

## UNICEF AUSTRALIA - COMPLAINTS POLICY

### 1. Purpose

The purpose of this policy is to ensure transparency and accountability to all stakeholders in relation to complaints regarding UNICEF Australia (UA) and its operations. It seeks to make clear the mechanisms available for making complaints and the way in which complaints will be handled and resolved.

UA acknowledges the value of feedback as an important tool in understanding and responding to stakeholder's expectations. We therefore welcome feedback and will respond constructively and in a timely manner to complaints.

Complaints may come from our supporters, donors, the general public, beneficiaries, official bodies and our partners. This policy deals only with external complaints and does not cover internal issues and/or complaints by staff, interns or volunteers. These are dealt with in accordance with the UA Grievance Policy.

The Whistle blower Policy can be used by either internal or external complainants, where the issue is considered to be of a serious nature. This policy can be found on the UNICEF Australia website.

#### Guiding Principles

- **Confidentiality:** UA is committed to ensuring that all information related to complaints and their resolution will remain confidential. The privacy of individuals will be maintained and personal information will not be divulged.
- **Accessibility:** complaints procedures should be easily accessible and well publicised to the people we work with and other stakeholders. Information relating to the process is accessible and options exist to make a complaint to ensure no complainants are disadvantaged.
- **Objectivity:** complaints are treated with respect in a fair and equitable manner. Conflicts of interest will be identified to ensure objectivity.
- **Responsiveness:** complaints are dealt with in a manner that is timely, responsive and will be taken seriously. Complainants will be kept informed on the progress of their complaint through the process.

### 2. Definitions

UA defines a **complaint** as an expression of dissatisfaction about the standards of service, actions or lack of actions by UA. It could be:

- Concern about the behaviour of staff, volunteers, Board members, suppliers, partners or others acting on UA's behalf,
- Criticism about a fundraising campaign or action,

- Concern over inappropriate use of funding,
- Any breach of the ACFID Code of Conduct,
- Organisational practices, policies or procedures
- Complaints about UA supported development programs and/or operations of partner Country Offices

A **complainant** is any person or organisation making a complaint.

### 3. Legislative and Regulatory Context

- Australian Council for International Development (ACFID) Code of Conduct
- Fundraising Institute of Australia (FIA) Principles and Standards of Fundraising Practice
- Public Fundraising Regulatory Association (PFRA)
- Privacy Act 1988 (Cth) (Privacy Act)

### 4. Compliance

The consequence of not complying with the policy and procedures ranges from disciplinary action to performance management to cessation of employment or contract agreement, dependant on the seriousness of the non-compliance.

### 5. Policy Statement

UNICEF Australia seeks to have any complaint or dispute raised and received in a constructive and open manner and resolution achieved in a timely and effective way.

Any complaint or dispute about an aspect of UA's operations or practices will be dealt with confidentially, effectively and with the appropriate degree of urgency.

All complaints will be managed to ensure there is procedural fairness to all parties, there is no conflict of interest by either party, there is no victimisation or retaliation and confidentiality is assured throughout the process.

### 6. Procedures

#### 6.1 Complaints Handling Process

UA 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).

Where a complaint cannot be resolved easily and informally, the Complaints Handling Process (7.1 – 7.9) described below should be followed.

### 6.1.1 Making and receiving a complaint

#### How can a complaint be made?

At UNICEF Australia we welcome feedback from our stakeholders, and we take complaints very seriously. All stakeholders should be clear on how to raise a complaint with the organisation.

UA's Complaints Policy is published on the UNICEF Australia website and highlights the following central points for all complaints:

- To make a verbal complaint contact our Supporter Relations Team on 1300 884 233
- Written complaints can be sent to the e-mail address: [unicef@unicef.org.au](mailto:unicef@unicef.org.au) or alternatively send to our address at PO Box 488, Queen Victoria Building, NSW 1230
- Complaints can also be made in person at our address Level 4, 280 Pitt Street
- 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>

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.

#### Who can receive a complaint?

Complaints can be taken by any staff member and will be referred to the manager responsible for the relevant area 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.

The employee receiving the complaint will record the following details:

- The name of the person/s making the complaint
- The date, time and location the complaint is received
- A brief description of the complaint and the expectations of the complainant

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

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

### 6.1.2 Acknowledging a complaint has been received

Each complaint must be acknowledged as it is received. Acknowledgement will also include an outline of the next steps. If an oral complaint is received the staff member should take the name

and contact details so the outcome can be communicated without breaching privacy or confidentiality.

### 6.1.3 Registering Complaints

All complaints dealt with under the Complaints Handling Process, whether verbal or written are recorded by the Supporter Relations team 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.

If a staff member, other than a Supporter Relations Representative receives a complaint they are to send the details of the complaint to the Supporter Relations team for recording.

### 6.1.4 Assessing and reviewing a complaint

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

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.

Once the investigation is completed a recommended course of action will be made by the person handling the complaint to the relevant EMT member.

- 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 (eg UA's Child Protection Policy, Anti Fraud Policy, etc).

### 6.1.5 Remedy or System Improvement

At times, remedy and systems improvement may arise out of complaints dealt with under either Informal Resolution or under the Complaints Handling process. This procedure will be initiated by the relevant manager using the following steps. It also applies to suggestions.

1. Assess if remedy and/or systems improvement is warranted or no action is required.
2. Implement immediate remedy/system improvement or plan future implementation of remedy/system improvement.
3. Inform complainant of outcome

**Remedy** is action taken to correct or rectify a situation for an individual where it identified he/she has been treated poorly or unfairly by the system. Remedy may involve one or more of:

- providing explanation and reasons if not previously provided
- dismissing the complaint if the decision accords with relevant policy or procedure

- concluding that the complaint has been substantially resolved
- reaching a compromise solution
- giving an apology or providing a service not previously provided
- addressing or referring the issue for system improvement.

**Systems improvement** is an opportunity to improve **policies, procedures, organisational culture, or similar issues** to prevent future problems. Systems improvement may involve one or more of:

- referral for consideration of policy change
- policy development or revision
- process improvement, such as changes to procedures and workplace practices
- program review
- expert assistance, staff development or performance improvement
- improved implementation, such as issuing updated documentation or reminders
- monitoring compliance
- other action to ensure that the matter is handled appropriately in future.

#### **6.1.6 Informing complainant of outcome**

Once the complaint has been resolved, the complainant will be advised of the outcome ensuring the privacy of any individual involved in the matter.

#### **6.1.7 Timeframe for Response**

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

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

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

#### **6.1.8 Appeals Process**

If the complainant is unhappy about the responses received from UA or if they believe action has not been implemented they may appeal to the next management level. If the matter involves an executive level manager, it should be referred immediately to the CEO. If the complaint involves the CEO it should be referred to the Chair of the Board.

## **6.2 Publication of the Policy**

UNICEF Australia will provide clear information to its stakeholders and members of the public about how to make a complaint and the ability to make a complaint to the ACFID Code of Conduct Committee for suspected breaches of the Code by a signatory organisation.

This information will be made public on the UNICEF Australia website and in the Annual Report. UNICEF Australia staff will inform relevant stakeholders of the policy where appropriate and provide copies of the policy on request.

### **6.3 Training of Policy**

New staff will be provided with the 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 UA's website.

Training and/or communication will also be provided following an update or change to the policy.

### **6.4 Beneficiaries and stakeholders of international programs**

UNICEF Australia may receive complaints relating to one of our directly supported programs or Country Office partners by a community member, including children and youth, implementing partner or government official. All complaints relating to UNICEF's in-country operations will be managed according to UNICEF's established internal mechanisms, as outlined in the UNICEF Executive Directive CF/EXD/2007-005 Revision 2 – Section 3.

UNICEF Country Offices are responsible for responding to complaints relating to UNICEF's operations in each respective country. Complaints made directly to UNICEF Australia will be referred to the head of the office (Country Representative) or division concerned.

Serious complaints of misconduct related to UNICEF country offices (particularly relating to fraud or sexual exploitation and abuse) will be made to the designated authority and managed according to established guidelines, including:

- (a) the Director, Office of Internal Audit and Investigation
- (b) the focal point appointed to receive reports of sexual exploitation and abuse

## **7. Responsibilities**

- UNICEF Australia's Executive Management Team (EMT) is responsible for ensuring that UA responds to complaints according to the policy and procedures.
- The Chief Executive Officer (CEO) is ultimately responsible for complaints which cannot be resolved by management or EMT.
- The Chair of the board is responsible for managing complaints relating to the CEO.
- The Supporter Relations Manager acts as the Complaints Handling Officer and is responsible for:

- 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;
- Ensuring complaints are appropriately referred, resolved and that follow up actions have taken place;
- Maintaining the Complaints Log.

## 8. Supporting Documents

Protection against retaliation for reporting misconduct or for cooperating with duly authorized audits, investigations and other oversight activities - UNICEF Executive Directive CF/EXD/2007-005 Revision 2 – Section 3 (6 February 2015)

<https://intranet.unicef.org/corp/ehandbook.nsf/52a011b05637bd7285257391005a2169/2ff8aeabe781439785257deb00701560?OpenDocument>

UNICEF Policy Prohibiting and Combatting Fraud and Corruption – UNICEF Executive Directive CF/EXD/2013-008 (29 August 2013)

<https://intranet.unicef.org/corp/ehandbook.nsf/c35089a8609b01c5852579eb0059d13e/8710d929f67ed88e85257bdb004b284e?opendocument>

Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse – UNICEF Executive Directive CF/EXD 2003-029 (30 December 2003)

<http://www.intranet.unicef.org/Corp/EHandbook.nsf/1bdbb646842533be85257463007280bd/59c809fad97320be852574470058f968?OpenDocument>

Further Guidance on the Implementation of the Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse – UNICEF Executive Directive CF/EXD/2004-002 (28 January 2004)

<https://intranet.unicef.org/pd/pdc.nsf/d24b0a9272f55f1c852566fa005da6e7/1bf0ca863351a78085256e2a00617a83?OpenDocument>

Prohibition of discrimination, harassment, sexual harassment and abuse of authority – UNICEF Executive Directive CF/EXD/2012-007 (30 November 2012)

[https://intranet.unicef.org/Corp/EHandbook.nsf/0/084BA42D3EA046E185257ACB005F5E9D/\\$FILE/CFEXD2012-007%20Prohibition%20of%20Discrimination%20Harassment%20Sexual%20Harassment%20and%20Abuse%20of%20Authority.pdf](https://intranet.unicef.org/Corp/EHandbook.nsf/0/084BA42D3EA046E185257ACB005F5E9D/$FILE/CFEXD2012-007%20Prohibition%20of%20Discrimination%20Harassment%20Sexual%20Harassment%20and%20Abuse%20of%20Authority.pdf)

**Internal Policies and Guidelines:**

UNICEF Australia Child Protection Policy

UNICEF Australia Fraud Policy

UNICEF Australia Grievance Policy

UNICEF Australia Whistle Blower Policy

**9. Information About This Policy**

Version	Date	Comments	Author/s	Approved By	Review Date
V1	June 2013		Chief Operating Officer	EMT & Board	June 2016
V2	28 June 2016		Chief Operating Officer	EMT & Board	June 2017