

## World Vision Australia Complaints Policy with related Procedures and Tools

### Preliminary information:

<b>Type of Policy:</b> Organisation	<b>Core Value supported:</b> We are Responsive
<b>Leadership Owner:</b> Chief Community, Retail & Supporter Experience	<b>Issue Date:</b> 1 July 2016
<b>Frequency of review:</b> Every 2 years <b>Last review date:</b> 19/07/2021 <b>Next review deadline:</b> 19/07/2023	

### Purpose of the Policy:

The purpose of this complaints policy (“**Policy**”) is to set out the guiding principles and parameters for lodging or reporting a Complaint and the manner in which World Vision Australia (“**WVA**”) receives and handles Complaints that fall within the scope of this Policy. This Policy is applicable to all WVA staff, volunteers, Board members 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.

Within WVA, the objectives 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.

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 on our website outlining how and where to make a Complaint. Access to the Complaint handling process is free of charge to Complainants.

## Who the Policy applies to:

**TABLE I**

		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		Yes*	
Service or goods providers (that is, suppliers of goods or services to us), whether individuals or organisations		Yes*	
Our partner organisations (e.g. other NGOs)		Yes*	
Our supporters or public in general		Yes	May make a Complaint
Other:		-	

*\*Adherence to this policy relates to the individuals working for these organisations who represent WVA in interactions with our supporters, beneficiaries or the general public on our behalf. The Policy applies to these individuals insofar as a Complaint is raised with them (they would need to follow the steps outlined in Section 5) and more generally, if a Complaint is raised about them, the principles of this Policy will apply in relation to the management of that Complaint.*

## 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.

Table 2 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.

**TABLE 2**

	<b>Implementing the Policy and the related standards, procedures and guidelines:</b>	<b>Amending the Policy:</b>	<b>Amending the related standards, procedures and guidelines:</b>	<b>Responding to and dealing with incidents (including non-compliance):</b>
<b>Recommend</b>	Not applicable	Any person	Any person	Any person
<b>Consult</b>	Relevant staff member	Head SX & Retail Operations Head of Risk General Counsel	Head SX & Retail Operations	Chief Community, Retail & SX Channel Heads Department Chiefs
<b>Decide*</b>	Chief Community, Retail & SX	Chief Community, Retail & SX	Chief Community, Retail & SX	Channel Heads
<b>Perform</b>	All staff, volunteers, Board members and/or authorised WVA representatives	Chief Community, Retail & SX and/or Head SX & Retail Operations	Head SX & Retail Operations	Operational Managers and/or Channel Heads

## 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 Community, 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 Complaints Policy and training relevant personnel

- 3.1 To ensure that WVA staff, volunteers, Board members and authorised WVA representatives are equipped to understand and implement this Policy, we provide induction training on Complaints handling, including expected standards of conduct, and provide ongoing and refresher training as needed for relevant staff. We partner with our World Vision offices to implement work in the field. World Vision takes special care to train its field personnel to understand how to 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 Complaints Policy is readily available on our [website](#) via policy links at the bottom of each page. There is also a dedicated Complaints Policy [web page](#) outlining how to make a Complaint, this includes a link to a [web form](#) that can be used to submit a Complaint and information on our Complaint handling process and timelines. 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, taking into consideration the needs of the most vulnerable, minorities and the disadvantaged, including literacy, language, age and gender. We do this by offering a number of ways to lodge a Complaint in Australia. Our in-country partners offer staff, volunteers, beneficiaries, contractors, vendors and other in-country entities a confidential mechanism for reporting Complaints. We also stipulate that events presenting an immediate threat to life or property should be reported to local emergency services. 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 a Complaint
- 4.3 In addition to the general reviews of our Complaint handling specified in section 15 we will monitor how effectively we are publicising this Policy on a continuing basis and make necessary improvements in its communication.
- 4.4 Contractual arrangements with our partners, both domestically and internationally, expressly require them to comply with our policies and requirements to report various matters including for example safeguarding, fraud, corruption and privacy.

## 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:* Complaints can be made to WVA in the following ways, all of which are handled by the World Vision Australia Contact Centre:
    - Via our online Complaints [form](#)
    - By phone on 13 32 40 (9am-5pm AEST/AEDT Monday-Friday).
    - Via email at [service@worldvision.com.au](mailto:service@worldvision.com.au)
    - Via online [Chat](#) (9am-5pm AEST/AEDT Monday-Friday).
    - Via post: GPO Box 9944, Melbourne, VIC 3001
    - In person: 1 Vision Drive, Burwood East, VIC 3151
  - (c) *Complaints received at public events, retail sites and/or via social media:* Staff, volunteers and authorised WVA representatives are trained to respond to Feedback immediately. If in receipt of a Complaint, they will refer the Complainant to our online Complaints form and the World Vision Australia Contact Centre on 13 32 40 for handling by the appropriate team.
- 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 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 it may not be possible to provide a remedy to an individual.
- 5.4 We are a signatory 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 [ACFID Code of Conduct Committee](#).
- 5.5 We are also a member of the Fundraising Institute of Australia (FIA) and subscribe to the FIA Code. Complaints relating to an alleged breach of the FIA Code may be made directly and anonymously to the FIA at: [Complaints - Fundraising Institute Australia](#).

## 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

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 a 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 minor Complaints which are made verbally and/or via online chat. However, as far as possible, we will ensure that the 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 Best endeavours will be taken to acknowledge written Complaints within five business days of receipt.
- 9.2 We will acknowledge verbal Complaints, and Complaints received via online chat, 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, and/or verbally where appropriate.
- 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 of Conduct Committee of ACFID (“**Committee**”) and offer to assist in the referral. On request from the Committee, we will also provide the Committee with all relevant information.

## **11. Confidentiality**

- 11.1 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.

## **12. Complaint data**

- 12.1 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.

## **13. Reporting about Complaints**

- 13.1 We will promptly escalate complex and/or major Complaints (see Section 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.
- 13.2 Complaints and Feedback will be reported regularly at Lead team meetings and if required at Executive meetings.
- 13.3 Minor Complaints will be reported in summary form. Major Complaints will be reported in detail by the relevant business area Head, or a senior member of staff delegated by the relevant business area Head.
- 13.4 An analysis will be included in the Complaints report provided with the Complaints data.



#### **14. How we will learn from Complaints**

- 14.1 We will ensure that all relevant personnel are informed of the outcomes of Complaints and the implications for our services, goods, procedures and processes.
- 14.2 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.
- 14.3 Where appropriate we will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

#### **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.

#### **16. Exceptions to this Policy**

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

#### **17. Consequences for breaches of this Policy and associated procedures**

- 17.1 Breaches of this Policy and associated policies and procedures:
  - (a) may be reported to the Head of Risk, if required.
  - (b) may result in disciplinary action up to and including termination of employment.
- 17.2 Regulatory breaches may be reported to the Board, if required.

### Tools related to the Policy:

- [ACFID Flow Chart](#)
- Business Process 2.6.0 Referral of Complaints
- Business Process 2.6.1 Handling and Reporting of Complaints
- Business Process 2.6.2 Handling and Recording of Feedback and Complaints
- WVA Complaints Reporting Form

### Related Policies:

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

### Policy Revision History

Revision Date:	Revision no:	Summary description of revision(s) made:	Section(s) changed:	Approved by:
19/07//2021	03	Scheduled Review	Various	Chief Community, Retail & SX
17/02/2021	02	Updated with mandatory ACFID requirements and in line with business processes; new logo	Most sections	Chief Retail SX
17/07/2020	01	Updated role titles as per org chart added 5.6 clause		Chief Retail SX
01/07/2016	00	Establish Policy	N/A	Chief SO