



## Complaints Policy

### 1. Purpose

This policy provides guidelines to ensure a fair and timely process for responding to concerns or complaints and encourage all stakeholders to disclose any unethical conduct they observe.

Our complaints handling procedures are specifically designed to be child-friendly. We prioritize privacy, safety, and dignity throughout the process. Children are encouraged to express their concerns in a supportive environment, and we ensure that complaints are addressed promptly and effectively.

### 2. Scope

This policy applies to CFC ANCOP Australia Ltd. (referred to as ANCOP within this document) leadership and members, as well as our partners, volunteers and recipients.

### 3. Definitions

**Complaint** - Any grievance, suspicion, allegation, concern or report about an incident or someone's behaviour; this includes whistleblower complaints.

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

**Victim/Survivor** - a person who is, or has been, sexually exploited, harassed or abused.

**Partners** - Individuals or organisations that ANCOP works with to deliver humanitarian and development programs or activities; this includes their downstream partners.

**Perpetrator** - a person (or group of persons) who commits an act of sexual exploitation, abuse and harassment or other types of crime or offence.

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

- Inappropriate handling or reporting of financial transactions.
- Misappropriation of funds, supplies, or other assets/resources.
- Disclosing confidential and proprietary information to outside parties.
- Falsifying information, qualification or credentials.
- Accepting/seeking favours or material things from contractors, vendors, or persons providing services/materials to the organisation.
- Destruction, removal, or inappropriate use of records, assets, resources and/or any similar or related irregularity.

**Discrimination** – when someone is treated less favourably based on sex, race, religious belief, marital status, pregnancy, disability, age, sexual orientation.

**Harassment** – unwanted and discriminatory behaviour that offends; intimidates; humiliates or targets another person.

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Victimisation - when a person is threatened or harmed for discriminatory reasons.

Vilification - a public act that could incite or encourage hatred, contempt or severe ridicule towards a person or group for discriminatory reasons.

Bullying - inappropriate, unreasonable and aggressive behaviour that is usually repeated, and which creates a risk of physical and /or psychological harm.

#### 4. Roles and responsibilities

4.1 The Safeguarding Officer is responsible for:

- The implementation of this policy and handling of complaints brought against ANCOP.
- Providing guidance and support to members, volunteers and partners regarding the implementation of this policy.

4.2 President, Management Committee, Department Heads and Partners are responsible for:

- Ensuring this policy is upheld.
- Informing the Board of any concerns and updates relating to this policy.
- Ensuring their teams and volunteers are aware of and understand their responsibility and accountability to this policy.
- Ensuring practices, plans and operations/procedures align with this policy.

4.3 ANCOP members and volunteers are responsible for:

- Understanding and following this policy and related procedures.

#### 5. Policy Commitments

Our commitments are grounded on the following CFC ANCOP Australia guiding principles:

- Our mission to help end poverty, promote justice and uphold dignity.
- Our Code of Conduct stating that our programs and services will have a commitment to the following:
  - a. Ability to maintain public trust and confidence in the integrity and professionalism of the programs and services to the community.
  - b. Personal and professional behaviour of working towards the best possible standards of service to the community, following ANCOP policies and procedures. Volunteers shall not behave in any way that may cause offence or embarrassment to the organisation, members of the public or other volunteers.
  - c. Reporting of serious offence – volunteers must report any charges and convictions relating to a serious sex or violence offence in writing to the president within seven days of charges being laid.
  - d. Offences -volunteers who commit serious offences, break the rules as outlined in the Code of Conduct and the CFC ANCOP Australia Ltd’s Policy and Procedures, or perform poorly will be dealt with promptly and fairly.

5.1 What can be raised as a complaint?

Any abuse, safety-related misconduct or inappropriate conduct of any ANCOP leader, member, volunteer or program partners and external stakeholders, that may include and not be limited to:

- Infringements of privacy
- Fraudulent acts
- Discrimination
- Harassment
- Victimisation
- Vilification

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- Bullying
- Abuse
- Breach of ANCOP code of conduct

**Note:** Complaints will include whistleblowing and a referral process (see Section 5.5 below) in case alleged incident is committed by another organisation or an individual not connected with ANCOP.

## 5.2 Who can raise a complaint?

- Any ANCOP leader, member, volunteer, partner.
- Internal and external stakeholders affected by ANCOP projects and programs.
- Any member of the public who may have a concern with ANCOP.

## 5.3 How to Raise a Complaint

CFC ANCOP Australia Ltd, has a Complaints Handling Policy which outlines the roles and responsibilities, approaches to dealing with different types of complaints, reporting obligations and record keeping requirements. There are clear procedures that provide step-by-step guidance on the response and action to be taken for different types of complaints, including:

- breaches of Codes of Conduct;
- disclosures, allegations, or concerns of current abuse of a child;
- an adult bringing forward a complaint of abuse suffered as a child; and
- an adult bringing forward a complaint of current or past abuse experienced as an adult.

CFC ANCOP Australia Ltd, acknowledges that power imbalances may exist between the complainant and respondent and has strategies in place to address this.

CFC ANCOP Australia Ltd, has responsibilities in relation to handling complaints and when procedures are enacted. Any form of abuse, complaints, incidents, allegations, disclosures, concerns and referrals are recorded, and confidential information is stored, protected and retained according to the Privacy Act, and at least 10 years.

- Accessible contact points as well as a Complaint form are available on our website <https://cfcancop.org.au/>
- E-Mail: [complaints@cfcancop.org.au](mailto:complaints@cfcancop.org.au)
- All reports are treated as “Confidential”

## 5.4 Managing Complaints

### 5.4.1 Receiving and recording

- Use the Complaint Form in Annex 1.
- ANCOP protects personal information as per ANCOP Privacy policy. This will prevent discrimination or retribution as a result of the complaint. Personal information considered or recorded will respect the privacy of individuals involved unless there is a risk to someone’s safety. Whistleblowers are also protected and supported throughout the reporting and investigation processes.
- Where applicable, whistleblowers and those affected by sexual exploitation, abuse and harassment (SEAH) will have the option to raise an anonymous complaint.
- Seek from the complainant the resolution/outcome they are expecting. Inform them that the complaint will receive full attention and give an estimated date by which ANCOP will provide an update.

### 5.4.2 Escalation and Reporting

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- CFC ANCOP Australia Ltd, commits to an initial risk assessment if a complaint of abuse is received, to identify and minimise any risk to children and adults.
- Ongoing risk assessments are conducted throughout investigation processes. Complainants are responded to promptly and kept informed as to the progress of dealing with their complaint.
  - Trauma-informed and victim-centred support and care is offered to any child or adult who has experienced or is alleging abuse.
  - Prioritise complaints that are urgent, with safety implication, or those that can potentially and quickly escalate into a critical issue for the individual, the organisation or the public.
  - If immediate danger is present, refer complaints to statutory authorities – e.g. the police, child protection or 000. Refer alleged SEAH incidents that involve a criminal aspect to the correct local law enforcement channels where it is safe to do so and is in accordance with the wishes of the victim/survivor.
- Refer to the ANCOP Safeguarding Policy for reports of abuse/exploitation of individuals under the age of 18 years.
- Escalate complex and/or major complaints to the President.
- Complaints will be reported during Management Committee meetings. An appropriate trend analysis will be included where applicable.

#### 5.4.3 Investigation and Decision

- The Safeguarding Officer will:
  - review information of the complaint and determine the appropriate manner of investigation.
  - involve the victim/survivor in the process and updates of investigation, and where possible in decision making and final outcome.
  - decide whether ANCOP will investigate the misconduct themselves, delegate to a more appropriate person/authority, or form a committee.
  - determine resources needed for the investigation and secure access to such, which may include assistance of other employees or external professional help (e.g. lawyers, accountants, operational experts, etc).
- The Safeguarding officer will prepare an investigation report and forward to the President, who has the final responsibility for the resolution of the complaint.
- The President or the Safeguarding officer will then write to the parties involved regarding findings of the investigation and the outcome/resolution.
- In our decision we will advise that if a complainant is not satisfied, we are prepared to consider any additional information they may provide and to review our decision. Decisions on serious complaints may be referred to our governing board.
- The President or the Safeguarding officer will close a complaint and store all documentation in ANCOP's Office 365 Suite.

#### 5.4.4 Corrective action for validated breaches

- Corrective action may be in the form of:
  - Change in policy and/or procedure (if required)
  - Personnel training, counselling and/or disciplinary proceedings
  - Reports to relevant authorities and potential legal action if crimes are alleged
  - Further investigation if systemic problems are revealed.
- Offer support to the complainant/victim/survivor. This may include counselling, medical, social, legal and financial assistance, or referrals to such services.

#### 5.4.5 Monitor implementation of recommendations/remedies.

- The Safeguarding officer and relevant managers will continue to monitor the environment under which the complaint occurred until recommendations have been implemented.

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- Feedback on the process will be sought from affected parties to identify opportunities for improvement. Complaints will be monitored over time to identify emerging trends which would indicate that further action is required.

#### 5.5 Inquiries, minor or out of jurisdiction complaints

- Some complaints may not warrant an investigation. In case of a misunderstanding or insufficient information, provision of the required information may immediately satisfy the complainant. The complaint thus becomes an inquiry and can be recorded as such.
- Some complainants just need to be listened to, understood, respected and, where appropriate, provided with an explanation and apology. The appropriate form and method of apology will depend on the circumstances of the case and the desired outcome. Effective apologies generally include the following: recognition of the wrong, acceptance of responsibility, sincere remorse/request for forgiveness, proposed action to address the grievance/mitigate the harm and a promise not to repeat.
- A complaint may be outside the jurisdiction of ANCOP due to:
  - an action of another organisation or of an individual not connected with ANCOP
  - a matter that must be dealt with and reported to police or other authorities – i.e. notifiable matters that involve criminal offences like assault, theft or severe damage to property.
  - civil matters such as defamation.

For out-of-jurisdiction complaints, basic information must still be recorded in the complaint form. Then in the Outcome/Decision section, indicate where or to whom the matter will be referred to.

## 6. On-going Education and Training

CFC ANCOP Australia Ltd are trained and supported to implement the safeguarding policies and procedures.

Volunteers are provided regular education and training on safeguarding policies and procedures.

An induction and refresher Safeguarding of Children and Adults training that covers:

- Code of Conduct;
- Safeguarding risk management;
- Safeguarding Policy and procedures;
- Complaints Handling Policy and procedures;
- Reporting obligations; and
- e-safety training.

Records are maintained to ensure all personnel attend induction training and participate in refresher safeguarding training at least every three years. All volunteers with specific safeguarding responsibilities will receive ongoing support and professional development relevant to their role.

Volunteers are supported to recognise the nature and indicators of child abuse, including harmful behaviours by a child towards another child.

- Education and training programs include materials addressing factors that may place children at risk of abuse, building knowledge to:
- understand the nature and impact of child abuse;

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- understand the nature, factors, and impact of institutional abuse;
- identify risk factors, such as grooming behaviours; and
- understand, identify, and respond to abusive behaviours by a child towards another child.

## 7. Communication, Monitoring and Review

- All ANCOP leadership, members, partners and volunteers are made aware of this policy through ongoing induction.
- ANCOP policies are available and accessible on our website <https://cfcancop.org.au/>.
- This policy is reviewed every three years using feedback from members, partners and program recipients to continuously improve on content and implementation.
- An independent review of the effectiveness of ANCOP complaint policy is recommended every 5 years.

## 8. References

ANCOP Code of Conduct  
 ANCOP Safeguarding Policy  
 ANCOP PSEAH Policy  
 ANCOP Privacy Policy  
 ACFID Code of Conduct

## 9. Revision History

Version	Approval Date	Summary of Changes
V1.0	May 2024	Original policy
V2.0	October 2024	

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**Annex 1 Complaint Form**

Record one complaint per form. Complaints written on another sheet of paper or verbally raised must be documented on this Complaint Form by person receiving. *Use and attach additional sheets as needed.*

Date complaint received		Complaint received by	
Complainant personal details:  a.) If complainant wishes to remain anonymous, leave section blank.  b.) If complainant is a child (below XX yrs. old), get details of the parent/guardian.	Name: _____  Age: _____  Contact details : _____ _____  Parent/Guardian details (as applicable): _____ _____		
Type of complaint	<input type="checkbox"/> Suggestion/feedback <input type="checkbox"/> Matter of concern <input type="checkbox"/> Allegation <input type="checkbox"/> Property damage or theft <input type="checkbox"/> Code of Conduct compliance breach <input type="checkbox"/> Drug/ alcohol related <input type="checkbox"/> Accident or Near-miss Other: _____		
Complaint in brief	Additional pages or supporting information attached? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Resolution Sought			
Investigation and actions taken to manage complaint			
Outcome/Decision summary	<input type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory  Referred to (if outside of ANCOP's jurisdiction) : _____ _____		
Closure Date		Authorised by	

Any follow-up action(s) required	
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