



Policy Name:	Complaints Handling	Policy No.:	1.9
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## COMPLAINTS HANDLING POLICY

Business for Development is committed to listening and responding to concerns and complaints. We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies to delivery of services and accountability to stakeholders including clients and beneficiaries. Receiving concerns and complaints is one of the most important ways for us to improve our work so that we can achieve our stated objectives.

Business for Development recognises the importance and value of listening and responding to concerns and complaints

### 1. SCOPE AND COMPLIANCE

This policy addresses the Australian Council for International Development's (ACFID) Code of Conduct compliance obligations for members to maintain a high standard of conduct in the complaints handling process.

This Policy is intended to be adhered to for all Business for Development activities and by all persons working for Business for Development or on our behalf in any capacity including staff members, board members, third-party representative, project partners, clients, suppliers and visitors, and it is expected that they are familiar with it.

This Policy is intended to apply to any complaint, regardless of who makes it.

We will accept complaints relating to our staff members, our partners, our contracted service providers or anyone else acting on our behalf.

A complaint may be made by 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 members, clients or a member of the public.

Anonymous complaints can be made, however, our ability to investigate them may be limited because of this.

### 2. OUR APPROACH

Business for Development have adopted the following approach for our complaint policy and procedures.

#### Visibility

We publicise information about how and where to complain.

#### Accessibility

We ensure that our complaint handling process is as accessible as we can practically make it to all complainants.



### Responsiveness

We respond to each complaint according to our predetermined timeframes.

### Objectivity

We address all complaints in an equitable, fair and unbiased manner using evidence.

### Charges

There is no cost to complainants in our complaint handling.

### Confidentiality

We observe strict confidentiality in complaint handling.

### Accountability

We ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established.

### Continual improvement

Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives.

To this end we maintain data collection on complaints to identify trends for enhancing information management and service provided.

## 3. DEFINITIONS

Definitions we use:

**Complaint** means 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** 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.

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

## 4. EDUCATING THE ORGANISATION ON THE COMPLAINT POLICY

Our Complaints Policy is distributed to all our staff members and contracted service providers. We require all those who may be involved in any way with a complaint to be familiar with this policy. The policy will be made available to all Business for Development partners.

## 5. PUBLICISING OUR POLICY

We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website home page has a link to our policies enabling users to access this policy and information on how to make a complaint. Where literacy is a constraint we will orally invite expressions of concern and complaint. 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 ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. 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.

Our website will be used as the platform for explaining our procedures for handling complaints including:

- where or to whom complaints can be made;
- information to be provided by the complainant;
- the process for handling complaints;
- time periods associated with various stages in the process;
- the complainant's options for remedy, including external means; and
- how the complainant can obtain feedback on the status of the complaint.

We will monitor how effectively we are publicising our complaints policy and make necessary improvements in its communication.

## 6. WHERE AND HOW COMPLAINTS MAY BE MADE

B4D will receive complaints orally in person, by telephone, in writing, by post or email. Where complaints are made orally, we will ensure our write up of the complaint contains all the information the complainant wishes to provide and is signed by the complainant.

Complaints may be made by a friend or advocate of the complainant on their behalf.

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.

We encourage our staff members, board members, visitors, beneficiaries and members of the public to speak up, without retribution, about any concerns. We will not tolerate retaliation or reprisal against any workers, suppliers, or others for having reported a complaint.

B4D ensures all stakeholders and members of the public know how they can report a complaint in a simple, safe and accessible manner as noted below.

**Staff members with a concern:** Staff members should report their concern immediately to their manager or the Operations Manager. If the staff member does not feel comfortable reporting to the Operations Manager or their manager (for example if they feel that the report will not be taken seriously, or if those persons are implicated in the concern) they may report their concern to the CEO or the Board.

**Board members with a concern:** Board members should report concerns to the CEO or the Chair.

**Beneficiaries, visitors and members of the public with a concern:** B4D ensures that its beneficiaries, visitors, members of the public, partners and others know they can report a concern to any staff member and that their report will be treated in a safe and confidential manner.

As the concern may be about the behaviour of a B4D staff member or board member it is important that beneficiaries also have an alternative means of raising a concern. B4D ensures that its beneficiaries know they can also report their concern to the client who has engaged



B4D. Clients typically always have a direct connection with beneficiaries and the local community.

Any staff member who receives a concern from a beneficiary, member of the public or from a client must report that concern immediately in accordance with the process that applies to any concern they might have themselves.

***In all instances:*** A complaint can be made directly to the Chief Executive Officer:

Phone: +61 3 9008 9030

Email: [feedback@businessfordevelopment.org](mailto:feedback@businessfordevelopment.org)

B4D's Whistleblowing Policy applies and should be read in conjunction with this policy. Matters relevant to complaints handling are addressed in a range of B4D policies, processes, frameworks and/or action plans. A list of related Policies that address matters relating to complaints are specified in Appendix 1.

## 7. HOW WE WILL HANDLE COMPLAINTS

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

When we take an oral complaint, we will:

- identify ourselves, listen, record details and determine what the client requires;
- confirm we have understood and received the details; and
- show empathy for the client, but not attempt to take sides, lay blame, or become defensive.

For all complaints, we 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.
- We will not create false expectations but assure the client that the complaint will receive the required attention.
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again.
- Check whether the client is satisfied with the proposed action and, if not, advise them of alternatives.
- Ensure that the complaint is appropriately acknowledged.
- We will register all complaints (see section 14).
- Complaints that are made about another organisation and/or their personnel will be referred to that organisation. It is the responsibility of that organisation to resolve it under their own complaints handling mechanism.



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.

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; and
- the need for, and possibility of immediate action.

If we assess the complaint as significant in terms of one or more of these criteria we will classify the complaint accordingly.

- We will abide by all mandatory reporting requirements. We are obligated in certain circumstances to report to authorities, such as law enforcement agencies, DFAT or ACFID.
- Regarding complaints with criminal aspects (including alleged incidents of fraud, sexual exploitation, abuse and harassment), B4D takes the view that these should also be reported. We will consider whether it is safe to do so, and take into consideration the wishes of the victims/survivors and whistleblowers.

## **8. INQUIRIES, MINOR COMPLAINTS AND JURISDICTION**

We will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, that is during the initial phone call or meeting. However, as far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the staff member handling the complaint 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)

## **9. OUR TIMEFRAMES**

- We will acknowledge written complaints within five working days.
- We will acknowledge oral complaints 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 30 days.



## 10. HOW WE WILL RESPOND TO AND CLOSE A COMPLAINT

Our CEO or a senior manager delegated by him/her 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.

We will communicate our decision on a complaint as soon as is practical. 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 orally and again in the appropriate language.

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.

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 referral to the Code Committee and offer to assist in referral.

Where appropriate we will assist in referring the complainant to services including legal, medical or financial assistance in regards to their complaint.

## 11. HOW WE WILL LEARN FROM COMPLAINTS

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 remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of staff members. Where needed, we will counsel or discipline staff members.

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

## 12. CONFIDENTIALITY

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

We 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.
- Immediate action taken (if any) to resolve the complaint.

This information will be retained on the organisation's electronic file storage system.

B4D will de-identify the complainant in all records on request.



#### **14. REPORTING ABOUT COMPLAINTS**

We will immediately escalate complex and/or major complaints (refer section 7) to our CEO or his/her delegate.

All complaints will be reported at our regular weekly Management Team meetings and our relevant Board subcommittee meetings. Where appropriate, complaints will be reported at meetings of the governing board.

Minor complaints will be reported in summary form. Major complaints will be reported in detail. An analysis will be included in the complaints report provided with the complaints data.

#### **15. CONTINUOUS IMPROVEMENT**

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

We will conduct an internal review of the effectiveness of our complaint handling annually.







## **APPENDIX 1. ASSOCIATED POLICIES**

Privacy Policy

Whistleblowing Policy

