

# Complaints Policy

## WaterAid Australia

### Document control

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### Version control

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November 2014	1	Amendment	
July 2019	2	Reviewed and Amended	Director of PP
July 2020	3	Reviewed and Amended	Alexandra Kidner

### Related Policies/Procedures/Guidance Notes

Title	Date	Version
WaterAid International Global Code of Conduct	Dec 2019	
WaterAid Global Procedure for malpractice and breaches to the Code of Conduct – Adapted to WaterAid Australia	June 2019	3
WaterAid Australia Complaints procedures	June 2020	2
WaterAid Cambodia Complaints procedures		
WaterAid Papua New Guinea Complaints procedures		
WaterAid Timor-Leste Complaints procedures		
WaterAid Australia Fraud, Corruption and Bribery Policy	Oct 2019	2
WaterAid Australia PSEAH Policy Statement	June 2020	2
WaterAid Australia Child Safeguarding Policy	June 2017	3
WaterAid Australia Child Safeguarding Procedures	July 2020	3
WaterAid Australia Gender, Family Violence (Domestic Violence/intimate partners violence) and the impact of COVID-19 - Guidance Note	April 2020	1

# Complaints Policy

## 1. Policy Statement

- This policy is intended to ensure WaterAid Australia can be held accountable for its actions and behaviours, and to ensure that complaints are handled fairly, efficiently and effectively.
- WaterAid Australia is committed to ensuring the accessibility of its Complaints Policy, procedures and systems for making a complaint, across the breadth of our work.
- WaterAid Australia strives to uphold the highest standards of excellence in all that it does but recognises that this cannot always be the case. When we make a mistake, we want and need to be informed. We will use the information to endeavour to put things right and to help us to become more effective.
- This policy should be read in conjunction with related WaterAid policies, procedures and guidance notes as detailed on the cover page.

## 2. Scope

- This policy covers WaterAid Australia, country programs managed directly by WaterAid Australia, and programs funded by WaterAid Australia but implemented by another WaterAid International federation member.
- This policy applies to all WaterAid Australia representatives (paid and volunteers), governing body members, partners, contractors, and any other entity receiving or managing complaints from the public and supporters made to or about us, beneficiaries and partners in the country programs where we work.
- This policy applies to all types of complaints regarding our programs, communications, fundraising, services and staff, as well as any complaints relating to this policy.
- For a complaint to fall within the scope of this policy, it needs to relate to an action for which WaterAid Australia is responsible or is within our sphere of influence. However, for matters concerning Child Safeguarding and Sexual Exploitation, Abuse and Harassment (SEAH), WaterAid Australia commits to acknowledging all complaints, taking a survivor centric approach and providing survivors with appropriate referral support.
- Complaints related to breaches of the *Global Code of Conduct* for WaterAid staff and representatives can be filed on the basis of this policy. Depending on the nature and seriousness of the complaint, specific procedures will apply which outlines the process for investigating and managing the complaint. Relevant procedures include those listed on the cover page of this policy.

- Details on investigation procedures for different types of complaints can be found in the WaterAid Australia Complaints Procedure, or relevant Country Program Complaints Procedure.

### 3. Definitions

- A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action by WaterAid Australia or its staff, volunteers or anybody directly involved in the delivery of our work. It is a criticism that implicitly or explicitly expects a response or is legally required.
- Complaints can be about any of the following issues (not an exhaustive list):
  - Exploitation or abuse of children, vulnerable adults or any other person
  - Misuse of funds or fraud (including terror financing)
  - Misconduct (including sexual exploitation, abuse, and harassment) by an individual involved in the work of WaterAid Australia, including employees, volunteers, and contractors of WaterAid Australia, partner organisations or other stakeholders, or by an individual unrelated to WaterAid Australia's work.
  - Concern from someone with whom we work about the quality of program delivery
  - Concern from a member of the public or supporter about a particular fundraising approach or campaign
- A complaint is not:
  - A general query or feedback about WaterAid Australia's work
  - A request for information
  - A contractual dispute
  - A request to amend records e.g. to correct an address, cancel a donation
  - A request to unsubscribe from a WaterAid Australia 'service' e.g. a newsletter or email.
- A complainant is the person or entity who has made a complaint or requested someone else to make a complaint on their behalf. A complainant can be any supporter, partner organisation, community or individual with whom we work or any member of the public whether an individual, company or other entity in Australia or anywhere else in the world.

### 4. Principles

- **Accountability.** WaterAid Australia holds itself fully accountable for all actions, programs and staff behaviour related to our organisation. We are

committed to providing safe channels for stakeholders who feel we may have failed in upholding the high standards we hold ourselves accountable to as an organisation. We value the opportunity to be able to restore confidence in us and for us to learn from any mistakes.

- **Accessibility.** WaterAid Australia commits to making this policy easily accessible to the public, our staff and representatives, our partners, and in the communities where we work. Complainants should be able to make a complaint through a variety of channels as we are committed to making communication with us as easy as possible.
- **Responsiveness.** WaterAid Australia commits to acknowledge and resolve complaints within a reasonable timeframe. In the event that a complaint cannot be resolved within the timeframe indicated in the acknowledgement of the complaint, the complainant will be informed about the progress made to date and when they can expect the complaint to be resolved. 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 escalated appropriately.
- **Confidentiality.** We will protect the identity of people making complaints where this is practical and appropriate. We respect the needs of complainants who wishes to remain anonymous and 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. Confidentiality also applies to any sensitive verbal or written information recorded in the course of the complaint handling process. Survivors of SEAH have the right to be de-identified in our records of the complaint.
- **People-centred approach:** The interests of participants/beneficiaries, partners and other stakeholders are foremost in our approach to complaints handling. We are committed to ensuring that the most disadvantaged and vulnerable people can exercise their right to file a complaint. We will take into account cultural and gender sensitivities to ensure that complaints are handled appropriately.
- **Survivor-centred approach:** We commit to a complaints mechanism which is accessible to survivors of SEAH by ensuring that all complaints are handled confidentially and by responding sensitively to the needs and wishes of the survivors. WaterAid Australia also commits to providing any survivor of SEAH with appropriate referral to local organisations equipped to handle the immediate and longer-term needs of the survivors, regardless of whether the complaint falls within the scope of this policy.
- **Right to appeal:** Complainants who have launched a well-founded complaint and who are unsatisfied with WaterAid Australia's response to that complaint have the right to appeal. If the complainant is unsatisfied with the outcome of the internal appeal, there is the option of contacting the Australian Council For International Development (ACFID) Code of Conduct Committee (CCC) to file a complaint.

- **Mutual Respect:** WaterAid will address each complaint with integrity and in an equitable, objective and unbiased manner. We are committed to being accessible and responsive to all people who approach us with 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 staff, and
  - our ability to allocate our resources fairly across any complaints we receive.

Vexatious or frivolous complaints can detract our resources and may 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.

- **Objectivity:** We will address each complaint with integrity and in an equitable, objective and unbiased manner. We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being implicated. 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.

## 5. Working with partners

- Partners that do not have their own complaints policy fall under the scope of WaterAid Australia's complaints policy.
- Partners that have their own complaints policy are required to ensure the principles and commitments in this policy are applied in any management of complaints which may be related to WaterAid. Any complaint that falls within the scope of this policy can be made to WaterAid directly, regardless of the scope of our Partners' policies.
- We work with partners in different ways to ensure that all stakeholders can make complaints in a safe and confidential manner, and that complaints are handled in line with existing policies.
- WaterAid Australia ensures that the complaints policy and procedures are shared and discussed with partners at the time of establishing a partnership, during the inception phase of a project and regularly throughout the duration of the partnership. It is the responsibility of WaterAid Australia and country programs to ensure that the information is clear and easily accessible to partners.
- Partners are an integral part in the implementation of the complaints policy and procedure in communities where they work, and it is the responsibility of partners to ensure awareness of existing complaints mechanisms in those communities.

- Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the complainant and/or their representative is clear and coordinated. Subject to the seriousness of the complaint as well as privacy and confidentiality considerations, communication and information sharing between the parties will also be organised in a sensitive manner to facilitate a timely response to the complaint.

## 6. Other WaterAid Federation members

- If we become aware of any complaint received which relates to WaterAid International or another WaterAid Federation member we will notify the complainant accordingly and forward to the other WaterAid entity for attention.

## 7. Where and how complaints can be made

- Complaints can be made verbally in person, by telephone or in writing by post, email, or online via our website. Complaints may be made by a friend or advocate of the complainant on their behalf.
- Complaints can be made through the following channels:

**Website:** [www.wateraid.org/au](http://www.wateraid.org/au) using the Contact link on our website

**Email:** info@wateraid.org.au

**Mail:** WaterAid Australia  
Level 9  
176 Wellington Parade  
East Melbourne  
Victoria, 3002  
Australia

**Phone:** +61 1300 858 022

**In person:** If the complaint cannot be made by phone, email, or post, it may be made directly to a WaterAid Australia staff member.

**Country Office:** In countries where WaterAid Australia operates country programs, complaints can be made through various channels, including in person to the Country Representative, or submitted by mail to the Country Office. Details for each Country Program can be found in their respective procedure to this policy.

## 8. Complaints Management

The five key stages in our complaint management system are set out below.



Further details for each of these steps are outlined in the WaterAid Australia and each Country Programs' Complaints Procedures.