

1. Purpose of this Policy

The policy outlines Interplast Australia & New Zealand's (Interplast's) commitment to seeking and responding to external feedback and complaints about any aspect of Interplast's work in Australia and overseas. Interplast welcomes all feedback that may improve the quality of its work, enhance the trust and confidence of stakeholders, identify areas of work that may need to be improved, and ensure Interplast learns from the feedback provided through this process. Therefore, Interplast welcomes feedback and will react constructively to complaints from the people it works with - its supporters, donors, the general public, official bodies and its partners.

2. Scope of the Policy

This policy deals solely with external grievances. While the policy needs to be understood and used by all staff, Directors, volunteers and in-country volunteers/observers, this policy only covers complaints made by those external to Interplast including:

- a person with whom Interplast works to deliver its international programs including local partners, organisations and national governments;
- other NGOs;
- members of the Australian public;
- supporters, donors, trusts and foundations; and
- The Australian Government

Internal issues and grievances made by staff and volunteers are dealt with in discussion with management and in accordance with Interplast's Grievance and Dispute Resolution Policy. Internal complaints regarding serious misconduct or wrongdoing should be made through the Interplast Whistleblower Policy procedures.

3. Definitions

Interplast defines a complaint as:

“an external grievance made against Interplast or against one or more of its Directors, employees, volunteers, partner organisations or anyone else acting officially on its behalf, where the organisation has allegedly failed to meet a requirement or legitimate expectation. The complaint might be related to Interplast's use of resources, mission

and values, particular individuals' conduct/behaviour, legal requirement or any other expression of dissatisfaction with the organisation's performance."

4. Legislative Framework and Standards

Interplast is a signatory to the ACFID Code of Conduct and is committed to recognising the importance and value of listening and responding to concerns and complaints and ensuring all stakeholders are enabled to make complaints to the organisation in a safe and confidential manner. (Commitment 7.3.3. ACFID Code of Conduct).

Interplast will manage all complaints responsively and fairly and will meet the following minimum standards:

- a) Complainants will be treated respectfully and without prejudice, irrespective of age and gender.
- b) All information provided will be treated with the strictest confidentiality and any sharing of information will only be made with the permission of the parties involved.
- c) All complaints will be acknowledged, investigated and resolved in a timely manner.
- d) Interplast aims to resolve complaints **within one month** of receipt. If a complaint is unable to be resolved within one month, the complainant will be provided with **monthly updates** until the complaint is resolved.
- e) All parties will be kept informed of the actions being taken and the progress of the complaint, subject to applicable legislation and legal advice.
- f) All complaints will be acknowledged **within five working days from receipt**.
- g) Where complaints are unable to be promptly resolved, complainants will be provided with a copy of Interplast's Complaints Handling Policy.
- h) Once resolved, complainants will be provided with a detailed response to their complaint giving the outcome (within applicable legislation, legal advice and Code practice requirements).

5. Policy Statement

The following principles will guide Interplast's complaints handling process:

- **Visibility:** information about the process for making a complaint will be clear and well publicised to our stakeholders.
- **Accessibility:** the process for making complaints is readily accessible to all stakeholders. Complaints should be addressed to the Interplast CEO/Complaints Handling Officer and will be accepted in any of the following formats: telephone, facsimile, e-mail, letter and/or in person.
- **Objectivity:** all complaints are addressed in a fair and equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified to ensure objectivity.
- **Confidentiality:** confidentiality relating to the complaint will be safeguarded as required by law.
- **Customer-focused approach:** welcoming feedback, including complaints and committing to actively resolve all complaints.

- **Responsiveness:** all complaints and constructive feedback will be taken seriously and handled as swiftly as practicable, subject to applicable legislation and legal advice. All complainants will be updated on the progress of their complaint through the complaints handling process.
- **Accountability:** accountability for handling complaints and reporting on the actions and decisions of Interplast with respect to complaints handling is clearly established. All complaints will be recorded through one central point before allocating responsibility to the appropriate staff member to respond.
- **Continuous improvement:** through collection and classification of complaints trends, analysis and reporting of complaints trends, monitoring of complaints handling processes, auditing/management reviews of the complaints handling process and refining of complaints handling in light of those reviews.
- **Organisational commitment to this policy:** Interplast ensures sufficient resources and expertise is provided to handle complaints.

6. Policy in Practice

Once a complaint is received by Interplast, no matter the nature or relevance of the complaint, all reasonable steps will be taken to ensure the gathering of all necessary information for the ultimate resolution of the complaint.

The process Interplast follows for the initiation and resolution of complaints is as follows:

a) *Receiving and Acknowledging Complaints*

- People wishing to lodge a complaint with Interplast can do so by phone, e-mail, letter and/or in person. This policy, specifically highlighting the central point for all complaints is also publicised on Interplast's website as follows:

Interplast Complaints Handling Officer
Interplast Australia & New Zealand
Royal Australasian College of Surgeons Building
250-290 Spring St
East Melbourne VIC 3002
Phone: (03) 9249 1231
contactus@interplast.org.au

- The member of staff receiving the complaint is empowered in the first instance to deal with the complaint and enact any steps to resolve the complaint at the initial point of contact. All complaints must be logged in the Complaint Record Form (see Appendix 1).
- If the complaint is unable to be resolved at this first point of contact then the staff member will inform the CEO and/or Complaints Handling Officer.
- The CEO and/or Complaints Handling Officer will ensure an acknowledgement of the complaint is provided to the complainant **within five business days** of the complaint being received. This acknowledgement will confirm that the complaint

has been received and outline next steps, the contact officer and likely timeframes.

- Where a complainant does not identify themselves, the complaint will be assessed for validity and whether further investigation or caution is called for. This will be determined by the CEO and/or the President of the Board.
- Complaints about the CEO should be referred to the President of the Board. To obtain their details, a complainant should contact the Interplast office where an appropriate e-mail/postal address will be provided.
- If the complaint relates to an issue raised by a statutory body such as ACFID, DFAT, ATO, ASIC, ACNC, Workcover or state-based fundraising authority then the CEO is to be advised immediately and will take immediate control of the complaint. Depending upon the seriousness of a complaint, the CEO may escalate a complaint for the Board for Directors' input, involvement and/or decision, in line with Interplast's Risk Management Policy.

b) Registering and Analysing Complaints

- All complaints received by Interplast will be recorded on the Complaints Record Form at Appendix 1.
- These forms will be collated by the CEO and/or Complaints Handling Officer and a report prepared for the Audit and Risk Committee at a minimum on a quarterly basis.
- The Interplast Board has an important role to play in overseeing the number and nature of complaints received by Interplast and ensuring they have been handled satisfactorily, that appropriate corrective action has been implemented and that trends are identified and addressed. A complaints register will be presented to the Board twice a year recording a summary of each complaint received since the last report to the Board. These will be de-identified for privacy.

c) Resolving Complaints

- Each complaint will be investigated. The person handling the complaint will establish the facts and gather the relevant information and, if necessary and/or practicable, interview those involved.
- If, as a result of the investigation, it is felt there is a case to answer by a staff member, then the appropriate disciplinary and other organisational policies and procedures will be followed (e.g. Interplast's Human Resources Policy, financial management policies on fraud and other irregularities and the Child Protection Policy). All relevant laws and code compliance requirements will be taken into account in determining appropriate action.
- 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. Interplast will let the complainant know the official response to the complaint within the boundaries of applicable law.

d) Referral Process

If a complainant is unhappy about the response received from Interplast, or if they believe the corrective action has not been adequately implemented, they may refer the matter to the next level. For example:

- If the complaint is about a matter at management level, then the complainant may appeal to the President of the Board; and
- If the complaint is about Interplast's governance, then the complainant may appeal to the President of the Board.

Interplast is a signatory to the ACFID Code of Conduct, a voluntary, self-regulatory code that sets out an organisation's commitment to conducting its activities with integrity and accountability. Interplast is committed to the code's high standards of sustainable development, governance and financial management.

If the complainant is concerned that Interplast is not complying with the ACFID Code of Conduct, they can lodge a complaint with ACFID directly. Complaints should be marked 'confidential' and emailed or posted to:

Chair, ACFID Code of Conduct Committee
Care of ACFID
Deakin ACT 2600
Tel: [+61 2 6285 1816](tel:+61262851816)
Email: code@acfid.asn.au
www.acfid.asn.au

Interplast is a member of the Fundraising Institute of Australia (FIA) and is committed to the highest standards in fundraising practice. If the complaint is to do with fundraising and the complainant feels that it has not been resolved satisfactorily by Interplast, then the FIA can investigate the complaint by contacting FIA directly at:

Fundraising Institute of Australia
PO Box 642
Chatswood NSW 2057
Tel: [1300 889 670](tel:1300889670)
Email: members@fia.org.au
www.fia.org.au

7. Monitoring and Review of Policy

This policy will be monitored and reviewed in line with the process outlined in the Policy Framework. The CEO is accountable to the Board for managing and maintaining this policy.

Where compliance issues are identified, the CEO will work with staff and other relevant stakeholders to address these issues promptly.

The Interplast CEO and Complaints Handling Officer are responsible to take any recommended amendments to this policy and procedural guidelines to the Interplast Board for its approval.

***Revisions to Complaints Handling Policy**

Nature of proposed revisions	Date on which CEO endorsed	Date on which Board approved
Initially approved	10 October 2012	16 October 2012
Annual review and updates including; Minor grammatical, spelling and wording changes, changes to minimum standard, updates to reporting,	2013 - 2017	
Minor updates to reflect new ACFID Code of Conduct. Deleted reference to the Risk Management Framework from complaints report presented to the Audit and Risk Committee.	16 November 2017	21 November 2017
Deletion of fax number from Interplast contact details. Minor update to ACFID Code of Conduct reference. Inclusion of Whistleblower Policy reference. Inclusion of third-party contacts.	8 November 2018	20 November 2018
ACNC included in the list of statutory bodies under 6a.	1 November 2019	19 November 2019

This Policy will be reviewed and adjusted, as required, by the CEO, staff and Board on an annual basis.



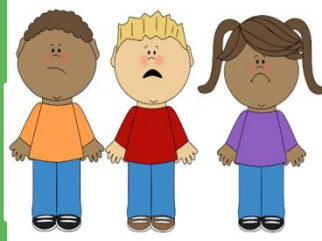
COMPLAINTS HANDLING POLICY
Appendix 1: Complaints Record Form

All complaints about Interplast or any of its people from an external individual or organisation, whether verbal or written, are to be recorded on this form. Interplast's CEO has responsibility to initiate and coordinate the complaint response and must be forwarded this form ASAP.

Date: Date complaint is received	
Personal details: Name, contact details, if appropriate	
Nature of complaint: Brief outline of the complaint	
Detail of complaint: A detailed description of the complaint the person has made	
Who dealt with it: Name of person who is or has responded to the complaint	
How it was dealt with: Action taken to handle the complaint	
Outcome: Outline of what has happened as a result of the complaint	
Follow up required: Any action required as a result of the complaint. This may include a change to Interplast's procedures and policies	



Has someone done or said something to hurt you?



Do you feel angry, scared or sad?



Tell an adult you trust.
Ask them to speak to someone at Interplast. Don't be worried, what happened is important.



Or, if you feel comfortable you can call, email or speak to someone at Interplast about what has happened.



Someone at Interplast will find out more about what happened.



Someone from Interplast will tell you what they did to resolve it.

What to do if you have a complaint?



Phone: +61 3 9249 1231

Email: contactus@interplast.org.au

Write: Interplast Complaints Handling Officer

Interplast Australia & New Zealand

Royal Australasian College of Surgeons Building

250-290 Spring St, East Melbourne VIC 3002