

Policy Title	Complaints Policy		
Unit	Operational Policies, Habitat for Humanity Australia		
Version	Version 2.0		
Authorised by	Board of Directors		
Date endorsed	25 June 2013	Reviewed	10 July 2015 18 February 2019
Re-ratified	18 February 2019		

Introduction

Habitat for Humanity Australia recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard and continuous improvement in every area of our work. This applies especially to delivery of services, seeking donations and accountability to stakeholders generally. We are committed to working according to or above the standard required by the Code of Conduct of the Australian Council for International Development (ACFID). Receiving concerns and complaints is one of the most important ways of learning what we need to do in order to improve our work.

Purpose

This policy applies to all our employees and volunteers. Those with particular relevant responsibilities are trained in its application and will ensure that the other employees and volunteers are familiar with the policy.

We make clear the value we place on receiving concerns and complaints in all relevant communications. We advise how a copy of this policy may be obtained and we provide clear information on how complaints may be made.

Policy statement

The following guiding principles will direct Habitat for Humanity Australia in the handling of complaints and ensure that as a signatory to the ACFID Code of Conduct we comply with the standards relating to complaints handling.

Consumer/client-focused approach

The interests of our consumers/clients are foremost in our approach to complaints handling.

Accessibility

We will ensure that our complaints handling process is as accessible as we can practically make it to all complainants.

Responsiveness

We will respond to complaints according to the timeframes stated in this policy.

Objectivity

We will address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaints handling process.

Accountability

We will ensure that accountability for and reporting on the actions and decisions with respect to complaints handling is clearly established.

Visibility

We will clearly publicise information about how and where to complain.

Confidentiality

We will observe strict confidentiality in complaints handling.

Continual improvement

Continual improvement of the complaints handling process and the quality of services is one of our permanent objectives.

To this end we will—

- maintain data on complaints for the purpose of identifying trends in order to enhance information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaints handling;
- foster a consumer/client-focused approach;
- undertake specific training and retraining of workers to foster better complaints handling practices;
- encourage innovation in complaints handling development; and
- recognise and reward exemplary complaints handling behaviour.

Charges

- Access to the complaint handling process is free of charge to complainants

Policy in Practice

Definitions

Complaint means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where an organisational response or resolution is explicitly or implicitly expected.

Complainant means a person, organisation or its representative, making a complaint.

Inquiry means a request for information or an explanation.

Feedback means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process.

Stakeholder or interested party means a person or group having an interest in the performance or success of the organization.

1. Scope of the policy

This Policy is intended to apply to any complaint, regardless of who makes it.

We will accept complaints relating to all our employees, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.

A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation with which we work, our employees, volunteers, donors or a member of the public.

Anonymous complaints can be made, however this may limit our ability to investigate the complaint.

2. Educating the organisation on the complaints policy and training relevant personnel

Our Complaints Policy has been distributed to employees and will be made accessible to other stakeholders by providing information on where to find it or how they could request copies of it.

We require staff and volunteers who may be involved in any way with a complaint to formally signify their commitment to this policy.

To familiarise them with this policy we run induction programs for our board members, all staff, Global Village Team Leaders, relevant office volunteers and contractors. Personnel directly involved in complaints handling are fully trained in all aspects of this policy and its implementation. We take special care to inform field personnel in implementing countries and HFHA staff meeting with beneficiaries in the field regarding this policy and encourage them to receive and handle complaints taking account of language issues and cultural sensitivities.

3. Publicising the Policy

We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website has a link in the "About" dropdown menu and in the footer that is across all our website pages with the word **Complaints** linking to this policy and to information on how to make a complaint. Where literacy is a constraint we will orally invite expressions of concern and complaint on a regular basis. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint.

We ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. 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 communications (for example, website, newsletters, annual report, partnership agreements, employee/staff policies) explain this and explain our procedures for handling complaints including:

- where or to whom complaints can be made
- information to be provided by the complainant
- the process for handling complaints
- time periods associated with various stages in the process
- the complainant's options for remedy, including external means
- how the complainant can obtain feedback on the status of the complaint.

In addition to the general reviews of our complaint handling specified in section 18 we will monitor how effectively we are publicising our complaints policy on a continuing basis and make necessary improvements in its communication.

4. Where and How Complaints may be made

We are able to receive complaints orally in person or by telephone, and in writing by post, email or online via our website. Where complaints are made orally we will ensure our write up of the complaint contains all the information the complainant wishes to provide. All complaints should go in the first instance to HFHA and only if no satisfactory resolution is achieved then alternate routes are to Habitat for Humanity International (HFHI) or to the ACFID Code of Conduct Committee or vice versa.

Complaints may be made by a friend or advocate of the complainant on their behalf.

In countries outside of Australia, due to the specific nature and/or geographical location of their activities, Habitat for Humanity's National Director/ Country Directors and senior managers are responsible for responding to complaints relating to Habitat for Humanity's operations in that country. Country Offices may develop additional procedures in order to fulfill the objectives and principles of the Policy including putting in place appropriate mechanisms for people to express complaints in a practical and safe manner. Receiving complaints in country can be done in a range of ways and decisions must be made (in conjunction with the local community as appropriate) as to what is most appropriate. In order to establish what the complaint is and its validity, interpreters might be needed. Some complaints about programs and/or staff ways of working may not be able to be resolved easily, and in-country staff may require additional support from the Habitat for Humanity Asia-Pacific Office.

Habitat for Humanity International has also provided a mechanism for raising in good faith any suspected violations of the laws or of Habitat for Humanity's policies. It is called MySafeWorkPlace (MSWP), and is a hotline and website provided by a third party service. This system can be used when the reporter wishes to remain anonymous or when the regular means of reporting concerns have not resolved an issue. MSWP can be used to report the following concerns:

- Theft, fraud or any other dishonest conduct (e.g. forgery, bribery, kickbacks, embezzlement, false representations, or reporting, etc.)
- Violations of law related to fraudulent activities

- Conflicts of Interest
- Mismanagement
- Concealment of material facts or gross negligence
- Waste or abuse of HFHI resources
- Discrimination or harassment, or
- Unsafe situations.

Reports can be made online or via telephone 24 hours a day, 7 days a week:

- Within the United States, call toll-free 1-800-461-9330
- Outside the United States, call collect 1-720-514-4400
- Online at

<https://www.mysafeworkplace.com/SplashPages/habitat/habitat.html>

Habitat for Humanity Australia's Complaints Handling Policy, specifically highlighting the following central points for all complaints, is publicised on HFHA's website.

- General complaints about any aspect of HFHA and its work should be sent to the e-mail address: complaints@habitat.org.au;
- Complaints about the Chief Executive Officer should be sent to the Chair of the Board: Duncan West c/o HFHA's official address: PO BOX 1048, North Sydney, NSW 2059
- Postal complaints can also be sent to the Chief Executive Officer or the Chair of the Board at HFHA's official address: PO BOX 1048, North Sydney, NSW 2059

5. How complaints are handled

When we take an oral complaint we will:

- Identify ourselves, listen, record details, and determine what the client wants;
- Confirm that we have understood and received the details;
- Show empathy for the client, but not attempt to take sides, lay blame, or become defensive.

For all complaints we will:

- Seek from the client the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given; or
 - if the complaint is to be investigated.
- We will not create false expectations, but assure the client that the complaint will receive full attention;
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
- Check whether the client is satisfied with the proposed action and, if not, advise them of alternatives;
- Ensure that the complaint is appropriately acknowledged;
- Follow up where necessary, and monitor whether the client is satisfied;
- We will register all complaints (see section 16).

Where appropriate we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

Initial assessment of complaint

We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

- a) severity;
- b) health (including mental health) and safety implications;
- c) financial implications for the complainant or others;
- c) complexity;
- d) impact on the individual, public and organisation;
- e) potential to escalate; and
- f) the need for, and possibility of immediate action.

If we assess the complaint as significant or serious in terms of one or more of these criteria we will classify the complaint accordingly. Examples of significant or serious complaints are reporting a fraud or misappropriation of funds, a complaint about a functional manager and a complaint about or a matter with an Australian State Affiliate organisation.

6. Inquiries, minor complaints and jurisdiction

We will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, that is, during the initial phone call or meeting. As far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint we will also attempt to determine expeditiously whether an investigation is required, depending on jurisdictional questions and whether the complaint is ill-conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable we will refer the complainant to the Code of Conduct Committee of the Australian Council for International Development (ACFID).

7. How complaints are investigated

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

8. Timeframes

We will acknowledge written complaints within 5 days of receipt.

We will aim to resolve complaints as quickly as possible within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

9. Responding to and closing a complaint

Our CEO or a senior manager delegated by him/her will normally make the decision on a complaint that has required investigation (that is not a minor complaint). Decisions on serious or major complaints will be reported to our governing board.

We will communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate, such as in the case of a complaint being made by a local community member (in the field), we will also communicate our decision orally and again in the appropriate language.

We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied we will be prepared to consider any additional information they may provide and to review our decision.

In all cases we will advise that the complaint may be referred to the Code of Conduct Committee of ACFID and to the My Safe Workplace complaints mechanism of HFHI. We will provide all necessary information for referral to the Code of Conduct Committee and offer to assist in referral.

10. Outcomes of complaints

We are committed to learn from complaints by taking the following steps:

- We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.
- We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of workers. Where needed we will counsel or discipline workers or volunteers.
- Where appropriate we will consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

11. Confidentiality

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than the Board, CEO, worker involved or an advisor we may engage and who will commit to keeping any information confidential in handling the complaint, without obtaining the complainant's permission.

12. Recording complaint data

We will register all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data (to include location, who is involved, witnesses, how many times it happened, supporting documents)
- the requested remedy
- the person(s), service(s) and/or good(s) and/or practice or procedure complained about

- the due date for a response
- immediate action taken (if any) to resolve the complaint.

13. Reporting about complaints

We will immediately escalate complex and/or major complaints (see 8) to our CEO or his/her delegate.

All complaints will be reported at our weekly Management Team meetings and our board meetings (Annex 2: Complaints Handling Log). Minor complaints will be reported in summary form. Major complaints will be reported in detail. Names and personal details of complainants will not be included in such reports.

An analysis will be included in the complaints report provided with the complaints data.

14. Continuous improvement in complaints handling

Management will monitor the effectiveness of our complaints handling in practice and make improvements as appropriate.

The Board's Governance and Nomination Committee will conduct an independent review of this policy and the effectiveness of our complaint handling every 3 years.

Annex 1. Complaints Record Form

All complaints about HFHA or any of its people from an external individual or organisation, whether verbal or written, are to be recorded on this form. Please ensure that you discuss this matter with the CEO as soon as possible after receiving a complaint and seek advice from him/her in order to complete this form and identify next steps required.

<p>Date:</p> <p>Date complaint is received</p>	
<p>Personal Details:</p> <p>Name, contact details, if appropriate</p>	
<p>Nature of Complaint:</p> <p>Brief outline of the complaint</p>	
<p>Detail of Complaint:</p> <ul style="list-style-type: none"> A detailed description of the complaint the person has made and relevant supporting data (to include location, who is involved, witnesses, how many times it happened, relevant documents) 	
<ul style="list-style-type: none"> Location 	
<ul style="list-style-type: none"> Who is involved 	
<ul style="list-style-type: none"> Witness/es (if any) 	
<ul style="list-style-type: none"> How many times it happened 	
<ul style="list-style-type: none"> Relevant documents submitted 	
<p>Requested remedy</p> <p>A description of how the reporter wants the complaint remedied</p>	
<p>Who dealt with it:</p> <p>Name of person who is or has responded to the complaint</p>	

<p>How it was dealt with: Action taken to handle the complaint</p>	
<p>When is the response expected to be completed?</p>	
<p>Outcome: Outline of what has happened as a result of the complaint</p>	
<p>Follow up required: Any action required as a result of the complaint. This may include a change to HFHA's procedures and policies</p>	

Annex 2. COMPLAINTS HANDLING LOG

The CEO or the delegate will use this form to formally ‘log’ all external complaints (summarising those documented on Complaints Record Forms for the period). This Log will be provided to the Leadership Team and then the Board in advance of their bi-monthly meetings. This completed log will be accompanied by any analysis that may highlight a need to review/improve/change organisational processes or practices.

Date	Nature and Detail of Complaint	Who Dealt With It	How it Was Dealt With	Outcome	Follow Up Required



a safe, ethical workplace

Habitat for Humanity is committed to supporting a safe, ethical workplace and good stewardship of our donations, funds and resources. When incidents arise, Habitat employees, volunteers, vendors and donors can use the free MySafeWorkplace® hotline to report concerns.

Log on at [MySafeWorkplace.com](https://www.mysafeworkplace.com) or call toll-free (800) 461-9330.

MySafeWorkplace® makes it easy to report matters to Habitat when the reporter wishes to remain anonymous or when regular means of reporting concerns have not resolved an issue.

Confidential and anonymous.

24 hours a day.

Multiple languages accepted.

Report concerns related to:

- Substance abuse
- Threats of violence
- Harassment
- Discrimination
- Safety issues
- Ethics violations
- Theft
- Conflicts of interest
- Bribery
- Fraud
- Accounting issues
- Whistleblower retaliation

How it works: Your confidential report will be instantly forwarded to the appropriate Habitat contact for review and proper handling.

You can anonymously receive and send messages related to your report by phone or via the online portal.

The MySafeWorkplace® hotline is hosted by Convercent. All contacts are confidential, and users are assured anonymity when they request it. Habitat for Humanity International will maintain the confidentiality or anonymity of the person making a complaint to the extent reasonably practicable within the law and the legitimate needs of any ensuing evaluation or investigation. Please be aware that the effectiveness of an investigation based on an anonymous complaint may be limited because of the difficulty of obtaining further information from anonymous complainants and conducting appropriate follow-up.

Habitat for Humanity International reserves the right to act or not to act on any information provided unless required to do so by law. Furthermore, Habitat for Humanity International is not required to disclose its response or actions pursuant to any information that may be provided or reported. The intentional misreporting of information may be actionable and subject to criminal investigation.

16-00009/100/1A/bc-2016