

FEEDBACK & COMPLAINTS POLICY & PROCEDURES

VERSION	3
PERSON RESPONSIBLE	Executive Director
DATE OF BOARD SIGN OFF	27 April 2021
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SCHEDULED REVIEW DATE	21 April 2025

POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English, Hebrew and Arabic.

Any suggestions about this Policy should be directed to the Project Rozana Development Director or Executive Director so changes can be considered. When suggestions are raised, the matter will be raised with the Executive Management Committee (EMC) for consideration. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The Development Director and Executive Director are responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table on the first page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual e.g., shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- · Communicating the changes to all staff; and
- Archiving the old version of manual.

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1. PREAMBLE

This policy was written by Project Rozana in Australia. It may be used as a template across all Project Rozana offices. Project Rozana operates five offices registered in each of Australia, USA, Canada, UK and Israel, which are part of the Project Rozana Global Alliance. In this policy, 'Chair' means Chair of Project Rozana International. Unless specified otherwise the 'Board' refers to the board of Project Rozana Australia.

2. PURPOSE

Project Rozana values feedback and complaints and recognises these are an essential part of our quality assurance and accountability to staff, partners, stakeholders and donors.

This policy sets out Project Rozana's approach to feedback and complaints from staff, partners, external stakeholders and the community.

The complaint handling process will be integrated into all of Project Rozana's programs and will be included in the Policies and Procedures Handbook to be used by staff, volunteers and partners with the understanding that it will be implemented by all Project Rozana offices worldwide, and all Project Rozana partners wherever possible.

Project Rozana is committed to ensuring that the complaints handling process is safe, confidential, prompt and fair.

3. SCOPE

The complaint handling process will be integrated into all of Project Rozana's programs and will be included in the Policies and Procedures Handbook to be used by staff, volunteers and partners with the understanding that it will be implemented by all Project Rozana offices worldwide, and all Project Rozana partners wherever possible.

Where this policy is contradicted by contractual obligations to funders, the contractual obligations must be adhered to. Exceptions to such obligations should be sought from funders prior to entering into contracts and any substantive areas of difference must be drawn to the attention of the Chief Executive Officer.

This policy does not relate to concerns that arise within the workplace between staff and/or volunteers. For these issues, staff and volunteers should refer to Project Rozana's **HR Manual**. **DEFINITIONS**

For the purposes of this policy:

Feedback: is positive or negative comment about an employee or volunteer, activities of the organisation or the organisation itself.

A complaint: is an expression of dissatisfaction about the standards of service or lack of action by Project Rozana or its staff, volunteers, partners or anybody directly involved in the delivery of our work.

4. BENEFITS OF FEEDBACK

Feedback, including complaints, provides Project Rozana with the opportunity to:

- Understand the needs and expectations of participants, stakeholders and communities with which Project Rozana works and supports
- Identify improvements to what Project Rozana does and how it is done
- Record, register, respond to and resolve issues and share these to improve practices
- Analyse and learn from trends to ensure Project Rozana is proactive and effective in its work.

Project Rozana's complaints and feedback processes have been designed in accordance with nine core principles of the Australian Standard Customer Satisfaction Guidelines for Complaints Handling in Organisations.

Principle	Action	
1. Visibility	All staff and volunteers know how to find this policy and how to follow procedures. Project Rozana publishes this policy on its website.	
2. Accessibility	The feedback process is straightforward. A person's age, language, culture or disability will not be a barrier to providing feedback.	
3. Responsiveness	Timely acknowledgement, progress and action is provided.	
4. Objectivity	Investigations are conducted impartially, fairly, equitably, ethically and completely.	
5. Charges	Provision of feedback is free of any charge or cost.	
6. Confidentiality	Personal information is only disclosed on a need-to-know basis and is handled in accordance with Project Rozana's Privacy Policy.	
7. Person-focused	Person-focused Project Rozana welcomes and promotes the right to provide feedback and recognises feedback as important to what Project Rozana does and how it is done.	
8. Accountability	Roles, processes, and decisions are clear, balanced, ethical and fair.	
9. Continuous improvement	Project Rozana seeks to learn, explore new solutions and improve performance.	

5. PROCEDURES

6.1 How to Make a complaint

- a) You can make a complaint to any Project Rozana employee. They may consult with their direct manager to get advice on the next steps. However, all sensitive or whistleblower complaints (including child safeguarding, sexual exploitation, abuse or harassment or fraud) can be reported via our secure and confidential third-party whistleblowing and incident reporting platform: <u>https://whistleblowersoftware.com/secure/RozanaReporting</u> (see Project Rozana's Whistleblower Policy for more details).
- b) In the countries where we work, complaints can be made to program partners or Project Rozana personnel in-country. Sensitive complaints should be reported via our secure and confidential third-party whistleblowing and incident reporting platform: <u>https://whistleblowersoftware.com/secure/RozanaReporting</u> Program partners and contractors have an obligation under their contracts with Project Rozana to have processes in place to receive and manage complaints and are required to follow these. We work with partners and personnel in-country to ensure that they:
 - Understand their obligations to receive and manage complaints
 - Provide multiple options for making a complaint that are easy to use and accessible
- c) Feedback, including complaints, may be provided to Project Rozana in a variety of forms including through formal correspondence, verbally or via email.

CONTACT DETAILS

The Complaints Officer

complaints@projectrozana.org

+61 3 9272 5600

PO Box 2400, Caulfield Junction, Vic 3161 Australia

6.2 Types of Complaints

- a) A general complaint includes but is not limited to:
 - Funding and program decisions
 - Program implementation
 - Fundraising and Supporter Services
 - Conflict of Interest issues

- Employment issues including complaints or concerns about:
 - $\circ\,$ Safety or security within the work environment
 - ${\scriptstyle \odot}$ Unethical behaviour associated with organisation changes
 - $\circ~$ Unfair or unjust employment conditions

Project Rozana supports a culture of speaking up. If you have a complaint about employment issues, you should first speak with your manager and refer to the HR Manual. If you feel your complaint is not being heard, it is appropriate to escalate it in line with this policy.

- b) A sensitive complaint includes but is not limited to:
- Child safeguarding
- Corruption
- Theft
- Fraud
- Misuse of funds
- Exploitation
- Abuse
- Harassment Bullying Discrimination

Complaints of this type should be reported via our secure and confidential third party

whistleblower and incident reporting platform at

https://whistleblowersoftware.com/secure/RozanaReporting

For further details, please refer to the appropriate Project Rozana policy below:

- Child Safeguarding Policy
- Conflict of Interest Policy
- Counter Terrorism and Money Laundering Policy
- Fraud & Corruption Policy
- Preventing Sexual Exploitation & Abuse Policy
- Whistleblower Policy

6.3 Handling Complaints

Project Rozana staff or volunteers who receive a complaint should refer the complaint immediately to Project Rozana's Complaints Officer who will register the complaint and acknowledging its receipt in writing within three working days.

- a) In the case of verbal complaints, the person receiving the complaint should make a record of the complaint and provide that record to the Complaints Officer
- b) If the complainant is seeking a response to their complaint, the record must include contact details of the complainant to allow a response to be provided.
- c) The Executive Director will work with a senior staff member associated with the matter to which the complaint relates in order to consider the complaint.

- d) The Complaints Officer will make an initial assessment of the complaint in terms of the following criteria:
 - I. Severity
 - II. Health (including mental health) and safety
 - III. Financial implication for the complainant or others
 - IV. Complexity
 - V. Impact on the individual, public and organization
 - VI. Potential to escalate
 - VII. Systemic implications and
 - VIII. The need for, and possibility of immediate action
- e) Ideally, most complaints should be resolved informally, and dealt with promptly by staff. An informal approach should be used as often as possible. Staff to whom a complaint is made can offer solutions consistent with their normal level of authority. Where the likely solutions appear to require approval from a higher authority, or if requested by the complainant the matter can be referred to a higher staff level. If complaints cannot be satisfactorily resolved informally, the formal complaint handling procedure outlined below will be followed.
- f) The Complaints Officer will immediately escalate complex and/or major complaints to Project Rozana's Executive Director All complaints will be reported at our weekly Management Team meetings. Minor complaints will be reported in summary form. Major complaints will be reported in detail. An analysis will be included in the complaints report provided quarterly to the Board.
- g) In acknowledging receipt of the complaint, the Complaints Officer will advise of the course of action to be taken in investigating the complaint. If advising of this course of action is not possible within three working days, an acknowledgement of the complaint will still be provided, with further advice on the course of action to be taken provided within a reasonable period.
- h) Any staff member or volunteer who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment or volunteer engagement.

6.4 Providing Support and Protecting You from Harm

Where practical and appropriate, we will protect the identity of reporters. Personal information that identifies individuals will only be disclosed when required by law. When required for purposes of the investigation or other related purposes, all reasonable efforts will be taken to de-identify information that is not required for the purpose of the disclosure. In some instances, it may not be possible for an investigation to progress if the existence of the report cannot be disclosed and a statement by the individual cannot be provided as evidence. However, in some instances we might judge that the reporter will be

better served if others are involved in the resolution of a complaint. Third parties will only be included in the resolution of confidential complaints on a case-by-case basis and with the agreement of the reporter

- a) We will assess any immediate needs for protection or assistance as soon as possible after a complaint is made. We will work with you to identify what support you may need. For example, we may be able to provide or refer you to services (such as counselling or medical services). We will also take reasonable steps to ensure you are safe and not exposed to further harm.
- b) For Project Rozana personnel, we may be able to provide flexible working conditions or workplace modifications and ensure managers are aware of their responsibilities.
- c) If you have suffered harm despite this support in place, we will let you know how to make a further complaint.

6.5 Improving our Procedures

- a) Project Rozana will conduct an internal review of the effectiveness of our complaint handling every year. Data collection on complaints will be kept for the purpose of identifying trends, monitoring the effectiveness of our complaint handling and making improvements as appropriate.
- b) The Complaints Officer is responsible for maintaining an up to date Complaints Register and will ensure that the following information is included
 - a) date of receipt
 - b) description of the complaint and relevant supporting data;
 - c) the requested remedy;
 - d) the service(s) and/or good(s) and/or practice or procedure complained about;
 - e) the due date for a response;
 - f) immediate action taken (if any) to resolve the complaint
- 6. If you feel Project Rozana has not fairly resolved your complaint, you can escalate the issue to one of the national industry bodies:

For unresolved complaints regarding fundraising, contact:

The Fundraising Institute of Australia PO Box 642 Chatswood NSW 2057 Tel: 1300 889 670 (Australia only) Tel: +61 2 9411 6644 Website: www.fia.org.au For unresolved complaints about non-fundraising related issues contact:

The Australian Council for International Development Private Bag 3 Deakin ACT 2600 Tel: +61 2 6285 1816 Email: main@acfid.asn.au Website: www.acfid.asn.au

7. DOCUMENT CONTROL INFORMATION

Date	Version	Revised Description	Reviewed / Updated by
April 2021	V1	Created	Board of Directors
26 August 2021	V2	Review of the policy in line with ACFID recommendations	Board of Directors
27 September 2023	V3	Changes to contact details and reference to Whistleblower online reporting platform	Board of Directors