POLICY G003: COMPLAINTS POLICY

Responsible person:	CEO	Version:	2.4
Approved by Board of Directors on:	27 February 2019	Scheduled review date:	May 2027

PREAMBLE

This policy was written by So They Can (Australian Entity) for use across all So They Can offices. So They Can operates five offices registered in each of Australia, Kenya, Tanzania, New Zealand, the USA and England & Wales, which are part of the So They Can Global Alliance. In this policy, 'CEO' means CEO of So They Can (Australian Entity). Unless specified otherwise the 'Board' refers to the board of So They Can (Australian Entity). This policy is intended for all So They Can staff, Board members and volunteers, in all 6 So They Can offices. So They Can procedures are consistent with So They Can policies.

DEFINITIONS

1. A **complaint** is an expression of concern or dissatisfaction made to So They Can related to its product, service, person appointed to act on its behalf, or the complaint handling process itself where a response or a resolution is explicitly or implicitly expected.
2. A complainant is any person, organisation or its representative, making a complaint.
3. Enquiry means a request for information or an explanation
4. Feedback means opinions, comments, suggestions and expressions of interest in the products or services of the organisation

POLICY PRINCIPLES

So They Can has adopted the following principles:

Visibility

So They Can will clearly publicise information about how and where to complain.

Accessibility

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

Responsiveness

So They Can will respond to complaint according to our predetermined timeframe.

Objectivity

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

Confidentiality

So They Can will observe strict confidentiality in complaint handling.

Stakeholder – focused approach

The interest of our stakeholders is foremost in our approach to our complaint handling.

Accountability

So They Can will ensure that accountability for and reporting on the actions and decisions with respect to complaint is clearly established.

Continual Improvement

Continual improvement of the complaint handling process and the quality of our work is one of our permanent objectives.

POLICY

So They Can recognises the importance and value of receiving feedback and responding to concerns and complaints. We are committed to achieving the highest standard of performance in every area of our work including accountability to our stakeholders. Ensuring that our stakeholders can hold us to account will improve the quality of our operations and bring greater impact.

This policy is intended to apply to any external complaint, regardless of who makes the complaint. A complaint may come from community members affected by our programs, including children and youth, members of the public, local organisations, supporters and donors. So They Can will accept, respond to and manage complaints relating to our staff, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.

Anonymous complaints can be made, but our ability to investigate them may be limited because of this. To enable the public as well as So They Can Representatives to make a complaint anonymously, So They Can uses an online platform, Whispli. Access to the Whispli platform https://app.whispli.com/SoTheyCan is also available through the So They Can website and the link included in relevant communications with stakeholders.

This policy **does not** cover complaints by So They Can trustees, members, directors, employees, contractors and volunteers and others acting on its behalf (together **Representatives**). These are governed by the So They Can Whistleblowing and Child Protection Policies.

This policy **does not** cover complaints relating to Sexual Exploitation, Abuse and Harassment (SEAH). Raising, investigation and handling of complaints relating to SEAH are governed by So They Can's Prevention of Sexual Exploitation, Abuse and Harassment Policy.

PROCEDURES

1. Publicising this policy

This policy including information on how to make a complaint is available to the public through the So They Can website.

So They Can is a member of the Australian Council for International Development and adheres to the ACFID Code of Conduct including the ACFID Fundraising Charter. Complaints relating to a breach of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee.

Translation of this policy into local language of So They Can Program Implementing Partners is published on the So They Can website.

2. Where and how complaints may be made

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. Where complaints are made orally we will ensure that our write up of the complaint contains all the information the complainant wishes to provide.

So They Can 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.

Complaints to So They Can can be made by telephone, letter or email are directed to the So They Can COO. The COO will make sure that these complaints are either resolved or referred on to a relevant manager or department, and in all cases will keep the So They Can CEO and the Head of the So They Can Audit and Risk Committee abreast of such complaints.

In So They Can program countries the Country Managers are responsible for responding to complaints relating to So They Can operations in that country. In consultation with the Program Implementation Manager, the Country Managers will develop additional procedures in order to fulfill the objects and principles of this policy including putting in place appropriate mechanisms for children and youth to express complaints in a practical and safe manner.

If the complaint is about the Country Manager, it should be directed to the Program Implementation Manager. If a complaint raised in a So They Can program country can't be resolved locally, the Country Manager must request additional support from the Program Implementation Manager or the COO. If necessary, the Program Implementation Manager or the COO will escalate to the CEO and Head of ARC.

3. Informal complaints handling procedure

Ideally, most complaints should be resolved informally, and dealt with promptly by staff. An informal approach should be used as often as possible. Staff to whom a complaint is made can offer solutions consistent with their normal level of authority. Where the likely solutions appear to require approval from a higher authority, or if requested by the complainant the matter can be referred to a higher staff level.

If complaints cannot be satisfactorily resolved informally, the formal complaint handling procedure outlined below will be followed.

4. Handling and Initial assessment of complaint

The person receiving the complaint will do so in a positive manner and will record the following details:

- The name of the person/s making the complaint;
- The date, time and location the complaint is received; and
- A brief description of the complaint.

The Country Managers, or the COO as applicable will make an initial assessment of the complaint in terms of the following criteria:

- Severity
- Health (including mental health) and safety
- Financial implication for the complainant or others
- Complexity
- Impact on the individual, public and organization
- Potential to escalate
- Systemic implications and
- The need for, and possibility of immediate action
- All complaints considered complex and/or major and could have substantial impact on the organisation will be immediately escalated to the CEO and the Head of the Audit and Risk Committee. The ARC will notify the Board of Directors of such complaints and steps taken to

investigate and resolve them.

5. Formal complaints handling procedure

On receipt of a complaint So They Can will attempt to determine promptly whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

So They Can will endeavor to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, during the initial phone call or meeting. So They Can will ensure that the complainant is completely satisfied with the information and or resolution provided.

If an initial assessment indicates that investigation of a complaint is warranted So They Can will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be proportionate with the seriousness and frequency of the complaint.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to the COO, or to the CEO and So They Can ARC if it is the COO handling the complaint, for review. If such a dispute is unresolvable we will refer the complainant to Code Committee of the Australian Council for International Development (ACFID)

6. Timeframe

So They Can will acknowledge oral complaints immediately and written complaints within 5 days.
Our aim is to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days So They Can will inform the complainant of progress and keep them informed of progress every two weeks.

7. Responding to and closing a complaint

So They Can will communicate our decision on a complaint as soon as is practical. The 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 we will also communicate our decision orally and in the appropriate language.

So They Can 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 So They Can will advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for referral to the Code Committee and offer to assist in referral.

8. Outcomes of complaints

So They Can will ensure that all relevant So They Can Representatives are informed of the outcomes of complaints and the implications for our programs.

So They Can will take all required remedial action including improvements to this policy and will be prepared to change the way in which we operate and improve or undertake further training of staff.
Where needed So They Can will counsel or discipline staff or other Representatives.

9. Confidentiality

So They Can will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainant's permission.

10. Recording of complaints

The CFO in Australia, the Country Manager in Kenya and in Tanzania are responsible for maintaining up to date Incidents and Complaints Register for their respective So They Can Entity.

All complaints received by So They Can must be recorded in So They Can's Incidents and Complaints Register of the entity receiving the complaint. The person recording the complaint 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;
- the requested remedy;
- the 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

11. Reporting about complaints

An update on complaints will be included in monthly reports from Program Implementation Partners to the Program Implementation Manager and to So They Can CEO. All new complaints will be reported at regular Executive Management meetings and at quarterly So They Can Board meetings.

RELATED DOCUMENTS

- So They Can Policy and Manual Register
- ACFID Code of Conduct
- So They Can Child Protection Policy
- So They Can Whistleblowing Policy
- So They Can Prevention of Sexual Exploitation, Abuse and Harassment Policy

Date	Version	Comment
October 2013	1.0	
February 2019	2.0	Policy alignment with new organisations structure and review of alignment of ACFID, addition of preamble
November 2019	2.1	
May 2020	2.2	Update of reporting and handling procedure, addition of PSEAH clause, update contact details and Whispli link
May 2021		Policy review, no changes
July 2022	2.3	Update contact details, update role titles
April 2023	2.3	Regular policy review, contact details changed for STC TZ.
29 May 2024	2.4	Updated contact details in Annex A

28 May 2025	2.4	Regular policy review, added England & Wales entity to preamble

Annexure A - CONTACT DETAILS FOR COMPLAINTS HANDLING

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