handling system where a response is not explicitly or implicitly expected or legally required.
Grievance	A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

11. RELEVANT LEGISLATION

Hagar Australia personnel, contractors and Hagar Australia-funded partners must adhere to local and international laws. These include Australian Commonwealth, state and territory laws, and international conventions and local laws in the countries where Hagar Australia works.

12. RELATED POLICIES AND PROCEDURES

- Child Safeguarding Policy
- Prevention of Sexual Exploitation, Abuse & Harassment Policy
- Prevention of Fraud & Corruption Policy
- Prevention of Terrorism Financing Policy
- Conflict of Interest Policy
- Privacy Policy
- Bullying, Harassment & Discrimination Policy
- Whistleblowing Policy
- Workplace Management Guide
- Incident Reporting Procedure

13. POLICY REVIEW

This policy will be reviewed at least every three years, or as required, incorporating lessons learned.

Contact:

For questions about this policy, contact Hagar Australia's Executive Director on +61 3 9416 1960.