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## Introduction

Habitat for Humanity Australia recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard and continuous improvement in every area of our work. This applies especially to delivery of services, seeking donations and accountability to stakeholders. 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 in order to improve our work. Having a complaints process in place which enables stakeholders to make complaints to HFHA in a safe and confidential manner is of paramount importance at HFHA and is a vital part of HFHA's overall approach to accountability and safeguarding.

## Purpose

This policy applies to all our employees and volunteers and partners. Those with particular responsibilities are trained in its application and will ensure that all employees and volunteers and partners are familiar with the Policy.

We make clear to stakeholders the value we place on receiving concerns and complaints in all relevant communications. We advise stakeholders how a copy of this policy may be obtained and we provide clear information on how complaints may be made.

## **Policy statement**

The following guiding principles will direct HFHA in the handling of complaints and ensure that as a signatory to the ACFID Code of Conduct we comply with the standards relating to complaints handling.

### Complainant-focused approach

The interests of all our stakeholders are foremost in our approach to complaints handling.

### Accessibility

We will ensure that our complaints handling process is as accessible as we can practically make it to all complainants and that the information is in a clear and easily understandable manner in appropriate forms and through appropriate media. We will ensure that complaints can be made taking into account the needs of the most vulnerable and minority/disadvantaged stakeholders. Where possible, we will adapt our complaints mechanisms to local contexts and provide the material in accessible formats and languages.

### Responsiveness

We aim to be responsive to all complaints and to respond to complaints according to the timeframes stated in this policy.

### Objectivity

We will address all complaints in an equitable, fair, transparent and unbiased manner using evidence submitted by both the complainant and our personnel through the complaints handling process. We will treat all people with respect, including those who have made the complaint.

### Accountability

We will ensure accountability for every aspect of the complaints handling process with clearly established procedures.

### Visibility

We will clearly publicise information about how and where to make a complaint.

### Confidentiality

We will observe strict confidentiality in all aspects of the complaints handling process.

### Continual improvement

Continual improvement of the complaints handling process and quality of service is one of our key objectives.

To this end we will:

- maintain data on complaints (de-identified if requested by the complainant) for the purpose of identifying trends in order to enhance information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaints handling;
- foster a complainant-focused approach whereby stakeholders are provided appropriate assistance particularly in the event of a complaint involving sexual exploitation or abuse;
- undertake specific training and retraining of staff to foster better complaints handling practices;
- promote a culture of welcoming complaints and responding in a transparent and accountable manner;

- encourage innovation in complaints handling development; and
- recognise and reward exemplary complaints handling behaviour.

### Charges

- Making a complaint is free of charge to complainants.

### **Policy in Practice**

#### **Definitions**

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

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

**Inquiry** means a request for information or an explanation.

**Feedback** means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process.

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

#### **1. Scope of the policy**

This Policy is intended to apply to any complaint, regardless of who makes it.

We will accept complaints relating to all our employees, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.

A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation with which we work, our employees, volunteers, donors or a member of the public.

Anonymous complaints can be made however this may limit our ability to investigate the complaint.

#### **2. Educating the organisation on the Complaints Policy and training relevant personnel**

Our Complaints Policy is published on our website and is referenced in the HFHA Employee Handbook and in the HFHA Partner Handbook and in Partnership and Activity Agreements with implementing partners. The Complaints Policy is made accessible to other stakeholders in annual reports and other communications and in the HFHA Transparency Statement, also available on the website.

We require staff and volunteers who may be involved in any way with a complaint to formally signify their commitment to this Policy.

To familiarise people with this Policy we run induction programs for our Board members, all staff, volunteer Team Leaders, relevant office volunteers and contractors. Personnel directly involved in complaints handling are fully trained in all aspects of this Policy and its implementation. We take special care to inform field personnel in

implementing countries and HFHA staff meeting with partners and beneficiaries in the field regarding this Policy and encourage them to receive and handle complaints taking account of language issues and cultural sensitivities.

### **3. Publicising the Policy**

We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website has a link in the “Contact Us” dropdown menu and in the footer that is across all our website pages with the word “**Complaints**” linking to this Policy and to 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 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 (for example, website, newsletters, annual report, partnership agreements, employee/staff policies) explain this and explain our procedures for handling complaints including:

- 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 regular reviews of our complaint handling processes we will monitor how effectively we are publicising our Complaints Policy on a continuing basis and make necessary improvements in its communication, where appropriate.

### **4. 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. All complaints should be directed in the first instance to HFHA. If no satisfactory resolution is achieved then alternate routes are to Habitat for Humanity International (HFHI) or to the ACFID Code of Conduct Committee which handles complaints relating to an alleged breach of the Code of Conduct by a member organisation.

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

In countries outside of Australia, due to the specific nature and/or geographical location of their activities, Habitat for Humanity's National Director/Country Directors and senior managers are responsible for responding to complaints relating to Habitat for Humanity's operations in that country. Country Offices may develop additional procedures in order to fulfill the objectives and principles of the Policy including putting in place appropriate mechanisms for people to express complaints in a practical and safe manner. Receiving complaints in country can be done in a range of ways and decisions must be made (in conjunction with the local community as appropriate) as to what is most appropriate. In order to establish what the complaint is and its validity, interpreters might be needed. Some complaints about programs and/or staff ways of working may not be able to be resolved easily, and in-country staff may require additional support from the Habitat for Humanity Asia-Pacific Office.

Habitat for Humanity International has also provided a mechanism for raising in good faith any suspected violations of the law or of Habitat for Humanity's policies. It is called the [Habitat Ethics and Accountability Line](#), and is a hotline and website provided by a third-party service – refer to Annex 3. This system can be used when the complainant wishes to remain anonymous or when the regular means of reporting concerns have not resolved an issue. Habitat Ethics and Accountability Line can be used to report the following concerns:

- Discrimination
- Harassment/bullying
- Sexual exploitation and abuse
- Conflict of interest
- Misstatements in financials
- Criminal activities
- Legal or regulatory violations
- Bribery or kickbacks
- Worksite violence or serious bodily injury or death
- Any significant or chronic compromise of work site safety
- Whistleblower retaliation
- Data security breaches
- Falsification of official records or reporting.

Complaints can be made online or via telephone 24 hours a day, 7 days a week:

- Within the United States, call toll-free 1-800-461-9330
- Outside the United States, call collect 1-720-514-4400
- Online at

[Habitat Ethics and Accountability Line](#)

HFHA's Complaints Policy, specifically highlighting the following central points for all complaints, is publicised on HFHA's website.

- General complaints about any aspect of HFHA and its work should be sent to the email address: [complaints@habitat.org.au](mailto:complaints@habitat.org.au);
- Complaints about the Chief Executive Officer should be sent to the Chair of the Board: Duncan West c/o HFHA's official address:  
PO BOX 1048, North Sydney, NSW 2059
- Postal complaints can also be sent to the Chief Executive Officer or the Chair of the Board at HFHA's official address:  
PO BOX 1048, North Sydney, NSW 2059

For complaints which do not fall within the scope of this policy, HFHA will assist where possible in referring the matter to the appropriate organisation or government authority.

## **5. How complaints are handled**

When we take an oral complaint, we will:

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

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:
  - 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 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;
- We will register all complaints; and
- We will report relevant matters to law enforcement authorities where appropriate.

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Where appropriate, we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

### **Initial assessment of complaint**

We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

- a) severity;
- b) health (including mental health) and safety implications;
- c) financial implications for the complainant or others;
- c) complexity;
- d) impact on the individual, public and organisation;
- e) potential to escalate; and
- f) the need for, and possibility of immediate action.

Where possible, complaints will be resolved at first contact with us. Our staff are empowered to resolve complaints promptly and with as little formality as possible where that is appropriate.

If we assess the complaint as significant or serious in terms of one or more of these criteria, we will classify the complaint accordingly. Examples of significant or serious complaints are reporting a matter to do with child protection or child labour, sexual exploitation or abuse of a person(s), an immediate risk to safety or security of a person, a fraud or misappropriation of funds including terrorism or money laundering, a complaint about a functional manager and a complaint about or a matter with an Australian State Affiliate.

## **6. 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, during the initial phone call or meeting. As far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided. When appropriate, we may offer an explanation or apology to the person making the complaint.

On receipt of a complaint, we will also attempt to determine expeditiously whether an investigation is required, depending on jurisdictional questions or whether the complaint is ill-conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the 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 ACFID Code of Conduct Committee.

## **7. How complaints are investigated**

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the significance or seriousness of the complaint. A significant or serious complaint will follow the procedure described in Annex 2 to this Policy.

## **8. Timeframes**

We will acknowledge written complaints within 5 working days of receipt.

We will aim to resolve complaints as quickly as possible within 30 working days unless there are exceptional circumstances. If a complaint is not resolved within 30 working days, we will inform the complainant of progress and keep them informed of progress every two weeks.

## **9. Responding to and closing a complaint**

The CEO or a senior manager delegated by them will normally make the decision on a complaint that has required investigation (that is not a minor complaint). Decisions on serious or significant complaints will be reported to the HFHA 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 and/or post. 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 we will advise that the complaint may be referred to the ACFID Code of Conduct Committee and to the [Habitat Ethics and Accountability Line](#) complaints mechanism of HFHI. We will provide all necessary information for referral to the Code of Conduct Committee and offer to assist in referral.

## **10. Outcomes of complaints**

We are committed to learn from complaints by taking the following steps:

- We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.
- We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of our personnel. Where needed, we will counsel or discipline our personnel.
- Where appropriate, we will consult and take advice from ACFID and/or other relevant sponsors and regulatory/enforcement authorities.

## **11. Confidentiality**

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than the Board, CEO, worker involved or an advisor we may engage and who will commit to keeping any information confidential in handling the complaint, without obtaining the complainant's permission.

## **12. Recording complaint data**

We will register all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data (to include location, who is involved, witnesses, how many times it happened, supporting documents)
- the requested remedy
- the person(s), service(s) and/or good(s) and/or practice or procedure complained about
- the due date for a response
- immediate action taken (if any) to resolve the complaint.

At a complainant's request, information can be de-identified once the complaint has been resolved.

## **13. Reporting about complaints**

We will immediately escalate complex or significant or serious complaints to our CEO or their delegate – refer to Annex 2.

All complaints will be reported at Management Team meetings and Board meetings (for serious matters) as detailed in the Complaints Register. Minor complaints will be reported in summary form. Significant or serious complaints will be reported in detail. Names and personal details of complainants will not be included in such reports.

An analysis will be included in the complaints report provided with the complaints data.

## **14. Continuous improvement in complaints handling**

Management will monitor the effectiveness of our complaints handling in practice and make improvements as appropriate.

The Board will conduct a review of this policy and the effectiveness of our complaint handling procedures at least every 3 years.

### Annex 1. COMPLAINTS RECORD FORM

All complaints about HFHA or any of its people from an external individual, group or organisation, whether verbal or written, are to be recorded on this form. Please ensure that you discuss this matter with the CEO as soon as possible after receiving a complaint and seek advice from him/her in order to complete this form and identify the next steps required.

<p>Date:</p> <p>Date complaint is received</p>	
<p>Personal Details:</p> <p>Name, contact details, if appropriate</p>	
<p>Nature of Complaint:</p> <p>Brief outline of the complaint</p>	
<p>Detail of Complaint:</p> <ul style="list-style-type: none"> <li>• A detailed description of the complaint the person has made and relevant supporting data (to include location, who is involved, witnesses, how many times it happened, relevant documents)</li> </ul>	
<ul style="list-style-type: none"> <li>• Location</li> </ul>	
<ul style="list-style-type: none"> <li>• Who is involved</li> </ul>	
<ul style="list-style-type: none"> <li>• Witness/es (if any)</li> </ul>	
<ul style="list-style-type: none"> <li>• How many times it happened</li> </ul>	
<ul style="list-style-type: none"> <li>• Relevant documents submitted</li> </ul>	
<p>Requested remedy</p> <p>A description of how the reporter wants the complaint remedied</p>	
<p>Who dealt with it:</p> <p>Name of person who is or has responded to the complaint</p>	

How it was dealt with: Action taken to handle the complaint	
When is the response expected to be completed?	
Outcome: Outline of what has happened as a result of the complaint	
Follow up required: Any action required as a result of the complaint. This may include a change to HFHA's procedures and policies	

## Annex 2 COMPLAINTS PROCEDURE

The procedure to assess a significant or serious complaint is as follows:

- 1) Any complaint is to be reported to a manager or CEO and if appropriate the Child Protection Officer (CPO). For all complaints of breaches, the manager (and CPO) will make an initial assessment of the severity of the breach and the urgency of action including notifying the CEO when necessary. The Chair of the HFHA Board will be notified that an investigation has started, depending on the severity of the breach. In the event that the complaint is about the CEO, the manager and if appropriate the CPO will notify the Board Chair directly. Any relevant donors or third parties (such as DFAT) will be informed as required by agreement with them, where a breach involves an activity that is supported by such a donor or third party.
- 2) The CEO will appoint a team to conduct a formal investigation into the complaint. The investigation team may include HFHA staff (such as Managers and CPO) or members of the HFHA Board. The investigation team will treat all complaints seriously. The investigation will be handled professionally, in confidence and in a timely manner. Procedural fairness will be applied and all decisions made will be in the best interests of the person(s) involved. HFHA will ensure that the person who raises the complaint is not required to express their suspicion to the person implicated. Individuals who report a suspected breach are not responsible for investigating their concern.
- 3) If the alleged perpetrator is an HFHA employee, the CEO has the right to stand them down on full pay (if appropriate), until an investigation has been completed. If the alleged perpetrator is associated with HFHA in a volunteer capacity, they must cease HFHA activities until the investigation has been completed. If the allegations are from previous involvement with HFHA, the alleged perpetrator is not able to reengage with HFHA until the investigation has been completed.
- 4) If the breach concerns a HFHA stakeholder overseas or one of our overseas partners; HFHA will work with the relevant overseas partner and local Habitat office to investigate the matter and to manage the allegation. If it involves a HFHA stakeholder on a Global Village team, HFHA will work with the Host Coordinator, Team Leader and other team members (when required) to investigate the issue.
- 5) The team that conducts the investigation will provide a written report to the CEO setting out what the investigation has discovered and recommendations of action to address the matters raised by the investigation.
- 6) Once an outcome has been determined by the CEO, the people involved will be informed including (where appropriate) the person or in the case of a child, the family, and alleged perpetrator. Anyone else actively involved will be informed on a need-to-know basis consistent with confidentiality requirements. Appropriate support will be provided to any complainant survivor and any cultural sensitivities and language barriers taken into account.
- 7) All necessary steps will be taken after the investigation has been completed to address the outcome. This may include:
  - Compensation for any person including a child harmed/misrepresented
  - Reinstatement of a staff member
  - Necessary actions to address any damaged reputation or confusion amongst HFHA staff and stakeholders
  - Dismissal of the perpetrator
  - Disciplining of a staff member
  - Steps to end engagement of a volunteer with HFHA
  - Requiring any associated organization such as an Affiliate to carry out appropriate steps including those set out above.

8) HFHA will keep a record of all complaints and the investigation and outcomes of those complaints. This record should be appropriately kept so as to protect confidentiality.



# a safe, ethical workplace

Habitat for Humanity is committed to an organizational culture built on humility, courage and accountability. We support a safe, ethical workplace that insists upon good stewardship and care of our people, donations, funds and resources. When incidents arise, Habitat employees, volunteers, beneficiaries, vendors, partner agencies and donors can use the Habitat Ethics and Accountability Line (formerly known as the MySafeWorkplace® Ethics and Compliance Portal), to report concerns.



**Confidential and anonymous.**



**24 hours a day.**



**Multiple languages accepted.**

## How it works:

Your confidential report will be instantly forwarded to a team of independent investigators at Habitat for Humanity International's Governance, Risk Management and Compliance department, or GRC, who will ensure confidential review and proper handling.

You can anonymously send and receive messages related to your report by phone or via the online portal listed below.

## Ways to report:

- **Access [heal.habitat.org](https://heal.habitat.org).**
- **Within the U.S.:**  
Call toll-free (800) 461-9330.
- **Outside the U.S.:**  
Obtain your local toll-free phone number from [heal.habitat.org](https://heal.habitat.org).



The Habitat Ethics and Accountability Line is an easily accessible and confidential way to report matters to Habitat for Humanity International when the reporter either wishes to remain anonymous or believes that reporting the concern to their local Habitat organization has not been or will not be effective.

## Report concerns related to:

- Discrimination.
- Harassment/bullying.
- Sexual exploitation and abuse.
- Conflict of interest.
- Misstatements in financials.
- Criminal activities.
- Legal or regulatory violations.
- Bribery/kickbacks.
- Worksite violence or serious bodily injury or death.
- Any significant or chronic compromise of work site safety.
- Whistleblower retaliation.
- Data security breaches.
- Falsification of official records or reporting.

In the interest of continuous improvement, Habitat for Humanity International asks managers to ensure that all immediately reportable issues (as listed above) are reported through the Habitat Ethics and Accountability Line. This confidential reporting line is hosted by a third-party provider called Convercent. All contacts are confidential, and users are assured anonymity when they request it. Habitat for Humanity International will maintain the confidentiality or anonymity of the person making a complaint to the extent reasonably practicable within the law and the legitimate needs of any ensuing evaluation or investigation. Please be aware that the effectiveness of an investigation based on an anonymous complaint may be limited because of the difficulty of obtaining further information from anonymous complainants and conducting appropriate follow-up.

Habitat for Humanity International reserves the right to act or not to act on any information provided unless required to do so by law. Furthermore, Habitat for Humanity International is not required to disclose its response or actions pursuant to any information that may be provided or reported. The intentional misreporting of information may be actionable and subject to criminal investigation.