



Complaints Handling Policy

Policy Statement

Baptist World Aid Australia (BWAA) is committed to building and maintaining trust with every stakeholder; providing the highest standards in humanitarian, development and advocacy programs; and working in an effective, transparent and accountable way. We are committed to being accountable to our stakeholders who include:

- our employees, volunteers, Board Members, consultants, and contractors.
- our supporters/donors
- our partners
- our beneficiaries including all people with whom we work, including children and other vulnerable people
- a member of the public.

We acknowledge that when we do not meet our own standards and policies, our stakeholders may be impacted. In these circumstances, they have a right to complain and to have those complaints taken seriously. BWAA is committed to transparent and responsive complaints handling, where no form of misconduct is acceptable and where no power should be abused.

We believe that to improve services provided to supporters/donors, partners, and beneficiaries, we need to be open to feedback, from all stakeholders. Receiving a complaint is an important process for learning and continuous improvement. Therefore, in the case of a complaint, timely and appropriate action will be taken to continuously improve the quality of our work and proactively develop and maintain good practice.

We also recognise that we have a responsibility to work with our partners to ensure they develop safe and effective complaints mechanisms. These should be accessible to all people including children and other vulnerable people, with whom they work. These beneficiary stakeholders should be informed about their rights and entitlements, and how to make a complaint.

Scope and Purpose

This policy applies to all BWAA representatives including officers and board members, staff, volunteers, consultants, contractors, suppliers, and members of the public, whether in Australia or overseas.

This policy addresses the handling and investigation of complaints. There may be circumstances where a complaint should be dealt with using a different policy and process. See **Appendix 1**

If a complaint is received that is outside of the scope of this policy BWAA will endeavour to refer the complainant to an appropriate place.



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LEARNING

What does the policy look like in practice?

Guiding Principles

- A complaint can be made by any BWAA stakeholder, including an Implementing Partner, our employees, volunteers, Board Members, supporters/donors, beneficiary, or a member of the public.
- BWAA will welcome and support a parent, guardian, or caretaker to lodge a complaint on behalf of children or youth under the age of 18
- BWAA will take all reasonable steps to ensure our complaints handling process is as visible and accessible as practicable for all complainants.
- BWAA will provide a safe and discrete point of contact for all stakeholders and ensure that confidentiality is maintained.
- BWAA will maintain a formal complaints procedure
- BWAA will commit to the practice of continuous improvement, ensuring all suggestions are considered and implemented, where applicable.

Publicising the Policy

The Complaints Handling Policy is available on our website <https://baptistworldaid.org.au/> and on SharePoint.

The policy and process of how to make a complaint and contact information is included in the BWAA Annual Reports. The process of how to make a complaint to ACFID and their contact information is also communicated on the BWAA website.

How Complaints are Made

BWAA will encourage stakeholders to express a complaint through BWAA's formal complaints procedure. A complaint can be received by any BWAA representative who will direct it to the Complaints Handling Officer, these complaints can be made:

- in person,
- by phone on 1300 789 991,
- by email at complaints@baptistworldaid.org.au, or
- in writing and sent to Baptist World Aid, Locked Bag 2200 North Ryde NSW 1670.

A child friendly form is also available on our website. [You can access the form here.](#)

We recognise that the beneficiaries of our International Partners may not have the tools and technologies necessary to access our Complaints Handling Policy. We will endeavour to work with our International Partners to reach mutually agreeable and practical implementation of processes that create awareness of, and access to, our Complaints Handling Policy, in addition to accessible local complaints mechanisms.

If the issue is not resolved to the reasonable satisfaction of the complainant, or if the complaint involves the CEO, then the complaint may be referred to the Chairperson of the Board (boardchair@transformaid.org).

BWAA will also make stakeholders aware of their rights to express a complaint directly to:

- **Australian Council of International Development's (ACFID) Code of Conduct Committee** regarding an alleged breach of the ACFID Code of Conduct, to which BWAA is a signatory.

Complaints can be emailed to the Chair, ACFID Code of Conduct Committee code@acfid.asn.au or by phone to the Code Secretariat at (02)81232234.

OR

- Australian Baptist Ministries (ABM) on info@baptist.org.au

Types of Complaints

1. Operational Complaints

Operational complaints may involve BWAA employees, volunteers, Board members or external stakeholders questioning or objecting to issues such as geographic and sectoral priorities, strategic approaches, advocacy campaigns, focus groups, choice of partners and adherence to programmatic policies and procedures.

2. Anonymous Complaints

We recognise that, at times, people who have genuine concerns cannot speak out and may wish to lodge a complaint without revealing their identity. In such circumstances, the Complaints Handling Officer can initiate an investigation if it is evident that there are grounds for further action and to ensure a safe and abuse-free environment.

3. Frivolous Complaints

It is expected that all complaints are made in good faith and are not motivated by intent for personal gain, personal interest, or a grudge. However, should a subsequent investigation reveal a complaint to be frivolous, (for example, an accusation that the complainant knows to be false) any investigation underway will be terminated immediately and the complaint closed. If a frivolous complaint is made by a BWAA Board member, employee or volunteer, disciplinary measures will be taken.

Process for Managing Complaints

Acknowledgement of Complaint

When a complaint is received, an initial letter of acknowledgement will be sent to the complainant within five (5) days. Similarly, the Subject of the Complaint (if an individual) will also be advised that a complaint has been lodged against them.

Initial Review

The Complaints Handling Officer will conduct an initial review to determine if an investigation is required. Some complaints can be resolved to the complainant's satisfaction through two-way communication between the complainant and the person who received the complaint.

The initial review will determine how to triage and manage the complaint and will include consideration of the following:

- Does the complaint constitute a 'complaint' as defined in this Policy?
- Does it relate to a breach of BWAA policies and procedures and/or the ACFID Code of Conduct?
- Is there enough factual information to investigate?
- What is the severity of the complaint?

- Will an investigation cause harm to the complainant or subject of the complaint?
- Does this have a significant impact on an individual, the public or BWAA as an organisation?
- If left unaddressed, would this have the potential to escalate?
- Is this complaint vexatious?
- Is there a need for immediate action?

In consultation with key stakeholders, the Complaints Handling Officer will:

- make the best judgment giving due consideration to the welfare of those involved, as well as BWAA's commitment to its guiding principles, accountability, and transparency.
- determine the nature of the complaint, if a formal investigation is required, and which policy and procedure will be followed. (refer to **Appendix 1**)
- inform the complainant of the outcome via an appropriate means of correspondence (such as phone, email or post).

If the complaint concerns the Complaints Handling Officer themselves, the complaint will be directed to the Director of Finance and Operations, who will determine if there is a need for investigation as per the above.

Complaints involving Partner Organisations

Complaints against an employee of a BWAA Partner Organisation, or against the organisation itself, will be referred to the Partner's Complaint Management processes or the person/role with delegated authority to handle complaints within that organisation.

BWAA will provide appropriate support to the Partner Organisation and will assess the need for further interventions on a case by case basis.

Investigation Process and Determination

In normal circumstances, the complaints process should have commenced and be completed within 30 days of receipt of the complaint, including a formal written response to the complainant, as well as the Subject of the Complaint. The broad categories of response will be:

- Dismissal of the complaint
- Referral of the Complainant to a more appropriate body, such as ACFID's Code of Conduct Committee
- Uphold the complaint and outline steps that will be taken to rectify the situation.

In the case of legal or insurance complaints we will make every endeavour to abide by the above timeframes, however we acknowledge that the nature of these matters may require more flexibility.

BWAA will communicate its' decision regarding a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email 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 endeavour to communicate our decision verbally and in the appropriate language.

We will encourage the complainant to respond and advise whether they are satisfied with the decision. If the complainant is not satisfied with the decision, BWAA will be prepared to consider any additional information they may provide and to review our decision.

Recording of Complaint Information

The following information will be recorded on our database:

- Date of complaint
- Details of the services or goods and/or practice or procedure complained about
- A description of the complaint and relevant supporting data
- The requested remedy
- In the case of verbal complaints, we will also record to whom the complaint was made

Details of the investigation outcome and decisions reached will also be included in the database record for each complaint.

The Complaints Handling Officer will ensure the complaint is recorded in a complaints case on the NEO database and will record any immediate action taken to resolve the complaint. Should the complainant or survivor request that they be de-identified, this wish should be respected and upheld.

Reporting

Complaints cases will be escalated as appropriate, and the Complaints Handling Officer will provide details about types of complaints and status of resolution for inclusion in the Compliance Report which is presented to the Board on a quarterly basis. The findings and recommendations will inform policy decisions, management processes and will be used to encourage learning and continuous improvement in this area.

Confidentiality

Information that identifies the complainant or the Subject of the complaint (where an individual) should only be disclosed to the appropriate people within the organisation. Such information should be actively protected unless the complainant expressly consents to its disclosure.

Training of Policy

We require all those who may act on our behalf to formally signify their commitment to this policy through signing the Code of Conduct.

We will provide induction training to BWAA employees, volunteers, and Board. Training will also be provided following an update or change to the Policy.

Responsibilities

Position	Responsible for:
CEO/ Chairperson of the Board	<ul style="list-style-type: none"> • Respond to and manage escalated complaints
Director of Risk, Governance and Business Optimisation	<ul style="list-style-type: none"> • Strategic oversight of policy • Ensure complaints policy is visible and accessible • Monitor effectiveness of complaint handling and introduce improvements.

Complaints Handling Officer	<ul style="list-style-type: none"> • Conduct initial review to determine if an investigation is required • Refer complaints about Partner organisations as appropriate • Manage formal complaints procedure ensuring all complaints are acknowledged, triaged, managed and responded to • Maintain records of complaints and their resolution in database and provide details for inclusion in the Compliance Report.
Director of International Programs	<ul style="list-style-type: none"> • Ensure implementing partners have access to TIA's complaints policy
HR Team	<ul style="list-style-type: none"> • Provide training to all people covered by this policy during induction and after policy updates

Compliance with this policy will be monitored by the positions listed in the table above. Noncompliance with this policy will be managed in accordance with the Disciplinary Policy.

Accessing the Policy

Our Complaints Policy has been distributed to all employees, volunteers, Board, partners, contracted service providers and all others acting on our behalf and is available on BWAA's Governance Hub in the Policies and Procedures Teams Channel and from our website.

This policy will be provided to all relevant staff during induction.

Review and Amendment

We will continuously monitor the effectiveness of our complaint handling policies and processes and introduce improvements as appropriate.

We will conduct a comprehensive review of the efficiency and effectiveness of our complaint handling policies and processes every three years.

Definitions

A **complaint** is an expression of dissatisfaction or concern regarding BWAA, our employees, volunteers, Board Members, contractors, partners, or anyone else acting on our behalf in relation to BWAA's work, products, or services; where a response or resolution may be explicitly or implicitly expected.

A complaint may include (but is not limited to) matters such as:

- Unfair, inappropriate, or incorrect conduct
- Any breach of BWAA policies or the ACFID Code of Conduct
- Concern over inappropriate use of funding
- Concern about a particular fundraising approach or marketing campaign
- Timeliness of responses to queries
- Concern over the quality of program delivery

- Concern from a beneficiary in relation to one of our programs
- Behaviour or decisions of employees
- Organisational practices, policies, or procedures
- Threat of or actual legal/insurance action, or a protracted dispute that requires escalation, received from corporations or related entities in relation to or as a result of our advocacy work.

Examples of what is not a complaint:

- A general query about BWAA's work
- A contractual dispute
- A request to unsubscribe from regular BWAA communication, for example, a campaign newsletter or email.
- Disagreement with our advocacy work by corporations or related entities subject to our advocacy work, unless the disagreement is threats of or actual legal/insurance action, or a protracted dispute that requires escalation.
- Complaints against another organisation or employee of another organisation
- A vexatious matter, which is raised without grounds or without the possibility of pursuing a legitimate end. They have the intention, or inevitable effect, of causing distress, trouble, and annoyance.

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

Complaints Handling Officer: the delegated BWAA person responsible for facilitating the address and resolution of complaints.

ACFID: "Australian Council of International Development", the peak body representing Australian International Development Agencies that promotes good development practices, transparency, and integrity.

ABM: Australian Baptist Ministries (formerly Baptist Union of Australia), the peak body for Australian Baptist Communities, of which BWAA is an Affiliated Body ([Australian Baptist Ministries | Here To Serve](#)).

Enquiry: A request for information or an explanation.

Feedback: opinions, comments, suggestions, and expressions of interest in the work/services/products or the complaint handling process.

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

Related Policies and Procedures

This Policy should be read in conjunction with the following:

- Complaints and Feedback Handling Procedure
- Child Safe Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Child Safe and SEAH Allegation Management Procedure
- Grievance Policy

- Disciplinary Policy
- Whistleblowing Policy

Document Control Information

Complaints Handling	
Owner	Director of Risk, Governance and Business Optimisation
Master Copy	Risk & Governance Team
Document Type	Approval required
<input type="checkbox"/> Governance, Substantive Operational/ Organisation Policies	Board
<input checked="" type="checkbox"/> Operational/ Organisation Policies	Executive
<input type="checkbox"/> Departmental Policies	Department Director
<input type="checkbox"/> Procedure	Department Director
<input type="checkbox"/> Substantive Procedure/ Procedure that impacts whole organisation	Executive
<input type="checkbox"/> Other BWAA Documents: work instructions, forms, guidelines, manuals	Department Director
<input type="checkbox"/> Other substantive BWAA Document	Departmental Director, Executive and Board
Date created	2011
Date last reviewed	14/02/2024
Date Approved	11/9/2024
Date next Review	11/9/2027

Date	Version	Revision Description	Reviewed / Updated by
2011	1	BWAA version created	Director of Business
04/06/2015	2	BWAA version updated	Director of Business
19/09/2016	3	BWAA version created. Updated contact information for Complaints Handling Officer	Policy QA Coordinator
03/11/2016	4	Updated Guiding Principles to make Policy child friendly	HR Advisor/ Policy QA Coordinator
09/11/2016	5	Added sentence about Board Chair taking complaints regarding CEO	Policy QA Coordinator
23/01/2017	6	Added definition and examples of what is and is not a complaint. Explained procedure for handling advocacy complaint.	Policy QA Coordinator
07/02/2017	7	Expanded complaint definition to include complaints that do not require a response. Amended CHO definition. Changed timeframe section to allow for	Policy QA Coordinator

		different timeframes for legal/insurance complaints.	
01/11/2019	8	Updated to align with ACFID and DFAT PSEAH requirements	Policy QA Coordinator
01/07/2020	9	Updated to align with ACFID's guidance document and BWAA's newly developed Complaints Handling Procedure	Policy QA Coordinator
16/11/2020	10	Updated to align with new organisational structure	Complaints Handling Officer
2020	11	Updated to align all complaints related policies together. Appendix 1 and 2 added. Content modified to align with ACFID guidance	Risk and Governance Coordinator
18/7/2024	12	Updated to streamline language and sharpen focus to complaints handling, rather than including feedback and enquiries.	Risk and Governance Coordinator & Director Risk, Governance and Business Optimisation

Appendix 1: BWAA Complaints Mechanisms

Problem					
Type	General Complaint	Whistleblowing	Grievance	Safeguarding, CS, PSEAH Incident	Feedback/Query
Distinction	Concerns over; use of funding, breach of policy, quality of programming, organisational practices, behaviour of employees or partners	Breaches of legal obligations; criminal, corrupt or fraudulent activity; abuse of authority	Work-related problem or concern; communication interpersonal conflict, unfair treatment, victimisation, vilification and/or bullying	Undignified or inappropriate content of children, child exploitation material, Sexual exploitation, abuse or harassment, of a child or any adult	Positive or negative opinions, comments, suggestions and expressions of interest in the work/services/products <i>Not covered by Complaints mechanism – refer to National Engagement feedback guidelines.</i>
Responsible Officer	Complaints Handling Officer (CHO)	Governance Manager CFO Auditor Whisplii	Direct Manager HR Manager	IP Safeguarding Officer Organisational Safeguarding Officer	Supporter Engagement Manager
Policy & Procedures	Complaints Handling Policy	Whistleblowing Policy	Grievance Policy	Child Safe Policy	Complaints and Feedback Handling Procedure
	Feedback and Complaints Handling Procedure	Whisplii Speak Up system	Code of Conduct	Safeguarding Code of Conduct PSEAH Policy CS and PSEAH Allegation management procedure	