



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. 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.

3. SOURCES OF AUTHORITY

3.1. Australian Council for International Development

- *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 *Principles of Fundraising Practice*

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-Australia

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



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, volunteers, interns and contractors at all WWF-Australia workplaces.
- 5.2 This policy applies to WWF Partner Organisations implementing overseas Aid and Development Activities, their staff, Board members, volunteers and contractors.
- 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

Aid and Development Activities:	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.
Complaint	A statement that something is unsatisfactory or unacceptable. Complaints can be lodged via face to face, telephone, fax, letter, email and social media, but may arise from other sources.
Complaint handling process	Set of steps used to record, escalate, resolve and follow up on any complaint lodged to WWF.
Partner Organisations:	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, volunteers and contractors comply with all WWF-Australia policies.
 - Ensuring that all Partner Organisations and their board members, staff members, volunteers and contractors 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.
 - 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, volunteers and contractors 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, volunteers and contractors with support and assistance during any complaint handling process.

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

- Ensuring that staff members, volunteers and contractors 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, volunteers and contractors implementing Aid and Development Activities funded by, or through, WWF-Australia.
- Ensuring that staff members, volunteers and contractors maintain comprehensive records of all complaints and subsequent actions.
- Ensuring that staff members, volunteers and contractors 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, volunteers and contractors.
- 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, volunteers and contractors 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 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 following the following procedure:
- Contact WWF-Australia on 1800 032 551 or at enquiries@wwf.org.au
 - Download and complete the Complaints Form, available on our website www.wwf.org.au/privacy-policy
 - Submit the completed Complaints Form to 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 28 days to address the complaint.
 - 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 staff are required to follow when a complaint is received.

9. CONFIDENTIALITY AND DOCUMENT CONTROL

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



10. APPROVAL

Signed:

Name: Dermot O'Gorman

Title: CEO

Date of Issue: 6.5.2014

Revised 9.7.2018



Annex 1

WWF-Australia Complaint Handling Process

- 1) The WWF staff 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
 - submit the record to the Director of the staff member's department;

- 2) Escalation Process:
 - 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;
 - If the complaint is made against a WWF-Australia staff member or volunteer, the issue is to be investigated according to the Disciplinary Policy and/or Internal Investigation and Disciplinary Panels Procedure;
 - If the complaint is made against a WWF's Partner Organisation, the issue will be escalated to the Conservation Director or to the CEO;
 - If the complaint is made against a third party (e.g. agencies, providers), 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;
 - 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;

- 3) Once the situation is resolved, a WWF representative will make contact with the complainant (unless he/she choose to remain anonymous and did not provide contact details) and advise of the outcome.