

## Complaints & Feedback Handling Procedure

AVI encourages all internal and external stakeholders, and external stakeholders to reach out and report any matters of concern to AVI. AVI will act to investigate and attempt to resolve all issues raised.

This procedure is intended to be read in conjunction with the Complaint and Feedback Handling Policy and the Whistleblowing Policy. This procedure does not include staff grievances regarding other staff members or employment matters. These matters are covered in a separate process.

When resolving complaints AVI will follow the process outlines as below. For a visual representation of the process please refer to the [AVI Complaint Handling Flowchart](#).

### Step 1 Making a complaint

- Complaints can be received verbally (face to face, phone call) or in writing (letter, email, text message). Additionally a complaint can be made through Stopline, <https://avi.stoplinereport.com/>. The platform is also accessible via AVI's website
- Stopline is AVI's online platform for complaints, and whistleblowing. Once a report has been lodged through the portal it will be sent to AVI's Complaints Officers, who are the People & Culture Manager and the Chief Financial Officer.
- For complaints with relation to Child Protection, please refer to [AVI's Child Protection Policy](#)
- Complaints with relation to AVI's Chief Financial Officer will be sent to the Chair of the Board.
- The AVI Complaint Officers are responsible for triaging complaints and assigning investigation of these to the relevant designated officials within AVI. If a complainant's safety or security is at risk, AVI will respond immediately and will escalate appropriately.
- During the initial receipt of the complaint, the Complaints Officer will:
  - acknowledge the complaint to the complainant within 24 hours, on its receipt
  - triage the complaint and send it to the relevant personnel as nominated by AVI
  - seek further information where required from the complainant so that the matter can be satisfactorily resolved
- Log the complaint into AVI's Incident Management System, in line with AVI's Incident Reporting Policy and AVP Register
- determine whether the complainant wishes to remain anonymous and whether the nature of the complaint meets the Whistleblowing definition of a 'protected disclosure'
- Consult with the CEO regarding the most appropriate person to manage the complaint, if it is not deemed a serious incident or falls outside the scope of the Complaint Handling Policy. If the CEO is unavailable, delegation applies to the acting CEO. A complaint may be allocated to another nominated person within AVI to manage, where:
  - The complaints officer is the subject of the complaint or there is a conflict of interest in their involvement
  - Another party is better situated to manage it because of the position they hold, or their knowledge and experience means they are better able to skilfully resolve the issue.

- Determine whether the complaint is categorised as a serious incident and needs to be escalated to the CEO, the Australian Volunteers Program - Program Director and/or other relevant designated personnel
- Serious incidents include complaints with regards to:
  - Child Protection and Safeguarding
  - Sexual Exploitation and Abuse
  - Harassment, Abuse, Violence
- Designate personnel include:
  - Child Protection and Safeguarding: Child Protection & Safeguards Advisor
  - Sexual Exploitation and Abuse: People & Culture Manager
  - Harassment, Abuse, Violence: People & Culture Manager
- If the complaint concerns a child or child safeguarding the nominated Child Protection Liaisons will provide advice
- If the complaint involves the conduct or performance of an AVI staff member People and Culture will be advised. Where there is an internal investigation involving a staff member People and Culture will assist in managing the process to raise the issue with them, to act as an organisational witness, and to ensure a procedurally fair process is followed and the principles of natural justice are applied according to the relevant jurisdiction. Where there is a conflict of interest, or the complaint relates to a staff member within the People and Culture team the matter will be referred to the CEO.
- The CEO or AVI Board may appoint an external Investigator for complex matters, where there are internal conflicts and/ or where legal client privilege is required
- If the incidents could constitute an alleged criminal act it will be reported to the Police in the jurisdiction applicable. Please note that this may not preclude an internal investigation or process also running in parallel.
- Complaints that do not fall within the scope of AVI's Complaint Handling Policy, such as complaints against employees of other organisations, will be escalated to AVI's CEO. Depending on the severity of the incident, matters include those that appear to involve alleged criminal offences will be referred to the Police.

## **Step 2      Informing stakeholders**

- Upon receipt of the complaint, where the complaint is in relation to or affects a program such as the Australian Volunteers Program or an AVI International Services Program – the Complaints Officer will confidentially inform the Program Director, Australian Volunteers Program; or Executive Manager, International Services of the complaint received, unless it is deemed inappropriate because the complaint is in relation to these individuals. This is to ensure that the Head of the program can liaise and manage any queries with relevant internal and external stakeholders in a timely manner with the Complaints Officer. Complaints in relation to the Program Director Australian Volunteers Program or Executive Manager International Services will be referred to the CEO.

- As appropriate and where the complaint relates directly to the Australian Volunteers Program, the Program Director, will notify the relevant person within the Department of Foreign Affairs and Trade (DFAT) of the complaint. Regular updates will be provided as need be and as per AVI's Privacy Policy.
- As appropriate and where the complaint relates the Department of Foreign Affairs and Trade (DFAT) funded programs, AVI will notify relevant DFAT personnel.
- As appropriate and where the complaint relates directly to programs under International Services, the Executive Manager International Services will notify the relevant stakeholder of the complaint. Regular updates will be provided on an as needs basis and as per AVI's Privacy Policy.

### **Step 3 Appointment of Investigator**

On the occasion that an appropriate person has been assigned to investigate the complaint by the CEO or AVI Board or legal counsel they will:

- Contact the complainant and confirm the nature and scope of the complaint and set out any allegations to be responded to
- identify those that need to provide a response to the allegations and provide the respondent with the details of the allegation in writing and meet with the respondent who will respond to the allegations within the complaint
- For internal investigations, if there are AVI staff that need to respond to allegations in relation to their conduct or performance, the process will be managed by People and Culture to ensure a procedurally fair process is followed and the principles of natural justice are applied applicable to the jurisdiction, unless a conflict of interest has been identified in the first instance
- interview all named witnesses as necessary
- review internal policies or procedures or documents or other work practices as as required and relevant to the investigation

All parties may request the presence of a support person at meetings. Staff members who are responding to complaints will be provided with the opportunity to have a suitable support person in attendance in accordance with legislative requirements.

The Investigator will collate all the facts and prepare a report to legal counsel (where legal client privilege is required) or the CEO, depending on the circumstances, with the findings and recommendations.

### **Step 4 Possible Outcomes**

The Complaints Officer, or the nominated investigator, will try to resolve the complaint to the satisfaction of all parties as soon as practicable and in a timely manner, with the following possible outcomes discussed in consultation with the CEO or legal counsel:

- Complaint is substantiated
- Complaint is unsubstantiated.
- Complaint is disproved
- Complaint is malicious, misleading, false or vexatious

Appropriate actions and remedies will be discussed with the CEO and relevant parties dependent on the findings of the investigation.

The Complaints Officer communicate with the complainant to explain to them the findings of the complaint, proposed course of action, and provide the advice in writing, approved by the CEO.

If the complaint is proven to be malicious, misleading, false or vexatious the complainant will be advised of this outcome and, if an AVI staff member, may be subject to disciplinary action up to and including termination of employment.

**Step 5 Where complainant is not satisfied with the proposed resolution**

The complainant may appeal the decisions or conclusions taken by AVI. All appeals need to be submitted in writing to the CEO. The CEO, or the Board Chair, or a Director nominated by the Chair, as appropriate to the circumstances, will review the process undertaken and conclusions drawn. All conclusions drawn from the appeal will be provided to the complainant in writing and will be final.

If any complaint entails an alleged breach of the ACFID Code of Conduct, the complainant should be advised of their ability to lodge a complaint with the ACFID Code of Conduct Committee.

**Step 6 Continuous Quality Improvement Process**

A summary of all complaints received with outcomes will be submitted to the AVI People and Culture Committee by the Complaints Officer, including an analysis and will form part of AVI's Continuous Quality Improvement. The Committee will endorse and where necessary monitor the recommendations for the implementation of the continuous quality improvement projects, changes of policies, procedures, and systems. All reports to the Committee will contain de-identified information only.