

EXTERNAL COMPLAINTS POLICY

Policy number	2.10	Version	2021 V6
Responsible Person	CEO/Division Managers	Approval date	29-09-2021

INTRODUCTION

This policy relates to the way in which ASHM deals with complaints by:

- service users about its goods and services
- ASHM members
- other ASHM stakeholders.

All ASHM personnel (including governing body members, staff, volunteers, representatives, contractors, visitors to projects and partners) are expected to comply with the principles and reporting requirements specified in this policy.

This policy refers to complaints originated from the public, agencies, providers, partners and stakeholders in Australia and overseas.

PURPOSE

ASHM welcomes constructive critical feedback on its activities, as well as formal complaints, to help improve delivery of services to service users.

A negative comment about any aspect of ASHM services is not a complaint unless the person making the complaint indicates this and follows the procedures in this policy for making a complaint.

A negative comment in an informal setting, such as an anonymous negative comment on an evaluation sheet at a training course, is not a complaint for the purpose of this policy.

DEFINITIONS

Complaint means an expression of dissatisfaction made to ASHM, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

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

Enquiry means a request for information or an explanation.

Feedback means opinions, comments, suggestions, and expressions of interest in the products or services of ASHM.

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

POLICY

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Principles

Accountability: ASHM provides information to all stakeholders, including to members of the communities where its activities are implemented, about the reporting and complaints procedure.

Accessibility: ASHM's External Complaints policy is readily accessible on ASHM's website. ASHM provides information in a clear and easily understandable manner in appropriate forms and through appropriate media.

Confidentiality: ASHM's External Complaints policy provides a safe and discrete point of contact for stakeholders in Australia and countries where ASHM work is conducted, to raise concerns or complaints about the organisation.

Fairness: ASHM ensures that requirements for filing a complaint take into consideration the needs of the most vulnerable and considers minority and disadvantaged stakeholders.

Responsiveness: ASHM's complaints process is responsive. Key steps undertaken in the management of complaints as they are received, include how a complaint is identified, confirming, and recording details of complaints received, and expected responsiveness. (See Procedures below)

People-focussed Approach: ASHM commits to providing appropriate assistance and referrals to survivors (e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services.)

No retaliation: a person who, in good faith, reports misconduct or suspected misconduct will not suffer retaliation.

ASHM's External Complaints policy is consistent with its Prevention of Sexual Exploitation, Harassment and Abuse Policy and its Child Protection Policy. It recognises:

- Gender equality
- Zero tolerance of inaction on incidents of SEA
- Victim/survivor centred responses

General policy statements

ASHM is committed to efficient and fair resolution of complaints by people in the organisation at all levels. ASHM acknowledges customers' and stakeholders' right to complain and we positively invite feedback from customers and stakeholders about the goods and services we provide.

ASHM will provide a safe and discrete point of contact for stakeholders in Australia and countries where ASHM work is conducted, to raise concerns or complaints about the organisation.

In handling complaints, we will be fair to both the complainant and the service or person against whom the complaint is made. Complainants will be treated courteously.

ASHM will endeavor to provide appropriate assistance and referrals to complainants/survivors which may include:

- medical
- social

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- legal and
- financial assistance or
- referrals to such services.

Any complaint or dispute about an aspect of ASHM's operations or practices will be dealt with confidentially, effectively and with the appropriate degree of urgency.

All complaints concerning Child Protection and Prevention of Sexual Exploitation, Abuse and Harassment must be reported immediately to the ASHM CEO and follow reporting guidelines described in those policies.

All complaints will be managed to ensure there is procedural fairness to all parties, there is no conflict of interest by either party, there is no victimisation or retaliation, and confidentiality is assured throughout the process.

ASHM commits to:

- providing an induction on complaints handling to all personnel and partners to ensure they are equipped to understand and implement the policy, including expected standards of conduct;
- providing ongoing and refresher training as needed for all personnel and partners on a regular basis;
- developing communications materials about complaints handling, expected staff behaviours, and complaints processes for communities in appropriate language and media.

There is no fee for lodging a complaint or having it processed by Society staff.

ASHM is a signatory to the [Code of Conduct](#) for Australian aid and development agencies, which is administered by the [Australian Council for International Development](#) (ACFID). ASHM is committed to full adherence to the ACFID Code of Conduct.

As an ACFID Code of Conduct signatory, ASHM complies with [policies that include child protection, non-development activity and conflict of interest](#).

ASHM welcomes inputs and feedback from all stakeholders. Comments should be directed to ashm@ashm.org.au

RELATED POLICIES

2.09 Child Protection Policy

2.14 Whistleblower Policy

2.18 Prevention of Sexual Exploitation, Abuse and Harassment Policy

4.24 Staff Complaints and Grievance Policy

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AUTHORISATION

ASHM Board

HISTORY

Version	Approved Date	Comments/ Amendments
2016v1	05-04-2016	First policy version
2018v2	31-03-2018	Annual review and update
2019v3	04-11-2019	Annual review and update
2020v4	03-08-2020	Annual review and update
2020v5	24-08-2020	ACFID Compliance update
2021v6	29-09-2021	Annual review and update. Board re-approval not required for minor change.

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EXTERNAL COMPLAINTS PROCEDURE

Procedures number	2.10	Version	2021 V6
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RESPONSIBILITIES

It is the responsibility of:

- the CEO to ensure that complaints are handled in accordance with this policy and procedure
- all staff to ensure all complaints received are escalated and recorded.

PROCEDURES

Anyone, including participants in ASHM's projects overseas, with a complaint about ASHM goods or services should make that complaint to the person immediately concerned.

If you wish to make a complaint against an ASHM staff member or volunteer, please send an email (marked confidential) to either the ASHM Chief Executive Officer, Alexis Apostolellis Alexis.Apostolellis@ashm.org.au or to the ASHM President president@ashm.org.au.

If you wish to report a breach of the ACFID's [Code of Conduct](#) to which ASHM is a signatory, please refer to the [ACFID website for instructions](#).

If the complainant does not know who to complain to or about, they should either contact the office reception (02 8204 0700, or to ashm@ashm.org.au), who will direct them to the appropriate Division Manager.

Complaints can also be made by following the 'Contact Us' link on the ASHM website: www.ashm.org.au

If the complainant has complained to the person immediately responsible and is not satisfied with the outcome, they may take their complaint to a Division Manager. If at that point they are still not satisfied, they may take their complaint to the CEO and then the Board. Complaints to the Board must be in writing, addressed to the President, placed in a sealed enveloped marked 'confidential', and posted to ASHM.

Any complainant may approach a Division Manager for assistance in formulating and lodging a complaint. Managers are expected to provide the appropriate assistance in a helpful and impartial manner.

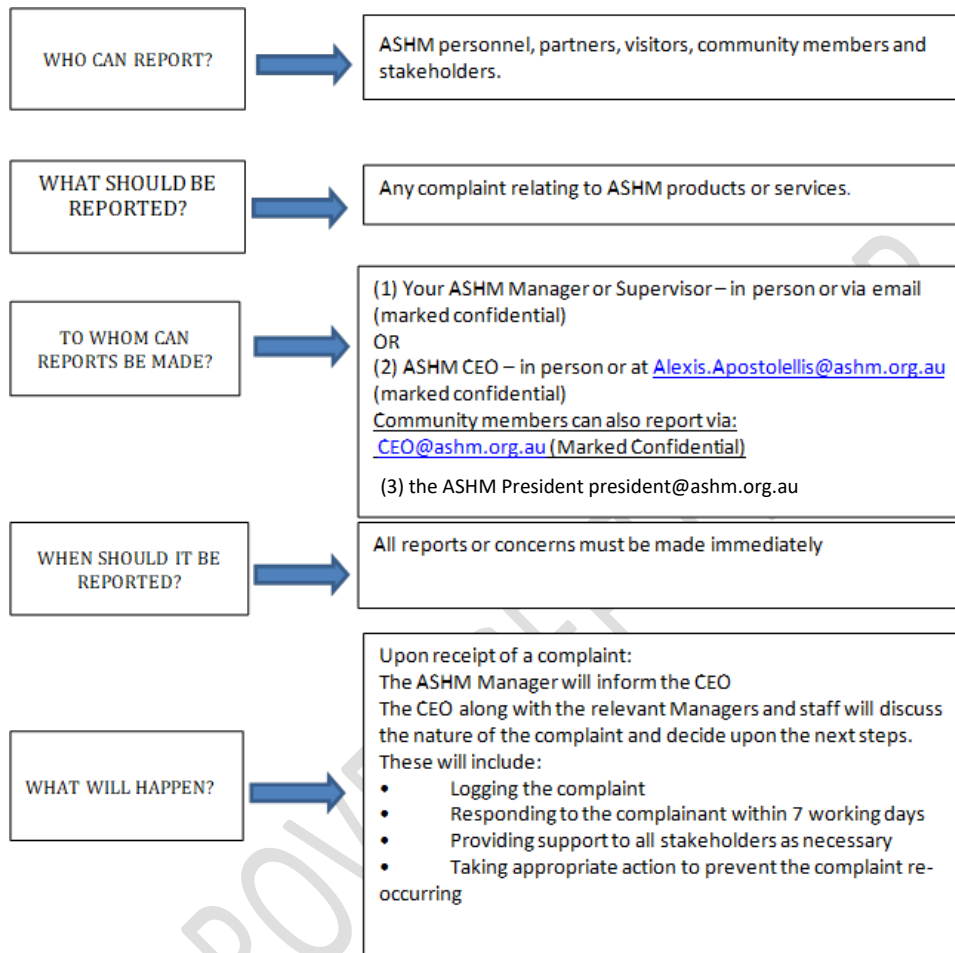
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Reporting flowchart



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The following principles apply:

- Complaints will be dealt with promptly.
- All complaints will be logged, and complainants will be contacted within 7 working days.
- An organisational record will be kept of all misconduct complaints. Complaints on this record can be de-identified at the request of the complainant or survivor.
- Serious complaints should be immediately reported to a Division Manager.
- High risk complaints should be reported to the Chief Executive Officer within 24 hrs.
- Where a complaint has been taken to a Division Manager, the CEO or the Board, the relevant person or persons will determine and implement the appropriate action.
- **Implementation**
- The labour and time spent on complaints-handling is a legitimate job task of all staff positions. Where a staff person considers time spent on complaints resolution is disadvantaging other core tasks they should raise this matter with a supervisor or manager to allow deployment of extra resources.
- This policy will be publicised to customers and stakeholders in newsletters and the website. Written complaints and their outcomes will be recorded and reported in the Society's [Annual Reports ASHM](#)
- The management team will consider complaints overall, to identify and rectify systemic and recurring problems.
- This complaints-handling process will be reviewed yearly during internal evaluation of the Society as part of preparation of annual business plans for the following year.

WORKING WITH PARTNERS

- ASHM's partners may play a vital role in ensuring awareness of expected behaviours and complaints mechanisms, managing the behaviours of their staff and responding to complaints or incidents. ASHM's policy will be extended to our partners as required under the ACFID Code of Conduct.
- Complaints handling will be incorporated into ASHM partnership processes. This could include reference to consultation with partners to develop shared understandings of expectations, due diligence or partner capacity assessment processes (as required under ACFID Code of Conduct Compliance Indicator 5.1.2), the provision of training for partners, partner agreements (as required under ACFID Code of Conduct Compliance Indicator 5.2.1) and ongoing monitoring of their compliance.
- ASHM will work with or support our partners to develop their own complaints handling policy which is aligned with the requirements set out in the ACFID Code of Conduct.

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Complaints to External Body

- It is possible that ASHM could be regarded as a health service provider under NSW law, being a provider of health education services in New South Wales ([Health Care Complaints Act 1993 \(NSW\), s4](#)).
- Where a health service affects the clinical management or care of an individual client in New South Wales, a complaint may be made to the NSW Health Care Complaints Commission, (02) 9219 7444.
- NSW Department of Fair Trading may also be contacted in the case of a complaint. Complaints can be registered online at:
[Make a complaint | NSW Fair Trading](#)
- A complaint may also be made by telephoning the Department on 13 32 20
- As ASHM is a signatory to the ACFID Code of Conduct, complainants may also make a complaint regarding an alleged breach of the ACFID Code to the ACFID Code of Conduct Committee. Refer to the [ACFID website for instructions](#)

Complaints Outside the Scope of this Policy

- Where a complaint is made to ASHM concerning an employee or practice of another organisation, that complaint should be conveyed to the CEO. The CEO will direct management of this complaint, usually by referral to the entity that is the subject of the complaint.

RELATED DOCUMENTS AND FORMS

See above

AUTHORISATION

ASHM CEO

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