



RAWCS Complaints Handling Policy and Procedure

APRIL 2025

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1. Introduction

1.1 *Who we are*

1.1.1 Rotary Australia World Community Service Ltd (RAWCS) is a registered charity with the Australian Charities and Not-for-profits Commission (ACNC). We back doing good by supporting and facilitating a broad range of humanitarian and development projects, both in Australia and in developing countries. RAWCS administers three Tax Deductible funds:

1. **Rotary Australia Overseas Aid Fund (RAOAF):** This fund supports efforts by Rotary Clubs, Rotary Districts and other partners to deliver humanitarian assistance in developing countries. RAOAF focuses on both sustained development and immediate disaster response, working collaboratively with communities to deliver impactful, sustainable projects to meet identified needs.
2. **Rotary Australia Benevolent Society (RABS):** RABS supports Rotary Clubs, Rotary Districts and other partners to respond to specific community challenges within Australia. It offers an avenue for wider community involvement through tax-deductible donations. The Rotary Australia Compassionate Grants Projects within RABS uses matching funds from donations, such as those provided by Dick Smith's Trust, to assist Australians facing hardship.
3. **Rotary Australia Relief Fund (RARF):** This fund is dedicated to responding to national appeals and efficiently disbursing funds to appropriate aid projects. RARF's focus is on mobilising rapid support during national crises, such as natural disasters, providing a structured channel for public generosity to be transformed into effective aid. This fund acts as a hub for contributions from both Rotary and non-Rotary sources, ensuring swift and effective aid delivery to disaster-affected areas.

1.2 *Purpose*

1.2.1 The purpose of this policy is to:

- provide a complainant with access to an open and responsive process;
- ensure that we handle complaints fairly, efficiently and effectively;
- enhance our ability to resolve complaints in a consistent, systematic and responsive manner;
- enhance our ability to identify trends and address causes of complaints, and improve our operations; and
- provide a basis for continual review and analysis of the complaints-handling process, the resolution of complaints, and process improvements made.

1.2 *Scope and Governance*

1.2.1 This policy applies to RAWCS and all of its administered funds and subsidiaries – referred inclusively within this policy as RAWCS.

1.2.2 This policy applies to our operations globally. Feedback or a complaint can be made by any supporter, partner organisation, community or individual with whom we work or any member of the public whether an individual, civil society organisation, government, company or other entity. This policy is applicable to all RAWCS staff, volunteers, Board members, committee members, suppliers and contractors. Within this policy all of these people are represented by the term: “**our people**”. This policy includes RAWCS partner organisations.

1.3 Policy References

This policy was developed with references to the following documents:

- Standards Australia (AS 10002:2022) Guidelines for complaint management in organizations
- ACNC Complaints Handling Model Policy and Procedure
- ACFID Code of Conduct
- RAWCS Code of Conduct
- RAWCS Commitment to Human Rights, Humanitarian Principles and Racial Justice Statement
- RAWCS Equity, Diversity & Inclusion Policy
- RAWCS Child Safeguarding Policy and Code of Conduct
- RAWCS Gender Equity Policy
- RAWCS Disability Inclusion Policy
- RAWCS Volunteer Policy
- RAWCS Communication and Transparency Policy
- RAWCS Whistleblower Policy and Procedure
- RAWCS Privacy Policy

1.4 Definitions

Term	Definition
Complaint	An expression of dissatisfaction made to, or about us, our services, our people or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. As well as complaints being made directly to our organisation, remember that some complaints (or at least negative comments) made be made on social media
Complainant	A person, organisation or its representative, making a complaint.
Complaint handling system	All policies, procedures, practices, staff, hardware and software, used by us, in the management of complaints.
Dispute	An unresolved complaint escalated either within or outside of our organisation.
Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required

2. Complaints Handling Policy

2.1 Guiding Principles

- 2.1.1 We recognise the importance and value of listening and responding to concerns and complaints as set out in the ACFID Code of Conduct in ensuring that feedback and the complaints handling process is as effective, safe, confidential and accessible to all stakeholders as possible, irrespective of their gender, status or background and without prejudice to their future participation. We will do this by following these guiding principles:
- 2.1.2 **Confidentiality:** We will maintain the highest level of confidentiality regarding details shared in receiving and investigating a complaint, including the complainants name and personal details.

Information will only be shared as necessary to investigating and reporting the complaint. Information will be stored in a locked file.

- 2.1.3 **Visibility:** Information about the process for making a complaint will be clear and well publicised to supporters, rights holders participating in programs, and other stakeholders. We make clear the value we place on receiving concerns and complaints in all relevant communications. Our website 'contact us' page has a prominent tab with the word complaint linking to this policy and information on how to make a complaint. Our Partnership Agreements include a standard complaints report which is discussed with partners and a contextually appropriate mechanism agreed.
- 2.1.4 **Child-Friendly Complaints Approach:** We recognise the right of children to be heard and to have concerns taken seriously. We are committed to ensuring that complaints mechanisms are accessible and appropriate for children and young people who may wish to raise a concern or be involved in a complaint. This includes:
- providing information on how to make a complaint in age-appropriate and culturally suitable formats, including visual or oral methods where literacy is a barrier;
 - allowing complaints to be made through trusted adults, including teachers, caregivers, or project facilitators;
 - ensuring that complaints involving or made by children are handled by staff or volunteers trained in child safeguarding and child-friendly communication;
 - prioritising the safety, wellbeing, and confidentiality of children throughout the complaint process, and referring to child protection services where necessary; and
 - maintaining alignment with RAWCS' Child Safeguarding Policy and Code of Conduct at all times when managing complaints involving children.
- 2.1.5 **Accessibility:** The complaints handling process is easily accessible to all stakeholders. We will ensure that flexibility is provided to complainants to ring, write and e-mail complaints and/or to raise concerns in person. Where literacy is a constraint, we will orally invite expressions of concern and complaint. 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 will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If appropriate we will make use of pictorial means of communication. 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 communication (including our website, annual report, partnership agreements) explain how to make a complaint including:
- where or to whom complaints can be made;
 - information to be provided by the complainant;
 - the process for handling complaints, including confidentiality and protection for the complainant;
 - the complainant's options for remedy, including external means; and
 - how the complainant can obtain feedback on the status of the complaint.
- 2.1.6 **Objectivity:** All complaints will be addressed in a fair and equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified to ensure objectivity.
- 2.1.7 **Responsiveness:** All complaints and constructive feedback will be taken seriously and handled as swiftly as practicable. All complaints will be responded to immediately on receipt, and an investigation plan established. Whilst we aim to confirm all investigations within one month of notification, timeframes must remain flexible according to the investigation process. All

complainants will be treated courteously and kept updated on the progress of their complaint through the complaints-handling process. Further, in line with the Core Humanitarian Standards only trained staff should investigate allegations of sexual exploitation and abuse.

- 2.1.8 **Accountability:** Accountability for handling complaints and reporting on the actions and decisions of RAWCS with respect to complaints handling will be clearly established. All complaints will be handled using the agreed complaints procedure. All our people will receive training on complaints handling and investigations.
- 2.1.9 **Continuous improvement:** We are committed to the continual improvement of the complaints handling process and the quality of its work. This commitment is practically supported by the analysis and reporting of complaints trends, monitoring of complaints handling processes, auditing/management reviews of the complaints handling process, and refining of complaints handling in light of those reviews.
- 2.1.10 **Organisational commitment to this policy:** We will ensure that sufficient resources and expertise are provided to handle complaints. Our Complaints Policy will be distributed to all our people and all others acting on our behalf. Our people directly involved in complaint handling are to be fully trained in all aspects of this policy and its implementation. We take special care to train our people to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.
- 2.1.11 **Creating a safe environment:** We seek to provide a safe environment through which to voice a concern, without fear of reprisal or unfair treatment. We are committed to ensuring that all stakeholders should be able to raise reasonable concerns:
- without any risk of losing their employment or entitlements or suffering any form of retribution in the workplace or outside;
 - knowing that harassment or victimisation will not arise from raising a genuine concern – and if it does, to know that we will deal with it as a disciplinary action under the appropriate procedure;
 - knowing that their safety is our highest priority;
 - knowing that sensitive complaints will be addressed in a confidential manner; and
 - our complaints handling system is modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.

2.2 *Types of Complaints*

- 2.2.1 **Operational and sensitive complaints:** This policy is designed to handle both operational complaints and sensitive complaints.
- 2.2.2 **Operational Complaints:** This may include our partners disagreeing over areas of operation, funding sources, priorities, differences of interest between the public relations interests of the funding partners, conflict over approaches, the capacities of implementing partners, or noncompliance with our policies and program principles, among others. Complaints may also relate to RAWCS, e.g. regarding decisions on project priorities, strategy implementation, management issues, etc. Complaints may also relate to marketing, fundraising or campaign activities.
- 2.2.3 **Children and Young People:** Complaints involving children or young people are treated with particular sensitivity and managed according to child safeguarding procedures. Children are

supported to raise concerns in safe, trusted environments, and to participate in the process in ways appropriate to their age and understanding.

- 2.2.4 **Sensitive Complaints:** We consider allegations of harassment or bullying, of sexual exploitation and abuse, fraud and corruption or other gross misconduct as “sensitive” complaints. The policy supports the confidential handling of information related to sensitive complaints. It also ensures that sensitive complaints are addressed by senior management and that timely and appropriate support and redress is provided to any complainant who has suffered bullying, sexual exploitation, abuse or harassment.
- 2.2.5 **Anonymous complaints:** We acknowledge the importance of providing a safe channel for lodging complaints, including anonymously. We accept anonymous complaints if there is a compelling reason to do so, such as fear of retaliation or confidentiality concerns. To ensure the effectiveness of our response and uphold fairness, we require that such complaints provide sufficient detail to allow for a meaningful investigation. We will conduct a confidential investigation into the issues raised by an anonymous complaint, provided there is enough information to substantiate the claims made. This ensures that our actions are based on verified information, maintaining the integrity of our complaint handling process and safeguarding the interests of all parties involved.
- 2.2.5 **Malicious complaints:** We operate under the assumption 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 malicious – an accusation that the complainant knows to be false – any investigation underway must be stopped immediately and the subject of the complaint cleared. Complaints lodged for genuine reasons that are subsequently considered to be unfounded shall not be treated as malicious. If a malicious complaint is made by one of our people, disciplinary measures must be taken.

3. Respond to complaints

3.1 *Early resolution*

- 3.1.1 Where possible, complaints will be resolved at first contact with us. When appropriate we may offer an explanation or apology to the person making the complaint.

3.2 *Responsiveness*

- 3.2.1 We will promptly acknowledge receipt of complaints.
- 3.2.2 We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.
- 3.2.3 We are committed to managing people’s expectations, and will inform them as soon as possible, of the following:
- the complaints process;
 - the expected time frames for our actions;
 - the progress of the complaint and reasons for any delay;
 - their likely involvement in the process; and

- the possible or likely outcome of their complaint.

3.2.4 We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate). We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

3.3 *Objectivity and fairness*

3.3.1 We will address each complaint with integrity and in an equitable, objective and unbiased manner.

3.3.2 We will ensure that the person handling a complaint is different from any of our people whose conduct or service is being complained about.

3.3.3 Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

3.4 *Responding flexibly*

3.4.1 Our people are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

3.4.2 We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

3.5 *Confidentiality*

3.5.1 We will protect the identity of people making complaints where this is practical and appropriate.

3.5.2 Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.6 *Manage the parties to a complaint*

3.6.1 Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

3.6.2 Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

3.6.3 Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

3.6.4 Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We accept complaints not only about the actions of our people, but also the actions of our service providers.

3.7 Empowerment of our people

- 3.7.1 All our people managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.
- 3.7.2 Our people are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

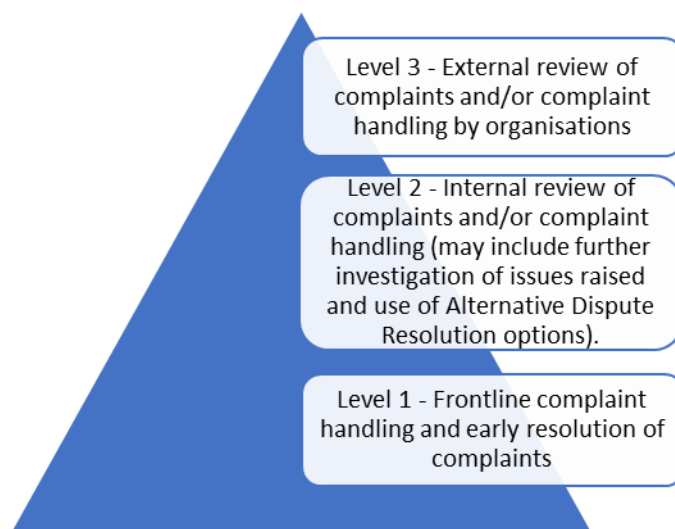
3.8 Managing unreasonable conduct by people making complaints

- 3.8.1 We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:
- our ability to do our work and perform our functions in the most effective and efficient way possible;
 - the health, safety and security of our people; and
 - our ability to allocate our resources fairly across all the complaints we receive.
- 3.8.2 When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

3.9 Alternative avenues for dealing with complaints

- 3.9.1 We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

4. The three levels of complaint handling



- 4.1 **Level 1:** We aim to resolve complaints at the first level, the frontline. Wherever possible our people

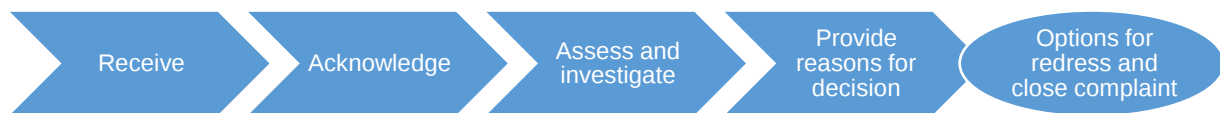
will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

- 4.2 **Level 2:** Where this is not possible, we may decide to escalate the complaint to a more senior officer within our organisation. This second level of complaint handling will provide for the following internal mechanisms:
- assessment and possible investigation of the complaint and decision/s already made: and/or
 - facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).
- 4.3 **Level 3:** Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an external review of our decision. At this stage we will engage an independent reviewer to thoroughly examine the complaint.

5. Complaint management system and procedure

5.1 *The five key stages in our complaint management system*

- 5.1.1 The five key stages in our complaint management system are set out below:



5.2 *The Complaints Handling Procedure*

- 5.2.1 The following Complaints Handling Procedure accompanies the complaint handling policy. It provides guidance to our people on how we manage complaints in accordance with our documented policy.
- 5.2.2 When responding to complaints, you must act in accordance with our complaint handling policy and procedures as well as any other internal documents providing guidance on the management of complaints. You should also consider any relevant legislation and/or regulations when responding to complaints and feedback.
- 5.2.3 For all RAWCS-supported activities conducted outside Australia, the designated RAWCS Volunteer Team Leader will act as the safe point of contact for stakeholders in the country where the work is being delivered. This person is responsible for:
- ensuring local stakeholders are informed about how to raise a complaint, who will handle it, and what they can expect from the process;
 - receiving complaints or concerns raised by project participants, local community members, and other stakeholders.
 - ensuring their name and contact details will be made available in project documentation and communicated clearly during community engagement processes
 - ensuring specific consideration is given to enabling children, young people, and marginalised groups to safely and confidentially raise concerns.

Where possible, complaints should be addressed locally by the RAWCS Volunteer Project Team

Leader, in consultation with partners and community leaders, unless the matter is sensitive or requires escalation.

- 5.2.4 If a complaint in relation to an overseas RAWCS activity cannot be resolved locally, or if the matter involves serious allegations (e.g. safeguarding, fraud, or misconduct), the Project Team Leader must escalate the issue to the RAWCS CEO and/or Child Safeguarding Focal Person.

5.3 *Receipt of complaints*

- 5.3.1 Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

- 5.3.2 The record of the complaint will document:

- the contact information of the person making a complaint;
- issues raised by the person making a complaint and the outcome/s they want;
- any other relevant information; and
- any additional support the person making a complaint requires.

5.4 *Acknowledgement of complaints*

- 5.4.1 We will acknowledge receipt of each complaint promptly, and preferably within five working days.

- 5.4.2 Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

5.5 *Initial assessment and addressing of complaints*

- 5.5.1 **Initial assessment:** After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

- 5.5.2 When determining how a complaint will be managed, we will consider:
- how serious, complicated or urgent the complaint is;
 - whether the complaint raises concerns about people's health and safety;
 - how the person making the complaint is being affected;
 - the risks involved if resolution of the complaint is delayed; and
 - whether a resolution requires the involvement of other organisations.

5.6 Addressing complaints

- 5.6.1 After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:
- give the person making a complaint information or an explanation;
 - gather information from the person or area that the complaint is about; and/or
 - investigate the claims made in the complaint.
- 5.6.2 We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

5.7 Providing reasons for decisions

- 5.7.1 Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:
- the outcome of the complaint and any action we took;
 - the reason/s for our decision;
 - the remedy or resolution/s that we have proposed or put in place; and
 - any options for review that may be available to the complainant, such as an internal review, external review or appeal.
- 5.7.2 If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy Act 1998* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

5.8 Closing the complaint, record keeping, redress and review

- 5.8.1 We will keep comprehensive records about:
- how we managed the complaint;
 - the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations; and
 - any outstanding actions that need to be followed up.
- 5.8.2 We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.
- 5.8.3 Records kept may be anonymised at the request of survivors / complainants.

5.9 Support and Referral for Complainants and Survivors

- 5.9.1 Complainants—particularly those reporting sensitive matters such as safeguarding concerns, sexual exploitation, or abuse—will be offered appropriate support.
- Where RAWCS is not best placed to provide assistance directly, the complainant will be referred to qualified support services in the relevant country or region, including child protection agencies, medical services, or counselling providers.
 - Information about available support and referral options will be provided at the point of complaint, with consent.
 - Support may include enabling a trusted adult or support person to accompany the complainant throughout the process.

6. Accountability and learning

6.1 Analysis and evaluation of complaints

- 6.1.1 We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the National Board of Directors.

7. Roles and Responsibilities

Roles	Responsibilities
National Board of Directors	• Promote a culture that values complaints and their effective resolution • Approving this policy and holding the Chief Executive Officer (CEO) accountable to how effectively this policy is implemented
CEO	• Report to the National Board of Directors on our complaint handling. • Provide adequate support and direction to key people responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage staff to make recommendations for system improvements. • Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.
Child Safeguarding Focal Person	• Responsible for child safeguarding systems, including: developing and implementing policies and procedures; providing training to staff and volunteers; and overseeing compliance with relevant laws and standards.
National Manager Projects & Volunteers	• Ensuring all project participants are aware of, and comply with this policy. • Fostering a culture of integrity by actively promoting and supporting whistleblowing channels to report unethical behaviour or policy violations.
All Our People	• Understanding and following this policy and related procedures • Treat all people with respect, including people who make complaints. • Be aware of our complaint handling policies and procedures. • Assist people who wish to make complaints access our complaints process.

	• Be alert to complaints and assist staff handling complaints resolve matters promptly.
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8. Implementation

8.1. Policy Distribution

- 8.1.1 We will ensure that all our people are notified of and made aware that they are required to follow this policy.
- 8.1.2 This policy will be available on our website and incorporated into our operational project manuals.

9. Review

9.1 Review Frequency

- 9.1.1 We will continually monitor our complaint management system to:
- ensure its effectiveness in responding to and resolving complaints;
 - identify and correct deficiencies in the operation of the system; and
 - monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.
- 9.1.2 We are committed to continuous improvement to our policy, procedures and practices. This policy will be reviewed at least every three years by the CEO and approved by the National Board of Directors to ensure it is working in practice and updated to accommodate changes in legislation or circumstance.

10. Continuous Improvement

- 10.1. We are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:
- support the making and appropriate resolution of complaints;
 - implement best practices in complaint handling;
 - recognise and reward exemplary complaint handling by staff;
 - regularly review the complaint management system and complaint data; and
 - implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

11. More information

11.1. If you have a query about this policy or need more information, you can contact us via:

- email: info@rawcs.org.au
- phone: +61 2 8833 8306
- post: Rotary Australia World Community Service Ltd
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Maitland Place
Norwest NSW 2153
Australia

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V1.1	28 Apr 2025	Sally Basser	Updates for ACFID requirements