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Chapter	Management Systems
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Policy

The Salvation Army International Development Department (SAID) is committed to the effective, timely and impartial resolution of complaints and the continuous improvement of our work. SAID recognises the importance and value of feedback from all stakeholders, including supporters, beneficiaries and partners. Where this feedback is in the form of a complaint, SAID will address and resolve the matter in a timely and professional manner.

This policy reflects the Australian Council for International Development (ACFID) Code of Conduct and should be read in conjunction with The Salvation Army's "Grievance Handling Policy and Procedures" HRP0001-Vol. 03 and the "Protected Disclosure Policy" PDP 0508. This policy is to be read in conjunction to SAID's Child Protection Policy (13.02.20) and Fraud, Bribery & Corruption Policy (13.01.02).

Scope:

This policy and associated procedures apply to all employees, Salvation Army (TSA) Officers, volunteers, organisations and persons engaged or involved, either directly or indirectly, in SAID programs, including partners and the SAID Executive Board.

Rationale

SAID believes that to improve services provided to supporters, beneficiaries and Partners we need to be open to feedback from all stakeholders, both positive and negative. Receiving a complaint is an important way of learning what is needed to improve our work, so in the case of a complaint, timely and appropriate action will be taken in order to improve the quality of our work and develop best practice.



Procedure

Definitions

Australian Council for International Development (ACFID): A volunteer body established by the International development community to regulate best practice and standards across Australia's NGOs. SAID is a member of ACFID and is ACFID compliant.

Child/Children: For the purposes of this policy the term 'child/ren' is defined in line with The United Nations Convention on the Rights of the Child (UNCRC) definition of a child, which is any person under the age of 18, regardless of whether a nation's laws recognise adulthood earlier.

Confidentiality: The victim of the exploitation or abuse is entitled to strict confidentiality. The accused person is also entitled to confidentiality to protect his/her reputation while the assessment and investigative processes are undertaken.

Corruption: The offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.

Department of Foreign Affairs & Trade (DFAT): The Australian Government Department responsible for International Development facilitation.

Fraud: 'Dishonestly obtaining a benefit, or causing a loss, by deception or other means' (Cth Fraud Control Framework 2014). This may include the deliberate misappropriation of funds, altering documents, falsifying signatures, misuse of Commonwealth assets, knowingly providing false information to the Commonwealth, unauthorised disclosure of confidential information, or the theft of project funds or assets.

Mandatory Reporters: Are persons required by law to inform child protection authorities that they have reasonable grounds to suspect that a child is at risk of harm. This policy regards all employees, volunteers, TSA Officers, partners, contractors and consultants to be mandatory reporters of child exploitation or abuse, or when there is suspicion that a child is at risk of significant harm, particularly in relation to Salvation Army Child Centres, Schools and Programs in Salvation Army Territories that receive funding from SAID.

Partners: These are TSA Implementing Territories responsible for undertaking International development activities.

Safe Salvos: This is the name of The Salvation Army Australia Eastern Territory's (AUEs) procedures for working with children. It is also the department responsible for providing support and training on child protection issues to Corps and Social Programs within The Salvation Army. The requirements of the Safe Salvos Manual (2014) form part of this policy.

Staff: This includes all paid employees, volunteers and TSA Officers.



Complaint: A complaint is any expression of dissatisfaction or concern regarding SAID, our staff, volunteers, officers, partners, contracted service providers or anyone else acting on our behalf in relation to the delivery of SAID work. It is a criticism that requires a response from and/or change by SAID to improve our work.

A complaint is an action for which SAID or partners are responsible, or is within our sphere of influence.

Considered a 'Complaint'	NOT Considered a 'Complaint'
<ul style="list-style-type: none"> ▪ Unfair, inappropriate or incorrect management ▪ Any breach of SAID policies ▪ Any breach of the ACFID Code of Conduct ▪ Concern over appropriate use of funding ▪ Concern from a member of the public or supporter about a particular fundraising approach or marketing campaign ▪ Timeliness of responses to queries from the public ▪ Concern from a colleague or implementing partner over the quality of program delivery ▪ Concern from a beneficiary in relation to one of our programs ▪ Behaviour or decisions of staff ▪ Practices, policies or procedures. 	<ul style="list-style-type: none"> ▪ A general query about SAID's work ▪ A request for information ▪ A contractual dispute ▪ A request to amend records e.g. to correct an address, cancel a donation ▪ A request to unsubscribe from regular SAID communication e.g. a campaign newsletter or email.

General Principles

1. A complaint can be made by any stakeholder connected to SAID, including a person to whom we deliver services or who is affected by our services, a partner, a local organisation with which we work, our Staff, volunteers, donors or a member of the public.
2. SAID will encourage stakeholders with a complaint to express this through SAID's formal complaints procedure. A complaint can be received by SAID in person, by phone, email, fax or in writing or can be lodged on the SAID website. The policy and process of how to make a complaint and contact information is communicated on the SAID website www.salvos.org.au/said and also in the SAID Annual Report.
3. SAID will make stakeholders aware of their rights to express a complaint to ACFID in relation to a breach of the ACFID Code of Conduct. The process of how to make a complaint to ACFID and their contact information is communicated on the SAID website www.salvos.org.au/said and also in the SAID Annual Reports.



4. SAID will maintain a formal complaints procedure and ensure all complaints are acknowledged/responded to in a timely manner, ideally within 24 hours of receiving the complaint
5. SAID will commit to the practice of continuous improvement, ensuring all suggestions for improvement are considered and implemented, where applicable.
6. SAID will take all reasonable steps for our complaint handling process to be as accessible as we can practically make it to all complainants.
7. SAID will take all reasonable steps in any investigation to protect the complainant from repercussions and ensure the investigation into a complaint is impartial. SAID will take all reasonable steps to ensure confidentiality is maintained, in line with The Salvation Army's "Protected Disclosure Policy" PDP 0508, and will safeguard against complainant victimisation,. We will not reveal a complainant's name or personal details to anyone outside SAID without the complainant's permission.
8. In all instances where a complaint relates to SAID Staff, that person is not to be responsible for recording the complaint or determining its resolution, in line with SAID's "Conflict of Interest" Policy 13.02.04.
9. SAID will advise all partner countries that our Complaints Handling Policy is available on our website www.salvos.org.au/said for their use.
10. Where a complaint is made by beneficiaries of SAID programs/projects regarding a Partner, they will be directed to The Salvation Army's international website www.salvationarmy.org where they will find contact information for that country. SAID will work with the Partner to determine a resolution.
11. SAID will make it clear to Staff, Partners and to the community that complaints can be made. This awareness will be done initially by SAID Project Staff during in-country monitoring visits and then followed up on further visits and documented in the Visit Report.

Each Partner has their own Complaint Lodging Form available through The Salvation Army Headquarters in that country and provides the process how they make their complaints.

Procedural Guidelines

1. General Complaints Handling

- 1.1 **Purpose:** The purpose of this Section is to provide clear guidelines regarding the process to be undertaken when a general Complaint is received. A 'general' Complaint is any Complaint that does not fit within an alternative Section of these procedural guidelines.



- 1.2 All Staff are to listen to the complaint and make all reasonable attempts to address the concern promptly at the initial stage.
- 1.3 The Staff who receives the Complaint is responsible to complete the SAID Enquiry/Feedback/Complaint Form (Appendix A). If a complaint is from a supporter, complete an interaction form on the Supporter Relationship Management System (SRM). This is to include:
 - 1.3.01 The date the Complaint was received;
 - 1.3.02 The name of the Staff taking the Complaint;
 - 1.3.03 The Complainant's name and contact details;
 - 1.3.04 The method in which the Complaint was received (phone, email, in-person, etc);
 - 1.3.05 The nature of the Complaint;
 - 1.3.06 The initial steps taken to address the Complaint when it was received.
- 1.4 After completing cl.1.3, the Staff are to forward the SAID Enquiry/Feedback/Complaint Form to the SAID Director.
 - 1.4.01 The SAID Director will determine the appropriate investigation steps to be taken and the Staff responsible for undertaking these.
 - 1.4.02 Where it is determined that it is inappropriate to record the complaint the on the Supporter Relationship Management System (SRM), the Complaint is to be recorded in EDMS in a secure folder.
- 1.5 A letter of acknowledgement of the Complaint is to be sent by the SAID Director, or delegated Staff, to the complainant within five (5) working days of the Complaint being received. The letter is to outline an approximate time frame for the Complaint to be fully resolved.
- 1.6 All Complaints will be investigated by the SAID Director, or delegated Staff, ensuring all applicable TSA internal policies and procedures are followed.
- 1.7 All Complaints will be raised as a standing item on the SAID Executive Board Agenda. The purpose for this is to ensure the Board is aware of Complaints being received.
- 1.8 A formal response by the SAID Director or delegated Staff will be provided to the Complainant either by email or mail within four (4) weeks of the Complaint being received. The response should include information on the resolution, if appropriate.
 - 1.8.01 Where the investigation and findings have not been completed within four (4) weeks, the SAID Director will formally provide the Complainant with a progress update by email or mail, and provide a realistic timeframe for a resolution to be provided.
- 1.9 Where the resolution requires a change to SAID policies or systems, a review period will be set for a maximum of three (3) months from the change being implemented to ensure the change has minimised and/or eliminated the concern.
- 1.10 All Complaints received qualify as an 'Incident'. These are to be recorded on the SAID 'Incident Register' with the AUE Risk Department.



- 1.11 An outline of Complaint 'Themes' is to be presented to the SAID Executive Board every six (6) months. This allows any systemic issues to be identified, reviewed and addressed.
- 1.12 At no stage in the process is a Staff member with an interest in the Complaint, or outcome of the Complaint, to be involved in the investigation or determination of findings.
- 1.12.01 An example of an 'Interest' in the Complaint would be the SAID Project Staff that coordinated the project that the Complaint relates too.

2. Complaints regarding a Partner

- 2.1 Purpose: The purpose of this Section is to provide clear guidelines regarding the process to be undertaken when a Complaint is received by SAID regarding a Partner.
- 2.2 Clauses 1.2 to 1.4 are to be followed.
- 2.3 The SAID Director is to determine the Partner that the Complaint relates to and email a copy of the SAID Enquiry/Feedback/Complaint Form through the Territorial Leadership for that Partner.
- 2.4 A letter of acknowledgement of the Complaint is to be sent by the SAID Director, or delegated Staff, to the complainant within five (5) working days of the Complaint being received. The letter is to outline that the Complaint relates to a Partner and that an outline of the Complaint has been registered with the Partner. The letter is to provide the appropriate contact details for the Complainant to follow-up with the Partner.
- 2.5 A Complaint related to a Partner does not qualify as an 'Incident' and so is not to be recorded on the SAID 'Incident Register'.

3. Complaints Regarding SAID Staff

- 3.1 Purpose: The purpose of this Section is to provide clear guidelines regarding the process to be undertaken when a Complaint is received regarding a SAID Staff member.
- 3.2 Where a SAID Staff member receives a Complaint related to another SAID Staff, they are to politely pause the conversation as soon as they realise the Complaint relates to another SAID Staff.
- 3.2.01 The Staff member is to inform the SAID Director immediately that a Complaint has been made regarding a SAID Staff member and that the Complainant is currently waiting.
- 3.2.02 Where the SAID Director is unavailable, the Staff member is to take the contact details for the Complainant and explain that the SAID Director will call them back as soon as possible to discuss the Complaint.
- 3.2.03 The SAID Director is to contact the Complainant as provided in cl.3.2.02 as soon as practicable.



- 3.3 The SAID Director is to complete the SAID Enquiry/Feedback/Complaint Form (Appendix A). This is to include:
- 3.3.01 The date the Complaint was received;
 - 3.3.02 The name of the Staff taking the Complaint;
 - 3.3.03 The Complainant's name and contact details;
 - 3.3.04 The method in which the Complaint was received (phone, email, in-person, etc);
 - 3.3.05 The nature of the Complaint;
 - 3.3.06 The initial steps taken to address the Complaint when it was received.
- 3.4 The SAID Director is to determine whether it is appropriate for the Complaint to be forwarded to AUN Human Resources (HR). Where the Complaint relates to an Officer, the SAID Director is to determine where it is appropriate for the AUN Secretary for Personnel should be informed.
- 3.5 The SAID Enquiry/Feedback/Complaint Form is to be recorded on the SRM system where the complaint came from a donor. Where the SAID Director has determined, through cl.3.4, that HR or the AUN Secretary for Personnel should be informed, or if the complainant was not a donor, the Complaint will not be recorded on the SRM System. Where this occurs, the Complaint is to be recorded in EDMS in a secure folder.
- 3.6 All Complaints are to be investigated by the SAID Director. Where the SAID Director wishes to delegate investigation to another person, that person must not be connected with SAID.
- 3.7 Where cl.3.4 has resulted in HR or the AUN Secretary for Personnel to be informed, they are to be consulted and informed of the progress throughout the investigation.
- 3.8 Where the findings from the investigation regarding a SAID Staff member's conduct confirm the allegation, the SAID Director is to discuss the actions to be taken with a minimum of four (4) SAID Executive Board Members. The action to be taken with regard to the outcome of the Complaint will be made by a majority vote of the four (4) SAID Board members present and the SAID Director.
- 3.8.01 Where cl.3.4 has result in HR or the AUN Secretary for Personnel to be informed, that Department/Office is to be included in the discussion and determination of the outcome in consultation with the SAID Director, in place of the four (4) SAID Board members.
- 3.9 Where the Staff member identified in cl.3.2 is the SAID Director, the Staff member is to inform the AUN Assistant Chief Secretary and the Chair of the SAID Executive Board. Any task allocated to the SAID Director in clause 3.2 to 3.8 is to be completed or delegated by the AUN Assistant Chief Secretary. The AUN Assistant Chief Secretary may delegate these tasks to any Staff member except the SAID Director.

4. Complaints involving Children



- 4.1 Purpose: The purpose of this Section is to provide clear guidelines regarding the process to be undertaken when a Complaint is received involving conduct with a child.
- 4.2 Where the SAID Staff member receiving the Complaint identifies that the Complaint relates to conduct with a Child, they are to consult the SAID Child Protection policy prior to completing the SAID Enquiry/Feedback/Complaint Form as outlined in cl.1.3.
- 4.3 The SAID Director is to consult the SAID Child Protection Policy for the appropriate actions and notifications to accompany the investigation.
- 4.4 The applicable process regarding clauses 1, 2 or 3 are to continue from cl.1.4, 2.3 or 3.4 respectively, taking into account the requirements of the SAID Child Protection Policy.

5. Notification of Complaints Processes

- 5.1 Purpose: The purpose of this Section is to provide clear guidelines regarding the process to be undertaken to advertise, promote and make known the SAID Complaints process, including the ACFID Complaint process.
- 5.2 SAID will encourage stakeholders with a Complaint to communicate this through SAID's formal Complaints procedure. A Complaint can be received by SAID in person, by phone, email, fax or in writing or can be lodged on the SAID website.
- 5.3 The policy and process of how to make a Complaint and the contact information is communicated on the SAID website (www.salvos.org.au/said) and is also outlined in the SAID Annual Report.
- 5.4 SAID will ensure that all stakeholders are aware that they may make a Complaint regarding SAID to ACFID. This will be promoted through the following methods:
- 5.4.01 In the SAID Annual Report each financial year;
- 5.4.02 On the SAID website (www.salvos.org.au/said);
- 5.4.03 By the SAID Project Staff when on in-country monitoring visits.
- 5.5 SAID will advise all partner countries that our Complaints Handling Policy is available on our website (www.salvos.org.au/said) for their reference.
- 5.6 With reference to cl.5.4, as a minimum, the following contact information will be displayed;

AUSTRALIAN COUNCIL FOR INTERNATIONAL DEVELOPMENT (ACFID) CONTACT DETAILS

Web link: <http://www.acfid.asn.au/code-of-conduct>

Email: complaints@acfid.asn.au

Telephone: Code Management Team (02) 6281 9222

Mail: Chair, ACFID Code of Conduct Committee, C/- ACFID Private Bag 3, Deakin, ACT 2600



Complaints Handling Procedure	Person Responsible	Timeframe	Actioned Y/N with date
Complete Complaint Report form including name and contact details of complainant	Staff member who takes the complaint	immediate	
Log complaint on SRM and then send Complaint Report form to Director	Staff member who takes the complaint	Same day	
Acknowledge in writing/email complaint within 24 hours	SAID Director or delegated staff member	Within 24 hours	
Plan investigation	As delegated by SAID Director		
Investigate complaint	As delegated by SAID Director		
Provide complaint to SAID Board (if criteria requires)	SAID Director		
Follow up any customer service concerns with complainant	SAID Director		
Consider if there is a systemic issue to be addressed	SAID Director and team		
Respond to complaint with a resolution within four weeks of initial contact	SAID Director or delegated staff member	4 weeks	
Act on and make changes within SAID where necessary to resolve complaint	SAID Director and team	3 months	
Complete complaints summary and provide to SAID Board	SAID Director	Every 6 months	



SAID Enquiry / Feedback / Complaint Form



Date: _____ Staff member: _____ Date logged on SRM: _____

Supporter Contact Details: _____

Change of Address: Old Address _____

New address _____

Reason for call: Request Feedback Complaint Donation Sponsorship Other

Description: _____

Service Satisfaction Rating: 1 2 3 4 5
 Very Satisfied Satisfied Don't Know Dissatisfied Very Dissatisfied

COMPLAINT HANDLING

Person Responsible:
Investigation Plan (detail)
Resolution determined
Follow up with complainant Yes No Date:
Were there changes within SAID necessary to resolve complaint? Yes No Details
Date changes implemented:
Date complaint provided in summary to SAID Board: