

COMPLAINTS HANDLING POLICY

ORGANISATION:	Kokoda Track Foundation
ACN:	103 660 948
POLICY TITLE:	Complaints Handling
VERSION:	9.0
STATUS:	Final
ALLIED POLICIES / PROCEDURES:	Code of Conduct Child Protection Policy Child Protection Code of Conduct Prevention of Sexual Exploitation, Abuse and Harassment Policy Fraud & Corruption Prevention Policy Whistleblower Policy Working with Communities Policy
OWNER:	CEO
APPROVED BY:	Board
LAST UPDATE:	08.07.2024
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PURPOSE

Kokoda Track Foundation (KTF)'s Complaints Handling Policy outlines the policy and processes to be undertaken by KTF and all stakeholders including staff, partners, beneficiaries and general public in order for complaints to be appropriately dealt with, ensuring a fair and timely complaints handling process and ultimately strengthening KTF's accountability and efficiency as an organisation.

SCOPE

This Complaints Handling Policy applies to all employees, contractors, volunteers, directors and partners of KTF. Implementing and co-delivery partners are expected to adhere to this policy and to undertake the Complaints Handling Procedures (including advertising, recording, and dealing with complaints) received directly, in regards to KTF, or in regards to KTF-projects.

POLICY

KTF seeks to resolve difficulties, grievances, and complaints in a prompt, impartial and just manner. KTF will ensure that all stakeholders, including vulnerable and marginalized beneficiaries, have clear and accessible means to make a complaint. KTF will ensure that the process of filing and resolving complaints takes into consideration the needs of all stakeholders, including the most vulnerable and that any person raising a complaint will be treated respectfully and without fear of discrimination. KTF respects the right of anyone to make a complaint anonymously and/or confidentially. Via the process of resolving complaints, KTF seeks to improve the quality of its work, keep its people, partners and beneficiaries safe from harm, enhance the trust and confidence of stakeholders, identify areas of work that need to be improved, and ensure that KTF learns from the feedback provided through this process.

As a member of the Australian Council for International Development (ACFID), KTF adheres to [The ACFID Code of Conduct](#). If a complainant is dissatisfied with the way KTF has handled their complaint, and it relates to a potential breach of the ACFID Code of Conduct, then they may make a complaint directly to ACFID's Code of Conduct Committee. Details about how to make a complaint to ACFID are on [their website](#).

DEFINITIONS

KTF defines complaints as:

General Complaints: Any expression of dissatisfaction or grievance made against KTF or against one or more of its directors, staff, suppliers, contractors, partners, volunteers or anyone else acting on its behalf, where the organisation has allegedly failed to meet a requirement. The commitment might be related to KTF's activities, use of resources, mission and values, staff conduct/behavior, or a legal requirement.

Safeguarding Complaints: Any complaint that may include issues relating to the potential treatment or protection of children will be managed through the procedures outlined in KTF's Child Protection Policy. Any complaint that may include issues relating to sexual abuse, exploitation or sexual harassment of any adult will be managed through the procedures outlined in KTF's PSEAH Policy. Please refer to those policies specifically for how these complaints will be handled, rather than this complaints policy.

Fraud and Corruption Complaints: Any complaint that may include issues relating to the potential allegation of fraud or corrupt behaviour, including: fraud, corrupt conduct, maladministration, money laundering, modern slavery, serious and substantial waste of public money, and/or a breach of KTF's Fraud and Corruption Prevention Policy and/or KTF's Code of Conduct will be managed through the procedures outlined in KTF's Fraud and Corruption Prevention Policy. Please refer to the specific Fraud and Corruption Prevention Policy for how these complaints will be handled, rather than this complaints policy.

RECORDING COMPLAINTS

All complaints made, verbally or in writing, will be recorded via KTF's Complaints Handling Form and summarized detailed entered into KTF's Organisational Complaints Log at the time that the complaint is made, or as soon as possible afterwards. The KTF representative who takes the complainant's details will record the complaint.

When taking a complaint, the KTF representative will record the name and contact details of the complainant, as well as full details of the complaint including the date. Details of all communication with the complainant and any actions to resolve the complaint will be recorded in the same place.

Recorded complaints will also be monitored for any ongoing trends by management and efforts to resolve any ongoing issues.

Personal details given by the individual or organisation, or details of their complaint will be recorded in a safe place and will not be divulged to third parties unless KTF has the complainant's written consent. Complaints are treated in a safe and confidential manner.

Complainants also have the option to make complaints in an anonymous manner; or to have their details de-identified, ensuring that the the internal processes that KTF puts in place will not reveal the identity of the complainant.

RESPONDING TO COMPLAINTS

Upon reviewing the complaint received, the KTF representative determines the nature of the complaint and whether it is to be handled under the Complaints Policy (e.g. general complaints) or referred to the Child Protection or PSEAH Policy in the case of issues relating to the potential treatment or protection of children or to sexual abuse, exploitation or sexual harassment of any adult.

KTF strives to resolve all complaints within 10 days. In regards to complaints relating to financial matters, KTF aims to

respond to all complaints within 48 hours. Written complaints will be acknowledged promptly.

Individuals and organisations will be given an approximate timeframe at the time they make their complaint. Individuals and organisations will be informed of the progress of their complaint, especially if there are any delays or changes to what has been agreed.

Individuals and organisations will be informed of any actions taken as a result of their complaint.

Where appropriate, individuals and organisations who have had a complaint resolved will be contacted at a later date to see if they are happy with how their complaint was handled.

Management will resolve a complaint by implementing the following Complaints Handling Procedures.

COMPLAINTS HANDLING PROCEDURES

KTF will handle informal and formal complaints via the following steps:

i. Advertising the complaints mechanism

KTF advertises on its official website (www.ktf.ngo) how individuals and organisations can make a complaint against the KTF (or its partners) and outlines the Complaints Handling Procedures.

KTF also advertises across its project locations in PNG how individuals and organisations can make a complaint and the Complaints Handling Procedures. Advertising of the complaints handling processes differ depending on the relevant scenario, for example, educational facilities supported by KTF or its partners advertise complaints mechanisms in staff and student handbooks, on relevant websites, and on physical complaints boxes on campuses. Partners are supported to let all stakeholders and program beneficiaries understand how they can make complaints about KTF or the partner via this policy. KTF provides information in a clear and easily understandable manner in appropriate forms and through appropriate media, which varies from location to location and project to project.

ii. Receiving complaints

There are different channels to which complaints can be made and recorded, factoring in access options for all stakeholders in Australia and Papua New Guinea.

Via email

General complaints about any aspect of KTF and its work (including partners) should be sent to the KTF's general e-mail address: admin@kokodatrackfoundation.org

Complaints requiring the attention of the CEO should be marked "CONFIDENTIAL" and addressed to the CEO for direct action. gen.nelson@kokodatrackfoundation.org

Complaints about the CEO should be marked "CONFIDENTIAL" addressed to the Chair for direct action. chair@kokodatrackfoundation.org

Online

KTF has a Feedback & Complaints form on its publicly available website <https://www.ktf.ngo/feedback-complaints>.

Complainants have the option to leave their complaint anonymously via this form. Links to our website can be found on our Facebook page, which helps facilitate access for stakeholders in Papua New Guinea as the platform is widely used.

Feedback boxes

Secure feedback boxes are located at all KTF project sites including the Colleges and aid posts operated by KTF, accessible for public access. These allow for written feedback with the KTF Feedback and Complaints Form. The person may choose to be either identified by leaving personal details or remaining anonymous. Boxes are monitored weekly by either College Principal's or the key Community Health Worker. Complaints are transferred confidentially to KTF head office for review and action.

Via mail

Complaints may also be sent to the Kokoda Track Foundation's official postal address:

Kokoda Track Foundation (Australia)
PO Box 184
Balmain NSW 2041
Australia

Kokoda Track Foundation (PNG)
PO Box 928
Port Moresby NCD
Papua New Guinea

By phone

Verbal complaints can be made over the phone by contacting the office number +61 (0) 2 8789 0767 during business hours from 9am to 5pm AEST.

Other options

Complaints can also be made via a range of reporting mechanisms in-country including partner review meetings, program planning, implementation, review and monitoring meetings, community consultations, monitoring and/or evaluation activities, program updates, and general discussions with KTF staff. KTF will ensure the partners that we work with have adequate complaint policy mechanisms in place. Partners must advertise KTF's complaints handling process; but may develop additional procedures to fulfil the objectives and principles of this policy including putting in place appropriate mechanisms for children and most vulnerable beneficiaries or stakeholders to express complaints in a practical and safe manner. KTF and its partners will use best endeavours to ensure that primary stakeholders have been engaged in the development of complaints mechanisms that are felt to be more appropriate for the community and context in which our work is taking place.

Staff handling the complaint will ensure that the internal contact for all complaints is informed and that the Complaints Record Form is completed. Staff handling the complaint will receive training and will handle the complaint in a safe and confidential manner, understanding how to implement a survivor-centric approach to complaints handling including de-identification of complaint details.

iii. Clarifying complaints (informal and formal)

All staff who receive complaints will receive training to enable them to be able to clarify the following important things:

- Clarify what the complaint is;
- Determine whether it is one to which KTF is able to respond to;
- Seek from the complainant the outcome(s) they are expecting;
- Assess whether there is more than one issue raised in the Complaint and whether each needs to be separately

addressed;

- Make an initial assessment of the severity and type of the Complaint and the urgency of action. Assess if the Complaint needs to be referred to follow the Child Protection or PSEAH Policies & Procedures (and make referrals to the Chair of the CP or PSEAH Working Groups);
- To determine how a Complaint should be managed, staff will assess it in terms of the following criteria:
 - severity;
 - health (including mental health) and safety implications;
 - financial implications for the Complainant or others;
 - complexity;
 - impact on the individual, public and organisation;
 - potential to escalate;
 - systemic implications; and
 - the need for, and possibility of immediate action.
- Once a Complaint has been assessed, it will be triaged to the appropriate team or staff member for management. Where a Complaint is deemed significant in nature, it will be escalated appropriately including to the CEO and board of directors.

Staff receiving and clarifying complaints need to be capable of analysis, patience, and diplomacy. If a complaint does not fit with KTF's definition of complaint, then the complainant should, politely, be turned away. If the complaint is about another organisation then this should be pointed out to the complainant and refer the complainant to the appropriate process for actioning their complaint with that organisation; if it is possible to direct the complainant to someone else who will deal with their complaint then this should be done.

iv. Resolving complaints:

Resolving informal complaints

The majority of complaints KTF receives will be informal complaints and can be resolved immediately with common sense and knowledge of the programs. Staff handling complaints must be encouraged and supported to do this if at all possible. If a complaint is immediately resolved, the staff recording the complaint should still record details on a Complaints Record Form. Complaints Record Forms should be kept confidential at all times.

Resolving formal complaints

KTF understands that formal and more complex complaints about programs and/or staff cannot be resolved immediately or easily. If the complaints are programs related, they are likely to require time, effort and analysis to resolve. Others may be more complex and may require additional support (e.g., audit etc)

Formal complaints will be investigated and escalated as appropriate, depending on the seriousness of the issue (see above section for elements of the complaint to consider in determining seriousness of the issue). The person handling the complaint will:

- i. Establish the facts and gather relevant information
- ii. If necessary and/or practicable, interview those involved

Complaints will be escalated as follows:

1. Head of Education, Health, Localisation
2. Leadership Team
3. CEO

4. Board of Directors

If in doubt as to the seriousness of the issue, the person receiving the complaint will refer to the next level in the escalation chain for input. This will be done in a timely manner to ensure serious issues are identified and actioned in a timely manner.

Complainants will receive a response outlining the outcome of the complaint or, if it is a complex matter, when it will be investigated further and how long it is likely to take.

KTF will let the complainant know the outcome of the investigation, which may include: corrective action being taken; timeline for implementation; and person/role addressing the issue. KTF's CEO oversees this process.

If, during the process of investigating a complaint, KTF identifies assistance and/or referrals that may benefit the complainant, KTF will endeavor to refer complainants to services that may assist their situation. These will differ on a case-by-case basis.

If a complaint cannot be resolved by the usual complaint process, it will be referred to the Board of Directors and the complainant will be informed and given an amended timeframe for resolution. All safeguarding incidents will be brought to the attention of the Board of Directors (as per KTF's Child Protection and PSEAH Policies & Procedures).

If KTF cannot resolve the complaint to the satisfaction of the complainant, we will inform them about where they can take further action (including the Australian Council for International Development and the Equal Opportunity Commission).

v. Learning from complaints and amending our practice appropriately

KTF understands that the outcome of the complaints process will assist KTF to identify any issues that need to be addressed in our program delivery, staff and board of directors, policies and procedures, and/or ways of working so that similar complaints do not arise in the future. KTF will undertake all necessary steps to ensure that similar complaints do not recur and will implement any necessary training required to prevent similar complaints arising in future.

KTF's Organisational Complaints Log is reviewed regularly by management to ensure that processes are put in place to prevent issues from occurring again. An organisational record must be kept of all misconduct complaints, noting the ability to de-identify complaints at the request of the complainant.

INDUCTION AND TRAINING STAFF

KTF ensures that staff and volunteers receive training in this Complaints Handling Policy at induction, pre-deployment and at regular refresher intervals. The training includes:

- Receiving complaints: listening and empathy skills;
- Complaints Handling Form & Log, including taking confidential, anonymous and de-identified complaints;
- Responding to complaints: using tact, understanding the complainant point of view and responding using constructive language;
- Responding to complaints and complainants in a safe and confidential manner, especially those being made by disadvantaged or vulnerable stakeholders;
- Investigating the complaint: gathering factual information, interviewing skills;
- Escalating complaints and receiving support;
- Handling difficult complainants: how to respond under pressure.

This policy is available for all staff and board directors on a shared drive and on the KTF website. Information about the policy is part of the induction process for all new board and staff members and partners.

REVIEW OF COMPLAINTS HANDLING POLICY

KTF is committed to ongoing improvement and the KTF's board of directors and committees will review this policy regularly.

END