



EXTERNAL COMPLAINTS HANDLING POLICY

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TABLE OF CONTENTS

SECTION 1: EXTERNAL COMPLAINTS HANDLING POLICY.....4

1. PURPOSE.....	4
2. GUIDING PRINCIPLES.....	5
3. DEFINITIONS.....	6
4. SCOPE	7
5. EDUCATION AND TRAINING	8
6. PUBLICISING THE POLICY.....	9
7. RESPONSIBILITY AND AUTHORITY	10
8. HOW TO MAKE A COMPLAINT.....	12
9. HOW COMPLAINTS ARE HANDLED	13
10. TIMEFRAMES	15
10. CONFIDENTIALITY.....	16
11. RECORDING COMPLAINT DATA.....	17
12. REVIEWING AND ONGOING IMPROVEMENT	18

SECTION 2: COMPLAINTS HANDLING Procedures.....19

1. INITIAL ASSESSMENT OF COMPLAINT	19
2. HOW COMPLAINTS ARE INVESTIGATED.....	21
3. RESPONDING TO AND CLOSING A COMPLAINT.....	22
4. OUTCOMES OF COMPLAINTS	23
5. DISPUTES	24

SECTION 1: EXTERNAL COMPLAINTS HANDLING POLICY

1. PURPOSE

Sepheo recognises that listening to and responding to feedback, concerns and complaints is integral to our commitment to achieving the high standards and ensures accountability to all stakeholders. We further recognise that receiving and responding to complaints results in valuable learning and is aligned with our commitment to continuous improvement. The External Complaints Handling Policy outlines Sepheo's responsibilities and response to feedback and complaints from outside the organisation and the principles which underpin our approach.

2. GUIDING PRINCIPLES

Sepheo's External Complaints Handling Policy is guided by the following principles:

- 1. Visibility.** We will be proactive in providing clear and easily understandable information to our partners and stakeholders as to how and where to make a complaint or provide feedback (See '6. Publicising the Policy').
- 2. Accessibility.** We will take measures to ensure that accessible and safe points of contact are made available for people to make complaints or provide feedback (See '6. Publicising the Policy').
- 3. Responsiveness.** We will respond to complaints and feedback in a timely manner and according to the predetermined timeframes (See '9. Timeframes').
- 4. Objectivity.** All complaints will be addressed in a fair, equitable and unbiased manner, based on the evidence submitted and uncovered throughout the complaints handling process. Making a complaint will in no way result in prejudice with respect to an individual's future participation in any programs or activities.
- 5. Confidentiality.** All complaints and the complaints handling process will be kept strictly confidential.
- 6. Accountability.** Accountability for decision making and action pertaining to complaints will be clearly established and communicated.
- 7. Continual improvement.** Sepheo is committed to ongoing improvement in all areas of the organisation's work, including our programs and organisational policies and procedures.

3. DEFINITIONS

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

Complainant: A person, organisation or its representative, making a complaint.

Feedback: The systems and process which enable an organisation to listen to their stakeholders and ascertain if agreed standards, requirements, expectations and needs are being met. Feedback is inclusive of suggestions, comments, opinions and complaints.

Inquiry: A request for information or an explanation.

Beneficiary: People directly engaged in a project or program, or benefiting from the activities and outcomes of a program or project.

4. SCOPE

This policy applies to the handling of feedback and complaints relating to all Sepheo personnel, programs, advocacy initiatives, fundraising and campaign activities. This policy applies to complaints received from:

- Beneficiaries of Sepheo projects;
- Relatives of beneficiaries of Sepheo projects;
- Sepheo supporters and donors; and
- Members of the public.

The handling of internal complaints or grievances received from Sepheo staff or management, including whistle blowing, are covered under Sepheo's Human Resources Manual.

5. EDUCATION AND TRAINING

Both Sepheo's Internal and External Complaints Handling Policy and Procedures are distributed to all staff, volunteers and partners upon their commencement with the organisation. Updated versions are provided to all stakeholders upon approval. Induction training, which includes the Complaints Handling Policy and Procedures is provided for all stakeholders listed above.

Personnel involved in implementing the complaints handling procedures are fully trained in all aspects of implementation.

All Sepheo staff and volunteers working directly with children are provided with training and support to ensure they develop child friendly complaints handling procedures and reporting mechanisms.

6. PUBLICISING THE POLICY

Sepheo clearly communicates the value we place on receiving and responding to complaints in all relevant publications and communications and on our website. It is also communicated in partnership agreements and in staff policies.

The External Complaints Handling Policy and Procedures is easily accessible and available for download on the Sepheo website.

We ensure that making a complaint is as easy as possible. Complaints can be made both verbally or in writing by email, telephone, in person or through other means necessary to ensure inclusivity for people with disabilities or to overcome language barriers. We will endeavour to assist a complainant to put their complaint in writing or write down a complaint provided to us orally as factually and faithfully as possible.

7. RESPONSIBILITY AND AUTHORITY

Accountable Person	Responsible for
Directors	<ol style="list-style-type: none"> 1. Ensuring relevant staff receive appropriate training in implementing this policy. 2. Receiving and registering complaints, either by referral or directly, and categorising as Inquiry, Minor Complaint or Major Complaint. 3. Implementing the required investigation for Major Complaints and resolving the complaint according to this policy. 4. Referring any complaints on to relevant external bodies. 5. Ensuring all complaints are resolved appropriately and resolutions are communicated to the appropriate people. 6. Identifying and resolving any systemic issues underlying complaints. 7. Informing the governing/oversight body of Major Complaints under investigation and their resolutions where required by other policies. 8. Ensuring learning is incorporated into policy review, amendment, and adaptation with respect to organisational practices.
Sepheo Managers	<ol style="list-style-type: none"> 1. Directly receiving, registering and referring r complaints to the Directors. 2. Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms. 3. Ensuring staff have sufficient awareness and capacity to implement this policy in the context of their work. 4. Ensuring programs meet the expectations outlined in this policy.
Sepheo Staff	<ol style="list-style-type: none"> 1. Directly receiving, and referring complaints to the Managers and Directors. 2. Ensuring this policy is adhered to in the context of their work. 3. Ensuring visible and accessible context specific complaints and feedback mechanisms are developed and communicated to all stakeholders, in particular volunteers and project beneficiaries 4. Reporting complaints to external bodies/authorities where required at the direction of the Directors. 5. Communicating outcomes of a major complaint (at the direction of the Directors) to the complainant where the complainant is a beneficiary. 6. Conducting investigations of complaints, as instructed by the Directors
Sepheo Volunteers	<ol style="list-style-type: none"> 1. Directly receiving, and referring complaints to a Project Manager. 2. Ensuring visibility and accessibility to this policy and the complaints mechanisms

ACCI Relief	<ol style="list-style-type: none">1. Holding the Sepheo Directors accountable for implementing the policy.2. Involvement in major investigations where requested by the Sepheo Directors.3. Handling complaints against the Sepheo Directors.
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8. HOW TO MAKE A COMPLAINT

Complaints can be made orally in person or by telephone, and in writing by email, or online via our website. When a complaint is made orally, Sepheo personnel receiving the complaint will ensure the complaint is documented and contains all the information the complainant wishes to convey.

Complaints can be made by a complainant or by a friend or advocate acting on their behalf.

Complaints made anonymously will be accepted as they can alert us to legitimate problems which can be resolved and lead to organisational improvements. It is not however always possible to provide a remedy to the individual in the event of an anonymous complaint.

Complaints can be submitted to the Sepheo via the following contact details:

Email: complaints@sepheo.org

Phone: +266 5789 3112

Complaints against a Director can be submitted to ACCI Relief via the following contact details:

Email: complaints@acci.org.au

Phone: +61 3 8516 9600

Post: 5/2 Sarton Rd, Clayton, Victoria, Australia

Complaints can also be submitted to a Sepheo employee where the complainant has access to or contact with those personnel, particularly with respect to field-based complainants.

9. HOW COMPLAINTS ARE HANDLED

For all complaints we will:

- Seek from the complainant the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action;
- Clearly explain to the complainant the course of action that will follow dependant on:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given; or
 - if the complaint is to be investigated.
- We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint or that a person implicated in a complaint is involved in any way with the handling of that complaint.
- We will not create false expectations, but assure the complainant that the complaint will receive full attention;
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again.
- Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives;
- Ensure that the complaint is appropriately acknowledged;
- Follow up where necessary, and monitor whether the complainant is satisfied; and
- We will register all complaints (see section 1, item 10).

In addition to this, when we take an oral complaint we will:

- Identify ourselves, listen, record details, and determine what the complainant wants;
- Confirm that we have understood and received the details; and
- Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive;

10. TIMEFRAMES

We will acknowledge:

- Oral complaints immediately.; and
- Written complaints within 5 working days of receiving the written complaint.

We will aim to resolve complaints as quickly as possible and within 4 weeks unless there are exceptional circumstances. If a complaint is not resolved within 4 weeks we will inform the complainant of progress and keep them informed of progress every 4 weeks. However, where an external body is involved in a prolonged investigation, we will establish an appropriate alternative timeframe with the complainant for progress reporting.

10. CONFIDENTIALITY

All complaints will be treated as strictly confidential matters. Information will be shared on a needs basis only with those directly involved in the investigation. It is expected that all those involved in the investigation will also uphold strict confidentiality.

A complainant's name and personal details will not be disclosed to anyone other than those involved in handling the investigation without first obtaining the complainant's permission.

11. RECORDING COMPLAINT DATA

All complaints received by any means will be documented and registered. Sepheo staff responsible for receiving a complaint will ensure that the following information is included:

- A date of receipt
- A clear description of the complaint and any relevant supporting data or evidence
- A requested solution
- A description of the project, program, campaign, event or initiative, practice, procedure or personnel that the complaint pertains to.
- Due date for a response
- Action already or immediately taken to resolve the complaint

If a written complaint is received which does not contain the above information, or in the case of an oral complaint, we will ensure that this information is documented by Sepheo personnel.

12. REVIEWING AND ONGOING IMPROVEMENT

As part of our commitment to effective complaints handling and to ongoing improvement, Sepheo will ensure that we:

1. Monitor the effectiveness of our compliant handling procedures on an ongoing basis and appropriately update our policy and procedures based on organisational learning and and/or updated notions of best practice with regard to complaints handling practices;
2. Review the policy every three years, managed by the Directors and in consultation with relevant staff and stakeholders; and
3. Provide ongoing staff training and retraining regarding our complaints handling policy and procedures.

SECTION 2: COMPLAINTS HANDLING Procedures

1. INITIAL ASSESSMENT OF COMPLAINT

The staff member handling the complaint will pass the conduct an initial assessment to determine how a complaint should be managed and whether it is of a serious nature, by considering whether one or more of these criteria apply:

- a. Severity;
- b. Health (including mental health) and safety implications;
- c. Financial implications for the complainant or others;
- d. Complexity, including whether there is more than one issue raised in the complaint and whether each needs to be separately addressed;
- e. Jurisdiction - multiple jurisdictions or requires reporting to an external body;
- f. Impact on the individual, public and organisation;
- g. Potential to escalate;
- h. Systemic implications;
- i. The need for, and possibility of immediate action; and
- j. Whether or not anyone else needs to be consulted in making an assessment.

Based on this initial assessment, the complaint will be classified as either an:

- a. **Inquiry** - A complaint that is based on a simple misunderstanding or insufficient information, that can be resolved by the provision of information that immediately satisfies the complainant, will be recorded as an inquiry, with the complainant becoming an inquirer.

- b. **Minor Complaint** - A complaint that is not considered to be serious in its nature will be recorded as a minor complaint. Where appropriate, endeavour to resolve minor complaints immediately by correcting misunderstanding or providing missing information, then ensuring that the complainant is completely satisfied with the information and or resolution provided.

- c. **Major Complaint** - A complaint that is assessed as being serious or grievous in its nature will be recorded as a major complaint and will be investigated accordingly.

2. HOW COMPLAINTS ARE INVESTIGATED

All Major Complaint investigations require the oversight of the Directors.

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding all complaints. The level of investigation will be commensurate with the nature of the complaint including the level of supporting evidence or information provide by the complainant.

Where required, we will consult and take advice from ACCI Relief and/or other relevant external, regulatory or enforcement bodies in planning and carrying out an investigation.

Where the complaint falls under the jurisdiction of an external body, it may be either appropriate or mandatory for Sepheo to report or cooperate with that external body or for the investigation to be conducted by that external body. This includes, but is not limited to:

- Lesotho Mounted Police Force
- Lesotho Ministry of Social Development
- Other regulatory bodies

3. RESPONDING TO AND CLOSING A COMPLAINT

The Directors will normally delegate the decision on a Minor Complaint to the Operations Manager. A decision on Major Complaint will be made by a Director or may be referred up to the appropriate ACCI Board.

We will communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email or hard copy. However, where appropriate, such as in the case of a complaint being made by a local community member (in the field), we will also communicate our decision orally and again in the appropriate language.

We 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 relating to Sepheo, we will advise that the complaint may be referred to the ACCI Relief. We will provide all necessary information for referral to ACCI Relief and offer to assist in referral.

4. OUTCOMES OF COMPLAINTS

Based on the decision made in regards to the complaint, we will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes. In addition to this, it may be appropriate to:

- Take further remedial action, including changes to the way in which we operate and improve or undertake further training of staff;
- Counsel or discipline staff or volunteers;
- Review or terminate agreements; and/or
- Undertake further reporting to external regulatory bodies or enforcement authorities.

5. DISPUTES

The complaint will be referred by the member of staff handling the complaint to a more senior colleague or to the respective board for review if the complainant disputes any of the following:

- Our assessment that a complaint should not be investigated;
- The decision on their complaint; or
- The outcome of their complaint.

If such a dispute is unresolvable and relates to the Directors, we will refer the complainant to ACCI Relief: