

# Complaints Handling Policy

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## DOCUMENT VERSION

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17 April 2019	Draft document shared with Board
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## POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English only.

Any suggestions about this Policy should be directed to the Femili PNG Operations Directors, Development Manager or Chief Executive Officer/Senior Social Worker (CEO/SSW) so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Operations Directors, Development Manager and CEO/SSW is responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table at the top of this page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual eg. shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

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## 1.0 INTRODUCTION

This policy covers both Femili PNG and Friends of Femili PNG. For simplicity, the document will only refer to Femili PNG.

Femili PNG welcomes and encourages all feedback as we strive to improve our programs. Feedback can take the form of suggestions, compliments or complaints. We aim to make our feedback and complaints process as accessible as possible, and encourage contact through phone, writing and email.

Femili PNG is committed to ensuring that any person or organisation using Femili PNG services or affected by its operations has the right to provide feedback, lodge a complaint or to appeal a decision of Femili PNG and to have their concerns addressed in ways that ensure access and equity, fairness, accountability and transparency.

Femili PNG aims to provide a complaints and feedback handling procedure that:

- is simple and easy to use;
- is effectively communicated and promoted to all clients and stakeholders;
- ensures complaints are fairly assessed and responded to promptly;
- is procedurally fair and follows principles of natural justice; and
- complies with legislative requirements.

Femili PNG takes all complaints and allegations very seriously. All complaints are treated confidentially.

### 1.1 Purpose

The purpose of this policy is as follows:

- a. Provide an avenue for clients and stakeholders to raise complaints and provide feedback to Femili PNG and to ensure that all issues are addressed in a respectful, timely, constructive and positive way.
- b. To minimise damage of Femili PNG's reputation and reduce the risk of litigation by providing a clear and accountable mechanism by which complaints made against a Femili PNG staff member or against the service in general may be addressed.
- c. To ensure that Femili PNG and all its staff continue to comply with its operational policies including, but not limited to, the code of conduct, duty of care and client's rights.

### 1.2 Definitions

A complaint shall be deemed to mean any statement of a client or any person acting on behalf of a client alleging a grievance involving the action, inaction, activities or behaviour of any Femili PNG employee or Board members. Clients are encouraged to give feedback, complaints and comments about the service in whatever form. All complaints will warrant the same treatment as a written complaint.

A complaint will usually include at least one of the following elements:

- a. Complaint about Femili PNG's services.
- b. Potential damages or damages suffered by the client as the result of Femili PNG's services.

- c. Request for corrective measures.

A complaint is not:

- a. A general query about Femili PNG's work.
- b. A request for information.
- c. A contractual dispute.
- d. A request to amend records e.g. to correct an address, cancel a donation.
- e. A request to unsubscribe from a Femili PNG 'service' e.g. a campaign newsletter.

In general, complaints could include (but not limited to):

- Dissatisfaction with a service that has been provided
- Concern about a donation that has been made
- Concern about the behaviour or actions of staff
- Issues with a communications or fundraising approach or campaign.

### **1.3 Principles**

The following principles underlie Femili PNG's complaints handling policy:

- The intention of Femili PNG is to minimise and prevent the incidence of complaints.
- All Femili PNG clients have access to a clear and accountable complaints mechanism.
- Femili PNG will consider all feedback and complaints it receives.
- Femili PNG is accountable for the quality and manner of service delivery and encourages clients to question or comment on the service they receive, and possible improvements that can be made to it.
- Femili PNG will treat all complainants with respect, recognising the rights of the complainant and that the issue of complaint is important to the complainant.
- Femili PNG will ensure, where possible, that advocacy is available to clients who make a complaint and require support.
- Femili PNG will maintain confidentiality of parties involved, keeping any information private to those directly involved in the complaint and its resolution.
- In the event of a complaint being made, Femili PNG is committed to dealing with the complaint promptly.
- Femili PNG will act upon feedback received and undertake a fair investigation of any complaints. A resolution will be pursued through open communication, evaluation and review.
- Femili PNG will ensure that Board members and staff are provided with information about the complaints procedure as part of their induction and are aware of procedures for managing client feedback and complaints.
- Femili PNG will ensure service users and stakeholders are aware of their rights and the complaints policy and procedures.
- Femili PNG will ensure that a complainant is not penalised in any way or prevented from use of services during the progress of an issue.

- Clients, or those acting on their behalf, and stakeholders who have lodged a complaint will have access to the information gathered through an investigation of the complaint and be informed of outcomes of the complaint procedure.
- Femili PNG will ensure that feedback data (both positive and negative) is considered in service reviews and in planning service improvements.
- Third parties who are approached in relation to complaints, will be asked to encourage the client to use the complaint's policy procedures, but if the client is unable or unwilling to themselves make the complaint the third party may provide feedback to Femili PNG on the client's behalf, in the interests of improving the services provided.

#### **1.4 References / Other policies**

This policy must be read and understood in conjunction with the following other policies:

- Lukautim Pikinini Gut Long Birua - Femili PNG's Child Protection Policy and Code of Conduct - for complaints involving allegations of child abuse and reporting procedures
- Femili PNG Case Management Policy and Procedure Manual – for complaints from clients
- Femili PNG HR Manual – for complaints involving staff misconduct or for grievance procedures relating to staff complaints.

## **2.0 MAKING A COMPLAINT**

Femili PNG values feedback and complaints from donors and the public. General complaints **in Australia** should be addressed to:

Friends of Femili PNG,  
C/- Development Policy Centre  
Australian National University  
7 Liversidge St, Acton ACT 2601.  
Email: [friends@femilipng.org](mailto:friends@femilipng.org).  
Phone: +61 (0)2 6125 3446.

Feedback and complaints can also be lodged **in PNG** in the locations in which Femili PNG has a presence. Contact details are below:

**Femili PNG Lae Case Management Centre**  
PO Box 616  
Lae, Morobe Province, Papua New Guinea  
Email: [info@femilipng.org](mailto:info@femilipng.org)  
Phone: +675 7091 4027 or +675 472 8904

**Femili PNG Port Moresby Case Management Centre**  
PO Box 724, Vision City  
Port Moresby, Papua New Guinea  
Email: [info@femilipng.org](mailto:info@femilipng.org)  
Phone for Bel isi subscribers: +675 7055 4401  
Other enquiries/assistance: +675 7916 9063

Complaints can also be made through **social media**. To do so, visit our Facebook page [facebook.com/FemiliPNG](https://facebook.com/FemiliPNG) and lodge your complaint via messenger.

**Complaints can also be made directly to the Chair of Femili PNG in writing to [stephen.howes@anu.edu.au](mailto:stephen.howes@anu.edu.au), marked confidential.**

## ***2.1 General Service Complaints from Clients***

This policy aims to impartially assess the complaint in a manner which ensures there is adequate opportunity for all parties to present their case. It also aims to ensure that clients have redress if they have been disadvantaged by a decision of a staff member. It provides an opportunity for Femili PNG to identify and rectify problems in philosophy or management that may be impeding our ability to assist clients. The complaints procedure may not necessarily resolve a conflict.

Complaints can be sent, in writing or verbally, to any member of the organisation. Clients are placed in a difficult position when they complain, as their only contact with the organisation may be through the person about whom they wish to complain. Femili PNG employees should bear this in mind when considering whether a complaint is being made and what action should follow. Suppression of a complaint by a worker is viewed seriously, particularly as it may provide important information on Femili PNG policies and practices.

Femili PNG will deal with complaints as quickly as possible; however we must balance the need for a fair hearing against other clients' needs for service. Every attempt should be made by the Operations Director and CEO/SSW to ensure that support is offered to staff who have had a complaint made against them.

**The full process and procedure for dealing with complaints from clients is in Section 10, Case Management Police and Procedure Manual.**

## ***2.2 Complaints from children***

Femili PNG is committed to making complaints handling processes accessible to children in PNG. This can be challenging in an environment where there are difficulties with access to technology. Children are users of Femili PNG services through either being child clients or dependents of clients. Femili PNG will promote the ability of children to make complaints, through ensuring complaints processes are visible, accessible, responsive and confidential.

If a child has a complaint about Femili PNG, there are a few different options available to them. We encourage the child to talk with their case worker if their complaint does not involve them. If the complaint involves their case worker, the child is encouraged to speak directly with the Operations Director and CEO/Senior Social Worker.

If the child is uncomfortable raising the complaint with Femili PNG staff, they may consider discussing it with another trusted adult such as a teacher or a relative. Children in Femili PNG programs may also report to the District Welfare Child Protection Officer.

**The full process and procedure for dealing with complaints from clients is in Section 10, Case Management Police and Procedure Manual.**

**Mandatory reporting requirements in relation to child protection are outlined in *Lukautim Pikinini Gut Long Birua* – Femili PNG's Child Protection Policy.**

## **2.3 Other complaints**

In addition to complaints and feedback from clients and children, Femili PNG also welcomes feedback on other aspects of its operations such as our partnering activities, fundraising and communications. Feedback and complaints on these issues may be provided to our offices in PNG or Australia. Any complaints about Femili PNG may also be provided to external bodies (see section below).

## **2.4 External complaints**

In Australia, external complaints can be made to the Australian Charities and Not-for-Profits Commission (ACNC) if you believe there are issues with Friends of Femili PNG's charity registration, provision of accurate information, use of funds, fraud or criminal activity, or failure to act in good faith in the charity's best interest, among others:

<https://www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate>

Complaints relating to a breach of the Australian Council for International Development (ACFID) Code of Conduct be made to the ACFID Code of Contact Committee via [www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring](http://www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring).

In PNG, there is no statutory body which regulates the work of NGOs. However, complaints can be reported to the Provincial and National Family and Sexual Violence Action Committee, and the Community Development Office.

## **2.5 Examples of Serious Breaches**

Serious breaches of the Code of Conduct may include (but are not limited to) conduct that:

- a. Breaches the Child Protection Policy.
- b. Is dishonest, fraudulent, corrupt, illegal or unethical.
- c. Involves mismanagement or waste of Femili PNG funds or resources.
- d. Could cause financial or non-financial loss to Femili PNG.
- e. Is materially detrimental to the interests, reputation and good standing of Femili PNG.
- f. Is an abuse of authority, position or information.
- g. Poses a serious risk of harm to a Femili PNG employee, beneficiary, volunteer, partner supplier including to their health, safety or environment.
- h. Is an incident of sexual exploitation, abuse or harassment.

## **2.6 Partners and complaints handling**

Where possible, Femili PNG shall encourage partners to acknowledge, adopt and comply with our Complaints Handling Policy through the use of MoUs and other agreements. Femili PNG will provide guidance to partners on our complaints handling processes.

Femili PNG understands that, in many cases, this policy cannot bind other stakeholder organisations it works with. However, Femili PNG will promote good practice in complaints handling to partners and other stakeholders.

From time to time, Femili PNG may receive complaints that do not fall within the scope of this policy. This may include complaints against a government employee, core service



provider, donor or other organisation. These complaints will be referred to the Executive Management Committee to decide on a course of action. These actions may include reporting serious breaches to the relevant authorities.

### **3.0 PROCESSING THE COMPLAINT**

The receiving staff member is to commence the process by registering the complaint in the confidential Complaints Register.

They are to inform the complainant that their complaint has been received and provide them with information about the process and time frame applying to the investigation of their complaint.

#### **3.1 *Timeframe for investigating the Complaint***

Examine the complaint within three working days of the complaint being received (unless it is an allegation of an offence or matter which requires immediate attention eg. sexual assault or child abuse, in which case it must be actioned urgently).

Proceed to investigate the complaint and decide the process for response.

Inform the complainant by letter within five working days of the complaint being received of what is being done to investigate and resolve it, and the expected timeframe for resolution.

As far as possible, complaints will be investigated and resolved within seven working days of being received. If this time frame cannot be met, the complainant will be informed of the reasons why and of the alternative timeframe for resolution.

#### **3.2 *Resolving the Complaint***

Make a decision or refer to the appropriate people for a decision within five working days of the complaint being received. For matters relating to clients in the case management centre, the appropriate person would be the case worker manager. For complaints regarding safe house operations, this would be the safe house manager, and for matters relating to Friends of Femili PNG, the appropriate person would be the development manager.

Once the outcome of the complaint is decided, inform the complainant of the outcome. The outcome may be as follows:

- a. Upheld, and if so, what will be done to resolve it.
- b. Resolved and how this has been achieved.
- c. If no further action can be taken, the reasons for this.
- d. Inform the complainant of any options for further action, where relevant.

Femili PNG commits to a survivor-centred approach to complaints handling. Complainants shall receive appropriate assistance from Femili PNG, which may include facilitating access to medical, legal, welfare or other assistance. In instances where the complainant is not comfortable with Femili PNG providing this assistance, referrals to other service providers will be made.

### **3.3 Escalation of Serious Issues**

If the complaint is regarding a serious issue, such as that outlined in section 2.5, staff misconduct, a matter that jeopardises positive outcomes for a client or a matter that may lead to legal proceedings against Femili PNG, the complaint must be elevated to the EMC for oversight of the resolution process.

Femili PNG may seek legal advice on the best way to respond, if necessary, and will abide by mandatory and contractual reporting requirements. Complaints regarding child protection and incidents of sexual exploitation, abuse or harassment shall be reported in accordance to the procedures outlined in their respective policies.

### **3.4 Reviewing the Complaint**

If the complainant is not satisfied with the investigation and proposed resolution of their complaint they can seek a further review of the matter by contacting the Femili PNG EMC. The complainant will be provided with contact details by the CEO/SSW in order to facilitate this contact. If the complainant prefers, they can also seek further review by contacting the Chair of Femili PNG.

Nothing in this policy takes away a client's individual right to use relevant civil or criminal legal procedures to settle their complaint.

## **4.0 RECORDKEEPING**

A confidential Complaints Register will be kept by Femili PNG. The Register will be maintained and will record the following for each complaint:

- a. Details of the complainant and the nature of the complaint.
- b. Date lodged.
- c. Who will manage the complaint, and decide the outcome.
- d. Action taken.
- e. Date of resolution and reason for decision.
- f. Record of complainant being notified of outcome.
- g. Complainant response and any further action.

The Complaints Register and all associated files will be confidential with access restricted to the CEO/SSW and members of the EMC. Femili PNG is able to de-identify complaints upon complainant request.