

APJC POLICY

Handling Complaints

This policy is to guide APJC personnel on handling external complaints. Procedures for complaints made by staff members are outlined in the APJC Staff Code of Conduct.

This policy has been developed in consultation among the Executive Director, staff and Board of Directors. Stakeholders will be invited to review the policy and make recommendations on any areas that require revision or elaboration. APJC will keep this policy under review.

1. Overview

APJC will deal constructively with complaints from its alumni, supporters, partners, the general public, donors and official bodies.

Transparent and independent handling of complaints will improve APJC's accountability and the quality of its work. It will build the trust and confidence of stakeholders, identify areas of work that can be improved, and help APJC to apply the lessons of the feedback provided through this process.

This policy is intended to apply to any complaint, regardless of who makes it. A complaint can be made by any alumni, supporter, partner, community or individual with whom APJC works or any member of the public.

APJC is committed to ensure the accessibility of its Complaints-Handling Policy, procedures and systems for making a complaint. This policy will be included in staff induction packages. Staff will be briefed on the nature and purpose of the policy, and their responsibility for dealing with complaints in the proscribed manner.

2. Definitions

For the purpose of this policy, a complaint is regarded as any expression of dissatisfaction about APJC, its personnel, its partners, its contracted service providers, or anyone acting on APJC's behalf.

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action by APJC or its personnel or anyone directly involved in the delivery of APJC's work. A complaint may be related to APJC's activities, use of resources, mission and values, staff conduct/behaviour, or a legal requirement.

3. Principles

APJC will seek to handle complaints fairly, guided by the Code of Conduct of the Australian Council for International Development (ACFID) and the guidelines set out by other reputable organisations.

APJC will receive and respond to complaints irrespective of who makes them or the nature or subject of the complaint.

Everyone who makes a complaint to APJC will be treated with courtesy and respect. Complaints are to be addressed in a fair, equitable, objective and unbiased manner. Issues of conflict of interest will

be identified to ensure objectivity. In return, APJC expects people who make a complaint to communicate their concerns fairly and appropriately.

Complainants may lodge a complaint verbally face to face or by telephone, by email or other written correspondence, via a third party, or by other means.

Some complaints may be both made and resolved verbally, for example by telephone or face to face. Where they are unable to be resolved verbally, complaints must be made in writing.

Some complaints however need to be kept confidential in order to safeguard those making or involved in the complaint. In some instances APJC may judge that the complainant will be better served if others are involved in the resolution process. Third parties will only be included in the resolution of confidential complaints on a case-by-case basis, with agreement of the complainant.

4. Standards

The following minimum standards apply.

Complainants will be treated respectfully, whether it is felt the complaint is justified or not.

Complaints will be acknowledged as soon as possible and ideally within five (5) working days by the recipient. All complainants will receive a copy of this policy.

Complainants will receive a response giving the outcome of their complaint as soon as possible, ideally within 30 working days of receipt.

When a complaint cannot be resolved within this timeframe, the complainant will be informed about the progress to date and when they can expect to receive a response.

If the matter is more complex, a further acknowledgement will be sent explaining what further investigation is required to resolve the complaint and the likely timeframe.

All serious complaints are to be recorded in a file managed by the Office Manager.

5. Reporting about complaints

The person who receives a complaint must consider the nature and seriousness of the issues raised. They should never dismiss a complaint, but rather consult a supervisor or senior colleague to assess the seriousness of the complaint and the steps to be taken to resolve it in accordance with the procedures (Annex 1).

Some complaints are of a more minor nature and can be more easily and promptly resolved. More minor complaints might include a telephone complaint that can be responded to immediately, or a written complaint that proceeds on the basis of a misconception that can readily be corrected.

Minor complaints and disputes should be resolved promptly and without need to use formal procedures. Whenever possible, informal resolution should be attempted first in all matters assessed as less serious.

Other complaints may be **more complex** and require acknowledgement, initial assessment and investigation. They may require remedial action. For example, a change in the way APJC operates, counsels or disciplines personnel or even the involvement of regulatory/enforcement authorities.

Serious complaints are those that are deemed to pose significant operational, safety, financial or reputational risk to APJC. Serious complaints include allegations of criminal or corrupt conduct, maladministration or serious and substantial waste.

Complaints deemed serious are to be reported immediately to the Executive Director. In very serious cases a complaint may require the Board of Directors to investigate and respond.

If it is established that a complaint has been made maliciously, in bad faith or without serious intent a response will be made to the complainant explaining why the complaint is not being taken further.

Complainants who have made a well-founded complaint and who are unsatisfied with APJC's response may appeal to the Board of Directors. After the internal appeal, there is no further internal process. A complainant may however still contact the Code of Conduct Compliance Committee at the Australian Council for International Development (ACFID).¹

APJC will log and monitor serious complaints and results of such complaints. This information will be brought to the attention of senior managers, and the records will be managed by the Office Manager. The information will not necessarily be available to the public.

Annual and other reports to the Board of Directors will include information about serious complaints, how they were resolved and any resulting changes to organisational processes.

6. Staff Guidance

Informal guidance on handling complaints will be provided to personnel through peer to peer support. Guidance will cover:

- Receiving complaints: listening and empathising.
- Responding to complaints: using tact, understanding the complainant's viewpoint and responding using constructive language.
- Investigating the complaint: gathering factual information, interviewing skills.
- Handling difficult complainants: how to respond when under pressure.

Information about the benefits and purpose of this policy will be part of the induction for all new Board and staff members. The policy will be available for all staff and placed on APJC's website.

As part of the APJC's regular review sessions, staff will reflect on the lessons from complaints received and how they were resolved. This information will be included in APJC's annual report.

7. Resources

ACFID Code of Conduct D.6 Complaint-handling within signatory organisations

Australian Standard: Customer satisfaction – Guidelines for complaints handling in organisations (ISO 10002:2004)

Adopted: APJC Board, March 2013

¹ This action will be available once APJC is a member of ACFID.

Annex 1: Complaints-Handling Procedures

The Complaints-Handling Policy will be implemented using the following procedures.

1. Raising Complaints

General complaints about any aspect of APJC and its work can be received by any staff member (face to face, phone, email, etc).

The recipient of a complaint must notify their supervisor or a senior colleague of a complaint received in order to assess its seriousness, the steps to be taken, and the need to consult other staff members and/or the Executive Director.

As a small organisation with few staff, it is likely that all or almost all APJC staff are relevant to solving a complaint – for example, the recipient of a complaint, their supervisor and potentially another senior officer or director.

The responsibility to initiate and coordinate a complaint response will therefore be determined according to the nature of the complaint received, in consultation with a senior officer and/or the Executive Director as deemed appropriate.

All staff will be responsible to record all serious complaints received and the outcome of responses in a complaints file to be maintained by the Office Manager.

2. Receiving Verbal and Written Complaints

The complainant must be treated with respect at all times.

It is important that the recipient of a face to face complaint clarifies the issues underlying the complaint, listens to what the complainant has to say and makes a brief and accurate written summary of the complaint.

If a complaint is in writing it may be appropriate to write or speak to the complainant to clarify the details of the case.

The person managing the complaint should ask the complainant what outcomes they are seeking, and outline the possible reasonable outcomes. Always try to resolve complaints assessed as less serious by informal means first.

If a complaint is considered to be serious or not appropriate to be managed informally, the complainant should be informed of the complaint handling process, and to whom the case will be referred (if this is called for).

3. Acknowledging Complaints

Complainants, who are not anonymous, will receive an acknowledgement of their complaint to confirm that it has been received and an outline of the next steps to be taken by APJC.

4. Registering Complaints

All complaints, whether verbal or written, are to be recorded in the complaints file, which is managed by the Office Manager.

These records will be used to ensure complaints are dealt with efficiently and effectively and to monitor any trends. It will provide information on the number and types of complaints received.

5. Resolving Complaints

Each complaint will be investigated. The person handling the complaint will establish the facts and gather the relevant information, and if necessary and/or practicable, interview those involved.

If an investigation results in a view that a staff member (or other APJC personnel) has a case to answer, the Executive Director (or the Board of Directors, if more appropriate) will apply appropriate disciplinary and other organisational policies and procedures. These may include the Staff Code of Conduct, Child Protection Policy, Financial Management Policy and Procedures, APJC Constitution.

6. Responding to the Complainant

Complainants, who are not anonymous, will receive a response outlining the outcome of the complaint or, if it is a complex matter, when it will be investigated further and how long it is likely to take. APJC will let the complainant know the outcome, which may include the following.

- Corrective action, which has been taken.
- Timeline for implementation.
- The person/role addressing the issue.

Wherever possible APJC will invite the complainant to outline suggestions for actions the organisation can take to ensure similar complaints do not arise in future.

7. Appeals Process

If a complainant is unhappy about APJC's response or if they believe the corrective action has not been adequately implemented they may appeal to the next level. For example:

- If the complaint is about a matter at management level or governance, then the complainant may appeal to the Chair of the APJC Board of Directors.
- If the complainant is still dissatisfied, after all avenues have been explored to resolve the matter, a letter will be sent to the complainant explaining the steps/actions that have been taken, outlining any changes that have been put in place as a result of the complaint and bringing the matter to a close.

8. Points of Contact

Complaints may be made via the following methods:

- Telephone: +61 (0)3 93879740
- Fax: +61 (0)3 93879750
- Email: [inquiries\[at\]apjc.org.au](mailto:inquiries@apjc.org.au)
- Letter: 90 Amess Street, Carlton North, Victoria 3054, Australia
- In person: 90 Amess Street, Carlton North, Victoria, 3054, Australia