

## **THPA COMPLAINTS HANDLING POLICY**

Policy Name	THPA Complaints Handling Policy
Policy Owner	THPA Risk, Compliance and Operations Manager
Approved By	THPA National Board
Version Date	October, 2024
Version Number	4
Next Review date	2027
Review Period	3 Years

### **1. POLICY STATEMENT**

The Hunger Project Australia (THPA) is committed to openly receiving complaints from anyone, particularly those most vulnerable. We provide ways to make a complaint that are accessible, simple, and safe.

THPA commits to listening and responding to all concerns and complaints raised. All complaints will be handled quickly, fairly, effectively, and courteously. In doing so, THPA is committed to ensuring the rights of the complainant are protected, as are those of the staff who receive complaints or who may be the subject of a complaint.

THPA will ensure that all stakeholders and interested parties are aware of their right to make a complaint by having this Complaints Handling Policy and Procedure easily accessible on the website and shared with our Program Partners.

This policy aligns and works alongside our THP Code of Conduct.

THPA has zero tolerance for sexual exploitation, abuse and harassment (SEAH) of any kind. THPA's approach to SEAH is victim-survivor centred, prioritising the safety, dignity and wishes of the victim-survivor at all times. Any SEAH complaint will be managed in accordance with THP's Safeguarding, Anti-Trafficking and Child Protection Policy, and reported to relevant authorities as required by Australian Laws and in accordance with DFAT's requirements. SEAH complaints will be immediately escalated to the National Board. THPA is committed to meeting its obligations as a signatory to the ACFID Code of Conduct.

THPA is committed to fostering a culture of transparency and accountability and does not tolerate retaliation against any person who, in good faith, reports a concern or suspected wrongdoing. Eligible whistleblowers are protected under the Corporations Act 2001 (Cth) and may submit reports anonymously in accordance with THPA's Whistleblower Policy. All whistleblower disclosures will be handled confidentially, investigated promptly and impartially, and reported to the relevant authorities where required by law.

### **2. POLICY PURPOSE**

The purpose of this policy is to give structure and direction to THPA's complaints handling procedures. Under this policy, we endeavour to:

- provide an efficient, fair, accessible and easily understood framework for receiving and responding to the stakeholder and interested parties' complaints and feedback;
- provide a safe and discrete point of contact for stakeholders and interested parties in Australia and countries where work is conducted, to raise concerns or lodge complaints;
- provide information to all stakeholders and interested parties, including to members of the communities where activities are implemented, about the complaints procedure;
- provide information in a clear and easily understandable manner in appropriate forms through varying media avenues; and
- establish a process for analysing complaint information within the organisation to implement improvements within organisational processes and practices.

### 3. **SCOPE**

The below groups are expected to comply with the principles, processes and reporting requirements specified in this policy.

- THPA National Board Members
- THPA Staff and Volunteers
- THPA Youth and Development Board Members
- THPA Contractors

### 4. **REFERENCES**

- THPA Privacy Policy
- THP Code of Conduct
- THP Whistleblower Protection Policy
- THP Safeguarding, Anti-Trafficking and Child Protection Policy
- THP Financial Integrity Policy

### 5. **DEFINITIONS**

**Complaint** means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected. Complaints include general complaints or sensitive complaints.

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

**Feedback** means opinions, comments, suggestions, and expressions of interest in the products or services of the organisation.

**General complaint** means a complaint from anyone who has observed, heard about, or been directly affected by the actions of THPA or our partners, or who believes that THPA or its partners have failed to meet a specific commitment or obligation.

**Sensitive complaint** means a Complaint that needs to be treated urgently and confidentially by a senior member of staff within the organisation. A sensitive complaint can be made by anyone who has observed, heard about, or been directly affected by the actions of THPA or its program partners. Sensitive complaints may include bullying and harassment between employees, or unlawful discrimination.

**Whistleblower complaints** means a complaint about wrongdoing such as fraud, corruption, abuse, misuse of resources, risks to health and safety etc. This may also be a sensitive complaint.

**Stakeholder or interested party** means a person or group having an interest in the performance or success of the organisation.

**THPA** means The Hunger Project Australia

## 6. PRINCIPLES

- a. **Accountability** – we are accountable for the actions and decisions taken by staff with regards to complaints handling and reporting on actions or resolution of complaints. Staff will receive training on the Complaints Handling Policy and Procedure.
  - b. **Confidentiality** – to support people to feel safe to report a complaint, all complaints will be handled in a confidential manner where it is practicable and appropriate to do so. This means your identity (your name and other details) will not be shared, where possible and appropriate. Complaints may be made anonymously; however, this may affect our ability to respond to the complainant or to further investigate. Sometimes we may need to share some information with other parties. Confidentiality means we share with the minimum number of people, and only with people who need to know ('need-to-know' basis).
  - c. **Accessibility** – we ensure that there are various ways by which to make a complaint, and no fees will be charged to do so. We work with our Program countries and partners to ensure that complaints can be made in ways that are safe and easily accessible while being mindful of local context, culture, and language.
  - d. **Responsive** – THPA responds to all complaints promptly and takes action where required. We respond to complaints according to how urgent or serious they are. If somebody's safety or security is at risk, we will respond immediately and will escalate appropriately.
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- e. **Fair** – we prioritise the safety, rights and wishes of all people whilst upholding procedural fairness to all parties. We will ensure that the person handling a complaint is different from any employee who is the subject of, or involved in, the complaint.
- f. **People focused** – we provide information in a clear and easily understandable manner in appropriate forms and media to be as accessible as practicable. We especially recognise the needs of those who are vulnerable or may be victims/survivors of harm. We will provide the complainant with information about how we handle complaints. We will treat the complainant with dignity and respect, actively involve the complainant in decision making, provide the complainant with comprehensive information, protect the complainant’s privacy and confidentiality and, where required, assist the complainant to access other support services.

## **7. WORKING WITH PARTNERS**

THPA currently funds the delivery of development activities with other Hunger Project entities as our Program Partners across Africa and South Asia. THPA does not operate directly in these regions. In those countries, complaints will be managed as follows:

- a. Where THPA directly funds a project or program, either in whole or partially, we confirm that the THP Program Country office has complaints handling processes that are accessible and communicated to community partners, staff, volunteers and investors. The complaints handling processes must as a minimum require that:
    - I. any material complaints are referred to our colleagues at The Hunger Project Global Office (Global Office) for their consideration and input;
    - II. if the complaint is related to the programs or projects that THPA funds or to the THP Program Country office staff generally, the THP Program Country office must notify THPA at the same time as Global Office and keep THPA updated on the progress; and
    - III. complainants be informed of the resolutions in writing, where appropriate.
  - b. THPA will work with the complaints handling processes of Global Office to ensure that complaints are handled in a fair, transparent and responsive way and that processes are accessible and communicated to staff, volunteers, investors and community partners, and that complaints are referred back to us where appropriate.
  - c. We will have regular discussions with Global Office and THP Program Countries to monitor reports of complaints and understand the nature of complaints and resolutions as part of our ongoing monitoring and evaluation processes.
  - d. THPA will approach our discussions with Global Office and THP Program Countries in a transparent, open and cooperative manner.
  - e. As per THP’s Whistleblower Protection Policy, anyone, whether affiliated or not affiliated with The Hunger Project, in every country where we work may file an anonymous report using the external whistleblower hotline: [www.TheHungerProject.ethicspoint.com](http://www.TheHungerProject.ethicspoint.com).
  - f. THPA will share complaints received and resolutions about THPA or our staff that are relevant to the programs or projects we fund with Global Office and Program Countries.
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## **8. COMPLAINTS PROCESS**

### **a. Making a complaint**

- I. Complaints can be made by anyone, including individuals and organisations, that relate to any aspect of our work. Complaints to THPA can be made in person to any employee, or via phone, letter, email, or social media. We will respond in a timely manner to all complaints made verbally or through other channels such as email or social media. Contact details are listed in Annexure 1.
- II. Complaints should include the name and contact details of the complainant, noting that anonymous complaints will be accepted but may limit the ability of THPA to report on the outcome of the complaint or undertake further investigation. Complaints should also set out the basis of the issue/ incident, including all relevant details (names, locations, times, actions). Relevant supporting evidence may also be included in the complaint lodging.
- III. Complaints that relate to incidents of Safeguarding and Child Protection or Financial Misconduct, will comply with processes as per THP's Safeguarding, Anti-Trafficking and Child Protection Policy or THP's Financial Integrity Policy including investigation and reporting requirements.
- IV. As per THPA Whistleblower Policy, any eligible whistleblower outlined in the policy may submit an anonymous report in accordance with the procedures described therein.
- V. When managing and investigating a complaint, THPA commits to following fair, transparent, and responsive processes as outlined in the THPA Complaints Handling Procedure which is in clause 8.3 of this Policy.

### **b. Types of Complaints**

#### **I. General Complaint**

A General Complaint includes but is not limited to:

- Funding and program decisions;
- Program implementation;
- Fundraising and supporter services;
- Conflict of Interest issues;
- Employment issues including complaints or concerns about:
  - Safety or security within the work environment
  - Unethical behaviour associated with organisation changes
  - Unfair or unjust employment conditions

In relation to workplace complaints, THPA supports a culture of speaking up. If a Complainant has a complaint about employment issues, they should first speak with their manager (if appropriate) or the Risk, Compliance and Operations Manager. If a complainant feels that their complaint is not being heard, has a Whistleblower

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Complaint or the complaint relates to the manager to whom they would otherwise report the complaint, it may be appropriate to escalate it in line with this policy.

## **II. Sensitive Complaint**

A Sensitive Complaint includes but is not limited to:

- Corruption
- Theft
- Fraud
- Misuse of funds
- Exploitation
- Abuse
- Harassment
- Bullying
- Discrimination
- Misconduct
- Negligence
- Any other abusive or inappropriate behaviour by our personnel, partners or those involved in our work in-country.

## **III. Whistleblower complaint**

Please see the THPA Whistleblower Policy for more information on whistleblower complaints.

## **9. COMPLAINTS MANAGEMENT PROCEDURE**

### **a. Making a complaint**

We will undertake an initial assessment of the complaint to inform how a complaint should be managed and appropriate action taken based on the following criteria,

- severity;
- health (including mental health) and safety implications;
- financial implications for the complainant, organisation or others
- complexity;
- impact on the individual, public and organisation;
- potential to escalate;
- systemic implications; and
- the need for, and possibility of, immediate action.

THPA will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately. If the initial

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assessment of the complaint determines that further investigation is not warranted, we will respond to the complainant and provide the reasons for this decision.

### **b. Complaint Referral**

Complaints will first be reported to the Risk, Compliance and Operations Manager for assessment and investigation. If the Risk, Compliance and Operations Manager is unable to resolve the complaint within 10 working days or deems it to be of a serious nature, it will be escalated to the Senior Leadership Team (SLT) for further management.

A member of the SLT will be responsible for the ongoing management of the complaint and decisions on serious complaints may be referred to the National Board if warranted. Sensitive complaints are always referred to the THPA CEO for consideration and will only be managed and investigated by senior personnel.

Complaints will be assigned to an appropriate person who is impartial with the authority to take action where necessary. For example, where a complaint involves the CEO, it will be directed to the Chair of the Board.

Where the CEO is the subject of a sensitive complaint, the complaint will be referred directly to the Chair of the Board, who will assume responsibility for its management and investigation.

### **c. Managing Complaints**

- I. Complaints are taken seriously and will be handled as quickly as practical. The needs and wishes of the victim or survivor will be the primary consideration in determining how the complaint will be managed. We will aim to resolve complaints within 60 days. If a complaint is not resolved within 60 days, we will let the complainant know and continue to keep them informed.
- II. Where they are not anonymous, we will inform Complainants of the outcome via email or other suitable platforms.
- III. Where this policy conflicts with legislation, THPA will comply with legislative obligations.
- IV. If complaints are made by the community members that our Program Partners work with, we will request that our Program Partners communicate decisions made and the resolution of complaints using appropriate language in writing, or orally where required.

### **d. Outcome of Complaints**

If a Complaint is upheld, the matter will be referred for appropriate disciplinary processes.

## **10. Recording Complaints**

It is important to record stakeholder and interested parties complaints in order to:

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- Track the status of a complaint
- Ensure accountability
- Identify and improve procedures and practice
- Enable data analysis and management reporting

THPA will record all complaints within the complaints register. Complaints will be de-identified at the request of the complainant or survivor. Details of the complainant will be recorded only if necessary, and such information will be treated confidentially to ensure protection.

In addition, any complaints that warrant significant structural, procedural or policy change will be included in the quarterly National Board report as soon as practicable and reported to The Hunger Project Global Office and Program Partners where relevant.

## **11. ROLES AND RESPONSIBILITIES**

Complaints will be managed as outlined below:

### **a. Risk, Compliance and Operations Manager**

- Has overall responsibility for the review and implementation of this policy,
- Ensure all complaints are addressed appropriately and ultimately resolved,
- Maintain documentation of all complaints received and how they were resolved, including any changes that may be required for delivery of service, processes, or policy.
- Inform the Senior Leadership Team of the resolution of all complaints and advise on changes required to be implemented in the delivery of service, processes, or policy.

### **b. Senior Leadership Team Members**

- Oversee that the Complaints Handling Policy is implemented and accessible to staff and partners,
- Advise the Risk, Compliance and Operations Manager of the nature of a complaint and any action taken/to be taken,
- Upon request of the Risk, Compliance and Operations Manager, review and investigate all serious or unresolved complaints,
- Where required, escalate complaints to the National Board.
- Ensuring that staff responsible for Grants Management support our Program Partners to understand this policy, monitor and evaluate complaint processes and escalate any reports of serious complaints as required.

### **c. Staff**

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- Responsible for receiving stakeholder and interested parties' complaints and feedback,
- Are to give priority to assist in the resolution of complaints. Staff will resolve minor verbal complaints where appropriate or refer more serious verbal or written complaints directly to their line manager,
- Responsible for recording the details of minor verbal complaints received and resolved in writing and updating their manager.

## 12. **REVIEW**

This Complaints Handling Policy will be reviewed every 3 years. However, a review may be mandated at any time when a need is identified due to changes in legislation, organisational changes, restructure or occurrence of an incident. As owner of the Policy, the Risk, Compliance and Operations Manager is responsible for the review prior to THPA National Board approval of any significant changes.

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## **ANNEXURE 1**

### ***THP Offices Contact Details***

Complaints can be lodged directly with the THPA office or with The Hunger Project Global (US). Contact details are listed below:

#### **Australian Office**

Mailing: GPO Box 2108 Sydney, NSW, 2001, Australia

Email: [thpaus@thp.org](mailto:thpaus@thp.org)

Phone: +61 2 9222 9088

Website: <https://thp.org.au/contact-us/>

#### **Global Office**

Mailing: Level 6, 110W 30th Street, New York, New York, 10001, USA

Email: [info@thp.org](mailto:info@thp.org)

Phone: +1 212 251 9100

Website: <http://www.thp.org/who-we-are/contact-us/>

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## **ANNEXURE 2 - THPA Complaints Board Escalation Protocol**

THPA's Complaints Handling Policy provides for serious complaints to be referred to the National Board for decision. A complaint will be referred to the National Board when any of the criteria below are met:

### **Immediate Escalation (within 24 hours):**

- Complaint involves the CEO or a Board member
- Safeguarding/child protection matter or sexual exploitation, abuse and harassment (SEAH)
- Financial misconduct/fraud (any amount)
- Immediate safety/security risk to staff or communities
- Legal action threatened or commenced
- Negative media attention likely or received

### **Next Board Meeting:**

- Whistleblower complaint (unless immediate escalation applies)
- Complaint requires policy change
- Systemic issue affecting multiple programs/partners
- Reputational risk to THPA
- Complaint from major investor/partner (>\$100K funding)
- Unresolved complaint after 60 days
- Pattern of similar complaints (3+ in 6 months)

### **Quarterly Summary Report:**

- All other complaints recorded in register
  - Policy/procedure improvements implemented
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