

ORG-010, FINAL
Office of the CEO

External Complaints Policy

Global/Public

COMMITMENT

The Fred Hollows Foundation (The Foundation) welcomes feedback and believes that being open to complaints and taking them seriously is an important component of its corporate culture. Feedback enables The Foundation to improve the quality of its work, enhance the trust and confidence of stakeholders, identify areas of work that need to be improved, and ensures that The Foundation learns from the feedback provided through the process. Anyone has the right to raise a complaint, have that complaint addressed in a timely manner and receive an accurate and thoughtful response. Every effort will be made to resolve the complaint in a satisfactory manner and, if appropriate, to keep the complainant's identity private.

The Foundation is a signatory to the ACFID Code of Conduct and is committed to recognising the importance and value of listening and responding to concerns and complaints and ensuring its feedback and complaints handling process is as fair, effective, safe, confidential and accessible to all stakeholders without prejudice.

SCOPE OF THIS POLICY

This policy is intended to apply to any external complaint, regardless of who makes it. *[Internal issues and grievances raised by staff and volunteers are dealt with in discussion with management and in accordance with The Foundation's Grievance and Dispute Resolution Procedure.]*

This policy needs to be understood and used by all staff, our volunteers, our partners, our contracted service providers and Board Members and covers complaints made by those external to The Foundation.

DEFINITION

A complaint is 'an expression of dissatisfaction', as defined by the International Standards Organisation standard on complaints handling.

WHAT COMPLAINTS ARE CONSIDERED

The Foundation will receive and respond to all complaints irrespective of who makes them or the nature or subject of the complaint.

Complaints do not include:

- A general enquiry about The Foundation's work,
- A request for information,
- An initial request to amend donor records, and
- A request to unsubscribe or be removed from the database.

GUIDING PRINCIPLES

The following principles will guide The Foundation in the handling of complaints and ensure that as a signatory to the ACFID Code of Conduct we comply with the standards relating to complaints handling as follows:

- We recognise the importance and value of listening and responding to concerns and complaints (*Section D.6.1 – ACFID Code of Conduct*)
- The feedback and complaints handling process is as effective, safe, confidential and accessible to all stakeholders as possible, irrespective of their gender, status or background and without prejudice to their future participation. (*Section D.6.2 – ACFID Code of Conduct*)
- **Visibility:** Information about the process for making a complaint will be clear and well publicised to supporters, rights holders participating in programs, and other stakeholders.
- **Accessibility:** The complaints handling process is easily accessible to all stakeholders and is publicised on The Foundation's website. There is readily accessible information about the process of making and resolving complaints in a range of formats so no complainants are disadvantaged. The Foundation will ensure that flexibility is provided to complainants to call, fax, write and e-mail complaints and/or to raise concerns in person.
- **Responsiveness:** All complaints and constructive feedback will be taken seriously and handled as quickly as practicable. All complainants will be treated courteously and kept updated on the progress of their complaint through the complaints handling process.
- **Objectivity:** All complaints are addressed in a fair, equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified to ensure objectivity.
- **Confidentiality:** Confidentiality relating to the complaint will be safeguarded so far as reasonably practicable including the person(s) to whom the complaint is addressed.
- **Stakeholder-focused approach:** The Foundation has a strong stakeholder-focused approach and actively welcomes feedback including complaints and is committed to actively resolve all complaints.
- **Accountability:** Accountability for handling complaints and reporting on complaints-related actions and decisions of The Foundation with respect to complaints handling will be clearly established. All complaints will be recorded through one central point before action is taken. Complaints will be addressed at a local level as much as possible using the agreed complaints procedure and only escalated to management if they are of a serious nature.
- **Continuous improvement:** The Foundation is committed to the continual improvement of the complaints handling process and the quality of The Foundation's work. The commitment is practically supported by: the collection and classification of complaint trends; analysis and reporting of complaints trends; monitoring of complaints handling processes; and auditing / management reviews.
- **Organisational commitment to this policy:** The Foundation will ensure that sufficient resources and expertise are provided to handle complaints. Staff will be briefed on the nature and purpose of the

policy and senior managers dealing with the complaints will be given training in handling complaints. Complaints will be handled in accordance with The Foundation's policies and procedures and in accordance with Australian laws and regulations.

STANDARDS

The Foundation's handling of complaints will meet the following minimum standards:

- i. All complaints will be acknowledged as soon as possible, ideally within five working days by the recipient.
- ii. All complainants will receive a full response to their complaint giving the outcome (within applicable legislation, legal advice and Code practice requirements) as soon as possible and, as a standard rule, at least within thirty working days from receipt. If the matter is more complex and this timeframe proves impossible, the complainant will be notified of the likely timeframe for resolution.
- iii. All complaints will be recorded on a Complaints Record Form.
- iv. All complainants will be treated respectfully, whether it is felt the complaint is justified or not.

COMPLAINTS HANDLING

The Foundation is committed to ensuring the External Complaints Policy is accessible via The Foundation's website. The Foundation will work with overseas country offices and partners to ensure awareness of the policy, including their role in handling complaints and raising concerns with The Foundation about any of our programs and / or behaviours of country program or country office staff.

A separate document detailing the External Complaints Handling Procedure from start to finish is also available.

ROLE OF THE BOARD

The Foundation's complaints and response mechanism needs to be transparent and independent. In very serious cases a complaint may require The Foundation's Board to investigate and make a response. The Governance and Nominations Committee of The Foundation's Board has an important role to play in overseeing the number and nature of complaints received by The Foundation and ensuring that they have been handled satisfactorily, that appropriate corrective action has been implemented and that trends are identified and addressed. The Company Secretary, in consultation with the Executive Management Group, will endorse the completed External Complaints Register including any supporting analysis for submission to the Governance and Nominations Committee on an annual basis.

TRAINING FOR STAFF

Training will be provided to all staff who handle complaints. The training will include:

- Identifying complaints;
- receiving complaints: listening and empathising skills;
- responding to complaints: using tact, understanding the complainant view point and responding using constructive language;
- investigating the complaint: gathering factual information, interviewing skills; and
- handling difficult complainants: how to respond when under pressure.

SAFEGUARD FOR EMPLOYEES WHO RAISE A COMPLAINT

The following safeguards will be in place to ensure protection is afforded to all whistle-blowers in line with the requirements of Part 9.4AAA of the Corporations Act 2001:

Protection from reprisal: The Foundation recognises that the decision to report a suspicion can be a difficult one to make, not least because of the fear of reprisal from those being reported. In accordance with its Human Resource Policies, The Foundation will not tolerate harassment or victimisation and will take all practical steps to protect those who raise a complaint in good faith. The Foundation shall also ensure that the accused is treated fairly and in accordance with the principles and processes of natural justice.

Confidentiality: The Foundation will protect an individual's identity when he or she raises an issue and does not want their name to be disclosed. It should be understood, however, that an investigation of a malpractice may need to identify the source of the information and a statement by the individual may be required as part of the evidence.

Untrue or unproven allegations: If an allegation is made in good faith but it is not confirmed by an investigation, The Foundation guarantees that no action will be taken against the complainant. However, individuals should not make malicious or vexatious allegations aimed at damaging the character of any person.

REPORTING, MONITORING AND REVIEW OF POLICY

The *Associate Director, Strategy & Governance* is accountable to the CEO and Board for managing and maintaining this policy.

All members of the *Executive Management Group* (EMG) are accountable for ensuring their functional teams understand and adhere to this policy in their day-to-day work. Where compliance issues surface, the EMG members will work with staff to address these issues promptly.

The *Office of the CEO* will coordinate the development of a summary analysis of all complaints to the Executive Management Group (EMG) on a quarterly basis. The EMG will then decide if the report reveals systematic problems and, if so, how these will be addressed.

Any updates / revisions to the policy must be endorsed by the CEO and EMG before being submitted to the Board for approval (via the Governance and Nominations Committee). The policy will be reviewed every 3 years at latest or as required.

RELATED POLICIES & PROCEDURES

- Anti-Corruption Policy
- Child Protection Policy
- Grievance and Conflict Resolution Policy (internal)
- Privacy Policy
- External Complaints Procedure
- Relevant divisional procedures

RESOURCES

- ACFID Code of Conduct D.6 Complaint-handling within signatory organisations
- Australian Standard: Customer satisfaction – Guidelines for complaints handling in organisations (ISO 10002:2004)