

World Vision Australia

Complaints Policy with related Procedures and Tools

Preliminary information:

Type of Policy: Organisation	Core Value supported: We are Responsive
Leadership Owner: Chief Retail & Supporter Experience	Issue Date: 1 July 2016
Frequency of review: Every 2 years Last review date: 17 February 2021 Next review deadline: 17 February 2023	

Purpose of the Policy:

The purpose of this policy is to set out the guiding principles and parameters which support the complaints process within World Vision Australia (“**WVA**”). This policy is applicable to all staff, consultants, contractors and volunteers who work for WVA.

Within WVA, the objectives of the Complaints Policy is to ensure that the commensurate processes reflect the importance and value of listening and responding to concerns and complaints received.

WVA’s core values act as our guiding principles in this regard, namely:

- (a) **We are Responsive:** We will respond to complaints according to our predetermined timeframes.
- (b) **We are Christian:** We will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.
- (c) **We are Stewards:** Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives.
- (d) **We Value People:** The interests of our supporters are foremost in our approach to complaint handling. We will address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process. We will observe strict confidentiality in complaint handling. We will ensure that our complaint handling process is as accessible as we can practically make it to all complainants. We will clearly publicise information and how and where to complain. Access to the complaint handling process is free of charge to complainants.

Who the Policy applies to:

		Applicable?	Extent of application:
Our Board members (any person who is a member of our Board of Directors)		Yes	
Our employees:	Permanent	Yes	
	Casual	Yes	
	Fixed term contract employees	Yes	
	Secondees	Yes	
Volunteers		Yes	
Agency staff (e.g. temporary staff assigned by an agency to WVA)		Yes	
Consultants*, whether individuals or organisations (e.g. evaluators)		Yes	
Service or goods providers (that is, suppliers of goods or services to us), whether individuals or organisations* (e.g. print and mail house service providers, professional advisors)		No	
Our partner organisations* (e.g. other NGOs)		Yes	
Our supporters		No	
Other:		-	

*Also includes the people who work for them including any of their board member, employee, consultant, etc.

Authority and Responsibility for the Policy and the related Standards, Procedures & Guidelines:

The Executive Leader listed as the **Leadership Owner** of the Policy has:

- the overall responsibility for the Policy and exercises their responsibilities and authorities including those set out in the table below; and
- the particular responsibility of ensuring that the Policy is reviewed according to the frequency and by the deadline applicable.

The following table sets out for the actions listed, those:

- with the responsibility to *recommend* the action (including to report about an incident in the case of incidents);
- who are to be *consulted* about the action;
- those who have the authority to *decide* (including approve) the action; and
- those with the responsibility and authority to *perform* (which means taking all actions necessary) for the action overall.

	Implementing the Policy and the related standards, procedures and guidelines:	Amending the Policy:	Amending the related standards, procedures and guidelines:	Responding to and dealing with incidents (including non-compliance):
Recommend	Not applicable	Any person	Any person	Any person
Consult	Relevant staff member	Channel Heads Head of Risk General Counsel	Channel Heads	Chief Retail & SX Channel Head Department Chief
Decide*	Chief Retail & SX	Chief Retail & SX	Chief Retail & SX	Channel Head
Perform	Any staff member	Chief Retail & SX	Chief Retail & SX	Operational Manager and/or Channel Head

* Where the Policy is a Board policy, any amendments to the Policy must be considered and approved by the Board. Please liaise with the Company Secretary in relation to the process to be taken for this.

The Policy:

1. 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.

Feedback: means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process where a response is not expected.

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

2. Responsibilities

2.1 It is the responsibility of the Chief of Retail & Supporter Experience to implement this policy and to ensure that this policy is regularly reviewed and updated for approval.

2.2 All personnel who receive a complaint and are involved in the complaints handling process must comply with this policy and associated procedures.

3. Educating our organisation on our complaint policy and training relevant personnel

3.1 Our Complaints Policy has been distributed to all our paid staff, our volunteers, our partners, our contracted service providers and all others acting on our behalf. We require all those who may be involved in any way with a complaint to formally signify their commitment to this policy. To familiarise them with this policy we run induction programs for our governing board members and all relevant personnel. Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. We take special care to train our field personnel to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

4. Publicising Our Policy

4.1 We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website has "Contact Us" and policy links at the bottom of each page, linking to our policies and information on how to make a complaint. We invite expressions of concern and complaints via all online and Contact Centre channels. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint. We will take special care to facilitate complaints from vulnerable populations including children and marginalised groups.

4.2 We ensure that making a complaint to us is as easy as possible. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can.

4.3 All relevant communications explain this and explain our procedures for handling complaints including:

- (a) where or to whom complaints can be made
- (b) information to be provided by the complainant
- (c) the process for handling complaints

- (d) time periods associated with various stages in the process
 - (e) the complainant's options for remedy, including external means
 - (f) how the complainant can obtain feedback on the status of the complaint
- 4.4 In addition to the general reviews of our complaint handling specified in section 15 we will monitor how effectively we are publicising our complaints policy on a continuing basis and make necessary improvements in its communication.
- 4.5 Our partners, both domestically and internationally, are required to understand and promote and implement our Complaints Policy.

5. Where and How Complaints may be made

- 5.1 We are able to receive complaints via many channels and from various locations, including:
- (a) *Complaints from WVA's international and domestic field programs:* Complaints may be initially directed to the WV National Office and/or to the local or World Vision International website, which includes the [Ethics Point website and the World Vision International Integrity & Protection Hotline](#), a confidential, password enabled system for complaints and follow-up that is escalated globally to the appropriate office, including World Vision Australia.
 - (b) *Complaints lodged directly with World Vision Australia:* This may be via live online chat, telephone, email, mail, our website or social media channels, all of which are handled by the World Vision Australia Contact Centre.
 - (c) *Complaints received at public events and retail sites:* Staff are trained to respond to verbal complaints immediately or to escalate the individual's complaint to the World Vision Australia Contact Centre.
- 5.2 Where complaints are made verbally, we will ensure our write up of the complaint contains all the information the complainant wishes to provide.
- 5.3 Complaints may be made by a friend or advocate of the complainant on their behalf.
- 5.4 Where appropriate, for some projects/programs, we may establish complaint committees involving representatives from partner organisations and members of communities we are serving.
- 5.5 We recognise that in some circumstances, complainants may wish to remain anonymous. Because such complaints can alert us to problems that need fixing, we will accept them though clearly it may not be possible to provide a remedy to an individual.
- 5.6 Advise a complainant of the ability to make a complaint directly to the Australian Council for International Development (ACFID) Code of Conduct Committee regarding an alleged breach of the ACFID Code of Conduct.

6. How complaints are handled

6.1 When we take a verbal complaint, we will:

- (a) Identify ourselves, listen, record details, and determine what the complainant wants;
- (b) Confirm that we have understood and received the details;
- (c) Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive;

6.2 For all complaints we will:

- (a) Seek from the complainant the outcome(s) they are expecting;
- (b) Make an initial assessment of the severity of the complaint and the urgency of action;
- (c) Clearly explain to the complainant 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.
- (d) We will not create false expectations, but assure the complainant that the complaint will receive full attention;
- (e) Give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
- (f) Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives;
- (g) Ensure that the complaint is appropriately acknowledged;
- (h) Follow up where necessary, and monitor whether the complainant is satisfied;
- (i) Register all complaints (see section 13)

6.3 Where appropriate, we will ensure that personnel working in communities we serve have all necessary training to encourage and handle enquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

6.4 Complaints or expressions of concern received that relate to potential instances of sexual misconduct, abuse, exploitation of children or adult beneficiaries will be escalated to the WVA Safeguarding Focal Point to determine if the allegation requires further investigation and reporting. All child and adult safeguarding incident investigations will be undertaken by the WVA Safeguarding Focal Point in line with the Complaint Management Process outlined in our [Child & Adult Safeguarding Policy](#) of which the Chief of People and Culture is the responsible executive.

6.5 In line with the Child & Adult Safeguarding Policy, WVA is committed to providing appropriate assistance and referrals to survivors (e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services.)

6.6 We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

- 6.7 If a complaint is made about conduct by WVA that is illegal, dishonest, fraudulent or corrupt, it must be reported. If the complainant is eligible for protection under whistleblower laws and would like to utilise this mechanism in relation to making a report, they will be directed to the [Protected Disclosure Reporting page](#) on the WVA website. This page also provides a link to our [Protected Disclosure Policy](#) which identifies the people eligible for protection under whistleblower laws.
- 6.8 Initial assessment of complaint
- (a) We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.
 - (b) We will assess if the complaint needs to be referred to follow the Child & Adult Safeguarding Policy or Protected Disclosure Policy process.
 - (c) To determine how a complaint should be managed, we will assess it in terms of the following criteria:
 - severity;
 - health (including mental health) and safety implications;
 - financial implications for the complainant or others
 - complexity;
 - impact on the individual, public and organisation;
 - potential to escalate;
 - systemic implications; and
 - the need for, and possibility of immediate action.
 - (d) Once a complaint has been assessed, it will be triaged to the appropriate team or staff member for management. Where a complaint is deemed significant in nature, it will be escalated appropriately.

7. Enquiries, minor complaints and jurisdiction

- 7.1 We will endeavour to deal immediately with enquiries and minor complaints which are made verbally by telephone or in person, that is, during the initial phone call or meeting. However, as far as possible, we will ensure that the enquirer or complainant is completely satisfied with the information and or resolution provided.
- 7.2 On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required depending on jurisdictional questions and whether the complaint is ill conceived.
- 7.3 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 or escalate to the relevant business area Head and/or Head of Risk if required.

8. How we will investigate complaints

- 8.1 We will make every reasonable effort to investigate all relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

9. Timeframes

- 9.1 We will acknowledge written complaints within three business days of receipt.
- 9.2 We will acknowledge verbal complaints immediately.

- 9.3 We will aim to resolve complaints as quickly as possible and within 30 business days unless there are exceptional circumstances. If a complaint is not resolved within 30 business days, we will inform the complainant and keep them informed of its progress regularly.

10. How we will respond to and close a complaint

- 10.1 Serious complaints that have required investigation will be escalated to the relevant business area Head, or a senior member of staff delegated by the relevant business area Head, to decide. Decisions on serious complaints may also be escalated to the Department Chief for review, if required.
- 10.2 We will communicate our decision on a complaint as soon as is practicable. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision verbally in the appropriate language.
- 10.3 We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied, we will be prepared to consider any additional information they may provide and to review our decision.
- 10.4 In cases where complaints are unable to be addressed; we will advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for referral to the Code Committee and offer to assist in the referral.

11. How we will learn from complaints

- 11.1 We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.
- 11.2 We will take all required remedial action. We will 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.
- 11.3 Where appropriate we will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

12. Confidentiality

- 12.1 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 complainant's permission.

13. Complaint data

- 13.1 We will register all complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of verbal complaints, record this information ourselves:
- (a) date of receipt;
 - (b) a description of the complaint and relevant supporting data;
 - (c) the requested remedy;
 - (d) the service(s) and/or good(s) and/or practice or procedure complained about;
 - (e) the due date for a response;
 - (f) immediate action taken (if any) to resolve the complaint.

14. Reporting about complaints

- 14.1 We will immediately escalate complex and/or major complaints (see 6) to the relevant next level Manager, the relevant business area Head, or a senior member of staff delegated by the relevant business area Head.
- 14.2 Complaints and Feedback will be reported regularly at Lead team meetings and if required at Executive meetings.
- 14.3 Minor complaints will be reported in summary form. Major complaints will be reported in detail by the relevant business area Head.
- 14.4 An analysis will be included in the complaints report provided with the complaints data.

15. Continuous improvement

- 15.1 On a continuing basis we will monitor the effectiveness of our complaint handling and make improvements as appropriate.
- 15.2 We will:
 - (a) maintain data collection on complaints for the purpose of identifying trends and for the purpose of enhancing information management and service provided;
 - (b) keep abreast of best practices (both locally and overseas) regarding complaint handling;
 - (c) foster a supporter-focused approach;
 - (d) undertake specific training and retraining of staff to foster better complaint handling practices;
 - (e) encourage innovation in complaint handling development; and
 - (f) recognise and reward exemplary complaint handling behaviour.
- 15.3 We will conduct an internal review of the effectiveness of our complaint handling every year.

16. Exceptions to this policy

Exceptions to this Policy can only be approved by the Chief of Retail & Supporter Experience.

17. Consequences for breaches of this policy and associated procedures

Breaches of this policy and associated policies and procedures may result in:

- (a) Disciplinary action including termination of employment.

Tools related to the Policy:

- [ACFID Flow Chart](#)

Related Policies:

- Engagement Policy
- Social Media Policy
- [Code of Conduct Policy](#)
- [Protected Disclosure Policy](#)
- [Child and Adult Safeguarding Policy](#)

Policy Revision History

Revision Date:	Revision no:	Summary description of revision(s) made:	Section(s) changed:	Approved by:
1 July 2016	00	Establish Policy	N/A	Chief SO
17 July 2020	01	Updated role titles as per org chart added 5.6 clause		Chief Retail SX
17 February 2021	02	Updated with mandatory ACFID requirements and in line with business processes; new logo	Most sections	Chief Retail SX