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Introduction

Kyeema Foundation (Kyeema) is a not-for-profit NGO that works predominantly to reach resource-poor members of communities in developing countries. Kyeema is wholly committed to delivery of sound development activities and places great importance on operating with honesty, openness, and integrity.

Purpose

The purpose of this policy is to ensure transparency and accountability to all stakeholders in relation to complaints regarding Kyeema and its operations. This policy seeks to make clear the mechanisms available for making complaints and the way in which complaints will be handled and resolved.

Guiding Principles

Kyeema acknowledges the value of feedback as an important tool in understanding and responding to stakeholder's expectations. We therefore welcome feedback and will respond constructively and in a timely manner to complaints. We have adopted the following principles for our complaints policy and procedures.

Confidentiality: Kyeema is committed to ensuring that all information related to complaints and their resolution will remain confidential. The privacy of individuals will be maintained and personal information will not be divulged.

Accessibility: information about complaints procedures will be easily accessible and well-publicised to the people we work with and other stakeholders. There are options for making a complaint to ensure no complainants are disadvantaged.

Objectivity: complaints will be taken seriously and treated with respect and in a fair and equitable manner. Conflicts of interest will be identified to ensure objectivity.

Accountability: we will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling are clearly established.

Responsiveness: complaints will be dealt with in a manner that is timely and responsive. Complainants will be kept informed on the progress of their complaint through the process.

Definitions

A **complaint** as an expression of dissatisfaction about the standards of service, actions or lack of actions by Kyeema.

A **complainant** is any person or organisation making a complaint.

An **incident** as an event or occurrence resulting in a complaint

Scope

Complaints may come from our supporters, donors, the general public, beneficiaries, official bodies, our partners, interns and volunteers.

The Kyeema Human Resources Procedures Manual details Whistleblower Protection procedures that can be used by internal complainants, where the issue is considered to be of a serious nature.

Policy statement

Kyeema seeks to have any complaint or dispute raised and received in a constructive and open manner and resolution achieved in a timely and effective way.

Any complaint or dispute about an aspect of Kyeema's personnel, operations or practices will be dealt with confidentiality, effectively and with the appropriate degree of urgency.

All complaints will be managed to ensure there is procedural fairness to all parties, there is no conflict of interest by either party, there is no victimisation or retaliation and confidentiality is assured throughout the process.

The procedures for implementation of this policy are detailed in Attachment 1 – Procedures.

Responsibilities

Complaints Officers are responsible for ensuring all complaints are dealt with as per the procedures in Attachment 1.

A report on complaints is prepared for each meeting of the Kyeema Board of Management using Attachment 2 – Complaints Reporting Template for Board of Management. The Complaints Officer will advise the Board of Management of all serious complaints and what action was undertaken to resolve the issues based on the Incidents Register. This Incidents Register is the basis of reporting to the Board of Management, and ACFID and DFAT where necessary.

The CEO provides a copy of this Complaints Policy to all staff (contracted, volunteers and consultants) that join Kyeema and trains them in the processes of receiving and responding to a complaint. Complaint Handling Procedures are detailed in Attachment 1. The Policy is referenced in Kyeema's Procedures Manual for all Kyeema staff based at Headquarters, Regional Offices and field project staff. The Complaints policy is listed on the Kyeema website (www.kyeemafoundation.org) and compliance with the policy is reported to the Board of Management.

The Complaints Policy and its processes are highlighted in all project development discussions at an early stage of development as a potential avenue for redress of any issues in the future.

Information Source

ACFID Code of Conduct Commitment 7.3: We are accountable to our stakeholders

<https://acfid.asn.au/good-practice-toolkit/quality-principle-7-governance/commitment-7-3/>



ACFID Code of Conduct Commitment 9.3 We manage our people effectively and fairly
<https://acfid.asn.au/good-practice-toolkit/quality-principle-9-people-and-culture/commitment-9-3/>

Related Documents

This policy is to be read in conjunction with:

Kyeema Foundation Human Resources Procedures Manual

Kyeema Foundation Code of Conduct

Kyeema Foundation Prevention of Sexual Exploitation, Abuse and Harassment Policy

Kyeema Foundation Child Protection Policy

Authorisation

Signature of Policy Officer

Name of Policy Officer

13/03/24

Date

Attachment 1 Complaint Handling Procedures

Examples of complaints include:

- Concern about the behaviour of staff, volunteers, Board members, suppliers, partners or others acting on Kyeema's behalf.
- Criticism about a fundraising campaign or action.
- Concern over inappropriate use of funding.
- Any breach of the ACFID Code of Conduct.
- Organisational practices, policies or procedures.
- Complaints about Kyeema supported development programs and/or operations of partners.
- Exploitation or abuse of children or vulnerable adults or any other person.
- Misconduct including sexual exploitation, abuse and harassment.

How Complaints may be made

There are four ways to lodge complaints. Staff, partners and the general public can lodge complaints:

- 1) online via the Kyeema website;
- 2) by telephone;
- 3) by letter or using a complaint form obtained from the Project Leader; or
- 4) by word of mouth to the Project Leader who will submit this to the Complaints Officer.

Information on how to lodge a complaint is given to community members during project meetings and discussions. Community members are also given the opportunity to raise issues and complaints during meetings, field visits etc. Evaluation forms distributed during training and review exercises have general 'any other comments' section that can be used to raise complaints.

There are two Complaints Officers, one in Brisbane and one in the Maputo Regional Office. They receive all complaints, assess the level of seriousness of the complaint and will decide on the appropriate response should the complaint not be resolved on the spot. Serious complaints will most likely relate to abuse of human rights, significant financial discrepancies or misuse; staff and community conflicts.

An In-country Complaints Officer (PCO) is appointed for each project. The PCO reports to Regional and/or HQ Complaints Officer.

All complaints are to be passed to the Complaints Officer for recording, assessment and any follow up. If the original complaint was made via email, an online response of detailing further actions will be provided.

Complaints Officers:

- Mozambique Complaint Officer
- Malawi Complaints Officer
- Ethiopia Complaints Officer
- Brisbane/PNG Complaints Officer

- African Regional Complaints Officer
- Brisbane Headquarters Complaints Officer

Process for Handling Minor Complaints

All complaints will be considered carefully. If possible minor complaints will be dealt with on the spot and reported to the Complaints Officer verbally or by a project report.

If a similar complaint is lodged at approximately the same time by more than one person, it must be reported and recorded by the relevant Complaints Officer. The veracity of all minor complaints must be determined by community leaders and Kyeema field and office staff in the first place and if valid, a desirable course of action will be undertaken and recorded in field officers' reports.

Minor complaints that develop into serious complaints will be recorded and reported to the Complaints Officer.

Process for Handling Complex Complaints

Should a minor complaint presented in the field reflect a serious issue or if a complex complaint is made, the relevant Kyeema officer will advise the Complaints Officer who is responsible for determining what further action needs to be taken. This could involve a specific investigation, collection of more evidence, the appointment of a complaints team consisting of senior Kyeema and where feasible community leaders to assist in identifying the nature of the complaint and remedial options. These could include specific training, disciplinary actions, counselling and if necessary removal of people involved. Kyeema is committed to providing complainants with appropriate assistance and referrals to services that might include medical, social, legal and financial.

In serious cases, if the Head Office/Regional Complaints Officer considers after a detailed investigation and discussion with their counterpart in Headquarters/ Regional Office that there are elements of a criminal nature in the complaints, the involvement of regulatory authorities will be sought subject to the wishes and welfare of the complainant.

For those wishing to make a complaint externally, the matter can be referred to the Australian Council for International Development (ACFID) Code of Conduct Committee for review by email at complaints@acfid.asn.au or visit the ACFID website www.acfid.asn.au/code-of-conduct/complaints.

Complaints involving children or sexual exploitation, abuse and harassment are of the highest priority. Please refer to Kyeema's policy for Preventing Sexual Exploitation and Harassment (PSEAH) in addition to our Child Protection policy.

Complaints that do not fall within the scope of Kyeema's Complaints policy, e.g. other organisations, government departments, after due consideration may be referred to the appropriate organisation for its own investigation.

Responding to and closing a complaint

If a minor complaint is raised verbally in the field to a Kyeema staff member, it is anticipated that it can be resolved verbally on the spot.

All written complaints whether received in the field or in Australia, must be forwarded to the Complaints Officer who decides on the course of action to be undertaken. Complaints will be documented using an Incident Report Form which is available in all In-country offices and translated accordingly for full accessibility (see attachment 4).

If the issues are not substantiated after initial evaluation, the complaint will be dismissed and the Complaints Officer will be advised. The Kyeema HQ/field officer will relay a written response and if necessary, a verbal explanation to the originator of the complaint explaining the reasons for closing the complaint.

If a significant concern is raised in the complaint, the Complaints Officer will follow-up on the issues leading to the complaint. This may be via investigation, setting up a complaints committee, calling for witnesses/evidence, regulatory authorities, etc. Once the decision is made, with knowledge and advice from Kyeema Headquarters, a written response is given to the field/HQ officer or another officer if the current officer is part of the complaint with a brief to explain the process and outcomes and reasons to the person or group who made the original complaint. It may be necessary for the Complaints officer and Kyeema field officer to both report back to the originators of the complaint. The outcomes could involve operational and staff changes. The response of the complainants will be indicated by their level of satisfaction to the outcome/s of their complaint.

All serious complaints will be registered and reported to Kyeema Headquarters and reported to the Board of Management and noted in the ACFID Compliance Self-Assessment statement.

Should the outcome not resolve the serious issues to the parties concerned, complainants are able to make a formal appeal to Kyeema Headquarters or they have the opportunity to refer the matter directly to Australian Council for International Development (ACFID) Code of Conduct Committee for review by email at complaints@acfid.asn.au or on the ACFID website www.acfid.asn.au/code-of-conduct/complaints.

Timelines for dealing with Complaints

If possible, minor complaints are dealt with on the spot. If not they will be referred to the Complaints Officer.

All complaints that are referred to the Complaints Officers are to be acknowledged within 5 days by email/telephone or a letter.

The Complaints Officer will provide the response and resolution of the complaints to the originators of the complaint by within 30 days of receipt of the complaint by written summary and verbal description if necessary. The response will include with an acknowledgement of the obligation to update the complainant after 30 days, if the complaint is not resolved.

Confidentiality

No names of anyone who makes a complaint addressed to Kyeema will be revealed or personal details provided to anyone outside the organisation without the permission of the complainant. However, the complainant holds the right to de-identify themselves at any point in the process. It is also possible to make a complaint without providing a name so as to remain anonymous.

Recording Complaint data

The Regional Complaints Officer and the HQ Complaints Officer will both keep a Incidents Register. The HQ Incidents Register is the master register with inputs from the Regional Complaints Officer. Each complaint is to list the following:

- Date of Complaint
- Name of Complainant
- Date of acknowledgement/method
- Type of complaint - verbal/written
- Address of Complainant
- Kyeema Activity/Reference
- Brief description of complaint
- Rating of complaint-Minor/Serious
- Who received the complaint
- Summary of follow up
- Resolved YES/NO

A serious complaint will also list the following:

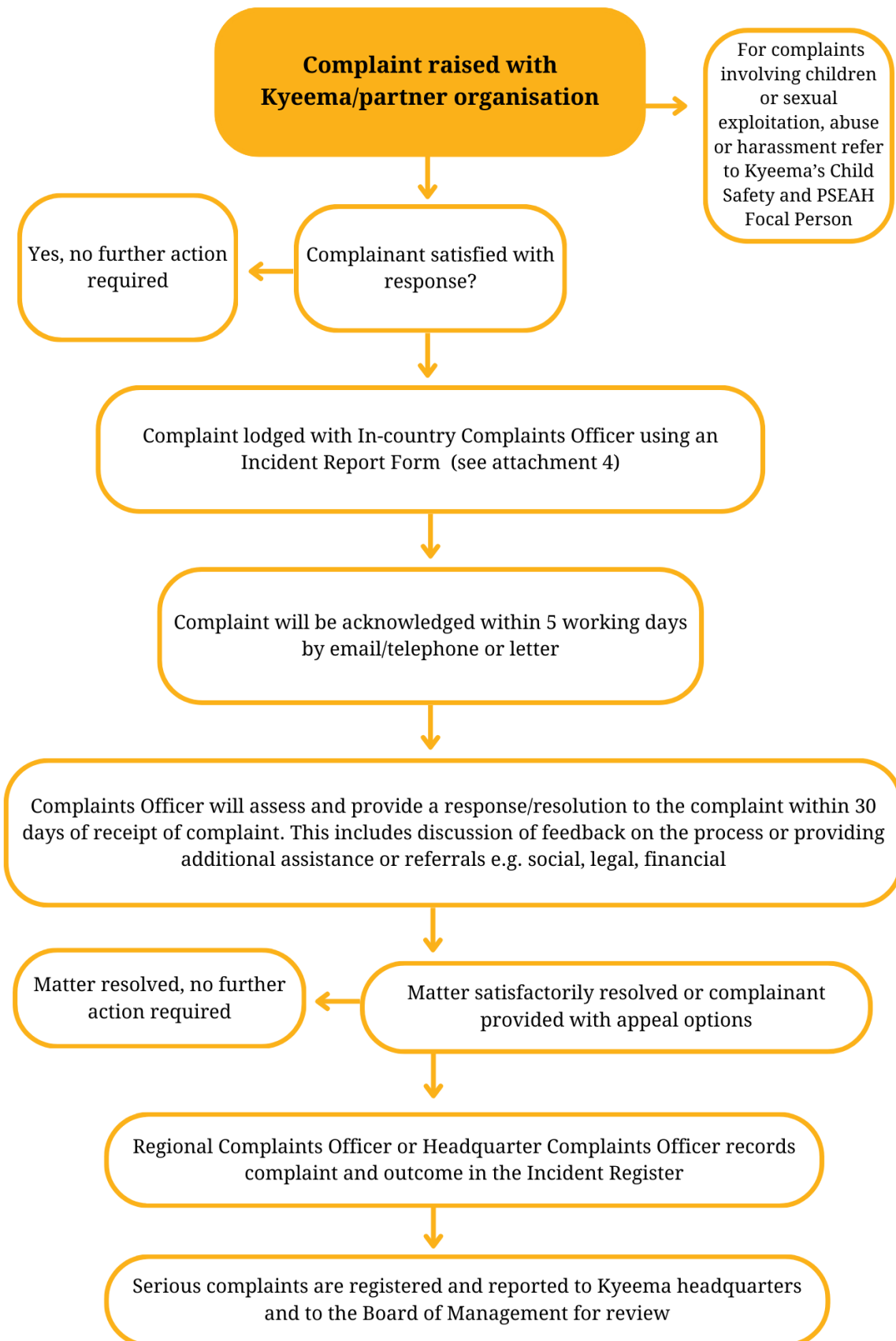
- Summary of follow up
- Organisations involved
- Date of resolution
- Kyeema Board of Management advised YES/NO
- Review by ACFID YES/NO

Training

New staff will be provided with the policy as part of their induction to the organisation. The policy will also be available for all staff on a nominated share drive and placed on Kyeema's website.

Training and/or communication will also be provided following an update or change to the policy.

Attachment 2 Complaint Handling Flow Chart





Attachment 3 Complaints Reporting Template

Complaints Reporting Template for Board of Management

Date of Board of Management Meeting...../...../.....

Were there any complaints of any nature made to anyone? Yes/No

Summary of details of the complaint.

Has the complaint been resolved satisfactory? Yes/No

Summary of action.

Is any further action required to resolve the complaint? Yes/No

Summary of further action required.

Signature:

Name:

Complaints Officer Australia

Date/...../.....

Signature:

Name:

Complaints Officer Africa

Date/...../.....

Has the Complaint Register been kept up to date? Yes/No

CEO signature:

Name:

Date/...../.....

Attachment 4 Kyeema Foundation Incident Report Form

Date of incident	
Reported by	
Type of incident	
Brief description of the incident	
Is the incident notifiable	
Location of incident	
Individual/s involved (if appropriate to reveal)	
Details of any issues (injuries, losses, etc.)	
Corrective actions	
Responsible person	
Completion date	
Wrap-up remarks	

An **incident** means a complaint, an allegation/report of fraud or impropriety, a health/safety incident, or an external event, which has the potential to adversely affect the core business of Kyeema Foundation. All such incidents must be reported without delay using this form and, from the outset, this form must be placed on the RPC Incident Register file. If space is insufficient, include details on a separate attachment.