
Complaints Policy

May 2022

Board Ratification Date	October 2012 Sept 2018	
Revision Date	May 2020 Sept 2018 Oct 2012	May 2020 full revision, only minor changes Sept 2018 full revision (clarified grounds for complaints in table, aligned with ACFID CoC and recent best practice)
	August 2020 Updates by CEO	Contact details updated. Complaint form updated to include a question identifying concerns around safety. Complaint form updated to add 'prefer not to say' to report form question on gender. 'Type of Complaint Table' and complaint form amended to improve explanation of our response to anonymous complaints.
	May 2022	Complaints mechanism and contact details updated to include Stopline Whistleblower service. References and links updated. Restructure of policy to align with Policies Policy Commitment to well-being of victim/survivor
Reaffirmation Date	May 2020	
Next Review Date and Cycle	May 2025	Every three years from date of ratification or last full review or earlier if required.

1) Policy Statement

Act for Peace is committed to providing high-quality humanitarian, development and advocacy programmes and to working in a transparent and accountable manner. In an effort to achieve high quality, we strive to meet and even surpass the expectations of our stakeholders, including our partners, communities affected by forced displacement, donors, supporters and the public. We realise, however, that there may be occasions when we do not meet the reasonable expectations of all stakeholders at all times. Managing these times is an essential part of being an effective agency. The development of the complaints policy is the first step in Act for Peace managing this process.

Our stakeholders have a right to raise any reasonable concern and provide feedback without any risks of reprisal or unfair treatment, including harassment or victimisation, or of losing their employment, entitlements or funding. All complaints are taken seriously, and we appreciate when people take the time to help us do our job better by raising their concerns with us.

We also recognise that as a member of ACT Alliance we have a responsibility to ensure the safety, dignity and rights of crisis-affected populations and communities in all of our humanitarian and development programs. We therefore encourage all our in-country partners to explore and develop safe and effective complaints mechanisms that are accessible to all persons with whom we work. Communities should be informed of their rights and entitlements and about how to make a complaint. Our in-country and implementing Partners are encouraged to access resources on the ACT Alliance website, including *ACT Complaints Handling and Investigations Guidelines*¹, and the *Core Humanitarian Standards (CHS) Complaints and Investigations*

¹ <https://actalliance.org/documents/act-alliance-complaints-and-investigation-guidelines/>

*Guidelines 2015*² to assist them to establish a complaints mechanism for their organisation and their programmes.

2) Objective

The purpose of this policy is to recognize, promote and protect stakeholder rights, including the right to raise a concern, give feedback and/or complain; whilst providing clear policy guidance for responding to and resolving complaints. Act for Peace believes that having a well-managed mechanism for handling external complaints can improve the quality of its work, enhance the trust and confidence of stakeholders, identify areas of work that need to be improved, and ensure that Act for Peace learns from the feedback provided through this process. Therefore the core objective of this policy is to ensure that Act for Peace reacts constructively to complaints from the people it works with; its supporters, donors, the general public, official bodies and its partners.

3) Principles and Standards

Act for Peace recognises the importance and value of listening and responding to concerns and complaints as set out in the ACFID Code of Conduct³ in ensuring that feedback and the complaints handling process is as effective, safe, confidential and accessible to all stakeholders as possible, irrespective of their gender, age, ability, status, background or other elements of their identify and without prejudice to their future participation. It will do this by following these guiding principles:

1. **Confidentiality:** Act for Peace will maintain the highest level of confidentiality regarding details shared in receiving and investigating a complaint, including the complainants name and personal details. Information will only be shared as necessary to investigating and reporting the complaint. Information will be stored in a locked file.
2. **Visibility:** Information about the process for making a complaint will be clear and well publicised to stakeholders. We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website 'contact us' page has a prominent tab with the word complaint linking to this policy and information on how to make a complaint. Our Partnership Agreements include a standard complaints report which is discussed with partners and a contextually appropriate mechanism agreed.
3. **Accessibility:** The complaints handling process is easily accessible to all stakeholders. Act for Peace will ensure that flexibility is provided to complainants to phone, write and e-mail complaints and/or to raise concerns in person. Act for Peace's stakeholders have varying levels of confidence in written English which is our main mode of communication. Where we can, we will provide information about our complaints and feedback policy and procedures verbally, allowing us to check shared understanding. We will take care to give this information in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint. We will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If appropriate we will make use of pictorial means of communication. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can. All relevant communication (including our website, annual report, partnership agreements, and staff policies) explain how to make a complaint including:
 - Where or to whom complaints can be made
 - Information to be provided by the complainant
 - The process for handling complaints, including confidentiality and protection for the complainant

² <https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/>

³ <https://acfid.asn.au/code-of-conduct> Commitment 7.3

- Time periods associated with various stages in the process
 - The complainants options for remedy, including external means
 - How the complainant can obtain feedback on the status of the complaint.
4. **Objectivity:** All complaints will be addressed in a fair and equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified and managed to ensure objectivity.
 5. **Responsiveness:** All complaints and constructive feedback will be taken seriously and handled as swiftly as practicable. All complaints will be responded to immediately on receipt, and an investigation plan established. Whilst we aim to conclude all investigations within one month of notification, timeframes must remain flexible according to the investigation process. All complainants will be treated courteously and kept updated on the progress of their complaint through the complaints-handling process. Further, in line with the Core Humanitarian Standards⁴ only trained personnel should investigate allegations of sexual exploitation and abuse.
 6. **Accountability:** All complaints will be handled using the agreed complaints procedure. All staff will receive training on the complaints policy and the handling of complaints We will encourage in-country partners to use the ACT Guidelines and Core Humanitarian Standards on Complaints Handling and Investigations to encourage them to establish a complaints mechanism for their organisation and their programs.
 7. **Continuous improvement:** Act for Peace is committed to the continual improvement of the complaints handling process and the quality of its work. This commitment is practically supported by the analysis and reporting of complaints trends, monitoring of complaints handling processes, auditing/management reviews of the complaints handling process, and refining of complaints handling in light of those reviews.
 8. **Organisational commitment to this policy:** Act for Peace will ensure that sufficient resources and expertise are provided to handle complaints, including using an external complaints and whistleblowing service to support the lodging of complaints. Our Complaints Policy will be accessible on the website and distributed to our Board, paid staff, office-based volunteers, partners, consultants, contracted service providers and all others acting on our behalf. Act for Peace will run induction programs for all relevant personnel. Personnel directly involved in complaint handling are to be fully trained in all aspects of this policy and its implementation. We take special care to train our field facing personnel to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.
 9. **Creating a safe environment:** Act for Peace seeks to provide a safe environment through which to voice a concern, without fear of reprisal or unfair treatment. We are committed to ensuring that all stakeholders should be able to raise reasonable concerns:
 - Without any risk of losing their employment or entitlements or suffering any form of retribution in the workplace or outside;
 - Knowing that harassment or victimisation will not arise from raising a genuine concern - and if it does, to know that we will deal with it as a disciplinary action under the appropriate procedure;
 - Knowing that their safety is our highest priority;
 - Knowing that sensitive complaints will be addressed in a confidential manner; and
 - Ensuring that survivors/victims of safeguarding breaches are at the heart of our safeguarding prevention and response and provided with sufficient resources including counselling, health and legal services and information.
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⁴ Core Humanitarian Standards, point 5, page 19

4) Scope

This Policy solely deals with external complaints. Internal issues and grievances made by staff are dealt with according to our Staff Grievance Handling Policy.

If a current or former Act for Peace employee, volunteer, Board Director, contractor, consultant or service provider wishes to raise an issue of wrongdoing or malpractice within Act for Peace, this should be dealt with according to the Whistleblowing Policy.

This policy covers complaints, concerns and/or feedback in relation to the following:

1. **Breaches of the Act for Peace Code of Conduct:** all staff, contractors representatives, volunteers or anyone else representing Act for Peace must sign and abide by the Code of Conduct and can be held to account for breaches of the Code, which outlines Act for Peace's zero tolerance approach to sexual exploitation and abuse, corruption, fraud, or other abuses of power.⁵
2. **Breaches of the Act for Peace Child-Safe Code of Conduct:** all Act for Peace staff, volunteers, consultants, representatives, volunteers or anyone else representing Act for Peace including through visiting an Act for Peace partner or project must abide by the Code of Conduct and can be held to account for breaches of the Code. Act for Peace also insists that all of our overseas programs partners maintain an equivalent zero tolerance approach to child abuse, and that their staff are similarly accountable.
3. **Breaches of Act for Peace's Code of Good Practice,** which outlines clear standards for programs, partnerships and good organisational practice. Act for Peace also has a range of other policies which create clear standards for our humanitarian and development work in Australia and overseas, and we can also be held to account for failing to uphold these standards in our programs, advocacy and other work.

The Complaints Policy is to be enacted alongside the above act for Peace Codes and obligations confirmed in additional Act for Peace policies including:

- Code of Conduct
- Child Safeguarding Policy
- Whistle-blower Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy

Complaints may also be made if there is concern Act for Peace or one of its staff have failed to deliver according to its quality and accountability standards as outlined in its various policies (see: www.actforpeace.com.au)

⁵ 'Abuse of power' includes any abusive behaviour (physical, psychological, sexual or emotional) by a person in a position of authority and trust against someone in a position of vulnerability and/or dependency.

Types of Complaints Accepted/Not Accepted under this complaints policy/mechanism:		Relevant Complaints Mechanism
✓	Complaints from any Act for Peace stakeholder about an Act for Peace staff member, Board Director, volunteer or representative for breaching one of our two Codes of Conduct, which are mandatory Act for Peace standards for individual behaviour.	Please refer to Section 6 of this Policy for the different ways you may lodge a complaint. For concerns related to Child Safeguarding, alternatively an applicable incident form is available within the Child Safeguarding policy available on our website. Act for Peace's general <i>Code of Conduct</i> and Act for Peace's <i>Child Safeguarding Code of Conduct</i> are available on our website: www.actforpeace.org.au
✓	Complaints that Act for Peace, as an organisation, has not lived up to the standards it has adopted under its <i>Code of Good Practice</i> or its other humanitarian and development policies.	Please refer to Section 6 of this Policy for the different ways you may lodge a complaint. To access Act for Peace's humanitarian and development policies, see our website: www.actforpeace.org.au
✓	Anonymous complaints. If you have genuine concern about revealing your identity please confirm this when you contact us.	Please use the Stopleveline whistleblower and external complaints hotline. Refer to Section 6 of this policy.
✗	Feedback and complaints from Act for Peace 'supporters' in Australia of any nature (except the areas above).	Please see the description of how supporters can lodge a feedback or a complaint on the website: https://actforpeace.org.au/learn/contact-us/
✗	Act for Peace staff complaints against other staff	These complaints should use Act for Peace's Grievance Policy.
✗	Act for Peace staff complaints about another organisation or one or more of its employees.	Such complaints should be raised with Act for Peace management and the staff member should be supported through the process of raising and addressing the complaint.
✗	Complaints against one or more employees of a third party organisation (e.g. not Act for Peace or one of its partners and not complaints raised by Act for Peace staff, volunteers or contractors)	Such complaints must be addressed to the management or governing board of the organisation.
✗	Offensive, malicious or abusive complaints, including complaints sent to as part of a bulk email to multiple organisations.	Act for Peace will not respond to these complaints.
✗	Complaints relating to ongoing legal proceedings.	Act for Peace will not hear these complaints until the case is resolved, unless the complaint brings additional and relevant evidence forward

If an agency, group, or individual submits a complaint – hereinafter referred to as “the complainant” – that is not within the scope of this policy, s/he will be informed accordingly.

5) Definitions

Feedback: We distinguish the term ‘complaint’ from ‘feedback’. Feedback is any positive or negative informal statement of opinion about someone or something – an opinion shared for information but without the intention of lodging a formal complaint. A complaint requires a response, but feedback may not.

Complaints: Act for Peace defines a complaint as a formal expression of dissatisfaction or discontent, and/or misconduct about someone or something.

Operational Complaints: this may include Act for Peace partners disagreeing over areas of operation, funding sources, priorities, differences of interest between the public relations interests of the funding partners, conflict over advocacy approaches, the capacities of implementing partners, or non-compliance with Act for Peace programmatic principles, among others. Complaints may also relate to Act for Peace, e.g. regarding decisions on funding appeals, strategy implementation, management issues, marketing, fundraising or campaigns activities.

Sensitive Complaints: Allegations of harassment or bullying, of sexual exploitation and abuse, fraud and corruption or other gross misconduct are considered by Act for Peace as “sensitive” complaints. The policy supports the confidential handling of information related to sensitive complaints. It also ensures that sensitive complaints are addressed by senior management.

Anonymous complaints:

At times people who have genuine concerns may not be able to speak out because of special circumstances and may wish to lodge a complaint with a staff person without revealing their identity to a wider audience. In this instance, we will accept the complaint and will endeavor through best efforts to protect the complainants identity through the course of the investigation and required reporting.

Malicious and Vexatious complaints:

We operate under the assumption that all complaints are made in good faith and are not motivated by intent for personal gain, personal interest or a grudge. However, should a subsequent investigation reveal a complaint to be malicious or vexatious – an accusation that the complainant knows to be false - any investigation underway must be stopped immediately and the Subject of Complaint (SoC) cleared. Complaints lodged for genuine reasons that are subsequently considered to be unfounded shall not be treated as malicious. If a malicious complaint is made by an Act for Peace employee, disciplinary measures must be taken.

6) Notifying Act for Peace of a Complaint

When to complain

If you wish to make a complaint, lodge your complaint as soon as possible after you become aware of the concern. Act for Peace will not accept a complaint more than six months after the alleged incident, except in exceptional circumstances and then only in cases of allegations of abuse, exploitation, fraud, gross misconduct or malpractice.

How to complain

Act for Peace invites its stakeholders – partners, supporters, beneficiaries or others - to contact Act for Peace through one of the following means (noting that information will not be shared with multiple contact points unless necessary to dissolve the concern):

Direct to Act for Peace

- **In Person:** by speaking to an Act for Peace staff member
- **By Email:** complaints@actforpeace.org.au, our Head of Operations at tkeys@actforpeace.org.au, or our CEO at jcousens@actforpeace.org.au, or by emailing your Act for Peace focal point
- **By Skype, Whatsapp** or other digital communications mechanisms that you regularly use to contact your Act for Peace focal point
- **By Letter:** please use the Complaints Form (see Annex 1.)
- **By phone:** contact your Act for Peace contact, or the Head of Operations on: (+61)(02)82590800

Via Stopleveline

Stopleveline is an external complaints and whistleblowing service engaged by Act for Peace to support safe handling of complaints and investigations.

- **By Email:** actforpeace@stopleveline.com.au
- **By online web-based form:** <https://actforpeace.stoplevelinereport.com>
- **By Letter:** Act for Peace, c/o Stopleveline, PO Box 403, Diamond Creek, VIC 3089, Australia
- **By phone:** Australia: 1300 30 45 50 International: +61 3 9811 3275

Complaints relating to a breach of our commitment to the ACFID Code of Conduct⁶ may also be lodged with the ACFID Code of Conduct Committee via the ACFID website <https://acfid.asn.au/content/complaints>

Minimum information required

When lodging your complaint, please include your name, address and contact telephone number in your email or letter so that we can contact you if we require further information. Where possible, let us know how you would like your complaint to be resolved.

Obligation to disclose

All Act for Peace staff, volunteers, partners, consultants and contractors are required to report allegations, concerns or suspicions of breaches related to abuse (including but not limited to child abuse), exploitation and fraud and corruption to relevant donors and authorities. Proven deliberate non-disclosure will lead to disciplinary action.

Please see the Act for Peace Code of Conduct for Act for Peace employee commitments.

7) Managing Complaints

All complaints will be taken seriously. Act for Peace aims to respond to the complainant within five working days and investigate the complaint within one month of receipt of the complaint. Where an investigation requires more time Act for Peace will revise the timeframe and will, where possible, inform the parties who have made the complaint.

Depending on the nature of the complaint, it may be investigated and dealt with internally or externally. Act for Peace may be required to seek further information from the person making the complaint. If the complaint cannot be resolved within Act for Peace, it may be referred to external processes such as mediation, or statutory complaints handling bodies.

Act for Peace commits to prioritising the safety and wellbeing of survivor/victims of safeguarding breaches and providing appropriate assistance and support.

Where possible, the person who has made the complaint will be advised in writing of the outcome of the investigation for this and of the proposed strategy for dealing with the complaint.

Act for Peace will keep a confidential register of complaints with the ability to de-identify complaints at the request of the victim/survivor.

Act for Peace will ensure independence in managing the complaint. If a complaint has been made about a complaint focal point, the Head of Operations or CEO, they will be excluded from the investigation team.

Review cycle

On a continuing basis we will monitor the effectiveness of our complaints handling and make improvements as appropriate. We will:

⁶ <https://acfid.asn.au/code-of-conduct>

- Maintain registers and further data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and service provided;
- Keep abreast of best practices (both locally and overseas) regarding complaint handling;
- Foster a partnership/consumer/client-focused approach;
- Undertake specific training and retraining of staff to foster better complaint handling practices;
- Encourage innovation in complaint handling development; and
- Recognise and reward exemplary complaint handling behaviour.

We will conduct an internal review of the effectiveness of our complaint handling every year and will commission an independent review of the effectiveness of our complaint handling every five years. In addition to the general reviews of our complaint handling, we will monitor how effectively we are publicising our complaints policy on a continuing basis and make necessary improvements in its communication.

Annex 1: Complaints Form

This form could be completed (or adapted) by or for the person wishing to lodge a complaint. If the person making a complaint would rather use a different format, that is fine too.

Please ensure that enough information is provided to enable Act for Peace to contact you to discuss your concerns. If you have genuine concern about revealing your identity please confirm this. Act for Peace aims to ensure that all complaints are handled fairly, timely and appropriately. Information shared will be kept confidential unless we need to share it to resolve a complaint, in which case we will discuss this with the complainant first. We will also do our best to support the complainant through the process of resolving the complaint.

A: General Information

1. Name of complainant: _____
2. Complainant Organisation (if any):

3. Complainant Location (city, country): _____
4. Male/Female/prefer not to say: _____ Age: _____
5. Address: _____
6. Tel: _____ Email: _____
7. Name of the person and/or organisation you wish to lodge a complaint against (if known):

8. Date of incident or concern: _____ Time of incident or concern: _____
9. Place of incident: _____
10. Date of reporting: _____ Time of reporting: _____

B: Please list any concerns you have for the safety of children or others, including yourself, in making this report. Please confirm if these concerns require immediate action.

C: Brief description of the incident or concern

D: Name of witnesses (if any/ and if relevant). Include the names of witnesses and where they can be contacted, if known;

E: State what kind of response you expect from Act for Peace and how you wish to see the matter resolved:

(Name)_____Signature_____

Please send by email, addressed to: The Act for Peace Complaints Officer: complaints@actforpeace.org.au

Annex 2: Resource and Reference List

Core Humanitarian Standards

<https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/>

ACT Alliance

<https://actalliance.org/documents/act-alliance-complaints-and-investigation-guidelines/>

ACFID

<https://acfid.asn.au/code-of-conduct>

ACNC

<https://www.acnc.gov.au/for-charities/manage-your-charity/governance-hub/governance-standards>

Australian Consumer Law

https://consumer.gov.au/sites/consumer/files/2017/12/guide_acl_fundraising-1.pdf

Annex 3: Policy Objectives and Indicators to measure Progress towards Objectives.

OBJECTIVES	INDICATORS
To ensure that Act for Peace is accountable to its standards and constructively manages complaints from its stakeholders.	<ol style="list-style-type: none"><li data-bbox="756 1234 1362 1357">1. Act for Peace’s organisational standards and the standards of behaviour expected of its staff and others are clearly communicated to Act for Peace’s stakeholders.<li data-bbox="756 1397 1315 1458">2. Act for Peace’s maintains a safe and accessible complaints mechanism.<li data-bbox="756 1498 1337 1559">3. Relevant staff and stakeholders are aware of the complaints policy.<li data-bbox="756 1599 1305 1637">4. All complaints are managed according to best practice principles.