

Anglican Board of Mission – Australia  
Anglicans in Development Ltd

Policy ABM1010-AID1010

Complaints Handling Policy

Accepted by the AID Board September 2022  
Accepted by the ABM Board September 2022

To be reviewed no later than 2027

---

Contents

Introduction

Scope

Definitions

Policy

Compliance with ACFID Code of Conduct

Review

Relevant ACFID Code of Conduct Indicators

Related Policies and Procedures

Appendix 1: Complaints Record Form

**Introduction**

ABM and AID welcome *Feedback* and are committed to handling *Complaints* promptly and appropriately according to their content and severity.

ABM and AID will enable transparent, fair, confidential, accessible, and documented *Feedback* and *Complaints* handling procedures that prioritise the needs, expectations, and rights of complainants. For details of this process, see *B2004 ABM-AID Complaints and Critical Incident Handling Procedures*.

**Scope**

This Policy applies broadly to anyone outside or inside the ABM/AID organisation who wishes to make a complaint regarding ABM/AID. Within the broader concept of *Complaint* covered under this policy, there are more specific kinds of complaint dealt with in ABM/AID's related policies or procedures:

- Those making Complaints from inside ABM or AID should follow ABM/AID's Grievance Procedure, where a workplace Grievance is involved.
- ABM/AID's Whistleblower Policy sets out ABM's and AID's commitments, and the obligations of ABM and AID Personnel, where a serious wrongdoing by ABM or AID has occurred or is suspected or alleged to have occurred.

*Complaints* may be made about anything for which ABM/AID are responsible and may include, but are not limited to:

- Dissatisfaction by a *Partner* or *Community* with any aspect of ABM's or AID's programs or projects;
- Concern by a member of the public or ABM/AID supporter about a fundraising approach or issue;
- Concern about fraud, corruption or misuse of funds by ABM, AID or their *Partners* funded by ABM or AID (See ABM/AID's Fraud and Corruption Policy);
- Concern about the behaviour of any ABM or AID Personnel, including illegal or unethical behaviour;
- Breaches of ABM's/AID's Child Protection or Prevention of Sexual Exploitation, Abuse and Harassment policies;
- Concerns about breaches by ABM or AID Personnel of any of ABM's/AID's policies or Code of Conduct.

## **Definitions**

### *ABM or AID Personnel*

Refers to ABM or AID employees, volunteers, directors of the ABM and AID boards or members of other governing bodies of ABM and/or AID.

### *ABM or AID Associates*

Persons representing or acting on behalf of either ABM or AID. These include but are not limited to and contractors to ABM or AID (or to their *Partners*), visitors to ABM or AID's projects in Australia or overseas, ABM or AID's *Partners* and participants in ABM's pilgrimages.

### *Complainant*

The person, organisation, or its representative, making a *Complaint*. This may be anyone, and includes, but is not limited to:

- Staff or volunteers from ABM and AID and ABM's/AID's *Partner* organisations
- *Communities* or individuals involved in any projects funded by ABM or AID
- Other stakeholders affected by ABM- or AID-funded projects
- Donors or other stakeholders in the Australian community
- The Anglican Church and Church community
- ABM and AID *Personnel* (but see also ABM's/AID's *Whistleblower Policy* and *Grievance Procedure*)

### *Complaint*

An expression of dissatisfaction made to or about ABM or AID, about their activities, programs, or their *Personnel* or *Associates*. In the broadest sense, it also includes *Critical Incidents*. See also *Critical Incident Report*.

### *Complaints Officer*

A person designated to receive *Complaints* and *Critical Incidents*. The *Complaints Officer* is the first point of contact for all *Complaints* (or *Critical Incident Reports*) including breaches of ABM/AID's *Child Protection* and *Prevention of Sexual Exploitation, Abuse and Harassment*

policies (in which cases the *Complaints Officer* will immediately inform ABM/AID's *Safeguarding Focal Person*).

#### *Community*

In the context of this policy, *Community* refers to those communities in which AID funds a *Partner* to provide any project activities.

#### *Critical Incident*

An event which may have serious consequences. It includes any alleged, suspected or actual breach of ABM's/AID's Code of Conduct, the law, or anything which has harmed or could harm a person, or which may have significant legal, insurance or risk consequences for ABM/AID. A *Critical Incident* may involve Serious Misconduct of an ABM or AID *Personnel* or *Associate*, or other person/s.

#### *Critical Incident Report*

Report of a *Critical Incident* (see also *Complaint*).

#### *Feedback*

Opinions, comments or suggestions about ABM or AID, their work, or their *Complaints*-handling process.

#### *Grievance*

A clear, formal, written statement by an ABM or AID staff member about another staff member or a work-related problem.

#### *Investigation*

A formal process for establishing the facts of a *Complaint* or *Critical Incident* report and for making decisions about outcome/s of a *Complaint* or *Critical Incident* report. *Investigations* may be internal to ABM/AID or conducted by an external party or parties.

#### *Investigator*

A person or organisation appointed by ABM or AID to investigate a *Complaint* or *Critical Incident*.

#### *Partner*

An organisation with whom ABM or AID has a formal funding agreement.

#### *Safeguarding Focal Person*

A person who may assist the *Complaints Officer* when the *Complaints Officer* receives a *Complaint* regarding of breaches of ABM's/AID's Child Protection and Prevention of Sexual Exploitation, Abuse and Harassment policies.

#### *Subject of a Complaint*

A person against whom a *Complaint* has been made.

Note: A *Complaint* does not have to be made about a person, but can also be made about any action performed by the ABM or AID organisation/s.

#### *Whistleblowing*

Complaints made by *ABM or AID Personnel* or *ABM or AID Associates* about alleged, suspected or actual wrongdoing by ABM/AID or any of its *Personnel* or *Associates*, for example, acts that are unlawful, unethical, or which breach ABM's/AID's Code of Conduct. See also ABM/AID's Whistleblower Policy.

#### *Witness*

A person who provides testimony or evidence during an investigation of a *Complaint* or *Critical Incident*, including, but not limited to, a *Victim/Survivor* of a *Critical Incident*, the *Complainant*, and the *Subject of a Complaint*.

*Victim/Survivor*

A person who has been harmed by a *Critical Incident*.

## Policy

### A ABM/AID will have an Accessible Incident Reporting Process

1. Anyone may make a *Complaint* to ABM/AID, by any means, including verbally, in writing, by telephone, in person, via a third party, or via social media. ABM's/AID's contact details are:

Email:

[complaints.officer@abmission.org.au](mailto:complaints.officer@abmission.org.au) (or, for Safeguarding issues, [safeguarding@abmission.org.au](mailto:safeguarding@abmission.org.au))

Mail:

ABM/AID Complaints Officer (or Safeguarding Focal Person)  
Anglican Board of Mission, Australia  
Locked Bag Q4005,  
Queen Victoria Building, NSW, Australia 1230

Telephone:

+612 9264 1021 and ask for the Complaints Officer (or Safeguarding Focal Person)

Fax: +61 2 9261 3560

**Note:** The *Safeguarding Focal Person* can assist with an investigation but is not the primary point of contact for a *Complainant*. The *Complaints Officer* can ask the *Safeguarding Focal Person* to assist, and the *Safeguarding Focal Person* is responsible for ensuring the incident and progress in its investigation is reported to the relevant ABM/AID board.

2. ABM/AID will make information available to all persons about this *Complaints* policy and related procedures. This will normally be via the ABM/AID website but will also be included in formal annual Partner agreements, and made available to communities with which AID works, through Partners, on projects. ABM and AID will assist those who require assistance to make a *Complaint*, to do so.
3. For activities conducted through *Partners*, ABM/AID will use their best endeavours to ensure that *Partners* introduce and maintain Feedback and *Complaints* handling policies and processes which, to the extent permitted by law, mirror those of ABM/AID and provide for *Partners* to inform ABM/AID when *Complaints* are made and keep ABM/AID informed of progress in handling them. Such Feedback and *Complaints* handling policies and processes must enable communities with which ABM/AID works, and particularly people most vulnerable and marginalised within those communities, to make *Complaints* to the relevant *Partner/s*, or directly to AID

or ABM, safely and confidentially.

4. AID will support its *Partners* to identify and train a *Safeguarding Focal Person* in their organisations to be a point of contact and to support *Complainants* as required.
5. ABM/AID will ensure that requirements for filing a *Complaint* or *Critical Incident* take into consideration the needs of the most vulnerable and consider minority and disadvantaged stakeholders.
6. ABM/AID will provide an accessible, safe and discreet point of contact for any person to raise concerns or *Complaints* about the organisation/s. This point of contact is the *ABM/AID Complaints Officer*. For *Complaints* or *Critical Incident Reports* about breaches of ABM's/AID's Child Protection and /or Prevention of Sexual Exploitation, Abuse and Harassment policies, the *Complaints Officer* should also inform ABM's/AID's *Safeguarding Focal Person*.
7. If a person wishes another person or organisation to assist or represent them in making a *Complaint*, ABM/AID will communicate with such *Complainants* through their identified representative/s. Anyone may represent a person wishing to make a *Complaint* or report a *Critical Incident*, providing they have the *Complainant's* written consent. This could be an advocate, family member, legal or community representative, Member of Parliament or another person or organisation.
8. ABM/AID will accept anonymous *Complaints* and *Critical Incident Reports* if there is a compelling reason to do so (such as safety of the *Complainant*) and will carry out a confidential investigation of the *Complaint* or *Critical Incident* providing sufficient information is given.
9. *Critical Incident* Reporting forms will include the following information:
  - Name of person providing the report (unless they have asked for anonymity) and how they may be contacted;
  - A description of what has happened, when and where;
  - Names of the parties involved (unless anonymity has been requested);
  - Names of witnesses and other involved parties, and how they may be contacted.
10. *Complainants* will be provided with information about ABM's/AID's *Complaints*-handling processes, will be listened to and treated respectfully by the person receiving the *Complaint* or *Critical Incident*, and will be provided with reasons for ABM's or AID's decision/s following an investigation, and given options for redress or review.
11. ABM and AID will take all reasonable steps to ensure that people are not adversely affected because a *Complaint* or *Critical Incident Report* has been made by them or on their behalf.
12. All *Critical Incidents* will be reported immediately to ABM's/AID's Executive Director and (for safeguarding incidents, the *Complaints Officer* will also inform ABM/AID's *Safeguarding Focal Person*).

## **B ABM/AID will Respond Appropriately to Feedback, Complaints and Incidents**

13. Where a Complainant makes an allegation of serious misconduct against a member of ABM's/AID's staff, a volunteer or member of a governance body, or against an *ABM/AID Associate*, ABM/AID will decide whether the subject of the complaint is to be assigned to other duties, stood down, or if the matter is to be referred to the police.
14. ABM and AID will equip their *Personnel* to understand ABM/AID's approach to *Complaints* and *Critical Incident* response and assist them to implement the policies and procedures effectively. This will include specific guidance for responding appropriately to concerns or allegations from children. Staff will receive regular training on all of ABM's/AID's *Complaints* and *Critical Incident* mechanisms.
15. ABM/AID will acknowledge the receipt of all *Complaints* and *Critical Incidents* within two days.
16. ABM/AID will assess and prioritise a *Complaint* or *Critical Incident* according to the urgency and seriousness of the Complaint/Critical Incident. Where the *Complaint/Critical Incident* relates to an immediate risk to safety or security, ABM/AID will respond immediately and will escalate the *Complaint/Critical Incident* appropriately. See also ABM/AID's Child Protection and Prevention of Sexual Exploitation, Abuse and Harassment Policy.
17. All *Complaints* and *Critical Incidents* will be reviewed, but ABM/AID may decide not further investigate *Complaints* or *Critical Incident* Reports which have been found to be vexatious, or have been made in bad faith, or without serious intent, or are already the subject of legal proceedings. In such cases ABM/AID will respond to the Complainant with reasons why the *Complaint* is not being further investigated. At the review stage, a *Complaint* may be resolved to the satisfaction of the *Complainant*, without the *Complaint* needing to be taken further.
18. Personal information that identifies individuals will only be disclosed or used by ABM/AID under relevant privacy laws. All information about a *Critical Incident* will be filed with access restricted to authorised staff.
19. Where a *Critical Incident* involves multiple organisations, ABM/AID will work with those organisations to ensure, where possible, clear and coordinated communication with the *Complainant/s* or their representative/s.
20. Where ABM/AID is notified of a *Complaint* or *Critical Incident* that falls outside of the scope of this policy (such as a *Complaint* against an employee of another organisation, or a government department) ABM/AID will advise that organisation or department and advise the *Complainant* accordingly.

## **C ABM/AID will Investigate Complaints and Critical Incidents Appropriately**

21. ABM/AID will enable a clear mechanism for quickly determining if the *Complaint* is a *Critical Incident*, and, if so, will ensure that the *Critical Incident* is acted upon urgently and that ABM's/AID's Executive Director is informed immediately. A decision may need to be made as to whether the *Critical*

*Incident* needs to be referred to external investigation, including to the police.

22. Incidents involving breaches of ABM's/AID's Fraud and Corruption Policy will be reported both to the Executive Director and to the Chair of the ABM/AID Finance Committee, and the Chair will be kept informed of the progress of the investigation.
23. All *Critical Incidents* (except those referred to the police) will be investigated by a nominee of the ABM/AID Executive Director. The *Investigator* may be internal to ABM/AID or external and will be someone with no involvement in the *Critical Incident*. The *Investigator* will report directly to the ABM/AID Executive Director unless there is a conflict of interest in which case the Investigator will report to the Chair of the relevant ABM or AID Board.
24. *Critical Incident Investigations* will be transparent, fair and confidential, involving only relevant parties.
25. *Critical Incidents* involving the ABM/AID Executive Director will be investigated by a nominee of the Chair of the relevant ABM or AID board.
26. *Critical Incident Investigations* will comprise the following process which will include the production of a written report of the Critical Incident and recommendations to ABM or AID board and ABM/AID Management:
  - a. Information gathering, including from all parties involved, timelines and evidence.
  - b. Analysis of the factors that contributed to the *Critical Incident*.
  - c. Recommendations (including any disciplinary procedures, any actions to address any harm done, or the impact of the *Critical Incident*, taking into account fairness, reports to relevant authorities, and potential legal action if crimes are alleged; and any further *Investigation* that may be required if systemic problems are revealed).
  - d. Risk management (including steps to be taken to mitigate the risk of similar *Incidents* happening again – this may include (but is not limited to) changes in policy or procedures and staff training).

The *Investigation* may find that the *Complaint/Critical Incident Report* was vexatious or false and recommend no further action.

27. Progress reports relating to an *Investigation* will be communicated to the *Complainant* in a timely manner and the timing of such reports will be discussed with the complainant at the time of the complaint being made. The outcome of an Investigation will be communicated to all relevant parties by the ABM/AID Executive Director in writing.
28. Where a *Critical Incident Report* indicates an immediate safety concern for anyone involved, interim safety measures will be taken pending the completion of the *Investigation*.
29. ABM/AID will triage allegations of criminal offenses appropriately in order not to jeopardise criminal investigations, using guidance based on the Core Humanitarian Standard for Investigations (2015).

## **D ABM/AID's Critical Incident Responses will be Centred on the Survivor/Victim**

30. Where a *Complaint* involves actual or suspected abuse or exploitation of children or vulnerable adults the person receiving the *Complaint*, or suspecting the incident has occurred, must take immediate steps to ensure the safety of the child or vulnerable adult (ie a child must be removed from harm's way). ABM/AID will respond immediately.
31. For all *Critical Incidents* involving the safety of persons, whether child or adult, ABM/AID will take a *Victim/Survivor*-centred approach, which prioritises the needs of the *Victim/Survivor*, whilst taking into account notions of fairness and due process. This means that *Victim/Survivors'* wishes, safety, rights, dignity and well-being are prioritised throughout ABM's/AID's whole response to the *Critical Incident*.
32. Subject to the provisions of 31 above, ABM/AID will be responsive and fair to all persons who are parties to a *Critical Incident*, without discrimination and without recrimination against *Complainant/s*.
33. When a *Critical Incident* involves a breach of ABM/AID's Child Protection, Prevention of Sexual Exploitation, Abuse and Harassment, or Fraud and Corruption policies in relation to a project funded by the Department of Foreign Affairs and Trade (DFAT), or where there is a potential reputation risk to DFAT, DFAT will be informed of the *Critical Incident* according to the following time-frames:
- a. **Immediately** for Child Protection incidents and any reports of non-compliance with ABM/AID's (or DFAT's) *Child Protection* policy.
  - b. **Within two business days** for incidents involving Sexual Exploitation, Abuse or Harassment, and **within five business days** for reports of non-compliance with ABM/AID's (or DFAT's) *Prevention of Sexual Exploitation, Abuse and Harassment* policy).
  - c. **Within five business days** for all Fraud incidents.
29. Where a *Critical Incident Investigation* shows that any *ABM/AID Personnel* or *ABM/AID Associate* have committed acts of Serious Misconduct, ABM/AID will institute appropriate disciplinary action, as per their relevant Workplace Guidelines, Contract or Board Charter, which may include dismissal.

## **E ABM/AID will Support Survivors**

30. ABM/AID are committed to supporting people who have been subjected to any form of harm or mistreatment by any *ABM/AID Personnel* or *ABM/AID Associate*. Such support includes, but is not limited to, referral to safe medical services, psychosocial counselling, specialised children's or women's services, and legal redress where appropriate. There is no time limit on such support.

## **F ABM/AID will be Accountable and Learn from Complaints and Critical Incidents**

31. *Complainants* who are not satisfied with the outcome of the investigation of a *Complaint* or *Critical Incident Report* have a right to appeal to

ABM/AID for a review of the outcome.

32. ABM/AID will make public, including on its website, the external bodies and networks to which ABM/AID is accountable. These include the Australian Council for International Development (ACFID) Code Secretariat, the Department of Foreign Affairs and Trade (DFAT), the Australian Charities and Not-for-Profits Commission (ACNC), Action by Churches Together (ACT) Alliance, the Australian Church Agencies Network (CAN) and the Australian Church Agencies Network Disaster Organisations (CAN DO).
33. The ABM/AID Executive Director will report a summary of all *Critical Incident* Reports and investigations and their outcomes to the ABM and AID boards. Reports related to safeguarding breaches will be made as part of the regular quarterly reporting to both boards by the *Safeguarding Focal Person*.
34. Following an investigation, ABM/AID's *Complaints Officer* or *Safeguarding Focal Person* (as appropriate), and relevant ABM/AID Managers will continue to monitor the environment in which the *Complaint* occurred until any recommendations have been implemented and evaluated. Feedback on the process will be sought, where possible, from the parties to the *Complaint* or *Critical Incident* Report to identify where any improvements can be made.
35. ABM and AID will maintain a process for reviewing and analysing information available from feedback, *Complaints* and *Critical Incidents* raised with them with a view to improving delivery of their services and performance of their obligations. Likewise, they will continue to review the effectiveness of their *Complaints* handling processes, including this policy, with a view to improvement.

### **Compliance with ACFID Code of Conduct**

AID is a signatory to the ACFID Code of Conduct and will advise potential *Complainants* of the ability to make a *Complaint* regarding an alleged breach by ABM or AID of the Code to the ACFID Code of Conduct Committee, at [www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring](http://www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring). This information is posted on ABM/AID's website.

### **Review**

This Policy will be reviewed by 2027.

### **Relevant ACFID Code of Conduct Indicators**

This policy complies with the following ACFID Code of Conduct Compliance Indicators:

- 1.4.3, 'Members have a documented child safeguarding incident reporting procedure and complaints handling procedure that aligns with principles of privacy and promotes safety and dignity'.
- 1.5.1, 'Members demonstrate their organisational commitment to the prevention of sexual exploitation and abuse'.
- 7.3.3, 'Members enable stakeholders to make complaints to the organisation in a safe and confidential manner'.

- 9.2.2, 'Members enable staff and volunteers to make complaints and report wrongdoing through fair, transparent and accessible procedures'.

**Related ABM/AID Policies and Procedures**

B2004 Complaints and Critical Incidents Handling Procedure  
 ABM1011-AID1011 Child Protection Policy  
 B1011 Child Protection Reporting Procedure  
 ABM1021-AID1021 Prevention of Sexual Exploitation, Abuse and Harassment Policy  
 ABM2002-AID2002 Whistleblower Policy  
 B2003 Grievance Procedure  
 AID1008 AID Code of Conduct  
 ABM1001-AID1001 Fraud and Corruption Policy

<b>Policy History</b>	
<b>Name of Policy</b>	<b>Date Adopted</b>
External Complaints Procedure	April 2012
Feedback and Complaints Policy	December 2015
Complaints Policy	December 2019
AID1010 Complaints Handling Policy	Accepted by AID Board April 2021
ABM1010-AID1010 Complaints Handling Policy	Accepted by AID Board September 2022 Accepted by ABM Board Sept 2022

**APPENDIX 1: COMPLAINTS RECORD FORM**

All complaints should be recorded on a separate form. Forms should then be saved in one central, safe and secure location in the office of the Executive Assistant.

People may submit a complaint on another piece of paper, or electronically, or they may give a verbal complaint to a staff member. The staff member should then write that complaint on this ‘Complaints Record Form’ and submit it to the appropriate person.

<b>Date:</b> Date complaint is received	
<b>Staff member/volunteer who received the complaint:</b> Which staff member or volunteer first heard or collected this complaint?	
<b>Personal details of complainant (person making the complaint):</b> Name, contact details, if appropriate. If the complainant wishes to remain anonymous, no detail is to be recorded here.	
<b>Nature of complaint:</b> What issue is this complaint related to?	
<b>Details of complaint:</b> A detailed description of the complaint the person has made	
<b>Who dealt with it:</b> Name of person who is or has responded to the complaint	
<b>How it was dealt with:</b> Action taken to handle the complaint	
<b>Outcome:</b> Outline of what has happened as a result of the complaint	
<b>Follow-up required:</b> Any action required as a result of the complaint. This may include a change to your organisation’s procedures and policies	

**Form Completed by (Name):**

**(Signature):**

**Viewed by (Executive Director): (Name):**

**(Signature):**