

COMPLAINTS POLICY

Purpose

Transparency International Australia (**TIA**) is committed to ensuring the accessibility of its Complaints Policy, procedures and systems for making a complaint, across the breadth of our work. We aim to ensure that our stakeholders can hold us to account and in doing so we will improve the quality of our work.

TIA strives to uphold the highest standards of excellence in all that it does but recognises that this cannot always be the case. When we make a mistake, we want and need to be informed. We will use the information to endeavour to put things right and to help us to become more effective.

This policy applies to TIA only.

Scope

A complaint is an expression of dissatisfaction about the actions or lack of action by TIA or its staff, volunteers or anybody directly involved in the delivery of our work. It is a criticism that expects a reply and would like things to be changed.

A complaint can be made by any supporter, partner organisation, community or individual with whom we work or any member of the public whether an individual, company or other entity in Australia or anywhere else in the world (Complainant).

Complaints could include the following (which is not an exhaustive list):

- Concern from someone with whom we work about the quality of program delivery
- Concern from a member of the public or supporter about a particular fundraising approach or campaign
- Concern about the behaviour of staff, volunteers or contractors.

If the concern falls within the scope of TIA's Whistleblowing Policy, then TIA's Whistleblowing policy and process applies.

A complaint must be about an action for which TIA is responsible or is within our sphere of influence. A complaint is not:

- A general query about TIA's work
- A request for information
- A contractual dispute
- A personal grievance
- A request to amend records e.g., to correct an address, cancel a donation
- A request to unsubscribe from a TIA 'service' e.g., a newsletter or email.
- A complaint about an individual or organisation with which TIA does not work and is not affiliated. (Such a complaint could be covered under TIA's Whistleblower Policy.)

Principles

TIA strives to adhere to the following principles in the management of complaints:

Accessibility. Complainants should be able to make a complaint as easily as possible: written correspondence, email, telephone, verbally, via a third party, etc. We are committed to making communication with us as easy as possible.

Timeliness. TIA aims to acknowledge receipt of any complaint within 1-2 business days and aims to resolve complaints within 14 business days of receipt. In the event that a complaint cannot be resolved within this timeframe the complainant will be informed about the progress made to date and when they

can expect to receive a response.

Complaints should be made within a reasonable time, and no more than 3 months following the relevant incident. In exceptional circumstances TIA may be able to respond to a complaint that is older than 3 months, although the passage of time may make it harder to resolve the complaint satisfactorily.

Confidentiality. Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. However, in some instances we might judge that the Complainant 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 Complainant.

Documented. Some complaints may be both made and resolved verbally, e.g., by telephone or face to face. Where they are unable to be resolved verbally, complaints must be made in writing. Records of complaints will be kept in line with TIA records management requirements. Where possible complainant details will be deidentified for the purposes of reporting or addressing the complaint.

Right to appeal. Complainants who have launched a well-founded complaint and who are unsatisfied with TIA's response to that complaint have the right to our peak body, the Australian Council for International Development (**ACFID**) (contact details below).

Mutual Respect. Everyone who makes a complaint to TIA will be treated with courtesy and respect. In return, TIA expects people who make a complaint to communicate their concerns fairly and appropriately. Where Complainants harass TIA staff or volunteers, behave abusively, or unreasonably pursue complaints, TIA may withdraw or modify its complaints process.

Cultural sensitivity. TIA will manage complaints in line with appropriate linguistic, social and cultural considerations and sensitivities, including when the complainant is making a complaint from outside Australia.

TIA's Chief Executive Officer and Board will monitor the application of this policy. An overview of complaints including number and analysis will be published, although to respect the privacy of individuals the details of individual complaints will not be public.

Process

Response to complaints received will be managed in line with the following process:

Complaint Receipt and Assessment

- **Receive Complaint:** Complaints can be submitted through various channels (e.g., email, phone, website).
- **Acknowledge Receipt:** Send a formal acknowledgment as soon as possible following receipt.
- **Preliminary Review:** Conduct a quick assessment to determine the type and scope of the complaint.

Determine Scope

- **In Scope:** If the complaint relates directly to TIA's operations, services, staff, or volunteers, proceed with the process.
- **Out of Scope:**
 - For complaints unrelated to TIA's operations (e.g., external vendor issues or personal grievances), communicate that the complaint falls outside the organisation's scope and, if possible, provide referral information for relevant agencies or resources.
 - For complaints that fall within the scope of TIA's Whistleblowing Policy, apply the principles and process under that Policy.

Escalation for Serious Incidents

- **Definition of Serious Incident:** 'Serious incident' means any event or circumstance that

[Transparency International Australia // Complaints Policy](#)

causes or could cause harm to the health, safety, or well-being of an individual, including death or serious injury, that involves a TIA employee, contractor or agent during the commission of work directly related to TIA.

- **Immediate Escalation:** If the complaint involves a serious incident, escalate it to senior management and, if necessary, external legal advisers.
- **Incident Report:** Document details and actions taken, following any mandatory reporting guidelines (e.g., safeguarding protocols or regulatory notifications).
- **Reporting to the Board:** All serious incidents will be reported to the Finance and Risk Committee of the Board at the earliest opportunity. The Committee is responsible for reviewing serious incidents, ensuring that risks are being managed appropriately, and determining whether additional action or reporting to the Board is required.

Investigation and Resolution

- **Gather Information:** Collect necessary information, including statements from involved parties and relevant documents.
- **Determine Resolution:** Based on findings, propose a resolution, which could include remedial action, policy adjustments, or other corrective measures.

Response and Follow-Up

- **Communicate Outcome:** Where appropriate and relevant, share the decision and actions taken with the complainant, maintaining transparency.
- **Follow-up:** Check in with the complainant after a reasonable time to ensure satisfaction and closure.
- **Documentation:** Record the complaint, process, and outcome in line with TIA records management obligations.

Monitoring and Continuous Improvement

Review & Analyse Trends: TIA will log and monitor all serious complaints and results of such complaints. This information will be communicated regularly to appropriate senior managers and/or Board members as appropriate in order to learn from both complaints and the complaint handling process. This information will not necessarily be available to the public

TIA's CEO and Board will monitor the application of this policy. The Board, through the Finance and Risk Committee, will receive standing agenda updates on safeguarding and serious incident reporting to maintain oversight of risk and governance responsibilities.

Complaints and the complaints management process are communicated on a regular basis to staff and overseas project leads to ensure familiarity with processes for managing complaints.

Policy Updates: Adjust policies or training based on complaint analysis to minimise future issues.

How to contact TIA

Through the website <http://transparency.org.au/> using the Contact Us link

By email to info@transparency.org.au

By mail to:

Transparency International Australia
Level 14
330 Collins St
Melbourne Victoria
3000 Australia

By phone at +61 421 498 644

If the complaint is about the Chief Executive Officer, please contact the Chair of TIA by email at ajbrown@transparency.org.au

When working with stakeholders beyond Australia, TIA will ensure that they are aware of and can access the Complaints Policy through appropriate forums and means.

How to contact ACFID

Through the website <http://www.acfid.asn.au/>

By email at <http://www.acfid.asn.au/contact-info>

Related documents

This policy should be read in conjunction with:

- Whistleblower Protection Policy

About this Policy

Title	Complaints Policy
Owner	CEO
Version	3
Date of Approval	31 January 2025
Next review date	31 January 2027