



This policy is formulated to meet the compliance requirements of:

- DFAT,
- ACFID,
- ACNC,
- External Conduct Standards,
- Modern Slavery Statement

For a detailed exposition see page 2 of the Master Policy Review Calendar

1 Introduction – The value of complaints and our commitment to good complaint handling

1.1 Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

This policy provides guidance to our staff and people who wish to make a complaint about the organisation, its work and its staff.

1.2 Scope

This policy applies to all our people – employees and volunteers – and they are familiarised with it. Those with particular relevant responsibilities are trained in its application.

This Policy is intended to apply to any complaint from the public, or supporters, customers project participants or beneficiaries.

We will accept complaints relating to our paid staff, our volunteers, our partners, our contracted service providers, downstream suppliers or anyone else acting on our behalf.

1.3 Organisational Commitment

TLMA recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. 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 to improve our work.

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. This policy is on our website. (need hyperlink)

2 Definitions we use

Complaint means an expression of dissatisfaction made to or about us, related to our products, services, staff or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected or legally required (AS/NZ 10002:2014).

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

Complaint handling/management system means all policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Dispute means an unresolved complaint escalated either within or outside of our organisation.

Inquiry means a request for information or an explanation.

Feedback means opinions, comments, suggestions and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our organisation, staff, work or complaint handling system where a response is not explicitly or implicitly expected or legally required.

Grievance means a clear, formal written statement by an individual staff member about another staff member or a work-related problem.

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

3 Guiding principles for Our Policy

We have adopted the following principles for our complaint policy and procedures.

3.1 Principle 1: Visibility.

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

3.2 Principle 2: Accessibility.

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

3.3 Principle 3: Responsiveness.

We will promptly let a complainant know that we have received their complaint. We will respond to a complaint according to our predetermined timeframes.

3.4 Principle 4: 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 complaint handling process.

3.5 Principle 5: Charges.

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

3.6 Principle 6: Confidentiality.

We will observe strict confidentiality in complaint handling. The identity of a complainant will not be shared, where possible and appropriate. It is possible to make an anonymous complaint.

3.7 Principle 7: People focused approach.

We understand that making complaints can be difficult. The interests and welfare of our complainants are foremost in our approach to complaint handling. We prioritise the safety, rights, needs and wishes of all people ensuring procedural fairness to all parties. This principle includes the principle of Do No Harm.

3.8 Principle 8: Accountability.

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

3.9 Principle 9: Continual improvement.

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

4 Educating our organisation on our complaint policy and training relevant personnel

Our Complaints Policy has been distributed to all our paid staff, our volunteers, our partners, our contracted service providers and all others acting on our behalf to signify their commitment to this policy.

To familiarise them with this policy we run induction programs for staff. Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. We take special care to train our partner organisations to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

5 Publicising Our Policy

We make clear the value we place on receiving concerns and complaints in all relevant communications. We use the word "complaint" or its equivalent in relevant languages other than English. Our website opening page has a placement with the word complaint linking to this policy and 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 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.

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 explain this and explain our procedures for handling complaints including: (Note - e.g. website, newsletters, annual report, partnership agreements, staff policies)

- 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 17 we will monitor how effectively we are publicising our complaints policy on a continuing basis and make necessary improvements in its communication.

6 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.

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

Where appropriate, for some projects/programmes we may establish complaint committees involving representatives from partner organisations and members of communities we are serving.

Where appropriate we may utilise complaint/suggestion boxes. We recognise that in some circumstances complainants may wish to remain anonymous. Because such complaints can alert us to problems that need fixing, we will accept them though clearly it may not be possible to provide a remedy to an individual.

6.1 Safeguarding Contacts

Where the complaint is of a sensitive nature (relating to fraud, sexual exploitation, abuse and harassment, and child protection matters) the following reporting channels are in place in line with our Safeguarding Policy.

TLMA Designated Safeguarding Lead (DSL)	Name: Nerida Collard Email: neridac@leprosymission.org.au Post: Mark as "Confidential" Nerida Collard PO Box 293, Box Hill, Victoria 3128 Phone: 03 9890 0577
TLMA Deputy DSL	Name: Andrew Newmarch Email: andrewn@leprosymission.org.au Post: Mark as "Confidential" Andrew Newmarch PO Box 293, Box Hill, Victoria 3128 Phone" 03 9890 0577
Country Lead / Chief Executive Officer	Name: Sheldon Rankin Email: sheldonr@leprosymission.org.au Post: Mark as "Confidential" Sheldon Rankin PO Box 293, Box Hill, Victoria 3128 Phone: 03 9890 0577
TLMA Board Safeguarding Lead	Name: Steven Meredith Email: steve.meredith@live.com.au
Safecall	Phone: 1800 312 928 Online: www.safecall.co.uk/report
TLM Global Fellowship DSO	Name: Damaris Villanueva Email: DSO@leprosymission.org

7 How we will handle complaints

7.1 Assigning complaints

Where appropriate, general complaints are referred to the relevant department to be investigated and resolved. Where this is not possible (because the complaint is sensitive, because there isn't

enough capacity or expertise at this level, or because the allegation involves senior personnel), the matter will be referred to a more senior person in the organisation.

Sensitive complaints (including fraud, sexual exploitation, abuse and harassment and child protection matters) should be reported to the DSL or appropriate Safeguarding contact as listed in section 6.1.

Complaints will be assigned to an appropriate person who is impartial with the authority to take action where necessary. For example, where a complaint involves the CEO, it will be directed to the Chair of the Board.

Where appropriate, TLMA may engage a third party to conduct reviews into complaints to ensure procedural fairness and avoid conflicts of interest.

7.2 Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of our service providers. Complaints that are made about another organisation and/or their staff will be referred to that organisation. It is the responsibility of that organisation to resolve it under their own complaints handling mechanism.

We will abide by all mandatory reporting requirements. We are obligated in certain circumstances to report to authorities, such as law enforcement agencies, DFAT or ACFID.

Regarding complaints with criminal aspects (including alleged incidents of fraud, sexual exploitation, abuse and harassment), we take the view that these should also be reported. We will consider whether it is safe to do so and take into consideration the wishes of the victims/survivors and whistleblowers.

If a complainant believes that The Leprosy Mission Australia has breached the ACFID Code of Conduct, a complaint may be lodged with the ACFID Code of Conduct Committee (<https://acfid.asn.au/content/complaints>).

7.3 Providing support and protecting the complainant from harm

In line with our Safeguarding Policy, we will assess any immediate needs for protection or assistance as soon as possible after a complaint is made.

We will work with the complainant to identify what support may be required. For example, we may be able to provide or refer the complainant to services (such as counselling or medical services). We will also take reasonable steps to ensure the complainant is safe and not exposed to further harm.

In line with our Grievance Procedures, for TLMA staff, we may be able to provide flexible working conditions or workplace modifications and ensure managers are aware of their responsibilities. If

the complainant has suffered harm despite this support in place, we will let them know how to make a further complaint.

Where appropriate the complainant and the alleged offender both have the right to bring a support person with them to any meeting.

We will offer protection to the complainant, as long as their complaint is made in good faith.

The protections include:

- Identity being kept confidential
- No 'payback', punishment or retaliation
- No legal action being taken against them for breach of contract, etc
- Potential compensation and remedies

7.4 Anonymity and Confidentiality

Complaints can be made anonymously. In those cases, while we may not be able to respond directly to the reporter, we may be able to use the complaint to alert us to matters that need to be investigated and/or referred to authorities.

An organisational register is kept in a confidential HR drive for all misconduct complaints, and on the request of the complainant the complaint can be de-identified

We 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.

7.5 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. However, 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 investigation is required or not 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 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 the Code Committee of the Australian Council for International Development (ACFID).

8 Accountability and learning

8.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the Board of Directors.

We will run regular reports on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and

- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to our CEO, senior management and to our Board for review, at least annually.

8.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system, and
- monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

8.3 Continuous improvement

We are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaint management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

9 Related Documents

- Safeguarding Policy
- Safeguarding Code of Conduct
- TLMA Staff Code of Conduct
- Whistleblowing Policy
- Grievance Guidelines and Procedure
- Community Directors Complaints Handling Standard

10 Policy Review

This Policy will be reviewed in 3 years.

Revision History

Version	Date	Author	Summary
3.0	20 September 2017	N Collard	New draft created for next revision
3.1	11 August 2021	A Newmarch	
3.2	25 August 2021	N Collard	Reviewed in line with ACFID feedback
3.3	17 September 2021	A Newmarch	Reviewed at IPC
3.4	15 October 2021	N Collard/A Newmarch	Review following Board feedback
3.5	11 November 2021	N Collard/S Rankin	Addition of compliance summary

Document Approval

Version	Date	Approved by
1	26 March 2012	TLMA Board
2.2	2 September 2017	TLMA Board
3.5	13 December 2021	TLMA Board