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#### **I. Document Information**

Title:	Complaints Policy
Approved By:	SEAPC Limited Board
Policy Owner:	SEAPC Limited Board
Policy Delegate:	Nil
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## 2. Purpose

- 1.1 The purpose of this complaints policy ("Policy") is to establish the guiding principles and parameters for lodging or reporting a Complaint and to delineate how SEAPC Limited (referred to as SEAPC) receives and manages Complaints falling within its scope. This Policy applies to all SEAPC staff, volunteers, Board members, and agency staff, including individuals representing SEAPC in interactions with Supporters, beneficiaries, or the general public on its behalf.
- 1.2 Within SEAPC, the objectives of this Policy are to ensure that the processes align with the significance and value of listening to and addressing concerns and Complaints from supporters, sponsors, beneficiaries, partners, and the general public.
- 1.3 SEAPC's core values serve as guiding principles, specifically:
  - 1.3.1 Care: We pray, we listen, we're attuned with God.
  - 1.3.2 Commitment: We do what God says, we do what we say, and we follow through
  - 1.3.3 Collaboration: We build each other up, we dream, we plan, and we achieve together.
  - 1.3.4 Innovation: We are courageous, we lead, we impact, and we find new ways.
- 1.4 Value for People: SEAPC will prioritise the interests of its Supporters in Complaint handling, ensuring equity, fairness, and confidentiality throughout the process. SEAPC will make the Complaint handling process as accessible as possible to all Complainants, providing clear information on how and where to make a Complaint, with access being free of charge.



# 3. Who the Policy Applies to

#### TABLE 1

		Applicable?	Extent of application:
Our Board members		Yes	
Our employees:	Permanent	Yes	
	Casual	Yes	
	Fixed-term contract employees	Yes	
	Secondees	Yes	
Volunteers		Yes	
Agency staff		Yes	
Consultants, whether	r individuals or organisations	Yes*	
Service or goods pro	viders	Yes*	
Partner organisations or NGOs)	s (e.g. other Non for Profits	Yes*	
Supporters or public in general		Yes	(May make a Complaint)
Other:		Yes	

<sup>\*</sup>Adherence to this policy relates to individuals working for these organisations who represent SEAPC in interactions with supporters, sponsors, beneficiaries, or the general public on its behalf. The Policy applies to these individuals when a Complaint is raised with them and more generally, if a Complaint is raised about them, the principles of this Policy will apply in managing that Complaint.



# 4. Authority and Responsibility for the Policy and Related Standards, Procedures & Guidelines

- 4.1 The Executive Leader designated as the Leadership Owner of the Policy holds:
- 4.2 Overall responsibility for the Policy and its implementation, exercising the relevant authorities and responsibilities outlined in Table 2.
- 4.3 Specific responsibility for ensuring the Policy is reviewed according to the applicable frequency and deadline.

#### TABLE 2

	Implementing the Policy and related standards, procedures, and	Amending the Policy:	Amending the related standards, procedures and quidelines:	Responding to and dealing with incidents (including noncompliance)
Recommend	guidelines  Not applicable	Any stakeholders	Any stakeholders	Any stakeholders
Consult	Relevant staff member	GM/Head of Risk	GM	CEO
Decide	CEO	CEO	GM	Department Managers
Perform	GM	GM	GM	GM

#### 5. Definitions

- 5.1 Complaint: An expression of dissatisfaction lodged with an organisation concerning its products or services, or the Complaint handling process itself, with an expectation of a response or resolution.
- 5.2 Complainant: An individual, organisation, or their representative filing a Complaint.
- 5.3 Feedback: Includes opinions, comments, suggestions, and expressions of interest regarding products or the Complaint handling process, where no response is necessarily expected.
- 5.4 Stakeholder or interested party: Individuals or groups with an interest in the organisation's performance or success.



#### **6** Responsibilities

- 6.1 It falls upon the GM to enforce this Policy and ensure its regular review and approval updates.
- 6.2 All personnel involved in receiving and handling Complaints must adhere to this Policy and its associated procedures.

#### 7 Educational Initiatives

7.1 To ensure understanding and implementation of this Policy, we provide induction training on Complaints handling, including expected conduct standards, to all SEAPC staff, volunteers, Board members, and authorised representatives. Ongoing and refresher training is provided as necessary. SEAPC collaborates with its global offices to implement these initiatives, particularly focusing on field personnel training, considering language barriers and cultural sensitivities.

### **8 Policy Publicity**

- 8.1 At SEAPC, we highly value receiving concerns and complaints, and we make this evident across all our communications. Our Complaints Policy is easily accessible on our website through policy links located at the bottom of each page. Moreover, a dedicated web page outlines the Complaints process, including a web form for submission, along with information on timelines for handling Complaints. We welcome expressions of concern and Complaints through all online and Contact Centre channels, ensuring our invitations are culturally appropriate and considerate of various cultural norms. Additionally, we prioritise facilitating Complaints from vulnerable populations, including children and marginalized groups.
- 8.2 We strive to make lodging a Complaint as straightforward as possible, taking into account the needs of vulnerable, minority, and disadvantaged individuals, including factors like literacy, language, age, and gender. To achieve this, we offer multiple avenues for lodging a Complaint in Australia. Our in-country partners provide a confidential mechanism for reporting Complaints to staff, volunteers, beneficiaries, contractors, vendors, and other in-country entities. We also emphasise reporting events posing an immediate threat to life or property to local emergency services in all relevant communications.
- 8.3 Furthermore, we ensure that all our communications explain the process for lodging Complaints, including where and to whom Complaints can be made, the required information from the Complainant, the handling process, associated timeframes, options for remedy, including external



- avenues, and how the Complainant can obtain feedback on the Complaint's status. In addition to periodic reviews of our Complaint handling procedures, we continuously monitor the effectiveness of our Policy's communication and make necessary improvements.
- 8.4 Contractual Obligations with Partners: Our contractual agreements with partners, both domestically and internationally, explicitly mandate compliance with our policies and requirements, including reporting matters such as safeguarding, fraud, corruption, and privacy breaches.

## 9 Where and How to Lodge Complaints

- 9.1 Complaints may be lodged through various channels and from different locations, including:
- 9.2 Complaints from SEAPC's international and domestic programs: Initial Complaints may be directed to SEAPC's National Office or the SEAPC website.
- 9.3 Complaints directly lodged with SEAPC: Complaints can be made to SEAPC through various channels, all handled by our Contact Centre:

Online Complaints form on our website www.au.seapc.org or via email below:

Email: info@au.seapc.org

- 9.4 Complaints received at public events, retail sites, or via social media: Our staff, volunteers, and authorised representatives are trained to respond immediately to feedback. Upon receiving a Complaint, they will direct the Complainant to our online Complaints form or the SEAPC Contact Centre for appropriate handling.
- 9.5 For verbal Complaints, we ensure that all relevant information provided by the Complainant is accurately recorded. We acknowledge that some Complainants may prefer to remain anonymous, and while we accept anonymous Complaints, we may not be able to provide individual remedies in such cases.

# 10 Handling of Complaints

- 10.1 When receiving a verbal Complaint, we:
- 10.1.1 Identify ourselves, listen attentively, record details, and ascertain the Complainant's expectations.
- 10.1.2 Confirm receipt of the details and show empathy without taking sides or becoming defensive.

Commented [Au1]: Does SEAPC AU need its own website? Or did you want to house the complaint form on the current SEAPC website?



- 10.1.3 Seek the desired outcomes from the Complainant, assess the severity and urgency of the Complaint, and explain the ensuing actions clearly.
- 10.2 We do not create false expectations but assure the Complainant of our full attention to the
- 10.3 We provide estimated timeframes for resolution and offer alternatives if the Complainant is unsatisfied. All Complaints are appropriately acknowledged, followed up, and registered for monitoring purposes.
- 10.4 We ensure that personnel working in communities we serve receive adequate training to handle inquiries, concerns, and Complaints sensitively, considering cultural and gender nuances and ensuring appropriate handling of cases involving children.
- 10.5 Complaints related to potential instances of sexual misconduct, abuse, or exploitation are escalated to SEAPC's Safeguarding Point for further investigation and reporting in line with our Safeguarding Policies.
- 10.6 In cases where a Complaint implicates SEAPC personnel, we ensure that the handling of the Complaint does not involve individuals implicated in the matter. Additionally, any illegal, dishonest, fraudulent, or corrupt conduct is promptly reported, with Complainants directed to utilize whistleblower mechanisms if eligible.
- 10.7 Initial Assessment of Complaints: Upon receiving a Complaint, we conduct an initial assessment to determine the number of issues raised, any safeguarding concerns, and the severity and urgency of the matter. Depending on the assessment, the Complaint is triaged to the appropriate team for further action.

## II Enquiries, Minor Complaints, and Jurisdiction

11.1 We prioritise addressing minor Complaints immediately, ensuring the Complainant's satisfaction with the provided information or resolution. We also swiftly determine whether investigation is required based on jurisdictional questions or the validity of the Complaint.

# 12 Investigation of Complaints

12.1 We undertake thorough investigations into Complaints, considering all relevant circumstances and information. The extent of the investigation corresponds to the seriousness and frequency of the Complaint, ensuring a fair and comprehensive resolution process.



#### 13 Timeframes:

13.1 We will make every effort to acknowledge written Complaints within five business days of receipt. Verbal Complaints and those received via online chat will be acknowledged immediately. Our aim is to resolve Complaints as swiftly as possible, typically within 30 business days, unless exceptional circumstances arise. If a Complaint remains unresolved after 30 business days, we will inform the Complainant and provide regular updates on its progress.

#### 14 How we will respond to and close a Complaint:

14.1 Serious Complaints requiring investigation will be escalated to the relevant business area Head or a senior staff member delegated by them for decision-making. Decisions on serious Complaints may also be escalated to the GM/CEO for review, if necessary. We will communicate our decision on a Complaint as soon as practicable, in writing via email and/or post, and verbally if appropriate. We will encourage the Complainant to respond and indicate their satisfaction with our decision. If the Complainant remains dissatisfied, we are willing to consider any additional information they provide and review our decision.

### 15 Confidentiality:

15.1 We are committed to maintaining the confidentiality of Complainants' names and personal details, disclosing them only to staff involved in handling the Complaint with the Complainant's permission.

## 16 Complaint data:

16.1 All Complaints will be registered, including the date of receipt, a description of the Complaint and relevant supporting data, the requested remedy, the service(s) and/or good(s) complained about, the due date for a response, and any immediate action taken to resolve the Complaint.



## 17 Reporting about Complaints:

17.1 We will promptly escalate complex and/or major Complaints to the relevant next level Manager, business area Head, or a senior staff member delegated by them. Complaints and Feedback will be regularly reported at Lead team meetings and Executive meetings. Minor Complaints will be summarily reported, while major Complaints will be detailed by the relevant business area Head or a senior staff member delegated by them. An analysis will accompany the Complaints report.

## 18 Learning from Complaints:

18.1 We will ensure that all relevant personnel are informed of the outcomes of Complaints and their implications for our services, goods, procedures, and processes. We will take all necessary remedial action, including operational changes, staff training, and disciplinary measures where appropriate.

# 19 Continuous improvement:

19.1 We will continuously monitor the effectiveness of our Complaint handling processes and make improvements as necessary. This includes maintaining data collection on Complaints, staying updated on best practices, fostering a supporter-focused approach, providing specific training and retraining to staff, encouraging innovation, and recognizing and rewarding exemplary Complaint handling behavior.

# 20 Exceptions to this Policy:

20.1 Exceptions to this Policy can only be approved by the Board of Directors of SEAPC Limited.



# 21 Consequences for breaches of this Policy and associated procedures:

21.1 Breaches of this Policy and associated procedures may be reported to the GM and may result in disciplinary action, including termination of employment. Regulatory breaches may be reported to the Board if necessary.





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