

POLICY G003: COMPLAINTS POLICY

Responsible person:	CEO	Version:	2.1
Approved by Board of Directors on:	27 February 2019	Scheduled review date:	February 2021

PREAMBLE

This policy was written by So They Can (International) in Australia for use across all So They Can entities. So They Can operates five entities registered in each of Australia, Kenya, Tanzania, New Zealand and USA, which are part of the So They Can Global Alliance.

In this policy, 'CEO' means CEO of So They Can (International), So They Can Kenya and So They Can Tanzania. Unless specified otherwise the 'Board' refers to the relevant So They Can board of the entity in which you are employed or located.

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.

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 obviously our ability to investigate them may be limited because of this.

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.

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.

Translation of this policy into relevant local languages of countries where So They Can operates, as well as a Home page tab with the translation of the word “complaint” into these languages, is also available on the So They Can website.

Where literacy and/or access to internet/technology is a constraint So They Can 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. So They Can will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If required we will make use of pictorial means of communication.

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.

All relevant communications with stakeholders such as newsletters, annual reports, and fundraising material communicate 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

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,

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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 in Australia, New Zealand and the US can be made by telephone, letter or email are directed to the So They Can CFO. The CFO 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 Manager is responsible for responding to complaints relating to So They Can operations in that country. In consultation with the Country Director, the Country Manager 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, complaints should be directed to the Country Director. 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 Country Director, the So They Can CFO, CEO and Head of ARC.

So They Can also established an anonymous online platform, Whispli, available to the public as well as So They Can Representatives to make a complaint or to report concerns of suspected or anticipated wrongdoing or unethical behaviour by another person, or a group of persons, within the So They Can organisation in an entirely safe way. Access to the Whispli platform is also available through the So They Can website Home page and the link included in relevant communications with stakeholders.

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 Manager or So They Can CFO as applicable will make an initial assessment of the complaint in terms of the following criteria:

- Severity

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- 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

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 endeavour 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 we will ensure that the complainant is completely satisfied with the information and or resolution provided.

If the complainant disputes an assessment that a complaint should not be investigated, the member of 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 Code Committee of the Australian Council for International Development (ACFID)

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.

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 So They Can CFO is responsible for maintaining an up to date Complaints Register. The CFO 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 (who meant by ourselves here?):

- 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

All complaints will be reported at regular Executive Management meetings and at quarterly So They Can Board meetings. Our Annual Report will provide de-identified information on complaints

All complex and/or major complaints will be immediately escalated to the So They Can CEO and the Head of the Audit and Risk Committee. The CEO will notify the Board of Directors of such complaints and steps taken to investigate and resolve them.

RELATED DOCUMENTS

- So They Can Policy and Manual Register
- ACFID Code of Conduct
- So They Can Child Protection Policy
- So They Can Whistleblowing Policy

Annexure A - CONTACT DETAILS FOR COMPLAINTS HANDLING

Head Office – Sydney, Australia

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