



DOOR OF HOPE AUSTRALIA INC

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DOHA FEEDBACK AND COMPLAINTS POLICY

Introduction:

This policy aims to reflect the importance Door of Hope Australia Inc. (DOHA) places on listening and responding to feedback, compliments, suggestions, concerns and complaints from our supporters, partners and the communities we serve. DOHA is committed to responding to all input effectively and appropriately.

In setting up a feedback and complaints mechanism, we are demonstrating our openness to learning: we recognise that we are fallible, that we do make mistakes and that we can learn from them. A cultural shift is required in order to welcome and encourage complaints, to see them as helpful information rather than avoiding them and seeing them as failure.

This mechanism needs to be proactive in seeking out any complaints that need to be addressed: as most of those with and through whom we work find themselves in an unequal power relationship with NGO workers.

Scope:

This policy applies to the handling of feedback, concerns and complaints from program partners and people we work with and for (to deliver our programs) including staff, partners, volunteers or anybody directly involved in the delivery of our programs.

This policy applies to all program activities, including long term development programs, humanitarian responses, advocacy and campaign activities; whether implemented in Australia or internationally, directly or through our Partners.

Outside the scope:

When a complaint is made outside the scope of this Policy; such as a complaint against a fellow employee, volunteer, Government or other Organisation, then the person registering

the complaint must refer the complainant to the Project Manager, who will refer them to the appropriate department or external body.

Related Policies:

DOHA Prevention of Sexual Exploitation, Abuse and Harassment Policy.

DOHA Child Safeguarding Policy

DOHA Human Resource Management Policy

DOHA Anti-discrimination, gender equity & disability Policy

DOHA Whistle-blower Policy

UNDERPINNING PRINCIPLES:

1. Accountability:

We will ensure that accountability for and reporting on the actions and decisions taken by DOHA regarding complaints handling are clearly established and prioritised.

2. Accessibility:

Complaints can be received through written correspondence, e-mail, telephone, verbally or through other communication mechanisms depending on the context

A copy of this Policy is published to our Website: www.doorofhopeaustralia.org/contact and hard copies are available on request from mvanzanen@doorofhope.com.au or 95849531.

We will ensure that the right to complain and that the mechanism by which complaints can be made is clear and well known amongst our Staff, Partners and Stakeholders.

3. Confidentiality:

Complaints must be dealt with in full confidence and the principle of confidentiality will be made clear to complainants. Any investigation or inquiry will be conducted in a manner that ensures that the identities of the persons involved are kept confidential.

Only appropriate members of management, the aggrieved Person, his/her representative, the alleged perpetrator, witnesses and an interpreter (if required), shall be present at any disciplinary inquiry relating to sexual harassment, abuse or exploitation. Disclosure of anything confidential will be on a need to know basis.

All Management, Employees and the parties concerned must endeavour to ensure that matters pertaining to the allegation of sexual harassment are kept confidential.

A record must be kept of all complaints; however DOHA has the ability to de-identify complaints at the request of the complainant or survivor.

4. Fairness:

DOHA is committed to fair, effective, transparent and responsive complaints handling. No form of misconduct is acceptable and no power should be abused by this Organisation or its representatives.

5. Responsiveness:

If complaints can be solved (relatively) immediately, then staff must be encouraged to do so. Other complaints not easily resolved must be forwarded to the appropriate person ASAP. (See Page 4 for the list of those responsible).

DOHA will ensure that the lines of communication are kept open with the complainant during this process.

6. People focused approach:

We will address all feedback, concerns and complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our staff/volunteers. We will observe strict confidentiality in complaint handling and ensure that the process is as accessible as possible to all complainants.

Where reasonably practicable, DOHA may offer the aggrieved Person assistance from an outside qualified person to advise, assist and counsel the aggrieved Person through this process.

We will take special care to facilitate complaints from vulnerable people; including children and marginalised groups. We aim to ensure that making a complaint is as easy as possible. We will do our very best to assist them to put their complaint in writing or to write it down ourselves as faithfully as we can.

Sexual exploitation, abuse & Harassment (SEAH):

Complaints of sexual exploitation, abuse or harassment (SEAH) made by a beneficiary against any of the DOHA staff, volunteers or partners are taken very seriously.

The person registering the complaint on behalf of DOHA may offer further services (medical, social, legal, financial, counselling or referrals) based on the needs and wishes of the survivor. This should be done at the time of the complaint being made.

Ensure that it is safe for the survivor to return to their place of residence.

Working with Partners:

Through Partnership Agreements and a Memorandum of Understanding, DOHA requires that our Partners are also committed to place importance on listening and responding to feedback, compliments, suggestions, concerns and complaints from our supporters and the communities we serve.

That they are committed to responding to all input effectively and appropriately and will ensure that stakeholders (especially those most vulnerable) have the ability to easily make a complaint.

Communicating this Policy:

(See Page 2 for Accessibility of this Policy).

New staff will be taken through an induction before commencement and refresher courses will be provided on an ongoing basis as required.

Complaints handling and expected staff behaviours are provided in the DOHA Procedures Manual which is given to every Staff Member at induction.

Staff will make partners aware of the complaints policy as part of any discussion around continuing or setting up a new partnership.

The Project Manager will ensure that it is clear to staff, partners and to the community at large to whom and how complaints can be made and will talk through the complaints policy with staff likely to receive complaints to ensure that they understand the rationale behind the complaints policy.

RESPONSIBILITIES:

The **Board of Directors** are responsible for the implementation and review of this Policy.

The **Chairman of the Board** is responsible for investigating and putting actions in place to resolve complaints and issues that may arise from within Australia about the work of DOHA.

The **Projects Manager** is responsible for investigating and putting actions into place to resolve complaints and issues which may be directly regarding a specific project or project partner in a country.

All employees, volunteers and contracts are responsible for ensuring full cooperation with any complaint investigation.

HOW COMPLAINTS ARE MADE:

WRITTEN COMPLAINTS to the DOHA Head office:

POST: PO BOX 5014, Cheltenham East VIC 3192

Chairman of the Board: Bryan Grasby bgrasby@doorofhope.com.au

Project Manager: Michelle van Zanen mvanzanen@doorofhope.com.au

Website: Complaints form: www.doorofhopeaustralia.org/contact

VERBAL COMPLAINT to the DOHA Head office:

In person or by phone to 61 3 9584 9531

Receiving a complaint:

Complainants must be treated with respect. Staff receiving complaints must listen, accept the complaint, be courteous and be committed to solving the complaint. Staff must remain neutral, not take sides or cast blame.

All staff receiving the initial complaint need to clarify what the complaint is exactly and determine whether it is one to which DOHA is able to respond.

DOHA defines a complaint as “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 “

Staff receiving and clarifying complaints need to be capable of analysis, patience, and diplomacy. If a complaint does not fit the above definition then the complainant should, politely, be turned away or referred to the appropriate person.

If the complaint is about another NGO then this should be pointed out to the complainant; if possible, direct the complainant to the appropriate person from that organisation.

In order to establish what the complaint is and its validity, interpreters may be required. The complaint registration form must be filled in and signed by both DOHA and the complainant. Once filled out and signed, the complaint registration forms go directly to the Project Manager.

Reporting and recording of complaints:

A record must be kept of all complaints regardless of how minor or major the complaint.

All records must be kept securely on file and disclosure of details given on a need to know basis, unless the complainant expressly consents to its disclosure. These records are necessary to help DOHA to improve and to protect vulnerable people in other Projects as we learn from these complaints.

DOHA has the ability to de-identify complaints at the request of the complainant or survivor. SEAH complaints may be reported anonymously if the complainant does not want to give their name. All efforts to protect their confidentiality will be made. Anonymous complaints will be treated with the same respect and courtesy.

Process for managing complaints:

- Acknowledgement of complaint: 5 working days
- Initial review: +15 working days
- Investigation process and determination: +30 working days
- Appeals process: +30 working days

Acknowledgement of complaint:

The complainant must be contacted by phone, email or letter within 5 working days of receiving the complaint by the Chairman of the Board or the Project Manager.

This communication must include the process that will occur following the complaint being made. This should include the expected time-frame so that the complainant knows how long this process should take.

Initial review:

The initial review must take place within 15 working days of receiving the complaint by the Chairman of the Board or the Project Manager.

To ensure fairness and transparency, any persons identified in the complaint will not be involved in the decision-making process or complaints handling.

Once a decision has been made on how to resolve a complaint this should be acted upon as soon as possible.

A triage system is used to determine how serious a complaint is and the type of response required. During the initial review the following Triage criteria is to be analysed:

1. Is this complaint relevant to DOHA?
2. How severe is the complaint on a scale of 1 to 10? (1 being minor)
3. Are there any health and safety implications?
4. Are there any financial implications?
5. Is the complaint simple or complex?
6. What is the impact on the individual, public and DOHA?
7. Does this have a potential to escalate?
8. What are the systemic implications?
9. Is there a need for immediate action?
10. Who is the best person to refer this complaint to?

Serious incident allegations require immediate escalation; such as: sexual exploitation, abuse or harassment of vulnerable persons, including children. Incidents of this nature require the Board of Directors to be advised and the complaint will be referred to the relevant authorities for investigation.

Investigation process and determination:

The investigation process and determination must take place within 30 working days of the initial review by the Chairman of the Board or the Project Manager.

The majority of complaints DOHA receives will likely be resolved immediately with common sense and knowledge of the programme. Staff must be encouraged and supported to do this if at all possible.

Even if a complaint is immediately resolved, it is still a requirement to fill in the complaint registration form, adding what was done to remedy the complaint. Complaint registration forms must be kept confidentially and securely by the Project Manager.

Some complaints about programmes and/or staff ways of working cannot be resolved immediately or easily. If complaints are programme related, they are likely to require time, effort and analysis to resolve – but they should be resolvable in countries where we have operative teams and resources. Others may be more complex and may require additional support (eg. audit, regional staff, etc).

Once a decision is made, the complainant must be informed that their complaint has or hasn't been upheld.

If complaint is upheld, advise the complainant that action has been taken. It is sometimes important, for the sake of confidentiality that the complainant is NOT told what action has been taken: this is most likely to be the case in sexual misconduct allegations. In addition it is important to inform staff that a complaint has been received, investigated and action taken.

This step can be vital in maintaining/restoring staff moral and upholding our wish to be an accountable organisation. Again it is important that the principle of confidentiality is upheld: sometimes it will not be possible to tell staff precisely who is involved and what action has been taken.

This, in most cases, will be the end of a complaints process. The complaint registration form must be updated with the actions taken and continued to be securely filed by the Project Manager.

Appeals process:

The appeals process must take place within 30 working days of receiving the appeal by the Board of Directors.

If a complaint is not upheld, the complainant must be informed of this and of their right to formal appeal, taking the complaint to the Board of Directors.

The Chairman of the Board will contact the complainant to advise the decision of the Board of Directors; if a decision has not been reached, the complainant will be provided with a progress report with an indication of a likely date of conclusion.

If the decision made by the Board of Directors is not satisfactory to the complainant they may appeal to the Australian Council for International Development (ACFID).

ACFID Code of Conduct:

DOHA is a member of the **Australian Council for International Development (ACFID)** and is committed to the full adherence to the ACFID Code of Conduct which defines minimum standards of governance, management and accountability of development for non-government organisations (NGOs).

A complaint can be made against any ACFID Member that is believed to have breached the Code of Conduct. If the complainant is unhappy with the way that DOHA has handled the complaint, they may bring their complaint to the attention of the ACFID Code of Conduct Committee by email to: code@acfid.asn.au or phone: 02 6281 9220. <http://www.acfid.asn.au>

Managing reports and continuous improvement:

A key part of the complaint process is to identify any issues that need to be addressed in our programme delivery and/or ways of working so that similar complaints do not arise.

This will be the responsibility of Board of Directors to ensure that appropriate Policies, Procedures and any relevant training is put into place.

DEFINITION OF TERMS:

Complainant: Person, organisation or its representative, making a complaint.

Partners: Individuals, groups of people or organisations that collaborate with DOHA to achieve mutually agreed objectives in aid and development activities. This may include affiliates.

Feedback: Opinions, comments, suggestions and expressions of interest in the products or services of the organisation

Stakeholder or interested party: A person or group having an interest in the performance or success of the organisation

Enquiry: A request for information or an explanation

Complaint: 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

PSEAH: Prevention of sexual exploitation, abuse and harassment.

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Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. It includes profiting monetarily, socially, or politically from sexual exploitation of another.

Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual harassment: Unwanted physical, verbal or non-verbal conduct of a sexual nature that can include indecent remarks or sexual demands.

Safeguarding: Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds.

Reviewing the DOHA Feedback and Complaints Policy

DOHA Feedback and Complaints Policy will be reviewed every two years.