

TITLE: World Vision Australia Complaints Policy			
APPROVED BY:	WVA Management		
POLICY OWNER:	Chief - Community, Retail &	POLICY DELEGATE:	Head - Supporter Experience & Retail
	Supporter Experience		Operations
VERSION #:	5	EFFECTIVE DATE:	July 2016
LAST REVIEW DATE:	October 2024	NEXT REVIEW DATE:	October 2027
PUBLICATION STATUS:	Internal and external use		
ASSOCIATED WVI POLICY:	N/A		

PURPOSE

World Vision Australia's (**WVA**) Complaints Policy (**Policy**) provides the guiding principles and parameters for lodging or reporting a Complaint and the manner in which WVA receives and manages Complaints that fall within the scope of this Policy. The objective of this Policy is to ensure that the commensurate processes reflect the importance and value of listening and responding to concerns and Complaints received from our supporters, beneficiaries, partners, and the general public.

WHO?

This policy applies to all WVA staff, Board members, volunteers, contractors, and agency staff; including individuals working for third-party organisations who represent WVA in interactions with our Supporters, beneficiaries or the general public on our behalf. Suppliers of goods and services to WVA are also covered by this Policy to the extent of the requirements set out in the *Suppliers Code of Conduct*.

WHAT YOU NEED TO KNOW	WHAT YOU NEED TO DO
 It is the responsibility of <u>all</u> WVA staff and representatives to manage, escalate and/or redirect to the relevant personnel Complaints received from our supporters, beneficiaries, partners, and the general public. All Complaints will be managed in a fair and equitable 	 WVA staff and representatives can find business procedures outlining the steps required for the handling and management of Complaints <u>here</u>. Supporters or members of the public who wish to submit a Complaint to WVA can do so <u>here</u> or via any of the
manner by appropriately trained WVA staff.	alternate contact methods outlined here.
 Complaints reporting is extremely valuable to WVA and allows for continuous improvement of our programs, policies and procedures. 	
 For supporters and members of the public, further information about how to make a Complaint and WVA's Complaints handling procedures can be found on our website. 	

POLICY STATEMENTS

1. Educating our organisation on our Complaints Policy and training relevant personnel

1.1 To ensure that relevant WVA staff and authorised WVA representatives are equipped to understand and implement this Policy, we provide induction training on Complaints management and expected standards of conduct including refresher training as needed.

2. Publicising Our Policy

- 2.1 Our Complaints Policy is readily available on our <u>website</u> via policy links at the bottom of each web page. There is also a dedicated Complaints Policy <u>web page</u> outlining how to make a Complaint, this includes a link to a <u>web</u> form that can be used to submit a Complaint and information on our Complaint handling process and timelines.
- 2.2 We ensure that making a Complaint to us is as easy as possible, taking into consideration the needs of the most vulnerable, minorities and the disadvantaged, including literacy, language, culture, age, and gender. We do this by offering a number of ways to lodge a Complaint.

3. How Complaints may be made

- 3.1 We are able to receive Complaints via various channels, including:
 - (a) Complaints lodged directly with World Vision Australia: Complaints can be made to WVA via our



online complaints form, phone, email, in person at our head office in Burwood East or by post.

- (b) **Complaints received at public events, retail sites and/or via social media**: Staff, volunteers and authorised WVA representatives will refer the Complainant to our online Complaints form and WVA's Supporter Experience Centre phone line.
- (c) 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.
- 3.2 We recognise that in some circumstances, Complainants may wish to remain anonymous. Because such Complaints can alert us to problems that may require addressing, we will accept them though it may not be possible to provide a remedy to the Complainant.
- **3.3** As signatories to the Australian Council for International Development (ACFID) Code of Conduct, complaints relating to an alleged breach of the ACFID Code of Conduct by WVA may be made directly to the <u>ACFID Code of Conduct Committee</u>.
- 3.4 As members of the Fundraising Institute of Australia (FIA), complaints relating to an alleged breach of the FIA Code may be made directly and anonymously to the FIA at: <u>Make a complaint (fia.org.au)</u>.

4. How Complaints are managed

- 4.1 We will handle all Complaints in a professional and impartial manner, ensuring not to take sides, assign blame, or become defensive. We will acknowledge the Complainant appropriately, record the details of the Complaint, and determine the resolution the Complainant is seeking. We will assess the severity of the Complaint and the urgency of the required action, and clearly explain to the Complainant the course of action that will follow. We will ensure that a Complainant is not required to express their Complaint to a person implicated in the Complaint. Additionally, we will ensure that a person implicated in a Complaint is not involved in any way with the handling of that Complaint.
- 4.2 All Complaints received will undergo a review process that aims to identify Complaints that may have potential regulatory or legal implications as defined in WVA's Regulatory Complaint Identification and Escalation Framework (**Framework**). The Framework also outlines the escalation requirements for regulatory Complaints and the applicable performance management outcomes.
- 4.3 If a Complaint is made about conduct by WVA that is illegal, dishonest, fraudulent or corrupt, the Complainant may be 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 <u>Protected Disclosure Reporting page</u> on the WVA website. This page also provides a link to our <u>Protected Disclosure Policy</u> which identifies the people eligible for protection under whistleblower laws.
- 4.4 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 investigations into child and adult safeguarding incidents will be conducted by the WVA Safeguarding Focal Point in line with the Complaint Management Process outlined in our <u>Child & Adult Safeguarding Policy</u>. The Chief of People and Culture is the responsible Executive for this Policy.
- **4.5** 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).
- 4.6 We are committed to providing Complaints handling processes that are child friendly.
- 4.7 We reserve the right to withhold a response to complaints received containing hateful rhetoric, expletives or explicit language, offensive racial or religious comments that contravene racial or religious discrimination laws, hateful vilification in relation to sexual orientation, transgender status or HIV/AIDs status, and complaints containing bigoted or offensive statements in relation to race, gender or disability. Complaints containing content of this nature may be disregarded in their entirety at WVA's discretion.



5. How we will investigate Complaints

- 5.1 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.
- 5.2 If the Complainant disputes an assessment that a Complaint should not be investigated, the member of staff managing the Complaint will refer it to a more senior colleague for review or escalate to the relevant business area Head if required

6. How we will respond to and close a Complaint

- 6.1 We will communicate our decision on a Complaint as soon as is practicable via email, post or phone. Best endeavours will be taken to ensure that the Complainant is completely satisfied with the information and/or resolution provided.
- 6.2 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.
- 6.3 In cases where Complaints are unable to be addressed, or Complainants are dissatisfied with the resolution provided, we will advise that the Complaint may be referred to the Code of Conduct Committee of ACFID (Committee) and offer to assist in the referral. We will also provide the Committee with all relevant information, upon request.

7. Timeframes

- 7.1 We will immediately acknowledge verbal Complaints and Complaints received via online chat.
- 7.2 We will endeavour to acknowledge written Complaints within five business days of receipt.
- 7.3 We will aim to resolve all Complaints as quickly as possible and within 30 business days unless there are exceptional circumstances.

8. Confidentiality

8.1 We will not reveal a Complainant's name or contact details to anyone in or outside our organisation, other than those involved in the handling and/or investigation of the Complaint.

9. Reporting about Complaints

- **9.1** We will register all Complaints, ensuring to document the date of receipt, a description of the Complaint and relevant supporting data, actions taken to resolve the Complaint and date of resolution.
- **9.2** Complaints and Feedback will be reported regularly via relevant internal channels and at Lead and Executive team meetings where required. An analysis will be included in the Complaints report provided with the Complaints data.
- **9.3** An overview of confirmed regulatory Complaints will be provided to WVA's Risk team and Audit & Risk Committee (**ARC**) on a quarterly basis.

10. How we will learn from Complaints

- 10.1 We will utilise Complaints reporting for the purpose of identifying trends and enhancing processes, information management and services provided.
- 10.2 When a Complaint relates to the conduct of WVA staff member or representative, we will ensure relevant training is provided and/or disciplinary action is taken where required.
- 10.3 We will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities where appropriate.

11. Exceptions to this Policy

11.1 Exceptions to this Policy can only be approved by the Chief of Community, Retail & Supporter Experience who is responsible for this Policy.



ROLES & RESPONSIBILITIES

Role	Responsibility
Chief – Community, Retail & Supporter Experience	It is the responsibility of the Chief of Community, Retail & Supporter Experience to implement this Policy and to ensure that this Policy is reviewed according to the frequency and by the applicable deadline.
All WVA staff, volunteers, Board members and/or authorised WVA representatives	All WVA staff and representatives who receive a Complaint and/or are involved in the Complaints handling process must comply with this Policy and associated procedures.

POLICY BREACHES

WVA is committed to acting quickly and appropriately to address any breaches of this policy. Employees in breach of this policy may be subject to WVA's disciplinary process and procedures.

Breaches of this policy can be reported via:

- an immediate Manager or any other Manager/Chief within WVA;
- WVA's Protected Disclosure (Whistle blower) procedure, including via the nominated independent, confidential external service (refer to WVA Hub for this policy);
- reporting to Head of Risk; and
- Board members may raise matters with the Board Chair or Company Secretary.

POLICY DEFINITIONS

ITEM	DEFINITION
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	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.

POLICY REVISION HISTORY

REVISION DATE	SUMMARY DESCRIPTION OF REVISION	SECTION(S) CHANGED
Oct 2024	Scheduled Review	New Policy template. Most sections.
July 2021	Scheduled Review	Various
Feb 2021	Updated with mandatory ACFID requirements and in line with business processes; new logo	Most sections
July 2020	Updated role titles as per org chart. Added clause 5.6.	Preliminary Information. Table 2. Section 5
July 2016	Establish Policy	N/A

SUPPORTING INFORMATION TO THIS POLICY

There are several external references and resources that can be used or referenced in conjunction with the information contained in this Policy. These documents include (but are not limited to):

STANDARD/ INDUSTRY REFERENCE	SUMMARY OF WHAT THESE COVER
Australian Council for International Development (ACFID) Code of Conduct	ACFID Code of Conduct is a voluntary, self-regulatory industry code of good practice. The aim of the Code is to improve the outcomes of international development and increase stakeholder trut by opposing the transportance of accountability of signatory organisations. It includes
	trust by enhancing the transparency and accountability of signatory organisations. It includes

	World Vision
	specific requirements related to the safeguarding of children and the management of feedback and complaints that are addressed in this policy.
Australian Council for International Development (ACFID) Complaints Handling Procedure	ACFID Complaints Handling Procedure - ACFID members agree to be bound by the independent, accessible, fair, and confidential Code complaints handling process.
Department of Foreign Affairs and Trade (DFAT) Accreditation Manual	DFAT Accreditation Manual provides information and guidelines to support the accreditation of NGOs who seek funding from the Australian Government through DFAT. It includes specific complaints handling requirements that are addressed in the policy.
Australian Charities and Not-for-profits Commission (ACNC) External Conduct Standards	External Conduct Standard 4: Protection of vulnerable individuals Have a procedure for confidential complaints that is accessible for all vulnerable persons, staff, volunteers and third parties. Deal with complaints appropriately, sensitively and promptly.

OTHER SUPPORTING DOCUMENT	SUMMARY OF WHAT THESE COVER
Social Media Policy	This policy ensures WVA staff, volunteers, Board members and authorised WVA representatives are equipped to understand and implement measures that relate to social media use and protect the World Vision Australia brand reputation, the children and communities with whom we work, and our Australian supporters, as well as increase appropriate employee advocacy.
Code of Conduct Policy	WVA's Code of Conduct provides guidance and a framework regarding the standard of behaviour expected in WVA workplaces. This policy states WVA's commitment to conduct that is ethical, legal, and consistent with the organisation's values and mission.
Protected Disclosure (Whistleblower) Policy	The purpose of this Policy is to create an environment and culture where individuals feel free and safe to speak up when there are reasonable grounds to suspect that WVA, its directors or employees are not acting ethically or in accordance with laws and obligations.
Child and Adult Safeguarding Policy	The safety and wellbeing of all children and all adults participating in World Vision Australia's work, programs and activities is paramount to our mission. This policy represents the Australian contextualisation of the World Vision Partnership Management Policy on Child and Adult Safeguarding.
Supplier Code of Conduct	The Supplier Code of Conduct draws upon international standards that advance social and environmental responsibility, to ensure that our suppliers work to the following legal, ethical, social and environmental standards of conduct.
Regulatory Complaint Identification and Escalation Framework	This Framework defines Complaint types which have regulatory and/or legal implications. It provides definitions and examples of these types of Complaints and defines the escalation requirements and performance management outcomes that are to be applied to them.