



External Stakeholders – Feedback and Complaints Policy

January 2018

SECTION 1. PURPOSE

- 1.1 The purpose of this policy is to make clear the mechanisms available to external stakeholders in order to provide feedback and make complaints to IJM Australia.
- 1.2 IJM Australia is committed to ensuring transparency and accountability to all stakeholders in relation to feedback and complaints regarding IJM Australia and its operations.
- 1.3 This policy does not cover internal feedback/issues and/or complaints by IJM Australia staff, which are dealt with in IJM Australia's internal grievance policy. The Whistle Blower Policy can be used by all complainants, where the issue is considered to be of a serious nature.

SECTION 2. FEEDBACK FROM STAKEHOLDERS

- 2.1 IJM Australia values all types of input and feedback from stakeholders (including partners of IJM Australia), both positive and negative, as well as suggestions for improvement. Such feedback assists IJM Australia in understanding how to further develop and evolve in order to continue to meet its vision.
- 2.2 Where IJM Australia deems that feedback requires a response from it, such response will be provided effectively and appropriately and within a reasonable timeframe.
- 2.3 Where such feedback is considered to be a "complaint", IJM Australia will follow the complaints process set out in this policy in order to resolve that complaint.

SECTION 3. GUIDING PRINCIPLES FOR FEEDBACK AND COMPLAINTS HANDLING

- 3.1 IJM Australia is guided by the following key legislation/regulations and codes of conduct:
 - (a) The Australian Council for International Development (**ACFID**) Code of Conduct;
 - (b) The Fundraising Institute of Australia Principles and Standards of Fundraising Practice;
 - (c) Privacy Act 1988 (Cth).

3.2 When dealing with feedback and complaints, IJM Australia recognises and adopts the following guiding principles:

- (a) **Confidentiality:** IJM Australia is committed to ensuring the confidentiality of all information related to complaints, handling process and resolution. The privacy of individuals will be maintained in accordance with the Privacy Act 1988 (Cth).
- (b) **Accessibility:** complaints procedures will be easily accessible and publicised to the people with whom IJM Australia works and other stakeholders. Further, IJM Australia will provide stakeholders with a copy of this policy on the website.
- (c) **Objectivity:** complaints will be treated with respect in a fair and equitable manner and IJM Australia will ensure procedural fairness is afforded to all parties. Conflicts of interest will be identified to ensure objectivity.
- (d) **Responsiveness:** complaints will be dealt with in a constructive and open manner that is timely, responsive and will be taken seriously. Complainants will be kept informed on the progress of their complaint through the process. IJM Australia will strive to resolve complaints in a timely and effective way and with the appropriate degree of urgency as assessed by IJM Australia.

SECTION 4. HOW TO PROVIDE FEEDBACK/MAKE A COMPLAINT

Making a complaint/providing feedback

4.1 The following avenues are available for feedback or complaints in Australia:

- (a) By email to: *Attention: The Director of Operations, contact@ijm.org.au*;
- (b) By post to: *The Director of Operations, IJM Australia Limited, PO Box 1442, Chatswood NSW 2057*; and
- (c) By phone: *1300 045 669*.

4.2 Should a complaint or feedback be made regarding a field office, complaints should be sent via email to: contact@ijm.org or through the global website via www.ijm.org.

4.3 Complaints regarding suspected breaches of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee. Information on how to make a complaint can be found on the ACFID website: <https://acfid.asn.au/content/complaints>

4.4 To ensure no disadvantages or barriers to making a complaint, where necessary, language interpreters may be required to help establish the nature of the complaint.

SECTION 5. COMPLAINTS HANDLING PROCEDURE

Complaints handling process

- 5.1** IJM Australia will receive and respond to all complaints irrespective of who makes them or the nature of the complaint. It is acknowledged that some complaints are of a more minor nature and can be resolved quickly and informally (“informal resolution”).
- 5.2** Where a complaint cannot be resolved by informal resolution, the Complaints Handling Procedure described below should be followed.

Complaints by children/minors

- 5.3** In circumstances where the complainant is a child/minor (being an individual under the age of 18 years), IJM Australia is committed to providing an appropriate forum for that child/minor to make his/her complaint, including:
- (a) Recognising the child/minor’s needs including if an advocate or a support person is required;
 - (b) Recognising the need for confidentiality, trust, respect and understanding the nature of the complaint being made;
 - (c) Providing a supportive environment for that child/minor to make his/her complaint including allowing for a face-to-face forum where possible (noting the child/minor must always be accompanied by a supervising adult);
 - (d) Ensuring visibility of the complaints procedure and ensuring that the process and status of the complaint is appropriately communicated to that child/minor.
- 5.4** At all times, IJM Australia will comply with its Child Protection policy.

Who can receive a complaint?

- 5.5** Complaints can be taken by any staff member and will be referred to the Feedback Officer for appropriate action. It is important the staff member taking a verbal complaint clarifies the issues, listens to what the complainant has to say and makes a brief and accurate written summary of the complaint. The staff member should also establish if the complainant needs assistance in making the complaint (for example, whether an interpreter is required and whether an advocate is required, especially in circumstances where the complainant is a child).
- 5.6** The employee receiving the complaint will record the following details:
- (a) The name of the person/s making the complaint;

- (b) The date, time and location the complaint is received;
- (c) A brief description of the complaint and the expectations of the complainant; and
- (d) Any other information considered to be relevant to the complaint being made.

5.7 The employee receiving the complaint should also inform the complainant that any personal information received will be handled in accordance with the IJM Australia privacy policy which can be found on the IJM Australia website.

5.8 In some instances, a complainant may request that their identity is not divulged however it should be acknowledged that this may restrict the resolution of the complaint.

Acknowledging a complaint has been received

5.9 Each complaint must be acknowledged as it is received. Acknowledgement will also include an outline of the next steps.

5.10 If an oral complaint is received the staff member should take the name and contact details so the outcome can be communicated to the complainant.

Registering complaints

5.11 All complaints dealt with under the Complaints Handling Procedure, whether verbal or written, will be recorded on the Complaints Record log. These records will be used to ensure complaints are dealt with effectively, to monitor trends and to ensure continuous improvement of the complaints handling process and our work.

Assessing and reviewing a complaint

5.12 When a complaint is received and addressed through the Complaints Handling Procedure, an assessment must be made about the appropriate course of action. This can only be achieved through investigation.

5.13 To conduct an investigation, the person handling the complaint will establish the facts and gather the relevant information and if necessary (and/or practicable) interview those involved.

5.14 Once the investigation is completed a recommended course of action will be made by the person handling the complaint to the Feedback Officer and, if necessary, escalated to the Chief Executive and Board of IJM Australia.

5.15 If the outcome of the investigation is that there should be action taken in relation to an employee then the appropriate disciplinary and other organisational policies and

procedures will be followed (for example, IJM Australia's Child Protection Policy, Anti Fraud Policy, etc.).

Remedy or systems improvement

5.16 At times, remedies and systems improvement may arise out of complaints dealt with by informal resolution or under the Complaints Handling Procedure. This procedure will be initiated by the relevant staff director using the following steps:

- (a) Assess if any remedy and/or systems improvement is warranted or if no action is required;
- (b) Implement any immediate remedies and/or systems improvements or plan future implementation of remedies and/or systems improvements; and
- (c) Inform the complainant of the outcome.

5.17 The above steps also apply to suggestions/feedback.

Informing complainant of outcome

5.18 Once a complaint has been resolved, the complainant will be advised of the outcome. The advice to the complainant will be verbal or in writing, depending on the seriousness of the complaint and whether any action was taken in response, taking care to ensure the privacy of any individual involved in the matter.

Timeframe for response

5.19 IJM Australia will seek to resolve complaints as quickly as possible and ensure complainants are regularly updated as to the progress or outcome of their complaint.

5.20 For less serious complaints IJM Australia will endeavour to resolve matters, or provide an update with an expected timeframe, within 5 working days.

5.21 For more serious complaints IJM Australia will endeavour to resolve matters, or provide an update with an expected timeframe, within one month.

Appeals process

5.22 If the complainant is unhappy about the responses received from IJM Australia or if they believe proposed steps have not been implemented they may appeal to the next management level.

5.23 If the matter involves an executive level manager, it should be referred immediately to the Chief Executive. If the complaint involves the Chief Executive it should be referred to the Chair of the Board and IJM's Vice President of Global Advancement.

SECTION 6. PUBLICATION OF THE POLICY

- 6.1** IJM Australia will provide clear information to its stakeholders and members of the public about how to make a complaint to IJM Australia and the ability to make a complaint to the ACFID Code of Conduct Committee for suspected breaches of the Code by IJM Australia as a signatory organisation.
- 6.2** This information will be made public on the IJM Australia website. IJM Australia staff will also inform relevant stakeholders of the policy, including partner offices so that partner offices can inform their clients (who are often vulnerable members of society, including children, who may be illiterate and without access to the internet) of their ability to make complaints and the means by which they can do so.

SECTION 7. TRAINING ON POLICY

- 7.1** New staff will be provided with this policy as part of their induction to the organisation. The policy will also be available for all staff on a nominated share drive and placed on IJM Australia's website.
- 7.2** Training of and/or communication to staff in relation to any update or change to the policy will also be provided.

SECTION 8. BENEFICIARIES AND STAKEHOLDERS OF INTERNATIONAL PROGRAMS

- 8.1** IJM Australia may receive complaints relating to one of our directly supported programs or Field Offices by a community member (including children and youth), implementing partner or government official.
- 8.2** IJM Australia's Field Offices are responsible for responding to complaints relating to IJM Australia's operations in each respective country. Complaints made directly to IJM Australia concerning a Field Office will be referred to the head of that Office or division concerned.
- 8.3** IJM Australia may receive complaints relating to *programs of the IJM global team or any IJM Field Office* by a community member (including children and youth), implementing partner or government official.
- 8.4** IJM Field Offices are responsible for responding to complaints relating to operations in each respective country. Complaints made directly to IJM Australia concerning a Field Office will be referred to the head of that Office or division concerned.
- 8.5** Serious complaints of misconduct related to IJM Field Offices (particularly relating to fraud or sexual exploitation and abuse) will be managed according to established IJM

reporting guidelines and will be directed to the IJM's Office of General Counsel, through legal@ijm.org.

SECTION 9. RESPONSIBILITIES

- 9.1** IJM Australia's Executive Management Team (Leadership Team) is responsible for ensuring that IJM Australia responds to complaints according to IJM Australia's policy and procedures.
- 9.2** The Chief Executive is ultimately responsible for complaints which cannot be resolved by the Feedback Officer or Leadership Team.
- 9.3** The Chair of the Board is responsible for managing complaints relating to the Chief Executive.
- 9.4** The Feedback Officer is responsible for:
- (a) Initial assessment of complaints and identifying those which can be dealt with informally and those which are clear, serious, or complex complaints to be addressed according to the complaints handling procedure;
 - (b) Ensuring complaints are appropriately referred and resolved and that follow up actions have taken place; and
 - (c) Maintaining the Complaints Log.

SECTION 10. DEFINITIONS

- 9.5** **"Complainant"** means any person or organisation making a Complaint.
- 9.6** **"Complaint"** includes (but is not limited to) an expression of dissatisfaction concerning any aspect of IJM Australia's work including, but not limited to its standards of services/actions/lack of actions/work/application of values, missions and/or objectives of IJM Australia, behaviour of IJM Australia staff, criticism of a fundraising campaign/action, concerns over inappropriate use of funds, breaches of the ACFID Code of Conduct, organisational practices/procedures, complaints about international programs and field work undertaken by IJM Australia.
- 9.7** **"External Stakeholders"** means stakeholders of IJM Australia that are not IJM Australia staff. This includes, but is not limited to supporters, donors, the general public, beneficiaries, official bodies and partners.
- 9.8** **"IJM Australia staff"** is a reference to all individuals employed by IJM Australia including full time and part time staff, permanent staff, casual staff, agents, volunteers, secondees and (for the purposes of this policy only) Board members.

- 9.9** “Our”, “IJM Australia”, “International Justice Mission”, “IJM” is a reference to IJM Australia Limited (except as provided below in relation to the meaning of “Field Office”).
- 9.10** “Field Office” means an Office of International Justice Mission that is based in a developing country.
- 9.11** “Remedy” is action taken to correct or rectify a situation for an individual/organisation where it is identified that they been treated poorly or unfairly. A remedy may involve one or more of:
- (a) Providing explanation and reasons if not previously provided;
 - (b) Dismissing the complaint if the decision accords with relevant policy or procedure concluding that the complaint has been substantially resolved;
 - (c) Reaching a compromise solution;
 - (d) Giving an apology or providing a service not previously provided; and/or
 - (e) Addressing or referring the issue for systems improvement.
- 9.12** “Systems improvement” is the improvement of policies, procedures, organisational culture, or the like to prevent future problems. Systems improvement may involve one or more of:
- (a) Referral for consideration of policy change;
 - (b) Policy development or revision;
 - (c) Process improvement, such as changes to procedures and workplace practices;
 - (d) Program review and consideration of program amendments/change;
 - (e) Expert assistance, staff development or performance improvement;
 - (f) Improved implementation, such as issuing updated documentation or reminders;
 - (g) Monitoring compliance;
 - (h) Seeking guidance from IJM Australia’s global counterparts or partners for assistance and/or guidance with any of the above; and/or
 - (i) Other action to ensure that similar circumstances are handled appropriately in future.