

AUSTRALIAN DOCTORS FOR AFRICA

Procedure: COMPLAINTS HANDLING

Last reviewed: 03/2024

Date of next review: 03/2027

1 INTRODUCTION

ADFA recognises the importance and value of listening and responding to concerns and complaints. ADFA is committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies especially to delivery of services, seeking donations and accountability to stakeholders generally. ADFA is a member of the Australian Council for International Development (ACFID) and committed to working according to or above the standard required by the ACFID Code of Conduct.

Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work. We make clear the value we place on receiving concerns and complaints in all relevant communications. This Complaints Handling Procedure is underpinned by the Complaints Handling Policy (available via the ADFA website).

2 SCOPE

This Procedure applies to any complaint, regardless of who makes it and how it is lodged.

ADFA will receive complaints relating to all ADFA staff, board members, volunteers, in-country partners or consultants.

3 DEFINITION

A **complaint** is any grievance or expression of dissatisfaction or discontent about the standards of service, actions or lack of action of ADFA, and or any misconduct of a representative of ADFA.

4 COMMUNICATION OF THIS PROCEDURE

This Complaints Handling Procedure is available on the ADFA website at <https://ausdocafrica.org/complaints/>. Communication of the procedure will occur in the following ways:

- All ADFA staff and board members will be made aware of these procedures during their induction, whilst volunteers will be informed of the procedure during their pre-departure briefing.
- The Procedure will be accessible to our program recipients through our visiting medical volunteers during our regular medical visits, who will display / make available information in local language regarding our complaints handling process to patients and their families. Additionally, information will be displayed in ADFA operated Clubfoot clinics in local language. Where literacy is a constraint ADFA representatives invite oral expressions of concern and complaint.
- Partner organisations will be made aware of the ADFA Complaints Handling Policy and Procedure through our partnership agreements, and they are also able to access these documents on the ADFA website.

5 WHO CAN MAKE A COMPLAINT?

Complaints can be made by ADFA beneficiaries and their family members, partner organisations, stakeholders, program participants including hospitals, international colleagues, or members of the community.

Complaints can also be made by representatives of ADFA (whistleblowers) who wish to make a complaint about other ADFA staff, volunteers or board members as it relates to the delivery of their responsibilities as ADFA representatives, as outlined in the ADFA Whistleblower Policy.

6 HOW COMPLAINTS MAY BE MADE

It is hoped that most complaints or concerns about ADFA's work or behaviour can and will be dealt with informally by staff or volunteers at a local level. However, some complaints are more serious and require further attention and investigation.

Complaints should be directed to ADFA in the following ways:

- Via **discussion** with staff (especially in country) or by providing a written complaint to staff.
- By **email** to the ADFA CEO (ceo@ausdocafrica.org) or the Chair of the Board (chair@ausdocafrica.org).
- In **writing** to:
Chief Executive Officer or Chair of the Board
Australian Doctors for Africa
Suite 1, 219 Onslow Road
SHENTON PARK WA 6008
- By **telephone**: +61 8 6478 8951

Alternatively, a complaint can be made directly to ACFID. ADFA is committed to working according to the standard required by the Code of Conduct of ACFID, and a complaint can be made against any ACFID member when it is believed that they have breached the Code. The independent Code of Conduct Committee (CCC) is responsible for receiving, managing and investigating complaints against ACFID members. The full procedure for this is outlined on the ACFID website (<https://acfid.asn.au/code-of-conduct/complaints/>) and also on the ADFA website at <https://ausdocafrica.org/complaints/>. Complaints can be lodged via the following means:

Website: ACFID Code Committee at <http://www.acfid.asn.au/code-of-conduct/complaints>

Email: Chair, ACFID Code of Conduct Committee at code@acfid.asn.au.

Post: Chair, ACFID Code of Conduct Committee c/- ACFID, Private Bag 3, Deakin ACT 2600 (such complaints should be marked 'confidential').

7 CONFIDENTIALITY

ADFA undertakes that complaints will be treated in strict confidence. We will not reveal a complainant's name or personal details to anyone in or outside our organisation, other than the CEO or delegate involved in handling the complaint, without obtaining the complainant's permission. No person will be victimised, discriminated against, or suffer consequences in lodging or assisting with information concerning a complaint.

Anonymous complaints can be made, but our ability to investigate them may be limited because of this, and communication of the outcome of the investigation to the complainant would be hampered.

8 HOW COMPLAINTS WILL BE HANDLED

8.1 In the first instance, ADFA will:

- determine if the case involves a child / children, and if so refer immediately to the ADFA Child Safeguarding Procedure document for detailed explanation as to required

procedures. If DFAT funding is involved, **immediately report** any suspected or alleged instances of child abuse, exploitation, harm or child protection policy non-compliance to the Conduct and Ethics Unit via childwelfare@dfat.gov.au.

- determine if the case involves sexual exploitation, abuse or harassment of anyone other than a child, and if so refer to the ADFA PSEAH Policy, and section 8.3 below. determine if the case involves a whistleblower, and if so refer to the ADFA Whistleblower Policy, and refer to section 8.4 below.

8.2 For all other complaints, the ADFA CEO or delegate will:

- seek from the complainant the outcome/s they are expecting and provide to them an estimated timeframe for a response;
- determine the wishes of the complainant in terms of anonymity or de-identification during investigation process;
- make an initial assessment of the complaint with the information available and determine if:
 - the complaint is to be investigated;
 - the complaint is out of our jurisdiction (eg, complaints made against another organisation or their staff should be referred to that organisation for response);
 - the complaint should be referred to another relevant body (eg, government department or authority);
 - further enquiries or consideration needs to be given; or
 - we exercise a discretion not to investigate.
- if the complaint is to be investigated, determine the appropriate manner of investigation, who should be involved in the investigation, including the involvement of external professional support (eg, lawyers, accountants etc) and any other resources required;
- ensure the investigation is undertaken by the appropriate people, and within the designated timeframe;
- at the conclusion of the investigation, provide a report for the CEO and Board, who have final responsibility for the resolution of the complaint;
- provide a written response to the parties involved outlining the findings of the investigation and the outcome determined;
- seek to provide assistance or referrals to relevant support services where appropriate;
- provide to the Board a summary of complaints on a quarterly basis; and
- register all complaints in the electronic Complaints Register.

8.3 Complaints related to **sexual exploitation, abuse or harassment**,

- all complaints must be reported immediately to the ADFA CEO (ceo@ausdocafrica.org) or Chair (chair@ausdocafrica.org)
- the complainant will be investigated as per the complaints handling procedure outlined in this document, and survivors may choose to be de-identified in any reporting;
- ADFA CEO or delegated person will report all alleged sexual exploitation, abuse and harassment (SEAH) incidents which have occurred during the implementation of DFAT funded programs, using the DFAT SEAH Incident Notification Form (www.dfat.gov.au/pseah) and email to seah.reports@dfat.gov.au, as follows:
 - Mandatory and immediate (within two working days of becoming aware of an alleged incident) reporting by all staff and DFAT partners of any alleged SEAH incident related to the delivery of DFAT business. This includes any alleged incident that poses a significant reputational risk to DFAT. For example, an allegation against a senior staff member of a partner organisation.

- Mandatory reporting (within five working days) by all staff and DFAT partners of any alleged Policy non-compliance; for example, failure to adhere to the PSEAH Policy Minimum Standards or principles.
- Any sexual exploitation, abuse or harassment allegations that involve a criminal aspect will be reported through correct law enforcement channels, subject to the wishes of the complainant.
- Personnel who are found to contravene ADFA's clearly stated expectations of their sexual conduct will be subject to disciplinary action that may result in dismissal as per the ADFA Human Resource Management Policy.

8.4 Complaints originated via **whistleblowers**, notwithstanding other provisions of this document:

- all complaints must be reported immediately to the ADFA CEO (ceo@ausdocafrica.org) or Chair (chair@ausdocafrica.org)
- an appropriate investigator will be appointed by the CEO and Chair, who is not implicated in the report, to lead the investigation. The internal investigator must have internal independence of line management of the area affected by the wrongdoing disclosure.
- the investigator has direct, unfettered access to independent financial, legal and operational advisers as required, and a direct line of reporting to either the CEO or the Chair as appropriate.
- regular reports to the Board are required into the investigative process and results.
- the investigator is responsible for keeping the Whistleblower informed of the progress and outcomes of the inquiry/investigation subject to considerations of privacy of those against whom the allegations have been made.

9 TIMEFRAMES

The complaint will be investigated within five working days of receipt and, where possible, the complaint process will be completed within a month. We will aim to resolve complaints as quickly as possible, however if a complaint is not resolved within a month, we will inform the complainant of progress on a regular basis.

10 OUTCOMES OF COMPLAINTS PROCESS

The outcomes resulting from a complaints process may include the following:

- should the complaint relate to misconduct by ADFA personnel, outcomes will be determined via the ADFA Human Resource Management Policy;
- should the outcomes of complaint have implications for our services, procedures and processes, these will result in effective changes to our ways of working;
- further training or awareness raising with our staff and volunteers;
- seeking advice from ACFID and/or other relevant regulatory/enforcement authorities where appropriate;
- referral to other relevant regulatory authorities or organisations for resolution or further investigation, dependent upon the wishes and welfare of the complainant;
- if a complaint cannot be resolved under the Complaints Handling Procedure, the complainant may wish to escalate the complaint to the Australian Council for International Development (ACFID). If any complaint entails an alleged breach of the ACFID Code of Conduct, complainants have the ability to lodge a complaint directly with the ACFID Code Committee at <http://www.acfid.asn.au/code-of-conduct/complaints>.

11 COMPLAINT DATA

ADFA will register all complaints in the electronic Complaints Register, ensuring personal information is stored securely, protecting it from unauthorised access. The register will capture the following information where possible:

- date of receipt;
- name and contact details of complainant (if willing to provide);
- name of investigator dealing with complaint;
 - a description of the complaint and relevant supporting data, and the requested remedy;
 - actions taken and outcomes;
 - follow up required;
 - date the complaint was closed out.

12 CONTINUOUS IMPROVEMENT

On a continuing basis we will monitor the effectiveness of our complaints handling and make improvements as appropriate. We will:

- collect data on complaints for the purpose of identifying trends to improve the service provided;
- keep abreast of best practices regarding complaint handling;
- undertake specific training and retraining of staff and volunteers on how to manage or receive a complaint including dissatisfaction with services; and
- review of the effectiveness of our complaints handling every 3 years.

13 REFERENCES TO RELEVANT CODES

- ACFID Complaints Handling Policy, 2019 https://acfid.asn.au/wp-content/uploads/2022/05/ACFID-Guidance-Complaints_2019_Final-1.pdf

14 ASSOCIATED DOCUMENTS

- ADFA Codes of Conduct
- ADFA Code of Conduct - Safeguarding
- ADFA Policy - Child Safeguarding
- ADFA Policy - Gender Equality
- ADFA Policy - PSEAH
- ADFA Policy - Whistleblower
- ADFA Policy - Human Resource Management
- ADFA Feedback Form (attached)

Established: August 2014

Reviewed: October 2017, October 2018, May 2020, October 2021, March 2024

FEEDBACK FORM

Name: _____
Address: _____
State/Province: _____ **Postcode:** _____
Country: _____ **Telephone:** _____
Email: _____

Are you lodging a complaint on behalf of someone else (Yes No)? _____
(If 'yes' we may need to contact the complainant for his or her permission to liaise with you.)

Details of the complaint *(please give us enough information to start our investigation, be specific and ensure information is relevant. Attach further pages if necessary):*

What would you like Australian Doctors for Africa to do about this?

Thank you for taking the time to provide us with this information.
Please forward this form to: ADFA CEO (ceo@ausdocafrica.org)
or ADFA Chair (chair@ausdocafrica.org).