



## COMPLAINTS POLICY & PROCEDURES - General

### 1. PURPOSE AND SCOPE

ADRA New Zealand recognises the importance and value of listening and responding to concerns and complaints about the organisation, its work or its personnel. ADRA New Zealand is committed to an effective complaint handling procedure that reflects the needs, expectations and rights of complainants and provides the mechanisms for complaints to be addressed in an efficient, fair and timely manner. This policy and the following procedures are intended to ensure that ADRA New Zealand has full accountability to its stakeholders by providing a responsive, fair and timely mechanism for responding to concerns or complaints. This policy is intended to encourage all stakeholders to disclose any unethical conduct they become aware of and will allow ADRA New Zealand to rectify its mistakes.

### 2. POLICY STATEMENT

#### A. Complaints Officers

ADRA New Zealand's ADCOM will designate a person to act as the Complaints Officer. This person will be responsible for the implementation of this policy and procedures and for handling any complaints brought against ADRA New Zealand. The Complaints Officer will also be responsible for developing training materials for ADRA New Zealand and its partners and for providing guidance and support as requested to staff and volunteers from ADRA New Zealand or its partners regarding the implementation of these policies and procedures.

#### B. What can be complained about?

The key areas of possible complaint may include, but are not limited to, the items below. These items are defined more fully in Appendix 1 at the end of this document.

- Inappropriate conduct of ADRA New Zealand Personnel
- Inappropriate conduct of other stakeholders involved in programs
- Infringements of privacy
- Fraudulent acts
- Discrimination
- Harassment
- Bullying
- Child abuse

#### C. Who can make a complaint?

ADRA New Zealand will receive complaints from –

1. ADRA New Zealand Personnel. (*Refer to Complaints Policy and Procedures – Personnel*)
2. Personnel from one of ADRA New Zealand's partner organisations.
3. Any stakeholders affected by ADRA New Zealand funded projects/programs.
4. Any supporter, donor or volunteer of ADRA New Zealand.
5. Any member of the public with a concern about ADRA New Zealand.



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#### D. ADRA New Zealand Personnel

Complaints by ADRA New Zealand Personnel that are about a workplace relations issue between two or more staff members should be first addressed by the concerned staff member(s) through ADRA New Zealand's Complaints Policy and Procedures - Personnel. Only when these procedures have been exhausted without a satisfactory result should ADRA New Zealand Personnel seek to address a workplace relations issue through the general Complaints Policy. Other types of complaints, such as fraudulent acts or failure to comply with policy, that have been identified by an ADRA New Zealand staff member may be addressed directly through the process outlined on page 6 below.

#### E. Making a complaint

Complaints should be directed to the ADRA New Zealand Complaints Officer who can be reached in the following ways:

- a. Email to [complaints@adra.org.nz](mailto:complaints@adra.org.nz)
- b. Mail to  
ADRA New Zealand Complaints Officer  
ADRA New Zealand  
124 Pah Road  
Royal Oak, 1345
- c. Telephone on +64 9 625 0880 and ask for the Complaints Officer
- d. Through a private and confidential interview with a visiting ADRA New Zealand staff member who will document the complaint and forward it immediately to the ADRA New Zealand Complaints Officer
- e. Writing down details of the complaint and giving it to a staff member of the project implementation partner who should immediately forward the complaint to ADRA New Zealand and the ADRA New Zealand Complaints Officer. (See Annex 1 for an example form).
- f. Direct request to the Complaints Officer.
- g. More Child friendly complaint handling techniques are in Appendix 3.

#### F. Making safe complaints

ADRA New Zealand undertakes that complaints will be treated in strictest confidence. ADRA New Zealand undertakes that persons making a complaint will not experience discriminatory treatment or retribution by ADRA New Zealand as a result of making the complaint. People who make complaints may choose to give their personal information or they may wish to remain anonymous. ADRA New Zealand Personnel talking to communities and other stakeholders must make it clear that there is no obligation to provide personal information. However, if people wish to be informed of the outcome of their complaint they will need to provide their contact details. Also, ADRA cannot take disciplinary action against employees on the basis of anonymous complaints.



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### G. Timeframe in managing the complaint

ADRA New Zealand undertakes to, as far as possible, investigate all complaints and have a draft response within 1 month from the date of receipt of the complaint. Where an investigation requires more time and ADRA New Zealand needs to revise the timeframe they will, where possible, inform the parties who have made the complaint.

### H. How ADRA New Zealand will manage the complaint

All complaints will be taken seriously. The complaint may be dealt with internally or externally. Where appropriate, ADRA New Zealand may seek more information from people who have made the complaint, the partner organisation involved or other stakeholders. If the Complaints Officer decides it is not possible to resolve the complaint within ADRA New Zealand, they may refer the complaint to external processes such as mediation, or statutory complaints handling bodies. Where possible, the person who has made the complaint will be advised in writing of the reasons for this decision, and of the proposed strategy for dealing with the complaint. The overall process will generally be the following:

- The Complaints Officer and Chief Executive Officer (CEO) will review the materials supporting the complaint on hand and determine the appropriate manner of investigation.
- The Complaints Officer and CEO will decide whether they will investigate the misconduct themselves, delegate to another person more appropriate, or form a committee of investigation.
- The Complaints Officer and CEO are to determine what resources are needed for the investigation and secure access to those resources including the assistance of other employees or external professional help (including lawyers, accountants, forensic analysts or operational experts). Where the complaint involves fraudulent acts, the Complaints Officer should refer to the procedures outlined in ADRA New Zealand's Corporate Fraud Policy.
- The Complaints Officer will prepare an Investigation Report and forward to the CEO. The CEO has final responsibility for the resolution of the complaint.
- The CEO will then write to the parties involved to identify the findings of the investigation and notify the resolution to all those involved.
- The CEO will provide a summary of the issue and resolution to the Board.

### I. Outcomes of the investigation of the complaint

The outcomes of the investigation of the complaint may be;

- Change in policy and/or procedures; if required,
- Personnel training, counselling and/or disciplinary actions;
- Reports to relevant authorities and potential legal action if crimes are alleged;
- Further investigation if systemic problems are revealed,

### J. Monitoring

The Complaints Officer and CEO will continue to monitor the environment under which the complaint occurred until recommendations have been implemented. Feedback on the process will be sought from the parties to identify where any improvements can be made. Complaints will be monitored over time to identify if any trends are emerging that indicate further action is required.



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**K. Compliance with CID Code of Conduct**

ADRA New Zealand is a member of the Council for International Development (CID) and adheres to their Code of Conduct. If a complaint relating to ADRA New Zealand's compliance or non-compliance with the CID Code of Conduct is not resolved satisfactorily by ADRA New Zealand, then the complainant is encouraged to raise the matter with CID. The process for making a complaint to CID can be found on their website at <https://www.cid.org.nz/make-a-complaint>

**L. International Program Partners and Complaints**

To ensure continuity between ADRA New Zealand and its major stakeholders, ADRA New Zealand includes a requirement in all partner agreements with overseas and local partners that they have an appropriate Complaints Policy consistent with ADRA New Zealand's.

**3. RELATED POLICY**

Complaints Policy and Procedures – Personnel

Workplace Relations Policy

Fraud and Anti-Corruption Policy

Privacy Policy



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## **Appendix 1. Definitions**

**Fraudulent Acts** may be defined as, but are not limited to:

- Impropriety in the handling or reporting of money or financial transactions.
  - Misappropriation of funds, supplies, or other assets (e.g. use of agency vehicles for personal purposes such as shopping by individuals not entitled to do so).
  - Profiteering as a result of insider knowledge of agency activities.
  - Disclosing confidential and proprietary information to outside parties.
  - Misrepresentation in a job application (e.g. falsifying qualifications or credentials).
  - Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the agency.
  - Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or any similar or related irregularity.
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- **Discrimination** means treating a person or group of people less favourably than another person or group, or causing them disadvantage on the basis of any of the following grounds; Gender (including pregnancy or potential pregnancy and childbirth); Marital status; Race (including colour, nationality, ethnic or ethno-religious origin); Sexuality (including sexual preference, transgender status or homosexuality); Age; Marital status; Family status; Religious belief; Political opinion; Disability; Ethical belief; or Employment status.

**Harassment** is uninvited or unwelcome behaviour that offends; intimidates; humiliates or targets another person, whether or not that effect is intended.

**Bullying** is repeated, and unreasonable behaviour directed towards a person or group of people, that creates a risk to health and safety which is not reasonable management action. Repeated behaviour refers to the persistent nature of the behaviour and can involve a range of behaviours over time. Unreasonable behaviour includes behaviour that a reasonable person may see as victimising, humiliating, belittling, intimidating or threatening.

**Infringements of Privacy** are any act by ADRA New Zealand that breach with all the requirements of the New Zealand Privacy Act 1993.

**ADRA New Zealand Personnel** are the organisation's employees, volunteers, contractors and Board of Trustees.



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**Appendix 2: Complaints Record Form**

All complaints should be recorded on a separate form. Forms should then be saved in one central, safe and secure location. People may submit a complaint on another piece of paper or they may give a verbal complaint to a staff member. The staff member should then write that complaint on this 'Complaints Record Form' and submit it to the appropriate person.

<b>Date:</b> Date complaint is received	
<b>Staff member/volunteer who received the complaint:</b> Which staff member or volunteer first heard or collected this complaint?	
<b>Personal details of complainant (person making the complaint):</b> Name, contact details, if appropriate. If the complainant wishes to remain anonymous, no detail is to be recorded here.	
<b>Nature of complaint:</b> What issue is this complaint related to?	
<b>Details of complaint:</b> A detailed description of the complaint the person has made	
<b>Who dealt with it:</b> Name of person who is or has responded to the complaint	
<b>How it was dealt with:</b> Action taken to handle the complaint	
<b>Outcome:</b> Outline of what has happened as a result of the complaint	
<b>Follow-up required:</b> Any action required as a result of the complaint. This may include a change to your organisation's procedures and policies	

**Written by:**

**Viewed by (Complaints Officer and CEO):**

**Name**

**Signature**

**Name**

**Signature**



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### Appendix 3: Guide to a Child Friendly Complaint Handling Processes

There is a need for an approach, that allows children the means to appropriately voice a complaint and for ADRA New Zealand to develop appropriate ways to listen, to be more responsive and accessible for children.

#### GUIDELINES

Children communicate in a different way to adults and need to know that:

1. the complaint is treated with respect
2. the process is clear and accessible for children
3. the procedures are responsive and flexible
4. there is an advocate available
5. there will be action taken and received with

The main elements of the child friendly mechanism is access and response, here are some suggestions that can facilitate this:

- It's important to ensure that complaints can be made in a number of different ways (face-to-face, telephone, online, in writing).
- Allow complaints to be made anonymously when complainant sends it through a friend or the beneficiary reference group
- Children and young adults feel more comfortable with face-to-face complaints, and are heard by someone with a respectful and patient person.
- Make sure the child or young person's comments are wanted and ensure a relaxed open environment
- Telephone/email complaint mechanism should have someone answering them immediately.
- Make sure the person dealing with the child or young person's complaint is an active listener who is helpful, understanding and responsive.
- Make sure that you respond to the child or young person as soon as possible, even just to acknowledge receipt of the complaint.
- Give the child or young person the option to choose how and whether they will be kept informed of the progress of their complaint.
- Let the child or young person choose how often they would like to be kept up to date.

#### PARTNERS

- Have a complaints officer who is appropriately trained to facilitate child friendly complaint handling procedures and to raise awareness with local community stakeholders and children of the procedures and how to implement them.
- Local staff have trainings in the proposed child friendly processes and procedures, interviewing children, facilitating feedback sessions with children and adults and recording of complaints. Regular refresher trainings, meetings are also held with them from time to time to equip them with new skills and share experiences.
- Ensure a conducive environment that guarantees confidentiality of any complainant.