



help the mother  
help the child...

# COMPLAINTS HANDLING POLICY AND PROCEDURE

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## Table of Contents

1.	Introduction .....	3
2.	Purpose .....	3
3.	Scope .....	3
4.	Definitions .....	3
5.	Principles and Policy .....	4
5.	Education and Training.....	5
6.	Accountability and Learning.....	5
7.	Publicising this policy .....	6
8.	How to make a complaint .....	6
9.	Complaint handling procedure .....	6
10.	Minor complaints and inquiries .....	7
11.	Learning from complaints .....	7
12.	Working with partners.....	7
13.	Review.....	8
14.	Related CINI Australia Documents.....	8
15.	References .....	8

## 1. Introduction

CINI Australia is a not-for-profit organisation registered as a charity in Australia. The objective of CINI Australia is to relieve suffering and poverty and to advance through supporting the health, nutrition, education and protection of women, adolescents and children in need in India and to do this without favouritism or discrimination on the basis of race, religion, culture or political persuasion.

CINI Australia is committed to development and humanitarian work that meets the highest standards of ethics and integrity. This requires a culture of accountability with stakeholders at the centre of its work. The development and implementation of comprehensive policies for the handling of complaints demonstrates a commitment to the empowerment of the communities with whom it works, keeping staff safe, and operating transparently with donors and to the continuous improvement of our work.

CINI Australia recognises the importance and value of listening and responding to concerns and complaints. CINI Australia is committed to achieving the highest standard it can in every area of its work and to continuous improvement.

## 2. Purpose

This policy is to ensure that CINI Australia has formal, accessible and timely complaints mechanisms and avenues for redress. It also ensures communities are given the opportunity for input and to provide feedback on work that impacts them.

This policy is to enable stakeholders to make complaints a safe and confidential manner and to ensure that CINI Australia handles complaints fairly, efficiently and effectively.

## 3. Scope

This policy applies to the Board, members, staff, contractors, volunteers, visitors to project sites and CINI Australia's implementing partners.

This policy applies to receiving and managing complaints from the public made to or about us, regarding our activities or our complaint handling process.

The policy provides guidance on the key principles and processes of the CINI Australia complaint management system.

## 4. Definitions

Complaint means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

**Complainant** means a person, organisation or its representative, making a complaint.

**Enquiry** means a request for information or an explanation

**Feedback** means opinions, comments, suggestions and expressions of interest in the products or services of the organisation

**Stakeholder** or interested party means a person or group having an interest in the performance or success of the organisation.

## 5. Principles and Policy

### Guiding Principles

Formal mechanisms for complaints and redress are an essential component of our organisational accountability and give communities the opportunity for input to and to provide feedback on work that impacts them, especially where this impact is negative. All people affected by international development interventions have the right to complain to an agency and to receive an appropriate and timely response.

Complaints handling is a key mechanism in the prevention of sexual exploitation and abuse and CINI Australia has zero tolerance of inaction of such incidents.

### Policy Commitments

The complaint handling system is modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into the CINI Australia organisational culture.

CINI Australia will enable stakeholders to make complaints to the organisation in a safe and confidential manner.

- (a) **Facilitation of complaints:** CINI Australia has a people focus and is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling. Any concerns raised will be dealt with within a reasonable timeframe. Any person making a complaint will be provided with information about our complaint handling process and how to access it.  
Any person making a complaint will be listened to, treated with respect and actively involved in the complaint process, where possible and appropriate. They will be provided with reasons for decisions and any options for redress or review. CINI Australia will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.
- (b) **Accessibility:** CINI Australia will ensure that information about how and where complaints may be made to or about us is available. This will include a discrete point of contact for such complaints both in Australia and India. If the complainant has another person or organisation to assist or represent them, CINI Australia will communicate with them through that representative if that is their wish.  
Information about the process will be clear, understandable and appropriate, and include the needs of the most vulnerable and minority groups.
- (c) **Objectivity and fairness:** CINI Australia will address each complaint with integrity and in an equitable, objective and unbiased manner. The Board will ensure that the person handling a complaint is different from any person whose conduct or service is being complained about.

- (d) **Confidentiality:** CINI Australia will protect the identity of persons making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws and confidentiality obligation.
- (e) **Complaint Triage:** CINI Australia will assess and prioritise complaints in accordance with the urgency or seriousness. If the matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately. CINI Australia will also advise people as soon as possible when CINI Australia is unable to meet our time frames for responding to the complaint and the reason for our delay.  
Where possible, complaints will be resolved at the first contact with us. When appropriate CINI Australia may offer an explanation or apology to the person making the complaint. CINI Australia will promptly acknowledge receipt of complaints.
- (f) **Assistance:** CINI Australia will provide appropriate assistance and referrals to complainants and/or survivors as required.
- (g) **Referral for Complaints outside Policy Scope:** CINI Australia will advise people as soon as possible when a complaint is deemed outside the scope of this policy and where CINI Australia is unable to deal with any part of their complaint. CINI Australia will then provide appropriate advice and referral. For example, in the case of employees of another organization or government department.
- (h) CINI Australia's commitment to safeguarding vulnerable persons will include a survivor centered and gender equity approach throughout the implementation of this complaints handling policy.

## 5. Education and Training

This policy will be distributed and available to all Board members and other personnel. CINI Australia will require Board members, personnel and any persons involved in any way with a complaint to formally signify their commitment to this policy.

Board members and other personnel will familiarise themselves with this policy when joining CINI Australia, and on an ongoing basis.

An induction and further training on complaints handling will be provided to all personnel and partners to ensure they are equipped to understand and implement the policy, including expected standards of conduct.

## 6. Accountability and Learning

CINI Australia will ensure that complaints are recorded for reporting and analysis by the Board and any relevant regulatory bodies. CINI Australia will report on the number of complaints received, the outcome of complaints, issues arising from complaints, systemic issues identified, and any requests received for external review of our complaint handling. Regular analysis of these reports will be

undertaken to monitor trends and to make improvements. Reports and their analysis will be discussed at Board level and will be made available to any relevant regulatory bodies. CINI Australia's records of all misconduct complaints will be kept confidential and have the capacity to de-identify complaints at the request of the complainant or survivor.

CINI Australia is committed to continually improving the way that our organisation operates, and CINI Australia will support appropriate resolution of complaints, implement best practices in complaint handling and regularly review the complaint management system and implement appropriate system changes when indicated.

### 7. Publicising this policy

CINI Australia will display this policy on its website and will provide a copy to anyone requesting to see it.

### 8. How to make a complaint

Any persons wishing to make a complaint may do so orally (in person or by telephone) or in writing, by post or email. If an oral complaint is made, we will ensure that the write up of the complaint contains all information that the complainant wants to provide.

In some circumstances, and if necessary, a complaint committee may be established.

### 9. Complaint handling procedure

When responding to complaints CINI Australia will act in accordance with this complaint handling policy, procedure, any other relevant policies of CINI Australia and relevant legislation. The 5 key stages to our complaint management system are detailed below.

1. **Receive:** unless the complaint has been resolved immediately, CINI Australia will record the complaint and any relevant supporting information. The record of the complaint will document contact information of the person making the complaint, the date received, the issues raised by the person and the outcome they want, any other relevant information and any additional support the person making the complaint may require.
2. **Acknowledge:** CINI Australia will acknowledge receipt of each complaint promptly, and preferably within 5 working days. When appropriate CINI Australia may offer an explanation or apology. Consideration will be given to the most appropriate method for communicating with the person making the complaint.
3. **Assess and investigate:** CINI Australia will determine whether the issue raised is within our control. CINI Australia will consider the outcomes sought by the person making the complaint. CINI Australia will consider factors including 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 is delayed and whether resolution requires involvement of other organisations. Investigation of the complaint may include giving the person information or an explanation, gathering

further information about the issue and/or investigating the claims made in the complaint. CINI Australia will keep the person up to date on our progress, particularly if there are any delays. CINI Australia will communicate the outcome using the most appropriate communication method. Those identified by the complainant will not participate in the decision making process of the complaint handling.

4. **Determining the outcome and providing reasons for the decision:** CINI Australia will contact the person making the complaint and advise them of the outcome of the complaint and any action taken. They will also be advised of the reasons for the decision, the resolutions that CINI Australia have proposed or put in place and any options for review that may be available to the complainant, including internal review, external review or appeal.
5. **Close the complaint, document and analyse:** CINI Australia will keep records about how complaints have been managed, the outcomes, recommendations made and any outstanding actions to be followed, including analysing any underlying or root causes. The Board of CINI Australia will ensure that outcomes are properly implemented, monitored and reported where appropriate.

### 10. Minor complaints and inquiries

CINI Australia will seek to resolve minor complaints and inquiries immediately. We will endeavour to resolve such complaints in a way that satisfies the complainant.

Following the receipt of a complaint, CINI Australia will quickly determine whether an investigation is required. If it is determined that a complaint does not require investigation, and the complainant disagrees with that approach, it will be referred to another Board member for review.

### 11. Learning from complaints

All relevant personnel from CINI Australia will be informed of any complaints and/or inquiries (no matter how minor), so that we may take remedial action and, if necessary, change the way we operate to prevent future occurrences.

CINI Australia is committed and prepared to changing the way in which it operates, improve or further train staff and to take advice from any other authorities, if necessary.

### 12. Working with partners

CINI Australia's implementing partner in India, Child in Need Institute India, works directly with communities and primary stakeholders.

CINI Australia will consult with Child in Need Institute and any other partners to develop a shared understanding of the principles of complaints handling as outlined in this policy, the expectations, due diligence and compliance monitoring.

Complaints handling will be included in the Memorandum of Understanding between CINI Australia and implementing partners. CINI Australia will support its partners to develop their Complaints Handling policy. Assessment and compliance monitoring will be included in the evaluation and monitoring of projects.

Complaints handling consultation with partners will include the principles of accessibility for vulnerable and disadvantaged persons, gender equity, a victim/survivor centred approach and zero tolerance of sexual exploitation.

### **13. Review**

CINI Australia will monitor the effectiveness of this policy and make improvements where necessary. It will conduct an internal review of its complaint handling policy, processes and procedures at least every 3 years. This will include a review of any relevant legislative or sector developments and changes.

### **14. Related CINI Australia Documents**

CINI Australia PSEAH POL3300 Rev1.0 2024

CINI Australia Code of Conduct POL2300 Rev1.0

CINI Australia Partnership Commitment POL3500 Rev1.0.

CINI Australia Child Safeguarding POL0900

### **15. References**

ACFID Code of Conduct