



POLICY

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# COMPLAINTS AND FEEDBACK HANDLING

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**SeeBeyondBorders**  
*Change begins with education.*

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## COMPLAINTS AND FEEDBACK HANDLING POLICY

### 1. DOCUMENT PURPOSE

SeeBeyondBorders recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies to our program delivery, fundraising and accountability to our stakeholders generally.

SeeBeyondBorders is committed to achieving and maintaining a workplace that fosters a productive, safe and harmonious environment for all employees, volunteers and visitors. This also applies to our beneficiaries and stakeholders through the program and projects that we deliver.

This document sets out to establish clear guidelines and procedures for how we handle complaints and feedback in general. Receiving feedback and complaints is one of the most important ways of learning what we need to do to improve our work and we seek input and feedback from stakeholders regularly.

### 2. GENERAL POLICY OBJECTIVES

SeeBeyondBorders seeks to resolve difficulties and complaints in a prompt, impartial and just manner and views complaints and feedback as providing an opportunity to review and improve its services, policies and processes.

### 3. GUIDING PRINCIPLES

SeeBeyondBorders has adopted the following principles for our complaints and feedback handling policy and procedures.

**Principle 1: Visibility** – We will clearly publicise information about how and where to complain or to provide feedback.

**Principle 2: Accessibility** – We will ensure that our complaints handling process is as accessible as we can practically make it to all complainants.

**Principle 3: Responsiveness** – We will respond to complaints according to our complaint procedures timeline.

**Principle 4: Objectivity** – We will address all complaints and feedback in a fair, equitable and unbiased manner using evidence submitted by the complainant and our personnel.

**Principle 5: Charges** – Access to the complaints and feedback handling process is free of charge.

**Principle 6: Confidentiality** – We will observe strict confidentiality in handling all complaints and feedback.

**Principle 7: Beneficiary and stakeholder focused approach** – The interests of our beneficiaries and stakeholders are foremost in our approach to handling complaints and feedback.

**Principle 8: Accountability** – We will ensure there is clear accountability and reporting on the action and decisions with respect to complaints and feedback.

**Principle 9: Continual improvement** – We will always ensure that complaints and feedback we receive are used to continually improve the quality of our program and projects.

#### 4. DEFINITIONS

This policy applies to all SeeBeyondBorders Personnel, defined as:

- board members and trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants

Any other person working for or on behalf of SeeBeyondBorders.

This policy also applies to other individuals and third parties who through their association with SeeBeyondBorders may visit our project activities (i.e. donors, Australian, Irish and UK Partner Organisations, service providers) although the management process for these groups may differ in certain aspects given their involvement.

**Complaint** means an expression of dissatisfaction made to SeeBeyondBorders or any organisation, related to SeeBeyondBorders programs or the delivery of its projects, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

**Complainant** means a person, organisation or its representative, making a complaint.

**Inquiry** means a request for information or an explanation.

**Feedback** means opinions, comments, suggestions and expressions of interest in SeeBeyondBorders programs or projects or the complaint handling process.

**Stakeholder** means a person or group having an interest in SeeBeyondBorders and its programs and projects.

**Survivor** means a person who has suffered difficulties or abuse.

SeeBeyondBorders recognises that feedback and critical comment are an important part of improving the quality of its programs and projects and, as such, these would not be viewed as a complaint unless specific action was requested.

#### 5. POLICY

This policy is intended to apply to any complaint or feedback where specific follow-up action is required, regardless of who makes it. Complaints and feedback can be made anonymously, but this may limit our ability to be able to investigate them.

##### 1. **Scope**

Any person associated with SeeBeyondBorders and its activities can make a complaint or submit feedback. A complaint can be about:

- Any aspect of a program or project provided by SeeBeyondBorders,
- Any of SeeBeyondBorders workplaces, courses, workshops, or project trips,

- Any incident arising from the workplace, courses, workshops, programs, projects or project trips,
- The behaviour or decisions of staff, volunteers, project team participants, visitors or any third party engaged with the organisation,
- SeeBeyondBorders' practices, policies or procedures.

For clarification, this scope embraces any direct or indirect connection between an interested party and SeeBeyondBorders and does not restrict a complaint to be about direct impact suffered by the complainant. On the contrary, this scope also embraces complaints regarding situations witnessed by the complainant where another party (a survivor) is impacted either directly, e.g. a person being abused by a person associated with a SeeBeyondBorders program, or indirectly through the inaction of SeeBeyondBorders resulting in a failure to implement a process as undertaken by the organisation, e.g. not utilising donor funds in accordance with the donor's original direction.

Note that members of SeeBeyondBorders management are also members of SeeBeyondBorders staff and are therefore in no way excluded by the scope of this policy from having a complaint raised about their behaviour, approaches, or attitude.

## **2. Organisational awareness and readiness to receive complaints and feedback**

All SeeBeyondBorders board members, trustees, staff, volunteers, visitors, contracted personnel and project team participants receive a copy of the complaints handling policy and are orientated on the complaints handling process and how to respond to complaints and feedback in a sensitive manner. This is done at the point of induction and through annual policy reviews and briefing sessions.

Anyone directly involved with handling complaints or feedback is given full training on the organisation's procedures.

## **3. Publicising our policy**

We make clear the value we place on receiving feedback and complaints in all relevant communications and we make every effort to disseminate information to all stakeholders. We use the words 'complaint' and 'feedback' and their equivalent in Khmer. Our website has a prominent section within the 'contact us' page with information on how to make a complaint or feedback and a link to this policy.

Where literacy is a constraint we will orally invite expressions of concern, complaint and feedback on a regular basis. We will take care to give this invitation in a way that is culturally appropriate recognising that in some cultures people require greater encouragement to make a complaint. We will take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If required we will make use of pictorial means of communication. We ensure that making a complaint to us is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can.

All relevant communications, for example our website, annual report, partnership agreements and staff policies, explain our procedures for handling complaints including:

- where or to whom complaints can be made

- information to be provided by the complainant
- the process for handling complaints
- time periods associated with various stages in the process
- the complainant's options for remedy, including external means
- how the complainant can obtain feedback on the status of the complaint.

#### **4. Where and how complaints and feedback can be made**

We are able to receive complaints and feedback orally in person or by telephone and in writing by post, email or online via our website or social media pages. Where complaints or feedback are given verbally, we will ensure our write up of the issue contains all the information the complainant wishes to provide. Please see the references below.

Complaints may be made by a friend or advocate of the complainant on their behalf.

Where appropriate we may utilise complaint/suggestion boxes or a dedicated telephone number that beneficiaries and stakeholders are made aware of through publicity at our program or project sites.

We recognise that in some circumstances survivors may wish to remain anonymous. Because such complaints can alert us to problems that need fixing we will accept them though clearly it may not be possible to provide a remedy to an individual.

Website: [www.seebeyondborders.org](http://www.seebeyondborders.org) – Contact Us Page

Email: [feedback@seebeyondborders.org](mailto:feedback@seebeyondborders.org)

Telephone: (Cambodia) +855 63 507 0888  
(Australia) +61 2 9960 7077  
(UK) +44 (0)7779 020334  
(Ireland) +353 (0)83 842 8035

#### In Writing:

Cambodia: SeeBeyondBorders Cambodia, House #785, Group 25th, Cham Kar Samrong II Village, Sangkat Cham Kar Samrong, Battambang City, Cambodia

Australia: SeeBeyondBorders, 106/1-3 Gurrigal St, Mosman NSW 2088, Australia

UK: SeeBeyondBorders, 31 Sistova Road, London, SW12 9QR

Ireland: SeeBeyondBorders, 31 Woodlands, Portmarnock, County Dublin, D13YN34

#### **5. How we handle complaints and feedback**

##### When we take an oral complaint, we will:

- Identify ourselves, listen, record details, and determine what the complainant wants
- Confirm that we have understood and received the details
- Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive

For all complaints we will:

- Seek from the complainant the outcome/s they are expecting
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the complainant the course of action that will follow:
  - if we may exercise a discretion not to investigate
  - if preliminary enquiries need to be made, or further consideration needs to be given
  - if the complaint is to be investigated
  - if the complaint is to be escalated.
- If the complaint is outside the scope of the policy, we will explain why and we will explain how we will refer it onto an appropriate party (eg if the complaint is against an employee of another organisation)
- We will not create false expectations, but assure the complainant that the complaint will receive full attention
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again
- Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives
- Ensure that the complaint is appropriately acknowledged
- Complete a [Complaints and Feedback form](#) and escalate the complaint appropriately (Appendix 2)
- Follow up where necessary, and monitor whether the complainant is satisfied
- We will register all complaints on SBB complaints register.

Where appropriate we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

**Initial assessment of complaint**

We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, we will assess it in terms of the following criteria:

- a) severity (minor, moderate, major, extreme – see Appendix 1)
- b) health (including mental health) and safety implications
- c) financial implications for the complainant or others
- d) complexity
- e) impact on the individual, public and organisation
- f) potential to escalate
- g) systemic implications
- h) the need for, and possibility of immediate action.

Where appropriate, we will refer complainants or survivors to appropriate assistance, which may include referral to medical, legal, financial, or social assistance.

## **6. Inquiries, minor complaints, proper complaints and jurisdiction**

We will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person during the initial phone call or meeting. However, as far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required or not, depending on jurisdictional questions and whether the complaint is ill conceived. If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to the CEO for review.

If such a dispute is unresolvable we will refer the complainant to an independent body in the corresponding country.

Australia and Cambodia:	Code Committee of the Australian Council for International Development (ACFID)
UK:	Charities Commission
Ireland:	Charities Regulator

## **7. How complaints are investigated**

We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

## **8. Our Timeframes**

We will acknowledge written complaints within 5 days. We will acknowledge oral complaints immediately.

We will aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

## **9. How we will respond to and close a complaint**

Complaints may be received by any SBB personnel, however the investigation of all complaints will be forwarded to the leadership team (or Country Manager or equivalent if outside of Cambodia) who will then assign a team member to lead the investigation and response. In some circumstances, depending on the severity of the complaint, it may be appropriate to assign a complaints committee or refer the complaint to the CEO in the first instance who may refer it to the

relevant Board of Directors or Trustees to handle. Any complaint involving the CEO will be referred to the Leadership Team and directly to an appropriate Board member.

Generally in Cambodia any leadership team member may handle a response, except the Cambodian Country Director, who is also the organisation's CEO. This is to allow for a process of review if the complainant is not satisfied with the response.

We will communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate, such as in the case of a complaint being made by a local community member who may have only basic literacy skills, we will also communicate our decision orally and again in the appropriate language.

We will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision, we will advise that if a complainant is not satisfied, we will be prepared to consider any additional information they may provide and any review will be directed in the first instance to the CEO and then to the Board in Australia or trustees in the UK or Ireland.

In all cases we will advise that the complainant may refer the matter to the Code Committee of ACFID or other relevant regulatory bodies in Australia, the UK or Ireland. We will provide all necessary information for referral to the Code Committee and offer to assist in referral.

#### **10. How we will learn from complaints and feedback**

We will ensure that all relevant personnel are informed of the outcomes of complaints and feedback and the subsequent implications for our programs, projects, procedures and processes. We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of staff. Where needed we will counsel or discipline staff or volunteers. Where appropriate we will consult and take advice from the relevant regulatory or enforcement authorities.

We will endeavour to routinely collect feedback from beneficiaries and to review this with our personnel through team meetings and program reviews. Feedback will help us to shape the design of our programs and projects.

#### **11. Responding to Disclosure or Complaint by a Child/Young Person**

SeeBeyondBorders will treat all concerns raised seriously and ensure that all parties will be treated fairly where the principles of natural justice will be a prime consideration. All reports will be handled professionally, confidentially and expeditiously.

All reports made in good faith will be viewed as being made in the best interests of the child / young person regardless of the outcomes of any investigation. SeeBeyondBorders will ensure that the interests of anyone reporting child abuse in good faith are protected as covered in our Whistle-blowing Policy. The rights and welfare of the child / young person is of prime importance. Every effort will be made to protect the rights and safety of the child throughout any investigation.

When a child / young person discloses that he or she has been abused, it is important to keep in mind:

- They may be feeling scared, guilty, ashamed, angry and powerless. You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief.
- If a child discloses abuse, whatever the outcome, the child must be taken seriously.
- It is important for you to remain calm and in control and to reassure the child / young person that something will be done to keep him or her safe.
- When a child or young person discloses they are being harmed you can show your care and concern for the child / young person by:
  - Listening carefully
  - Telling the child / young person you believe him or her
  - Telling the child / young person it is not their fault and he / she is not responsible for the abuse
  - Telling the child / young person you are pleased he / she told you
- You will not be helping the child / young person if you:
  - Make promises you cannot keep, such as promising that you will not tell anyone
  - Push the child / young person into giving details of the abuse. Your role is to listen to what the child / young person wants to tell you and not to conduct an investigation (beware of asking any leading questions as this may prejudice any subsequent investigation)
  - Indiscriminately discuss the circumstances of the child / young person with others not directly involved.
- If a report is made to you as a staff member / volunteer by a child or young person involving any child protection concerns and/or reports of abuse, follow the SeeBeyondBorders reporting processes, support, and response guidance in Appendix C of the Child & Vulnerable People Protection Policy.

## 12. Confidentiality

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainant's permission.

## 13. Register of complaints

We will hold a register of all complaints that we receive. This will be maintained by the Compliance and Monitoring function of the organisation.

We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data
- the requested remedy
- the programme and project and/or practice or procedure complained about
- the due date for a response
- immediate action taken (if any) to resolve the complaint
- date a response was provided
- any review or follow up action required.

We commit to de-identifying complaints held on this register, if requested by the complainant or the

survivor.

#### **14. Continuous improvement**

On a continuing basis we will monitor the effectiveness of our complaint handling and make improvements as appropriate.

We will:

- maintain data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and programs and projects
- keep abreast of best practices (both locally and overseas) regarding complaint handling
- foster a beneficiary and stakeholder focused approach
- undertake specific training and retraining of staff to foster better complaint handling practices
- encourage innovation in complaint handling development
- endeavour to collect feedback from beneficiaries on a regular basis
- recognise and reward exemplary complaint handling behaviour.

## 6. POLICY MANAGEMENT

This Policy has been approved by the Australian Board and the Trustees of SeeBeyondBorders' other entities as noted below.

Amendments and or developments will be recommended to the Board from time to time as deemed appropriate by senior management. Formal reviews will take place before the expiry of three years from the anniversary date of approval by the Board. Recommendations for minor changes can be approved by the CEO before the expiry of three years, and recommendations for changes to the background or policy in practice can be approved by the relevant Sub-Committee.

Doc ref	Doc type	Approved by Australian Board Date	Minute ref.	Approved by UK Trustees Date	Minute ref	Approved by Irish Board Date	Minute ref
	Policy Review	Board March 2016				N/A	N/A
	Policy Review	Board August 2018		October 2018	11 <sup>th</sup> Oct 2018	N/A	N/A
	Policy Update	Board Nov 2019		March 2020		N/A	N/A
CFHP/11/2019/1.1	Policy Update	CEO June 2020	CEO File Note: 28 Jun 2020				
CFHP/01/2021/2.0	Policy Review and Update	Board 16 Feb 2021	Item 4	Trustees 5 Feb 2021	Item 7		

**Appendix 1 – Complaint Severity Levels**

**Impact**

Minor	Moderate	Major	Extreme
The complainant or survivor has experienced a very low level of annoyance, frustration, worry or inconvenience.	The complainant or survivor has experienced moderate distress, inconvenience or pain.	The complainant or survivor has experienced distress or difficulties that have a significant impact on the way he/she lives his/her life.	The complainant or survivor is in immediate and significant danger or has raised a complaint that is so serious that it could be referred for legal action.

**Period of time the issue has been ongoing**

One-off	1-2 weeks	1-2 months	3-6 months	6 months +
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	Minor	Moderate	Major	Extreme
One-off	1	1	2	3
1-2 weeks	1	2	3	4
1-2 months	2	2	3	4
3-6 months	2	3	4	4
6 months +	3	3	4	4

Actions/ Escalation Required:

*In all instances, our first priority will be to ensure the complainant/survivor is safe and has been removed from any immediate danger.*

**4 = Immediate Risk:** Immediate action required. This complaint should be escalated immediately to the CEO who will escalate it immediately to the Board and/or Trustees. It is highly likely that a complaint of this severity will be referred to appropriate regulatory or enforcement authorities.

**3 = High Risk:** A leadership team member must undertake a detailed investigation and report the results of that investigation to the CEO within 48 hours of receiving the complaint.

**2= Moderate Risk:** A leadership team member will undertake an investigation and propose a resolution to the complainant/survivor within 5 days.

**1 = Low Risk:** Manage using routine procedures and ensure the complainant/survivor is satisfied with the resolution.

All complaints will be reviewed by the Board at quarterly meetings, but all Level 4 complaints and certain Level 3 complaints at the discretion of the CEO, will be escalated to the Chairperson immediately to allow the Board to be involved in the resolution.

**Appendix 2 – Complaints and Feedback form**

Please use this form to write down as much information as you can about the complaint\* or the feedback that you have received and send it to a member of the leadership team.

Your Name	
Date complaint or feedback received and way it was received	
Complainants name & contact details (if known)	
Nature of complaint <i>Does the complaint or feedback relate to Communications, HR (eg staff conduct), Finance, a specific project or something else?</i>	
<p>Please describe the details of the complaint or feedback:  <i>Eg. How was the complaint/feedback received? Email, face-to-face, letter, phone call?</i>  <i>Outline what the concerns are and why.</i></p>	
What is the complainant's requested resolution?	
Have you acknowledged receipt of the complaint or feedback?	
Who has the complaint/feedback been escalated to? (If appropriate)	
What is the date of escalation?	

*\*If the complaint relates to Safeguarding/Child Protection, please follow safeguarding procedures and use the Cause for Concern form*

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To be completed by leadership team member:

What is the complaint severity level? <i>See matrix</i>	
What action has been taken to resolve the complaint?	
Is the complainant satisfied with the action and response?	
If no, what are the next steps?	
Date of resolution	
Are there any lessons learnt from this complaint / feedback and if so, what are they?	

Please send this completed form to the Compliance Manager.

Please remember that all complaints must remain confidential and should not be discussed with anyone outside the nominated escalation points. All personal data must be handled in accordance with our Privacy Policy.