1.5 Complaints Handling Policy

Introduction

ABM and AID take *Feedback* and *Complaints* about our organisations seriously. We welcome *Feedback* and are committed to handling *Complaints* promptly and appropriately according to their content and severity. We will therefore 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 *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 Staff, Volunteers and Responsible People, where a serious misconduct or wrongdoing by ABM or AID or any of its Workplace Participants 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 *Workplace participants* 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 *Staff*, *Volunteers* or *Responsible People* of any of ABM's/AID's policies or *Code of Conduct*.

Definitions (See "Definitions and Acronyms" at the beginning of this Compendium)

Policy Commitments

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 (or, for Safeguarding issues, 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

Details about the Incident Reporting Process can be found in ABM-AID Complaints and Critical Incidents Handling Procedure

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.

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 should be negotiated with the communities concerned and must enable communities with which ABM/AID works, and particularly people most marginalised within those communities, or in *Vulnerable* positions, including *Child*ren, 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 those in the most *Vulnerable* positions, 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. This includes endeavouring to ensure the *Cultural Safety* of persons making a complaint

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

Details about how ABM/AID responds to complaints and incidents can be found in ABM-AID Complaints and Critical Incidents Handling Procedure

13 Where a Complainant makes an allegation of *Serious Misconduct* against an ABM's/AID *Workplace Participant*, 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 or other external authority or regulatory body.

14 ABM and AID will equip their *Workplace Participants* 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 *Child*ren. 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 to 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 Whilst ABM/AID will investigate all *Complaint*s that fall within the scope of this policy, 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 assist the complainant to identify any available *Complaints* mechanisms.

C ABM/AID WILL INVESTIGATE COMPLAINTS AND CRITICAL INCIDENTS APPROPRIATELY

Details about how ABM/AID investigates complaints and critical incidents can be found in ABM-AID Complaints and Critical Incidents Handling Procedure

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 Financial Wrongdoing 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 or other external authority) 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.

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 *Child*ren or adults in *Vulnerable* positions the person receiving the *Complaint*, or suspecting the incident has occurred, must take immediate steps to ensure the safety of the *Child* or adult in a *Vulnerable* position (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*, including for *Cultural Safety*, whilst taking into account notions of fairness and due process. This means that *Victim/Survivors'* wishes, safety, rights, dignity and well-being will be 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 *Safeguarding* or *Financial Wrongdoing* 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.

(a) **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 *Safeguarding* Policy or DFAT's Prevention of *Sexual Exploitation*, *Abuse* and *Harassment* Policy).

c. **Within five business days** for all *Fraud* incidents.

34 Where a *Critical Incident Investigation* shows that any *ABM/AID Workplace Participant* has committed act/s of *Serious Misconduct*, ABM/AID will institute appropriate disciplinary action, as per relevant Workplace Guidelines, Contract or Board Charter, which may include dismissal.

E ABM/AID WILL SUPPORT SURVIVORS

35 ABM/AID are committed to supporting people who have been subjected to any form of harm or mistreatment by any ABM/AID *Workplace Participant*. Such support will include, but will not be limited to, referral to safe medical services, psychosocial counselling, specialised *Child*ren's or women's services, and legal redress where appropriate. There will be no time limit on such support.

F ABM/AID WILL BE ACCOUNTABLE AND LEARN FROM COMPLAINTS AND CRITICAL INCIDENTS

36 *Complainants* who are not satisfied with the outcome of the *Investigation* of a *Complaint* or *Critical Incident* have a right to appeal to ABM/AID for a review of the outcome.

37 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).

38 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.*

39 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.

40 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 our services and performance of our obligations. Likewise, we will continue to review the effectiveness of our *Complaints* handling processes, including this policy, with a view to improvement.

Reporting to ACFID Code of Conduct Committee

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.This information is posted on ABM/AID's website.

Related Standards, Policies, and Procedures

ACFID *Code of Conduct*, especially 1.4.3, 1.5.1, 7.3.3 and 9.2.2
DFAT Accreditation Guidelines, especially A2.3, A2.4, A3.1, A3.2 and C3.3
CHS Alliance Toolkit for Managing Complaints (2023)
ABM-AID *Complaints* and *Critical Incidents* Handling Procedure
ABM-AID *Safeguarding* Policy
ABM-AID *Child* Protection Reporting Procedure
ABM-AID Whistleblower Policy
ABM-AID Grievance Procedure
ABM-AID Social Inclusion, Gender Equality and Diversity Policy
ABM-AID *Code of Conduct*
ABM-AID *Financial Wrongdoing* Policy

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.

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

Form Completed by (Name): **(Signature):**

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

Responsibilities for the Implementation of this Policy

The ABM and AID Boards will

- Provide organisational leadership that promotes a culture of *Transparency* and openness to receiving and dealing with complaints in a fair, timely and equitable way, *Safeguarding* the rights of all parties.

The Policy Committee will

- Ensure that training in this policy is provided to governance body members.
- Ensure that this policy is placed on the ABM website.
- Ensure that this policy is reviewed at least every five years.

The Executive Director will

- ensure that a *Complaints Officer* is appointed and is trained in receiving and handling *Complaints* and *Critical Incidents*;
- Receive reports of *Complaints* and *Critical Incidents* from the *Complaints Officer;*
- Be responsible for the investigation of all *Critical Incidents*;
- Ensure that training in this policy is provided to all staff.

The Complaints Officer will

- Be familiar with this policy and the related *Complaints and Critical Incident Handling Procedures*
- Act on all *Complaints* received by ABM/AID in a timely, *Confidential* way that is fair to all parties
- Report all *Complaints* and *Critical incidents* to the Executive Director and assist the ED with any *Investigation* as required.

ABM and~~/or~~ AID Senior Management will

- Cooperate with the Complaints Officer to ensure that all *Complaints and Critical Incidents* are responded to promptly and equitably (in accordance with this policy) and that *Critical Incidents* are reported to the ED as relevant

All ABM and AID Representatives will

- Be familiar with the contents of this policy and related procedures.

Policy History	
Name of Policy	**Date Adopted**
External Complaints Procedure	April 2012
Feedback and Complaints Policy	December 2015
Complaints Policy	December 2019
AID1010 Complaints Handling Policy	April 2021
ABM1010-AID1010 Complaints Handling Policy	September 2022
Complaints Handling Policy	October 2024
Complaints Handling Policy (Update to Commitment #20)	Feb 2026, March 2026