

# INTERNATIONAL NEEDS AUSTRALIA

## Board of Directors Policy

### **Title: 1.9 Policy on Complaints**

**Date of Adoption:** 28<sup>th</sup> May 2014

**Amended** 13<sup>th</sup> August 2014

**Amended** 30<sup>th</sup> August 2017

**Amended** 26<sup>th</sup> August 2020

**Amended** 29<sup>th</sup> November 2023

*This Policy is to be reviewed no later than 29<sup>th</sup> November 2026*

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### **Purpose**

International Needs Australia (INA) expresses our commitment to providing high quality programs and operating in an open and accountable manner. We realise that there may be occasions when we do not meet the reasonable expectations of all stakeholders at all times. Our stakeholders have a right to complain when this occurs. All complaints are taken seriously and will be handled in an effective and confidential manner. INA commits to maintaining a fair, accessible and transparent complaints system both in Australia and for project participants overseas, and to training staff in its implementation.

### **Definitions**

A “complaint” is a formal expression of dissatisfaction or discontent about someone or something. INA is committed to a transparent and efficient process of handling complaints.

This policy addresses complaints regarding:

- (a) Actions of INA.
- (b) Actions of an INA partner organisation.
- (c) Behaviour of INA staff, project visitors and volunteers.

This policy does not address complaints:

- (a) Which are offensive, abusive or malicious: such claims will not be considered.
- (b) Received as part of a bulk mail or an email to multiple organisations: such claims will not be considered.
- (c) Which involve breaches of the criminal code: these will be referred to the Police for further action.

If a complaint is identified as falling outside the scope of the policy, this will be discussed with the complainant and the complaint will be referred and handled under an appropriate procedure (see section below)

### **Policy**

## **Making a Complaint**

Complaints should be lodged as soon as possible after the complainant becomes aware of the concern. Complaints made more than 24 months after the event will not be considered unless they are of a serious nature.

Complaints should be directed to the Chief Executive Officer, or to the Board Chair (contact details below) where the CEO is the subject of the complaint. Complaints may also be lodged via the INA website at: <https://www.ina.org.au/complaints/>

Chief Executive Officer

Ph: 1300 731 550

Email: [ceo@ina.org.au](mailto:ceo@ina.org.au)

Board Chair

Email: [boardchair@ina.org.au](mailto:boardchair@ina.org.au)

Via post: PO Box 484, BAYSWATER, VIC 3153  
In person: 16 Corporate Boulevard, BAYSWATER, VIC, 3153

## **Lodging a Complaint Overseas**

INA acknowledges that all beneficiaries and stakeholders have the right to make complaints, but that INA does not have the capacity to communicate with everyone. As such, INA will support partners to implement their own complaints-handling mechanism in compliance with this Policy and ACFID and DFAT standards. These mechanisms must be suitable to the cultural context, advertised to all stakeholders in appropriate ways and made accessible (including making complaints orally or confidentially) to all people.

Complaints received by partners that concern INA-funded staff or projects will be forwarded to INA to be addressed in agreement with the relevant partner CEO. Minor complaints or complaints about partner programs that do not concern INA may be handled solely by the partner, but in all cases should be reported to INA.

## **Complaint format**

Complaints should include details of the concern (including the time, date and place it occurred if relevant) and contact details of the complainant in case INA needs further information or clarification of the concern. Complaints made anonymously will be investigated to the extent possible. A complaint format can be found and submitted on the International Needs Australia website. Alternatively, a complaint can be made by phone, fax, mail, email or in person.

INA is a signatory to the Australian Council for International Development (ACFID) Code of Conduct. Complaints relating to an alleged breach of ACFID Code of Conduct may be made directly to <https://acfid.asn.au/code-of-conduct/complaints/>

Complaints will be handled with the highest level of confidentiality possible without affecting the investigation.

### **Complaint handling**

Complaints will be preferably resolved in conversation with the complainant until they are happy with INA's response. If a solution cannot be resolved, or in the case of a serious complaint (including allegations of harassment or bullying, sexual exploitation and abuse, fraud and corruption or other gross misconduct) a formal investigation will be conducted.

The Investigation Manager should aim to undertake and complete a formal investigation within 30 days after receipt of the complaint and submit a report 14 days after the investigation ends. Any risks to the complainant should be assessed and appropriate protection provided.

The Investigation Manager will engage two suitable people to make up the investigation team with them. This team will:

1. Determine how policy or procedure has been breached
2. Collect background information and evidence
3. Interview the complainant and any witnesses, and then the subject(s) of the complaint (where it is in relation to the behaviour of a particular person/people)
4. Instigate rectifying procedures.

Upon receiving a complaint from a field partner, the INA Investigation Manager will discuss all potential courses of action with the CEO or other management staff of the partner agency involved. Rectifying actions to be taken by INA and the partner agency will be agreed by both parties. The field partner will be responsible for passing on communications to the complainant to keep them updated on how their complaint is being addressed. This communication must be undertaken appropriately, e.g., if a complaint was made orally, the response should be given orally.

All complaints should be filed in the complaints register (which can be found at: ..\..\A CORRESPONDENCE\A4 COMPLAINTS\Complaints register.xlsx) to ensure proper follow up occurs. The Investigation Manager is responsible for ensuring the register is up-to-date and accurate.

The findings of a formal investigation will be reported to the International Needs Australia Board, and the Board of the relevant partner agency if applicable.

The preliminary outcome of an investigation will be communicated to the complainant(s) no more than 60 days after acknowledgment of the complaint. If the investigation cannot be

concluded within this time frame, the complainant will be informed as to why, and be updated with the outcome of the Investigation at its conclusion.

INA will follow up on how partner agencies have responded to and rectified sources of complaint through regular reporting procedures, field visits, and/or evaluations.

INA will keep a record of all complaints received, including what the complaint was and how it was handled. These files will be maintained in a confidential manner.

In line with the Policy on Prevention of Sexual Exploitation, Abuse & Harassment, INA is committed to providing appropriate assistance and referrals to survivors, implementing a survivor-centric fast-track complaints handling mechanism for survivors, prioritising the rights, needs and wishes of the survivor, including treating them with dignity and respect, providing them with comprehensive information and involving them in decision making. As such, no action will be taken which may put the survivor at risk of further harm, or which contravenes their wishes; this might include providing safe shelters, psychological and medical assistance and involving authorities.

### **Complaint falling outside of the scope of the policy**

If complaints cannot be resolved, we will advise you that the complaint may be escalated to the Code of Conduct Committee of ACFID ("Committee"), and we will offer our support in facilitating the referral. Upon the Committee's request, we will furnish them with comprehensive information.

### **Cross Reference**

Procedures Manual – Vol. 2, Section 5.0: Complaint Handling Procedures

ACFID Code of Conduct Complaints processes - <https://acfid.asn.au/content/complaints>