



## COMPLAINT HANDLING POLICY

### 1. PURPOSE

This policy articulates the procedures for handling and resolving complaints lodged with WWF-Australia and its international Partner Organisations.

### 2. POLICY

- 2.1. WWF provides an accessible, safe and discreet point of contact for stakeholders in Australia and countries where work is carried out to raise concerns or complaints about the organisation.
- 2.2. WWF acknowledges the importance and value of listening and responding to concerns and complaints and providing a mechanism for people to lodge complaints.
- 2.3. All complaints will be treated as important and handled with respect and understanding.
- 2.4. All complaints are taken seriously and responded to within appropriate timeframes.
- 2.5. Best endeavours will be made to acknowledge written complaints within 5 business days of receipt. WWF-Australia aims to resolve complaints within 30 business days unless there are exceptional circumstances. If the complaint is not resolved within 30 business days, WWF-Australia will inform the complainant and keep them updated of its progress regularly. WWF-Australia may request additional information to support the investigation, if required.
- 2.6. Staff are to uphold WWF-Australia's I-CCaRe values at all times and be aware of the potential ramifications for WWF's work and reputation should a complaint not be handled with care.
- 2.7. A Complaints Handling Process is attached at *Annex 1* of this policy and provides the steps complainants or survivors can follow to lodge a complaint. It also outlines the steps staff are required to follow when a complaint is received.

### 3. SOURCES OF AUTHORITY

#### 3.1. Australian Council for International Development (ACFID)

As part of WWF's [commitment under the ACFID Code](#), WWF enables stakeholders to make complaints to our organisation in a safe and confidential manner.

- ACFID Code of Conduct
  - Quality Principle 2 – Commitment 2 (promote the empowerment of primary stakeholders)
  - Quality Principle 7 – Commitment 3 (accountability to stakeholders)

#### 3.2. Fundraising Institute of Australia Code (<https://fia.org.au/fiacode/>)

#### 3.3. The Office of the Australian Information Commissioner (OAIC)

Note: The OAIC is a government body independent of WWF-Australia. It has the power to investigate complaints about possible interference with privacy. OAIC can be contacted on <http://www.oaic.gov.au/>.

#### 3.4. WWF-International

- Speak Up WWF Network Standard

#### 3.5. WWF-Australia

- Code of Ethical Conduct
- Welfare, Evangelism and Partisan Politics Policy
- Fraud and Corruption Prevention Policy



- Disciplinary Policy
- Internal Investigation and Disciplinary Panels Procedure
- Policy on Sustainable & Inclusive Development
- Policy on Human Rights and Working with Marginalised Groups & Vulnerable People
- Speak Up Standard, WWF-Australia

This policy is in line with and supports the above related policies and procedures.

#### 4. OBJECTIVES

- 4.1. To ensure that all staff members understand their obligations and responsibilities regarding the handling and resolution of complaints.
- 4.2. To ensure that complainants are provided with fair, timely and confidential complaint resolution process that considers the views of all relevant parties.

#### 5. SCOPE

- 5.1 This policy applies to all WWF-Australia staff, board members, contractors, interns and volunteers at all WWF-Australia workplaces.
- 5.2 This policy applies to WWF Partner Organisations implementing overseas Aid and Development Activities, their staff, Board members, contractors and volunteers.
- 5.3 This policy refers to complaints originating from the general public, those who have dealings with WWF's external agencies, providers and partners and other stakeholders in Australia and in countries where activities funded by, or through, WWF-Australia are delivered.

#### 6. DEFINITIONS

<b>Aid and Development Activities</b>	Activities to reduce poverty and address issues of global justice through community projects and education, emergency management, advocacy, volunteering, the provision of technical and professional services and/or resources, environmental protection and/or restoration, and promotion and protection of human rights.
<b>Complaint</b>	An expression of dissatisfaction made to an organisation, related to its staff, services or partners, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected. Complaints can be lodged via face to face, telephone, fax, letter, email and social media, but may arise from other sources.
<b>Complaint handling process</b>	Set of steps used to record, escalate, resolve and follow up on any complaint lodged to WWF.
<b>Partner Organisations</b>	Organisations implementing programs or projects funded by, or through, WWF-Australia.

#### 7. RESPONSIBILITIES

7.1. **Executive Management** are responsible for:

- Ensuring that all WWF-Australia staff members, contractors, interns and volunteers comply with all WWF-Australia policies.
- Ensuring that all Partner Organisations and their board members, staff members, contractors, interns and volunteers implementing Aid and Development Activities funded by, or through, WWF-Australia, comply with all relevant legislation and WWF-Australia policies (including this one).



- Ensuring that escalation procedures and complaint records management systems are in place, all complaints of misconduct are recorded, and that complaints are de-identified at the request of complainant or survivors.
- Reviewing unresolved and/or escalated complaints as they are presented and implementing an appropriate course of action.

**7.2. People & Culture** are responsible for:

- Ensuring that all staff members, contractors, interns and volunteers comply with WWF-Australia policies.
- Assisting Managers with the development of appropriate training and development programs to support Managers and staff members in complaint handling and resolution.
- Providing staff members, contractors and volunteers with support and assistance during any complaint handling process.

**7.3. Managers and supervisors** are responsible for:

- Ensuring that staff members, contractors, interns and volunteers comply with all WWF-Australia policies.
- Communicating this Policy to all Partner Organisations and ensuring that Partner Organisations communicate this Policy to their board members, staff, contractors, interns and volunteers implementing Aid and Development Activities funded by, or through, WWF-Australia.
- Ensuring that staff members, contractors, interns and volunteers maintain comprehensive records of all complaints and subsequent actions.
- Ensuring that staff members, contractors, interns and volunteers are trained in providing accurate information and handling/resolving complaints.

**7.4. All staff members** are responsible for:

- Ensuring that they comply with all WWF-Australia policies.
- Reporting and resolving any complaint and recording the complaint and actions taken in accordance with this policy.
- Following escalation procedures where it appears the complaint is particularly complex, likely to prove difficult to resolve and/or may have implications regarding WWF's work and reputation.

## **8. PROCEDURES**

- 8.1.** This Policy will be included in all contracts and memorandums of understanding with Partner Organisations.
- 8.2.** No later than November of each financial year, WWF-Australia will organise an induction/workshop at which this Policy, its importance and consequences of non-compliance, will be presented to the Partner Organisation's executive and relevant staff, contractors, interns and volunteers.
- 8.3.** Partner Organisations implementing Aid and Development Activities funded by, or through, WWF-Australia are required to establish locally-appropriate complaints and feedback mechanisms that are safe, discreet and accessible for all stakeholders and consistent with this Policy.
- The mechanism will include special provisions to ensure it is accessible for children and other vulnerable people.
  - In contexts where literacy may be a constraint, stakeholders should also be orally invited to express any concerns and complaints on a regular basis.
  - The mechanism must include clear details for appropriate contact points in Australia and in the country of operation.



- 8.4.** All Aid and Development Activities funded by or through WWF-Australia and Partner Organisations and relevant staff, contractors and volunteers will be monitored to ensure they are not in breach of this Policy. Monitoring will include at least one country visit annually at which this Policy will be made the subject of special presentation.
- 8.5.** If this Policy does not provide a clear answer on how to comply in a particular circumstance, WWF will document clearly the decisions made and the reasons behind them and make them available to both recipients and donors.
- 8.6.** Feedback is important to WWF and our Partner Organisations as it encourages improvement. Therefore, all feedback is welcomed. Feedback will be directed to the relevant Department of WWF-Australia for action.
- 8.7.** A complainant regarding an alleged breach of ACFID Code of Conduct can be made directly to ACFID via email: [code@acfid.asn.au](mailto:code@acfid.asn.au) or posted to:

Chair, ACFID Code of Conduct Committee  
Care Of ACFID, Private Bag 3  
Deakin ACT 2600 Australia

Details of ACFID's Code of Conduct Complaint Handling mechanism can be found at:  
<https://acfid.asn.au/content/complaints>

- 8.8.** A complaint specifically regarding a breach of privacy can be made by the following procedure:
- Contact WWF-Australia on 1800 032 551 or at [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au).
  - Download and complete the Complaints Form, available on our website [www.wwf.org.au/privacy-policy](http://www.wwf.org.au/privacy-policy).
  - Submit the completed Complaints Form to [enquiries@wwf.org.au](mailto:enquiries@wwf.org.au) or mail to: Attn Privacy Officer GPO Box 528 Sydney NSW 2001. In order to effectively address the complaint, further information may be requested about the complaint and the reasons behind it.
  - Once all the information has been received, WWF-Australia allows approximately 30 business days to address the complaint unless there are exceptional circumstances.
  - The Office of the Australian Information Commissioner (OAIC) is a government body independent of WWF-Australia. It has the power to investigate complaints about possible interference with privacy. If you are not satisfied with the way WWF-Australia has handled your complaint, the OAIC can be contacted directly on <http://www.oaic.gov.au/>.
  - Further information regarding privacy can be found in the WWF-Australia Privacy Policy, available on our website <http://www.wwf.org.au/privacy-policy>.
- 8.9.** A Complaint Handling Process is attached at *Annex 1* of this Policy and provides the steps complainant or survivors can follow to lodge a complaint. It also outlines the steps staff are required to follow when a complaint is received. Complaint Handling Flowcharts are attached at *Annex 2* of this Policy as easily understandable guidance regarding the components of this Policy, where to go for help, how to lodge a complaint and WWF-Australia's approach to managing complaints.

## **9. CONFIDENTIALITY AND DOCUMENT CONTROL**

- 9.1.** This policy is available on Wiki Habitat for all staff members, contractors, interns and volunteers.



**10. APPROVAL**

**Signed:**

**Name:** Dermot O'Gorman

**Title:** CEO

**Date of Issue:** 6.5.2014

**Revised** 9.7.2018

**Revised** 21.3.2022



## **Annex 1**

### **WWF-Australia Complaint Handling Process**

#### **Who can lodge a complaint:**

- Anyone who is subject to, or has witnessed someone being subject to, inappropriate conduct by a WWF staff member, contractors, interns and volunteers.
- A reporter (also known as whistleblower) can be a WWF employee, contracting party, volunteer, board member, or an external stakeholder or beneficiary of WWF activities. This may include members of a community who works with, or is impacted by, WWF activities.

#### **Lodging a complaint:**

Complaints related to WWF-Australia staff, contractors, interns and volunteers implementing partners or services may be lodged in several ways:

- In writing or verbally to any WWF-Australia Board Member or any of the following WWF-Australia Executives.
  - Chief Executive Officer ([dogorman@wwf.org.au](mailto:dogorman@wwf.org.au)); or
  - Chief Operating Officer ([rlokuge@wwf.org.au](mailto:rlokuge@wwf.org.au)).
- WWF International senior officers.
  - Executive Director Operations (+41 22 364 9278); or
  - Director, Human Resources (+41 22 364 9275).
- WWF Network independent Whistleblowing mechanism (<https://report.whistleb.com/en/wwf>).

#### **What to expect when you submit a complaint:**

The WWF staff or Board Member, volunteer or contractor taking the complaint will:

- Listen carefully and advise that accurate records will be taken (focusing on facts, dates, times and people involved);
- Treat the information given confidentially;
- Thank the complainant for bringing the issue to WWF's attention;
- Acknowledge the problem and empathise;
- Apologise and avoid attributing blame;
- Advise the complainant that issues will be taken seriously and handled quickly in the strictest confidence;
- At the conclusion of the discussion, capture all the relevant information in writing; and
- Submit the record to the Director of the staff member's department.



### **Escalation Process:**

1. If the complaint is made against WWF-Australia, the issue will be escalated to the *Executive Team* and may trigger the use of the *Internal Investigation Procedure*.
2. If the complaint is made against a WWF-Australia staff member or volunteer, the issue will be investigated according to the *Disciplinary Policy and/or Internal Investigation and Disciplinary Panels Procedure*.
3. If the complaint is made against a WWF Partner Organisation, the issue will be escalated to the *Conservation Director or to the CEO*.
4. If the complaint is made against a third party (e.g., agencies, partners, or suppliers), the relevant information will be supplied to the *agency manager*, with all the details of the complaint and of the complainant, unless he/she choose to remain anonymous. If the issue continues to arise, appropriate disciplinary action will be taken by the agency involved. WWF-Australia will immediately raise the allegation to the partner or supplier, and seek assurances that the concerns were appropriately investigated and responded to. WWF-Australia holds the right and ethical responsibility, to sanction partners or suppliers for their lack of appropriate response: this may include but is not limited to immediate termination of the contract.
5. If the complaint is in regards to how we have collected or managed personal information, the complaint will be dealt with in accordance with *WWF's Privacy Policy and Privacy Complaint procedure*.
6. According to the Speak Up WWF Network Standard, the *Executive Team* are requested to escalate, within 24 hours, reports or events of inappropriate conduct to WWF International, who receives the reports on behalf of the WWF Network.

### **WWF-Australia's Duty of Care**

- WWF has a duty of care to protect victims from further abuse, including quickly making available a skilled "first responder" who can provide victims the care and support they need. This support may include referrals for medical, social, legal and financial assistance. WWF also has a duty of care to protect people who report an issue from retaliation (see below).
- WWF has a duty of care to also protect accused parties, who have a right to an impartial investigation, confidentiality of information raised, and fair treatment. WWF will accommodate complainant or survivor requests to de-identify and anonymise complaints.

### **No Retaliation Position**

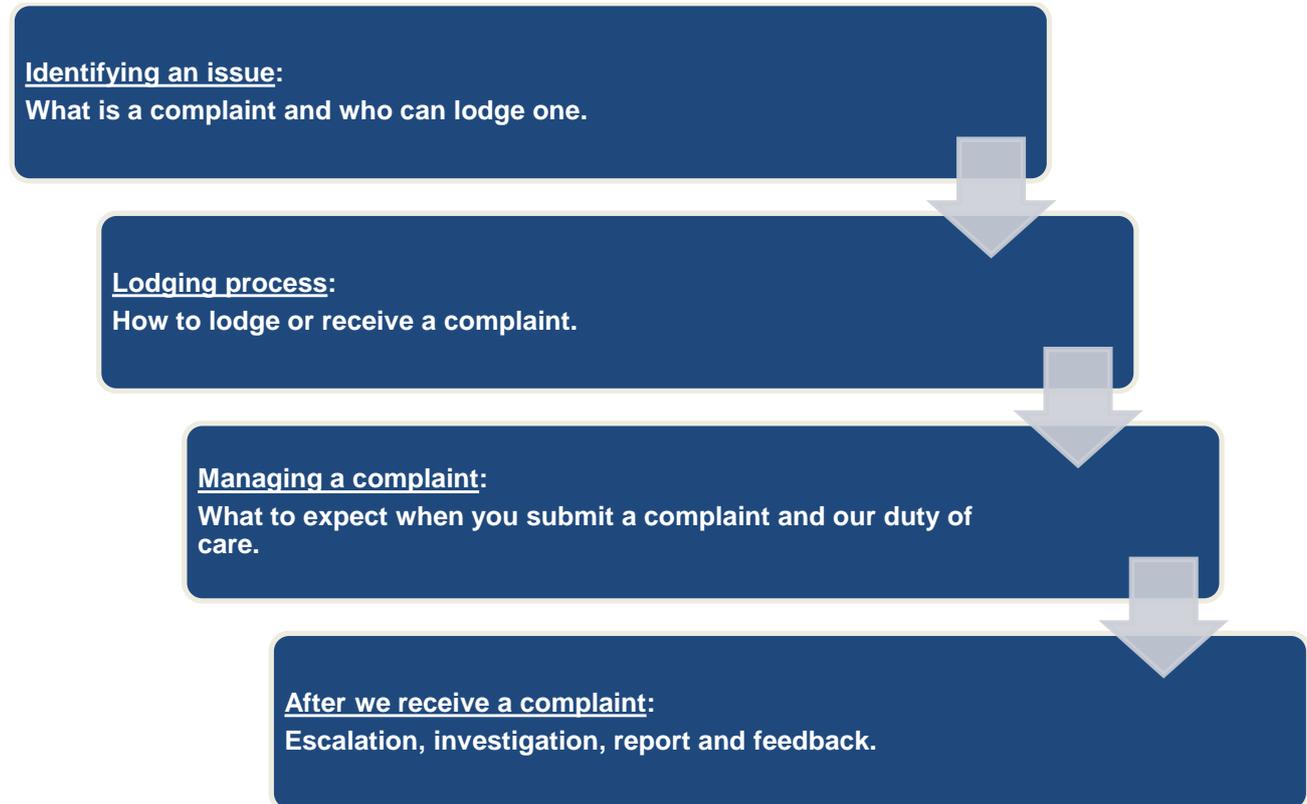
- WWF will not tolerate any form of retaliation against anyone who reports concerns of misconduct in good faith. Any employee who engages in retaliation, whether toward a victim or a reporter of alleged misconduct, will be subject to discipline up to and including termination.
- Anyone who subsequently believes they have been subjected to retaliation should immediately report it through the channels herein. Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the employee of the results of the investigation.



**Annex 2**

**Complaint Handling Flowcharts**

**1. Overview of our Complaints Handling Policy Components**





## 2. How to lodge a complaint with WWF-Australia

1. Before lodging	
<p><b>Who can lodge a complaint?</b></p> <p>(1) A reporter (also known as whistleblower) can be a WWF employee, contracting party, volunteer, board member, or an external stakeholder or beneficiary of WWF activities.</p> <p>(2) Anyone who is subject to, or has witnessed someone being subject to, inappropriate conduct by a WWF staff member, contractor, intern or volunteer.</p>	<p><b>What can I report?</b></p> <p>Concerns of inappropriate conduct or misconduct of WWF employees, employees of a WWF partner or implementing organisation; or WWF board members, consultants, volunteers, and interns.</p>
	
2. How to lodge a complaint?	
<p>(1) <b>In writing or verbally to any WWF-Australia Board Member or any of the following WWF-Australia Executives:</b></p> <ul style="list-style-type: none"> <li>- Chief Executive Officer (<a href="mailto:dogorman@wwf.org.au">dogorman@wwf.org.au</a>)</li> <li>- Chief Operating Officer (<a href="mailto:rlokuge@wwf.org.au">rlokuge@wwf.org.au</a>)</li> </ul>	<p>(2) <b>Report to WWF International senior officers</b></p> <ul style="list-style-type: none"> <li>- Executive Director Operations (+41 22 364 9278) or</li> <li>- Director, Human Resources (+41 22 364 9275)</li> </ul> <p>(3) <b>Report through the WWF Network independent Whistleblowing mechanism</b>  <a href="https://report.whistleb.com/en/wwf">https://report.whistleb.com/en/wwf</a>.</p>
	
3. What to expect after lodging?	
<ul style="list-style-type: none"> <li>- All complaints are seriously and handled quickly in strict confidence.</li> <li>- We will confirm that we have received your complaint.</li> <li>- We may ask you for more information if required.</li> <li>- We will let you know what support options are available for you (if applicable).</li> </ul>	<ul style="list-style-type: none"> <li>- We will rapidly assess your complaint and let you know whether a formal investigation will occur.</li> <li>- If we decide to start a formal investigation, we will provide you with an investigation report upon completion.</li> </ul>



### 3. WWF-Australia's Approach to Managing Complaints

<b>1. WWF-Australia's General Duty of Care</b>	
<p>(1) To protect <b>victims</b> from further abuse, including quickly making available a skilled “first responder” to provide care and support.</p> <p>(2) To protect <b>people who report</b> an issue from retaliation.</p>	<p>(3) To protect <b>accused parties</b>, who have a right to an impartial investigation, confidentiality of information raised, and fair treatment.</p>
<b>2. What do we do after receiving a complaint?</b>	
<p>The Executive team will escalate the report/events to WWF International within 24 hours. WWF-Australia's Internal Escalation Process depends on the context of the complaint.</p>	
<p>(1) <b>Against WWF-Australia:</b> issue will be escalated to Executive Team, and may trigger the Internal Investigation Procedure.</p> <p>(2) <b>Against a WWF-Australia staff member / volunteer:</b> issue will be investigated according to the Disciplinary Policy and/or Internal Investigation and Disciplinary Panels Procedure.</p> <p>(3) <b>Against a WWF Partner Organisation:</b> issue will be escalated to the Conservation Director or to the CEO.</p>	<p>(4) <b>Against a third party (e.g., agencies, partners or suppliers):</b> relevant information about the allegation will be supplied to the agency manager, and also immediately raised to the partner or supplier.</p> <p>(5) <b>Regarding personal information:</b> complaint will be dealt with in accordance with WWF's Privacy Policy and Privacy Complaint procedure.</p>
<b>3. Complaint Handling Guidance</b>	
<p>For WWF-Australia staff who receive a complaint</p>	
<ul style="list-style-type: none"> <li>- Listen carefully and advise that accurate records will be taken (focusing on facts, dates, times and people involved).</li> <li>- Treat the information given confidentially.</li> <li>- Thank the complainant for bringing the issue to WWF's attention.</li> <li>- Acknowledge the problem and empathise.</li> </ul>	<ul style="list-style-type: none"> <li>- Apologise and avoid attributing blame.</li> <li>- Advise the complainant that issues will be taken seriously and handled quickly in the strictest confidence.</li> <li>- At the conclusion of the discussion, capture all the relevant information in writing.</li> <li>- Submit the record to the Director of the staff's department.</li> </ul>
<b>4. Investigation and Feedback</b>	
<p>For WWF-Australia staff who are responsible for reviewing and/or investigating the complaint</p>	
<p>(1) Conduct a rapid assessment to determine whether, on the balance of probabilities, the allegation is credible.</p> <p>(2) If necessary, an independent investigation will be conducted according to the Internal Investigation and Disciplinary Panels Procedure. Related disciplinary action may be taken according to the Disciplinary Policy.</p>	<p>(3) After the investigation, feedback will be provided to the reporter/whistleblower, the accused party and other relevant personnel.</p>