

COMPLAINTS HANDLING POLICY

Policy number	IGOV-1	Version	003
Policy accountability	CEO	First approved	April 2019
Last approved	28 th September 2023	Next revision	September 2024

INTRODUCTION

The Global EverGreening Alliance (the Alliance) is committed to mitigating the risk of damage to the reputation of the Alliance and the broader sector within which the Alliance operates. We recognize that any alleged or real misdeeds of the Alliance may lead to detrimental outcomes in the organization and sector. Accordingly, the Alliance will adhere to the following protocols for investigating and responding to complaints, and commits to maintaining a fair, accessible and transparent complaints system both in Australia and overseas, and to providing staff and volunteers with this policy and training them in its implementation. A register of all complaints against the Alliance or its implementing partners is maintained and all complaints are reported to the relevant Board Committee and to the Board.

PURPOSE

The purpose of this Policy is to:

- a) provide a structure for and means of responding to complaints made against the Alliance (Board members, employees, contractors), its implementing partners or activities;
- b) communicate and share responsibility with all Alliance implementing partners and personnel in responding to complaints; and
- c) ensure that sufficiently robust protocols and systems for compliance are in place to ensure consistency and appropriate rigour in the handling of complaints (see the GEA Complaints Handling Procedures).

DEFINITIONS

Complaint means a formal expression of dissatisfaction or discontent about someone or something related to their behaviour or its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

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

Inquiry means a request for information or an explanation.

Feedback means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process.

Serious incidents include all misconduct allegations involving vulnerable people, as well as other critical aspects. To help determine whether an incident is 'serious', the Alliance will consider risk; risk to the complainant, risk to others, risk to the agency, and risk to the wider sector. At a minimum,

serious incidents include any allegations in relation to the sexual exploitation, abuse or harassment of vulnerable persons, including children; fraud and financial wrongdoing.

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

SCOPE

This policy applies to the Board, staff/volunteers and other representatives of the Alliance. This policy will be extended to implementing partners by Programme Implementation Agreements, MoUs and other mutually agreed documents.

POLICY

The Alliance will only consider complaints relating to breaches of Alliance Policies, the ACFID Code of Conduct and/or other relevant laws or regulations; and only where the Alliance's complaints handling process is appropriate to the nature of the complaint. The channels for submitting complaints are described in the Alliances' Complaints Handling Procedures. Where a complaint applies to another organisation, it will be referred to that organisation.

In addition:

- a) Anonymous complaints will not be accepted by the Alliance;
- b) Complaints will be handled with the highest level of confidentiality possible without affecting the investigation;
- c) In general, the Alliance will accept complaints made in writing or orally, and where the complainant is willing for his/her organisation (if any) to be made aware of the details of the complaint. The identity and other information relating to the complainant may be kept confidential in exceptional circumstances where the complainant identifies themselves as being at risk if their identity is revealed;
- d) The Alliance will respond to a complaint through the internal complaints handling process of the relevant organization (if any);
- e) Where there are more appropriate avenues for dealing with a complaint, (e.g. complaints relating to alleged breaches of Australian law, such as: employment of staff, third party providers, taxation, charities legislation, etc.) the complaint may require external evaluation by the relevant authority in addition to the Alliance's investigation;
- f) Where the Alliance chooses not to investigate a matter, the complainant or guardians or advocates (where the complainants are children or young people) will be promptly notified and, where appropriate, provided with advice as to what alternative avenues for dealing with the complaint may be open to the complainant;
- g) The Alliance may initiate its own inquiry into matters related to a complaint;
- h) The Alliance may continue to investigate a complaint against an individual or organisation during the handling process; and
- i) The Alliance will prioritise and escalate, as per our Complaint Handling Procedure, any complaint that involves a serious incident.

RELATED POLICIES AND PROCEDURES

GEA Complaints Handling Procedures
GEA Staff Grievance and Dispute Resolution Policy and Procedures
GEA Human Rights Policy and Procedures
GEA Child Safeguarding and Protection Procedures
GEA Whistleblower Policy
GEA Privacy Policy and Procedures

REVISION HISTORY

Revision Date	Revision no:	Summary description of revision(s) made	Section(s) changed:
April 2019	1	Creation of Policy	All
6 February 2020	2	Refinement of reporting channels and scope	Introduction and Policy
September 2023	3	Minor changes to clarify intent and extend scope to implementing partners Inclusion of reference to maintaining a register of complaints	Version control box information Introduction, Purpose, Scope, Policy

AUTHORISATION



Christopher Armitage

Board Secretary

28th September 2023

Global EverGreening Alliance Ltd

COMPLAINTS HANDLING PROCEDURE

Policy number	Version	002
Responsible person	Approved by CEO	2 March 2021

1. WHERE AND HOW COMPLAINTS MAY BE MADE

The Alliance is able to receive complaints in writing by post, email or online via our website. Where complaints are made orally, we will ensure our write up of the complaint contains all the information the complainant wishes to provide. Complaints may be made by a friend or advocate of the complainant on their behalf. Anonymous complaints will not be accepted by the Alliance.

Lodging a Complaint in Australia

Complaints should be lodged as soon as possible after the complainant becomes aware of the concern. Complaints made more than 24 months after the event will not be considered unless they are of a serious nature.

Complaints should be directed to the Chief Executive Officer, or to the Board Chair (contact details below) where the CEO is the subject of the complaint. Complaints may also be lodged via Contact Us at the Alliance website at: <https://www.evergreening.org/contact/>

Chief Executive Officer

Ph: 04 9037 1417

Email: contact@evergreening.org

Postal Address: 1 Vision Drive, Burwood East, Victoria, Australia 3151

Board Chair

Email: contact@evergreening.org

Lodging a Complaint Overseas

The Alliance acknowledges that all beneficiaries and stakeholders have the right to make complaints but that the Alliance does not have the capacity to communicate with everyone. As such, implementing partners are required to implement a complaint handling mechanism in compliance with this Policy and ACFID and donor's standards. These mechanisms must be suitable to the cultural context, advertised to all stakeholders in appropriate ways and made accessible (including being able to make complaints orally or confidentially) to all people, including children.

Complaints received by implementing partners which concern the Alliance funded staff or projects must be forwarded to the Alliance secretariat to be addressed in agreement with the relevant partner CEO. Minor complaints or complaints about partner programs which do not concern the Alliance may be handled solely by the partner, but in all cases should be reported to the Alliance.

2. HOW COMPLAINTS ARE HANDLED AND JURISDICTION

For all complaints made the Alliance will:

- Seek from the client the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
 - if the complaint is out of our jurisdiction;
 - if we 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.
- The Alliance will not create false expectation, but assure the client that the complaint will receive full attention;
- The Alliance will give an estimated timeframe or, if not possible, a date by which we will contact them again;
- The Alliance will check whether the individual is satisfied with the proposed action and, if not, advise them of alternatives.
- The Alliance will ensure that the complaint is appropriately acknowledged, follow up where necessary and monitor whether the individual is satisfied.
- The Alliance will register all complaints.

3. COMPLAINT INVESTIGATION

The Alliance will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

- a) severity
- b) health and safety implications
- c) financial implications for the complainant or others
- d) complexity
- e) impact on the individual, public and organisation
- f) potential to escalate
- g) systematic implications; and
- h) the needs for, and possibility of immediate action.

The Alliance will assess the complaint as significant in terms of one or more of these criteria and classify the complaint accordingly.

The Alliance shall determine whether or not a complaint should be investigated. If based on a misunderstanding or insufficient information it may be that provision of information immediately satisfies the complainant and thus the complainant becomes an inquirer and the complaint can be recorded as an inquiry. Careful consideration and negotiation will be taken and if necessary to take the matter further and refer the complaint externally, the Alliance shall do so as by the ACFID's Code Committee.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable, we will refer it to a more senior colleague for review. If such a dispute is unresolvable, we will refer the complainant to Code Committee of the Australian Council for International Development (ACFID).

If a complaint made is outside the jurisdiction of the Alliance as it relates to the actions of another organisation or an individual who is unconnected with the Alliance it may be dealt with by the police or another authority of the relevant state and thus the obligation of the Alliance is to notify the police or relevant authority. Such notable matters include those that appear to involve criminal offences eg. assault, sexual or otherwise, theft and severe damage to property. Civil matters such as defamation may also be outside the Alliance's jurisdiction.

The Alliance will make every reasonable effort to investigate all the relevant circumstances and informational surrounding a submitted complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

4. RESPONDING AND OUTCOMES OF COMPLAINTS

The Alliance will acknowledge written complaints within 5 days. Oral complaints will be acknowledged immediately. We will aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days, we will inform the complainant of progress and keep them informed of progress every two weeks.

Our CEO will normally make the decision on a complaint that has required investigation (that is not a minor complaint). Decisions on serious complaints may be referred to our governing board. The Alliance will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that a complainant is not satisfied we will be prepared to consider any additional information they may provide and to review our decision. In all cases we will advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for the referral to the Code Committee and offer to assist in referral.

5. CONFIDENTIALITY, RECORDING AND REPORTING

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainants permission.

Complaint Data

The Alliance will register all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data;
- the requested remedy;
- the service (s) and/or good(s) and/or practice or procedure complained about;
- the due date for a response;

6. CONTINUOUS IMPROVEMENT IN COMPLAINT HANDLING

We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes. We will take all required action and be prepared to change the way in which we operate and improve or undertake further training of staff. Where needed we will counsel or discipline staff or volunteers.

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

Continuous Improvement

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

The Alliance shall –

- maintain data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and service provided;
- keep abreast of best practises regarding complaint handling;
- foster a consumer/client focused approach
- undertake specific training and retraining of staff to foster better complaint handling practises;
- encourage innovation in complaint handling development; and
- recognise and reward exemplary complaint handling behaviour.

The Alliance will conduct an internal review of the effectiveness of our complaint handling every year. We will commission an independent review of the effectiveness of our complaint handling after 3 years and then every 5 years.

7. AUTHORISATION

A handwritten signature in black ink, consisting of a stylized, cursive 'S' followed by a horizontal line extending to the right.

Signature of Board Secretary

6 February 2020

Global EverGreening Alliance Ltd