

COMPLAINTS POLICY

March 2020

Opportunity International Australia (Opportunity) seeks to be open and transparent in all aspects of its operation and is committed to resolving complaints in a respectful, timely and transparent manner. The purpose of this policy is to provide a mechanism that ensures all complaints are appropriately addressed.

For the purposes of this policy, a complaint is defined as an expression of dissatisfaction made to Opportunity about its products or services, its staff, volunteers, partners, contracted service providers or anyone acting on its behalf, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

A complaint may be made by a person to whom we deliver services or who is affected by our services, a partner, a local organisation we work with, our employees, interns, volunteers, work experience students, contractors or sub-contractors, donors or a member of the public.

REPORTING COMPLAINTS

Complaints should be directed to the Company Secretary, who is the nominated executive with responsibility for dealing with complaints, by phone on 02 9270 3300, by email to companysecretary@opportunity.org.au, or via letter to Opportunity. Complaints made to other Opportunity staff and volunteers must be referred to the Company Secretary at the earliest opportunity.

The Company Secretary will complete a Complaint Record form for all complaints received to capture the relevant details, actions taken and outcomes. A summary of all complaints will be recorded in the Complaints Register, kept by the Company Secretary to ensure they are dealt with efficiently and effectively and to monitor trends and foster organisational learning.

In the case of misconduct complaints, records may be de-identified at the request of the complainant or survivor. Allegations involving criminal sexual misconduct will be reported to the local enforcement authorities unless it is at odds with the wishes or welfare of the affected person, or it would pose a threat to the life or safety of another individual.

When a serious complaint is received, such as an allegation of sexual or financial misconduct or child safeguarding incidents, the Company Secretary will escalate the complaint at the earliest opportunity to the Executive Team who will collectively determine how to respond. The Board will be informed of the allegation and proposed action plan.

If a complaint is about a Director, the CEO or the Company Secretary, the complaint can also be made directly to the Chair of the Audit & Risk Committee who is on the Board of Directors by emailing auditriskchair@opportunity.org.au.

A Complaints Process has been developed to ensure complaints are dealt with in a consistent manner and in line with this policy. Opportunity's Complaints Policy and process are publicised on our website with information explaining how to make a complaint. The contact details for the Company Secretary, who will receive and coordinate responses to all complaints, are also provided on the website.

The Company Secretary will respond by telephone, email or letter as appropriate to the nature of the complaint and manner of lodgement.

COMPLAINTS PROCESS

Opportunity takes every complaint seriously and will investigate each in a fair and objective manner, as appropriate to the circumstances and seriousness. If Opportunity has made a mistake, we want to be informed so we can rectify the situation.

The complaints process is published on Opportunity's website and includes:

- Acknowledgement of the complaint
- Providing details of the complaints process and the expected timeframe for resolution
- Advising the complainant on the outcomes and actions to be taken, as well as the process to appeal if applicable
- Advising the complainant on their right to make a complaint regarding breaches to ACFID's Code of Conduct to the ACFID Code of Conduct Compliance Committee
- Keeping a written record of the complaint, actions taken and outcomes.

TIMEFRAMES

All complaints should be acknowledged within two business days of receipt. Opportunity will strive to resolve minor complaints within five business days. For more serious or complex complaints, where it is anticipated the investigation and resolution will take longer, the complainant will be advised of the process and the expected timeframe for resolution. In this case, complainants will be updated regularly on the progress of the investigation and expected time for resolution.

ASSISTANCE AND REFERRALS

If a complaint relates to misconduct by an Opportunity employee or volunteer deployed by Opportunity, we will consider, on a case-by-case basis, providing the survivor with appropriate forms of assistance, including but not limited to access, or referrals, to relevant assistance and support services such as medical, social, legal and/or financial.

Where a complaint does not fall within the scope of this policy, for example the complaint is about an employee of another organisation or government department, Opportunity will make every reasonable effort to direct the person to the appropriate recourse or reporting avenue.

CONFIDENTIALITY

Opportunity will not reveal a complainant's name or personal details to anyone inside or outside the organisation, other than the people involved in handling the complaint, without

the complainant's permission. All details of the complaint will remain confidential, unless it is a requirement of the law or Opportunity's Child Protection Policy and/or Prevention of Sexual Exploitation, Abuse and Harassment obligations, to disclose or report the information; however this will not preclude Opportunity obtaining legal advice.

Complaints can be made anonymously, however, if we do not have sufficient information about the concern it may hinder our ability to investigate the matter.

REPORTING

A summary of all new complaints, and progress on complaints being investigated, will be documented and reported to the Leadership Team at its quarterly meetings (excluding complaints that relate to a member of the Leadership Team).

The Board will receive quarterly reports summarising complaints received and actions taken in the prior period. The Company Secretary and/or CEO will immediately notify the Chair of the Board of any complaint made against the Company Secretary and/or CEO, or any other serious complaint.

TRAINING

All Opportunity employees, interns and volunteers receive training on the Complaints Policy and process upon joining Opportunity as part of their induction. Training is also provided to all employees, interns and volunteers as part of our regular training program. A register is maintained to monitor the status of this training.

ACCESSIBILITY AND AWARENESS

Opportunity works through indigenous organisations in the countries where our programs are located, known as Implementing Partners. Opportunity is committed to ensuring all stakeholders, including those that are marginalised or vulnerable, are able to raise concerns or make complaints to our Implementing Partners. Opportunity requires its Implementing Partners to have a complaints handling policy or process and supporting procedures that include:

- informing clients on how to make complaints
- training employees to handle complaints
- having active and effective complaints resolution systems
- having a process for escalating complaints to Opportunity's Company Secretary or the Chair of our Audit & Risk Committee (as detailed above) if the complaint is about Opportunity or related to child exploitation or abuse, or sexual exploitation, abuse or harassment.

Opportunity monitors our Implementing Partners' progress towards meeting these standards.

OTHER POLICIES

Opportunity has a Child Protection Policy and a Prevention of Sexual Exploitation, Abuse and Harassment Policy which provide further guidance on how to respond to complaints or allegations in respect of these areas.

Opportunity's Whistleblowing Policy provides information about the protections available to individuals when they make a complaint about misconduct, dishonest, corrupt or illegal acts.

Opportunity has a Grievance Policy which is designed to handle personal work related grievances that are not covered under the scope of this policy.

CONTINUOUS IMPROVEMENT

Opportunity is committed to monitoring and reviewing the effectiveness of the complaints handling process and to ensure that the learnings that arise from complaints are carried through into the organisation. If required, we will take remedial action including changing our processes and/or ensuring staff and volunteers receive appropriate training.