

Feedback and Complaint Handling Policy

Purpose

Outlines Mary MacKillop Today's approach to managing feedback and complaints.

Additional Authority: Relevant laws.

Scope: This policy is intended to apply to any complaint regardless of who makes it. We will accept complaints relating to our paid staff, our volunteers, our partners or anyone else acting on Mary MacKillop Today's behalf.

Responsible Party: CEO.

Definitions

Complaint

An expression of dissatisfaction about the standards of service, actions or lack of action by Mary MacKillop Today.

Complainant

Any person or organisation making a complaint.

Commitment

Mary MacKillop Today is committed to the timely and fair resolution of complaints. Mary MacKillop Today recognises the value of feedback and complaints as a tool in understanding and responding to stakeholder expectations. Receiving feedback and responding to complaints are important ways for Mary MacKillop Today to improve performance and be accountable.

Complaints may come from donors, project participants or community members affected by our programs, members of the public, partners and supporters.

Mary MacKillop Today is committed to ensuring that all staff, volunteers, contractors and partners are aware of their responsibility to disclose any possible wrongdoing that they are aware of.

Policy

Guiding Principles

Mary MacKillop Today has adopted the following principles effective complaint handling.

1. **Visibility:** We will clearly publicise information about how and where to complain.
2. **Accessibility:** We will ensure that our complaints handling process is as accessible as we can make it. In particular, we commit to having child friendly processes in place.
3. **Confidentiality:** We will observe strict confidentiality in complaint handling.
4. **Ongoing Learning:** We will continue to learn from the complaints we receive to inform improvements in our work.
5. **Respect:** We will ensure that complainants will be treated respectfully, kept informed and supported in exercising their right to make a complaint without fear of discrimination. Individual's rights to access, amend, or annotate records about themselves are recognised to the fullest

extent.

Complaints Focal Points

The CEO shall appoint at least one staff member in Mary MacKillop Today's office in Sydney and at least one staff member in our office in Dili to be the Complaints focal points for the organisation. These focal points will promote this important aspect of our work through activities such as staff training, policy revision, and tool development. The focal points have responsibility for working with staff and partners to ensure complaints and/or feedback are responded to and managed in line with the Complaints Procedures outlined within this policy, and for maintaining records including the maintenance of the Complaints Register. The focal points can be consulted for any clarifications or concerns related to the implementation of this Policy.

Complaints

A complaint may be:

- A criticism relating to one of Mary MacKillop Today's development programs by a community member, partner or government official.
- Concern about the behaviour of staff, volunteers, contractors, suppliers, partners or others.
- Dissatisfaction from a supporter about an aspect of service.
- Criticism about a fundraising action or campaign.

A complaint may be made by anyone participating in or affected by Mary MacKillop Today's programs, a partner, a donor, our staff or volunteers or members of the public.

Extension of the Feedback and Complaints Policy to Partners

Mary MacKillop Today reviews partner organisation's Feedback and Complaints policy and related procedures through the Partner Organisational Capacity Assessment.

Where partners do not have an equivalent policy and procedure in place Mary MacKillop Today is committed to working with partners to operationalise this policy within the context of their work with Mary MacKillop Today.

Sensitisation on the importance of feedback and complaints, and the establishment of an internal Complaints and Feedback policy within the partner organisation should be identified as a priority within the Learning Action Plan to improve transparency and accountability to primary stakeholders.

This policy applies primarily to complaints raised regarding concerns directly related to the activities funded by Mary MacKillop Today.

This includes but is not limited to:

- When a complaint is made to a partner about the conduct of Mary MacKillop Today staff.
- When a complaint is made to Mary MacKillop Today about the conduct of partner staff.
- When a complaint is made to either a partner or Mary MacKillop Today about the project activities.

Complaints regarding broader organisational issues that may have some bearing on the Mary MacKillop Today funded initiative should also be handled following the below procedure and outcomes communicated to Mary MacKillop Today.

Complaints out of Scope of Policy

Where the complaint is outside the scope of this policy, for example about an employee of another

organisation or government department, the focal person will refer the complaint to the appropriate body for follow up.

Publicising our Policy

Mary MacKillop Today will ensure that stakeholders have clear and accessible means to make a complaint. Our full complaints policy is available on our website.

We work with our local offices and partners to ensure this policy is accessible in appropriate formats and different languages. This includes inviting oral expressions of concern where literacy is a constraint and providing age and developmentally appropriate formats for children. This ensures that all children are informed of the support and complaints processes available to them. At first contact with Mary MacKillop Today staff or partner organisations, all project participants or community stakeholders must be made aware of the Feedback and Complaints Policy and the procedure for making a complain. The process for this is outlined in the Policy Checklist for Community Activities document. Relevant communications are also used to publicise this policy including website and annual report.

This policy is included in the Mary MacKillop Today partnership agreements which are provided and explained to all partners as part of our project planning and orientation process. During monitoring trips Mary MacKillop Today's staff are required to provide mentoring to the partners to ensure that they are equipped to implement the policy and to discuss any challenges that have arisen in its implementation.

This policy is included in the Mary MacKillop Today Staff policy manual (for both Australian and overseas based staff) which is provided and explained to all staff as part of the induction process. This policy forms part of ongoing staff monitoring and mentoring to ensure staff are equipped to implement the policy and to discuss any challenges that have arisen in its implementation.

Learning from Complaints

Mary MacKillop Today is committed to learning from complaints received to improve the way we work. Mary MacKillop Today regularly reviews the records and registers of complaints and annually with the Board of Directors.

Mary MacKillop Today takes corrective actions in response to feedback from complaints.

Procedure

Where and how a complaint can be made to make a complaint, stakeholders can:

- email us at complaints@MaryMacKillopToday.org.au
- phone us on +61 2 8912 2777
- mail us a letter to PO Box 1646 North Sydney 2059 Australia, or
- contact our local office or partner.

If any person believes that Mary MacKillop Today has breached the ACFID Code of Conduct a complaint can be lodged directly on the ACFID website to the Code of Conduct Committee at www.acfid.asn.au.

We acknowledge that project stakeholders may find making a complaint difficult due to cultural, logistical and other challenges therefore additional measures have been integrated into the program cycle to ensure there is adequate space for open and honest feedback from vulnerable communities. As a minimum for all Mary MacKillop Today funded projects this includes communication to beneficiaries of our feedback and complaints mechanisms as part of project planning and during

implementation which is monitored through project proposals and reports.

Assistance

Mary MacKillop Today commits to appropriate assistance and referrals to complainants (this might include medical, social, legal and financial assistance, or referrals to such services) as deemed necessary.

Complaints handling procedure

A triage system will be used to assess and categorise the nature and severity of each complaint upon receipt. The purpose of this system is to ensure that serious incidents, including those involving sexual exploitation, abuse or harassment; child abuse or exploitation; or threats to the safety of individuals, are **immediately** prioritised and escalated to the appropriate senior staff or safeguarding focal point.

If the complaint is concerning child abuse or exploitation, then the complaint should be immediately escalated to follow the Safeguarding policy, including the Reporting Procedure. If the complaint is concerning sexual exploitation, abuse, or harassment, then the complaint should be **immediately** escalated to follow the Safeguarding Policy, including the Reporting Procedure.

For all other complaints, as general guidance the following complaints handling procedure should be instigated within 24 hours of a complaint being received with a view to resolving the complaints within 5 working days.

The Mary MacKillop Today representative receiving the complaint should:

- Ensure that they remain friendly and treat the complainant respectfully at all times
- 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.
- Handle the complaint in the first instance if it is within their usual level of authority and they feel able to deal with it. If the complaint is able to be handled in the first instance, the representative receiving the complaint should inform their supervisor or Mary MacKillop Today point of contact (for partner staff) of the complaint within 24 hours of receiving the complaint.
- If the complaint appears to exceed the employee's level of authority or they feel unable to deal with it, they should refer the complaint to their supervisor or Mary MacKillop Today point of contact. The supervisor or Mary MacKillop Today point of contact may choose to escalate the complaint on the staff persons behalf if they believe it should be handled by someone with a higher level of authority.

The person appointed to handle the complaint should then:

- Explore options and solutions that may help to resolve the concern.
- Make a brief record of the discussion and any agreed actions to be taken.
- Take follow up action(s) in a timely fashion.
- Make a brief record of the actions taken and includes copies of any correspondence or other communication.
- Place the file on the complaints file and register of complaints and alert the line manager or Mary MacKillop Today point of contact (for partner organisations) that the complaint has been resolved.
- Ensure that all relevant reporting, privacy, and employment law obligations are met.

- Ensure that any actual or perceived conflicts of interest in making and receiving the complaint are both identified and mitigated.

Child Safeguarding and Complaints

Mary MacKillop Today prioritises the safety and well-being of children. If the person making the complaint is a child, special procedures should be followed. These should include a parent or caregiver should also be present, the child should be supported and reassured that they are safe, and their complaint is confidential, the complaint can be in any form including but not limited to written, verbal and drawn complaints. If the complaint is regarding alleged abuse or exploitation to the child, then the complaint should be immediately escalated to follow the Safeguarding policy, including the Reporting Procedure.

Unresolved Complaints

If the complaint is unable to be resolved by the employee or their supervisor an acknowledgement of the complaint is to be sent by email or letter to the complainant within 5 working days of the complaint being received and an approximate timeframe given for the complaint to be fully resolved which ideally should be less than 3 months.

Complaints that have not been resolved by the employee or their supervisor to the satisfaction of the complainant will be referred to the CEO or Country Director for review.

The CEO or Country Director will review the matter and may: reconsider the original decision and take additional corrective action; overturn previous decisions and institute new measures considered necessary; and endorse the action that has already been taken with no further action required.

If the matter is still unresolved and appears to require additional action the CEO has the option to refer the matter to an external mediator or alternative dispute resolution agency if this is considered to be the most appropriate option.

Handling Complaints about Staff

Complaints that relate to a member of staff or volunteer will be directed to the relevant manager.

Complaints that relate to a member of staff or volunteer in a partner organisation will be directed to the respective International or Australia Group Leader.

If the matter involves a complaint against a Country Director, it should be referred immediately to the International Programs Group Leader.

If the matter involves a senior manager in Australia, it should be referred immediately to the CEO.

If the complaint involves the CEO or a member of the Board, it should be referred to the Chair of the Board.

Depending on the nature of the complaint, variations to the above procedures may apply.

Linked Policies

- 1.2 Safeguarding Policy
- 2.4 Fundraising Policy
- 3.7 Whistleblowers
- 3.8 Risk Management Policy
- 4.2 Working in Partnership Policy
- 5.7 Code of Conduct Policy