

Complaints Policy

WaterAid Australia

Document control

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Version control

Date	Version	Reason for change	Author
November 2014	1	Amendment	
July 2019	2	Reviewed and Amended	Director of PP
July 2020	3	Reviewed and Amended	Alexandra Kidner
March 2023	4	Reviewed and updated. Related policies updated. Inclusion of whistleblowing provider, Safecall.	Head of Program Operations

Related Policies/Procedures/Guidance Notes

Title	Date	Version
WaterAid Global Code of Conduct	2021	3
WaterAid Global Procedure for malpractice and breaches to the Code of Conduct – Adapted to WaterAid Australia	Feb 2022	5
WaterAid Global Standard - Child Safeguarding	Sep 2018	2
WaterAid Principles of Child Safeguarding	Jan 2022	1
WaterAid Global Safeguarding Policy	Dec 2021	3
WaterAid Australia Complaints procedures	Dec 2022	3
WaterAid Cambodia Complaints procedures	2021	1
WaterAid Papua New Guinea Complaints procedures	2021	1
WaterAid Timor-Leste Complaints procedures	2021	1
WaterAid Australia Fraud, Corruption and Bribery Policy	July 2021	3
WaterAid Australia Grievance Policy	Oct 2022	5
WaterAid Australia Child Safeguarding Policy	Sep 2022	6
WaterAid Australia Safeguarding Procedures	July 2020	3

WaterAid Global Disclosure Policy	May 2022	1.1

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 and Procedures 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 a mistake is made, WaterAid Australia needs to be informed and will use the information to rectify concerns. Learning will help inform future practice.
- 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 other WaterAid International Federation Members.
- This policy applies to all WaterAid Australia representatives. This includes staff, volunteers, governing body members, partners, contractors, and any other entity engaged by WaterAid to deliver services.
- This policy applies to all types of complaints regarding programs, communications, fundraising, services and staff/representatives, as well as any complaints relating to this policy.
- Anyone can make a complaint to WaterAid Australia. This includes WaterAid Australia representatives; partners; the general public; community members where WaterAid Australia is operating.
- 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.
- For matters concerning Child Safeguarding and Sexual Exploitation, Abuse and Harassment (SEAH), WaterAid Australia commits to acknowledging all complaints, taking a survivor centred approach, acting in the best interests of the child, 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 of the complaint, specific procedures will apply. These procedures outline the process for investigating and managing the complaint.

- 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 representatives. 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) or breaches to the Code of Conduct 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 about the quality of program delivery, programming approach, or impact on the environment
 - Concern from a member of the public or supporter about a particular fundraising approach or campaign
 - Concern from a Partner organisation
- A complaint is not:
 - A general query or feedback about WaterAid Australia's work. Feedback is defined as opinions, comments, suggestions 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.
 - 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 dispute over payment by either party which is a commercial, legal matter
- 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 WaterAid Australia works, 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 seeks to be accountable for all actions, programs and staff behaviour related to the organisation. Safe channels have been developed to ensure that stakeholders who feel that WaterAid Australia has

not upheld its standards. WaterAid Australia values the opportunity to correct any wrong-doing; restore confidence; and to learn from 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. Complaints will be assessed and prioritised 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.** WaterAid Australia will protect the identity of people making complaints where this is practical and appropriate. Complainants who wish 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 records of the complaint.
- **People-centred approach:** The interests of participants, partners and other stakeholders are foremost in WaterAid Australia's approach to complaints handling. Cultural and gender sensitivities will be taken into consideration to ensure that complaints are handled appropriately.
- **Survivor-centred approach:** WaterAid Australia commits 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 Australia will address each complaint with integrity and in an equitable, objective and unbiased manner. WaterAid is committed to being accessible and responsive to all people who approach us with complaints. WaterAid Australia's response to complaints, will consider:
 - effectiveness and efficiency;
 - the health, safety and security of our staff and representatives; and
 - allocation of our resources fairly across any complaints we receive.

Vexatious or frivolous complaints can detract from resources and may significantly affect the progress and efficiency of work. As a result, proactive and decisive action will be applied to manage any conduct that negatively and unreasonably affects WaterAid Australia.

- **Objectivity:** WaterAid Australia will address each complaint with integrity and in an equitable, objective and unbiased manner. Any individuals appointed to conduct an investigation should not be implicated in the complaint in any way (either an independent manager or an appropriate external professional should be appointed. 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 Partner policies.
- WaterAid Australia's approach to partnership means that partners are supported 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 new and existing complaints mechanisms in communities.
- Where a complaint involves multiple organisations, WaterAid Australia 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 nature 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 a complaint is received which relates to WaterAid International or another WaterAid Federation Member, the complaint will be forwarded to the other WaterAid entity for attention. Agreement will be made between the Members as to who will respond to confirm receipt of the complaint.

7. Where and how complaints can be made

WaterAid Australia encourages complainants to make complaints directly. Where the complainant is not comfortable with this approach, an independent provider can be contacted.

- 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:

Directly to WaterAid Australia

Website: www.wateraid.org/au using the Contact link on our website

Email: info@wateraid.org.au

Mail: WaterAid Australia, [The Commons, 3 Albert Coates Ln, Melbourne VIC 3000, 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.

Independent Provider - Safecall

Complaints can be made indirectly to WaterAid to an independent Whistleblowing agency, Safecall. The complainant can identify whether they wish their complaint to be kept anonymous. Complaints can be made by:

Phone. Operators will advise the complainant on the next steps for managing their complaint and will then share this with WaterAid

In writing, through an online form.

Australia: Phone - 1 800 312 928 (phone lines available 24/7)

<https://www.safecall.co.uk/en/clients/wateraid-australia/>

Full details are found in the WaterAid Australia Complaints Procedures, and Country Programs Complaints Procedures.

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.

