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# COMPLAINTS HANDLING POLICY



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## COMMITMENT TO GOOD COMPLAINTS HANDLING

Adara believes that receiving, considering and responding effectively to complaints from members, partners, donors, clients, beneficiaries and the public (**stakeholders**) is important for:

- protecting the reputation and integrity of Adara, and of the non-government organisation sector more widely;
- protecting stakeholders from inappropriate behaviour by any representative of Adara, including safeguarding children and people who are vulnerable to sexual abuse and exploitation (please refer to the Child Protection Policy and the Safeguarding Policy);
- enhancing the trust and confidence of our stakeholders; and
- improving the quality of our work.

To do this, we consider it essential that we have an effective mechanism for handling complaints.

## GUIDING PRINCIPLES

- Confidentiality: Adara is committed to ensuring that so far as the law allows:
  - all information related to complaints and their resolution will remain confidential; and
  - the privacy of individuals will be maintained and personal information will not be divulged.
- Accessibility: complaints procedures are easily accessible and well publicised to the people we work with and other stakeholders. Systems are established to enable all stakeholders, including children and young people, to express their views and make complaints. Information relating to the process is accessible and various options to make a complaint are in place to ensure no complainants are disadvantaged.
- Objectivity: complaints are treated in a fair and equitable manner and complainants are treated with respect irrespective of the person making the complaint. Conflicts of interest will be identified to ensure objectivity.
- Responsiveness: complaints are dealt with in a manner that is timely and responsive and will be taken seriously. Complainants will be kept informed on the progress of their complaint through the process.
- Survivor assistance and support: adopt a survivor-centred approach in responding to allegations of safeguarding or child protection incidents and provide assistance and referrals to survivors/victims in accordance with the Child Protection Policy and the Safeguarding Policy (as appropriate).

## SCOPE OF POLICY

This policy is intended to apply to any complaint by a stakeholder. We consider a **complaint** to be any expression of dissatisfaction in relation to Adara's operations or against any one or more of our representatives in the course of performing their role for Adara.

For example, this policy would apply if a:

- partner organisation raised concerns about an aspect of our programmes;
- member of the public contacted us with concern about the way we conducted a fundraising campaign; or

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- beneficiary raises concerns about a representative on project site taking photographs of beneficiaries without their consent.

A complaint is not:

- a general inquiry about our work, policies or procedures;
- a request to amend our records, for example, to be added to or removed from a mailing list;
- a request for information;
- an employee grievance; or
- a dispute under a commercial agreement.

For the purposes of this policy, a **representative** of Adara is a director, trustee, employee, secondee, contractor, volunteer, visitor or other person acting on behalf of Adara.

Adara recognises that many beneficiaries are children and young people. Children and young people must feel that they can express themselves in connection with our work otherwise there is a risk that if harm or another issue of concern is occurring, it will remain undiscovered and ongoing. Adara recognises the importance in asking children and young people when they feel safe, and when they feel unsafe. Children and young people are welcome and encouraged to make a complaint themselves or appoint an advocate to speak on their behalf.

Adara will take special care to facilitate complaints from vulnerable populations including children and young people. If appropriate we will make use of pictorial means of communication.

Any queries in relation to this policy should be directed to one of the nominated contacts for receiving complaints listed below.

## PUBLICISING THIS POLICY

### COMMUNICATING EXTERNALLY

Stakeholders will be made aware of this policy through a link on our website and in our annual report. We will also include reference to this policy in agreements with our partner organisations. Staff on project site will explain our complaints process to partners, clients and beneficiaries in those locations, in appropriate forums. Staff on project site meet regularly with Stakeholders, including children and young people, and will use the meetings, as appropriate, to elicit feedback, including about any dissatisfaction with Adara and/or its representatives.

Any visitors to project sites will undergo training on this policy as part of the pre-departure briefing.

Reference to this policy will be included in formal documentation to donors.

In addition, our research team receives feedback about our programmes and programme staff while conducting research on project site – this gives beneficiaries and clients the opportunity to make complaints or raise concerns with staff who are not involved directly in programme delivery.

### COMMUNICATING WITH CHILDREN AND YOUNG PEOPLE

Children and young people and their families will be informed through information sessions about relevant Adara policies and practices, including this policy and how it relates to them.

Children and young people will be made aware, as part of the curriculum or via other regular training, about their rights and about child protection. In addition, posters and fact sheets will be displayed and

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disseminated on complaints and allegations processes, including what to report and to whom complaints are to be made. Posters are displayed in child accessible areas.

Children and young people are also consulted during the review of this policy.

### COMMUNICATING INTERNALLY

All representatives will be made aware of this policy, during induction and in training. A copy of the policy will be accessible via the Adara intranet.

Training and/or communication will also be provided following an update or change to the policy.

## PROCEDURES

### HOW COMPLAINTS MAY BE MADE

A complaint can be made orally or in writing. Our website has a contact form for easy communication with Adara: <http://www.adaragroup.org/about/contact/> . If an oral complaint is complex, we may ask for the complaint to be put in writing. Adara will provide assistance to a complainant if they need help to do this. If a complaint is made in person, the complainant may have a support person with them (and at any subsequent meeting which may be held to discuss or attempt to resolve the complaint).

It is most helpful to us if the complainant provides their name and contact details. In some instances, a complainant may request that their identity is not divulged or may seek to make a complaint anonymously, but this may restrict our ability to investigate and resolve the complaint. A complainant may request that records of a complaint and its resolution be de-identified.

Children and young people will be taught and encouraged, during training and through material such as posters, that they can make a complaint to any staff member, volunteer or visitor.

### NOMINATED CONTACTS FOR RECEIVING COMPLAINTS

Our nominated contact for receiving complaints is:

Chief Executive Officer  
Adara Development (Australia)  
Level 2 117, Harrington Street, the Rocks, NSW 2000  
Telephone: +612 9395 2800  
Email: [complaints@adaragroup.org](mailto:complaints@adaragroup.org)

Complaints relating to our Nepal operations can also be referred to our Nepal Country Director  
Adara Development (Nepal)  
Chapali, Budhanilkantha, Kathmandu  
Nepal  
Telephone: +97701 4650164/ 4374577  
Email: [complaints@adaragroup.org](mailto:complaints@adaragroup.org)

Complaints relating to our Uganda operations can also be referred to our Uganda Country Director  
Adara Development (Uganda)  
c/o Kiwoko Hospital  
PO Box 116  
Luwero  
Nakaseke District  
Uganda

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Telephone +256 77 2643234  
Email: [complaints@adaragroup.org](mailto:complaints@adaragroup.org)

Complaints relating to our United States operations can also be referred to our Director of Global Health

Adara Development (USA)  
300 Admiral Way  
Suite 106  
Edmonds, Washington 98020  
USA  
Telephone: +1 425 967 5115  
Email: [complaints@adaragroup.org](mailto:complaints@adaragroup.org)

However, complaints can be taken by any staff member.

A staff member who receives a complaint must promptly notify the Chief Executive Officer (**CEO**) or the Chair (if the complaint is about the CEO).

The staff member must also notify the Head of Legal who will log details of the complaint in the Complaints Register.

## HOW WE HANDLE COMPLAINTS

The CEO or Chair (as appropriate) is responsible for the initial review and triage of a complaint.

In determining the seriousness of an alleged misconduct, the CEO or Chair may take into account the risks to the complainant, others in the community, Adara or the wider non-government organisation sector, whether the alleged misconduct involves vulnerable people (including children) or critical aspects of Adara's operation (e.g. financial wrongdoing), health, safety and systemic implications and need for immediate action.

Reports or allegations relating to safeguarding (including child safeguarding) will be dealt with in accordance with the Child Protection Policy or Safeguarding Policy, including referral to child protection officers or other safeguarding focal points (as appropriate).

The CEO or Chair will assess whether the Police (if the alleged behaviour is criminal) or any relevant statutory agencies need to be notified in relation to the allegations.

If a complaint does not fall within the scope of this policy, the CEO or Chair will determine the appropriate action to be taken, including whether the complaint should be referred to the appropriate entity which is the subject of the complaint.

The CEO or Chair will determine whether a complaint should be delegated to another member of staff to investigate and resolve or whether the CEO or Chair should be responsible for the particular complaints handling process. To ensure fairness and transparency in the complaints handling process, personnel/teams identified in the complaint will not be involved in the decision-making process of complaints handling.

The staff member responsible for investigating and resolving a complaint must ensure that ongoing details of the complaint are notified to the Head of Legal who will update the Complaints Register.

If the complaint requires investigation then the responsible staff member must hold interviews with all relevant parties in order to establish the facts and gather the relevant information. A person alleged to have acted inappropriately will generally be informed of the allegations and given an opportunity to explain his or

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her version of events. The responsible staff member must ensure that the Head of Legal records the outcome of those interviews, together with further action taken or to be taken, in the Complaints Register.

The responsible staff member will endeavour to ensure that the complaint is resolved amicably. Where Adara was at fault:

- (a) the responsible staff member should take steps to ensure that the complainant is adequately appeased, for example through a formal letter of apology; and
- (b) Adara must ensure that steps are taken to avoid a recurrence of the event which caused the complaint, for example, by modifying practices and procedures and/or by undertaking remedial training; and
- (c) Adara must ensure that appropriate disciplinary action is taken where warranted.

Where a child or children are involved in a complaint, whether as the complainant, the subject of the complaint or interviewed as a result of the complaint, the safety and well-being of that child or children is paramount whilst the investigation is being conducted.

## RESPONDING TO AND CLOSING A COMPLAINT

Each complaint must be acknowledged as it is received. If an oral complaint is received the staff member should take the name and contact details so the outcome can be communicated.

Once the complaint has been considered and, if necessary investigated, the complainant will be advised of the outcome. If it is determined that no action is required as there is no real basis for the complaint, the reasoning for this will be communicated clearly to the complainant. If the complaint is upheld, this will be communicated, together with any appropriate remedial action to be taken. A complainant who is not satisfied with the outcome of Adara's complaints process may make a complaint to the ACFID Code of Conduct Committee (details below).

## OUR TIMEFRAMES

All complaints will be acknowledged in writing within 5 business days of receipt. We will endeavour to resolve complaints which are not complex, within 10 business days of receipt. We will endeavour to resolve complex complaints as soon as possible, but in any event, within 20 business days. Where there are extenuating circumstances which mean it will not be possible to meet these timeframes, we will provide the complainant with a revised timeframe as to when the complainant can expect to hear from us. The timeframe for resolving complaints will involve balancing the concerns of the complainant with the need to investigate the circumstances of the complaint thoroughly and formulate the appropriate course of action to respond to the complaint, if it is substantiated.

## CONFIDENTIALITY

All information relating to complaints (including the names of people involved and the details) will remain confidential and any disclosure will be on a "need to know" basis, or when Police (or other applicable authority) is notified of the incident or allegation, or as required by law.

## RECORDING COMPLAINT DATA

Adara will establish and maintain a Complaints Register, which will include the following:

- (a) the date the complaint was made;
- (b) the name, address and telephone number of the complainant;
- (c) the nature of the complaint and a brief description of the complaint;
- (d) the name of the person or persons who were the subject of the complaint;
- (e) the action taken to investigate the complaint and details of the findings of the investigation;
- (f) the steps taken as a result of those findings; and
- (g) the date and manner by which the complainant was informed of the outcome.

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If the complainant (or survivor where relevant) requests, the information in the Complaints Register will be de-identified as far as practicable.

## REPORTING ABOUT COMPLAINTS

The CEO must submit a report to the directors and trustees before each board meeting summarising details of complaints (if any) received.

During the complaints handling process, the CEO (or any member of staff the CEO believes to whom it is appropriate to delegate) must analyse each complaint to determine any recurrences or trends in complaints received and to ensure that appropriate action is taken to prevent future recurrences.

## ALLEGED BREACH OF THE ACFID CODE

We are a member of the Australian Council for International Development (**ACFID**) and a signatory to the ACFID Code of Conduct. We are committed to full adherence to its requirements. These good practices ensure transparency and accountability, improve international development effectiveness and increase Stakeholder trust. Complaints relating to an alleged breach of the ACFID Code of Conduct can be made to the ACFID Code of Conduct Committee. Further information about the Code and its complaints process is available at: <http://www.acfid.asn.au/code-of-conduct/complaints>

Date of Policy: June 2023

Next review date: June 2026