Complaints Handling Policy

1. Scope
Sight For All is committed to providing quality service to all individuals and organisations it is associated with.

Sight For All recognises the rights of all individuals and organisations that it does business with to lodge a complaint and have it resolved fairly and as quickly as possible. Sight For All is committed to achieving the highest standard in our work and strives for continuous improvement.

This Policy is intended to apply to any complaint, regardless of who makes it.

Sight For All will accept complaints relating to our paid staff, our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.

Sight For All welcomes feedback from volunteers, partner organisations and associated businesses, to play a role in monitoring the service the organisation provides.

As an observer of the ACFID Code of Conduct, Sight For All recognises that individuals who believe there has been a breach of the Code by Sight For All, are able to make a complaint with the ACFID Code of Conduct directly. As per the ACFID Code of Conduct, Sight For All recognises the importance of and value of listening and responding to complaints and concerns.

This policy applies to all Sight For All Board Directors, employees and volunteers.

2. Guiding Principles
   With guidance from ACFID, Sight For All has adopted nine key principles in resolving complaints:
   • Visibility
The Sight For All Complaints Handling Policy is available on the Sight For All website http://sightforall.org/
How to make a complaint is available in-country in the local language via a poster on the wall of eye clinics or centres in which Sight For All projects are being undertaken.
The Complaints Handling Policy is available to Visionaries, Ophthalmic Country Officers and Fellows via their individual logins on the Sight For All website.
The Complaints Handling Policy is shared with partners in MoU’s and Project Agreements.

• **Accessibility**
The Sight For All Complaints Handling Policy is available to all on the website http://sightforall.org/ Copies of the policy are provided to Board Directors, staff, medical and non-medical volunteers. In-country colleagues are aware of the Complaints Handling Policy. How to make a complaint is available in-country in the local language via a poster on the wall of eye clinics in which Sight For All projects are being undertaken.

• **Responsiveness**
The Sight For All Executive Officer will acknowledge receipt of the complaint within 5 days. This is noted in this policy and flow chart.

• **Objectivity**
Whilst investigating complaints, the Sight For All Executive Officer will maintain confidentiality and keep an accurate record of conversations held and information gained.

• **Charges**
The Sight For All Complaints Handling Policy is accessible to all and there is no charge to access a copy.

• **Confidentiality**
Sight For All keeps all matters of the complaint and investigation process confidential and all documents safely secured.

• **Concumer/client-focused approach**
Sight For All has the interests of all those associated with Sight For All projects in mind.

• **Accountability**
The Sight For All Complaints Handling Policy outlines the responsibilities associated with investigating a complaint.

• **Continual Improvement**
The Sight For All Complaints Handling Policy is reviewed on an annual basis, with lessons learnt incorporated to ensure continuous improvement.

### 3. Definitions
- **Complaint** means an expression of dissatisfaction made to an organisation, related to its products or services, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.
- **Complainant** means a person, organisation or its representative, making a complaint.
- **Inquiry** means a request for information or an explanation.
- **Feedback** means opinions, comments, suggestions and expressions of interest in the products or the complaint handling process.
- **Stakeholder** or **interested party** means a person or group having an interest in the performance or success of the organisation.

4. **Educating our organisation on our complaint policy and training relevant personnel**
The Sight For All Complaints Handling Policy has been distributed to staff, Visionaries, volunteers, Ophthalmic Country Officers, Fellows and in-country partners. We require all those who may be involved in any way with a complaint to formally signify their commitment to this policy.

To familiarise them with this policy, we run induction programs for our Board Directors and all relevant personnel. Personnel directly involved in complaint handling are fully trained in all aspects of this policy and its implementation. We communicate with our staff and Ophthalmic Country Officers to encourage, receive and handle complaints taking account of language issues and cultural sensitivities.

5. **Availability of the Sight For All Complaints Handling Policy**
Sight For All recognises the importance of partners, supporters and volunteers in Australia and in-country being aware of the means to access the Sight For All Complaints Handling Policy and lodge a complaint if required. The Sight For All Complaints Handling Policy is able to be accessed via the following methods:
- Available for download on the Sight For All website
- Circulated to in-country partners
- Circulated to Ophthalmic Country Officers and Fellows
- Circulated to all medical volunteers (Visionaries) prior to their travel in-country
- There is no charge associated with accessing the Sight For All Complaints Handling Policy

6. **Demonstrated Understanding of the Sight For All Complaints Handling Policy**
Sight For All Visionaries (medical volunteers) are the greatest representatives of Sight For All in-country. As such the Complaints Handling Policy is distributed to them as a policy to read and acknowledge prior to their departure. As part of the circulation of the Sight For All Complaints Handling Policy, Board Directors, employees, Visionaries, Ophthalmic Country Officers and in-country partners are required to advise of their acknowledgement and understanding of the policy, either through the signing of a checklist or via a return email.
Sight For All Board Directors and employees have an understanding of the policies through their development and review phases.
When required, the Sight For All Ophthalmic Public Health Officer or ophthalmic Board Directors provide further clarification or instruction about the Complaints Handling Policy to partners while they themselves are in-country.

7. **Rights when lodging a Complaint**
In lodging a complaint, Sight For All will:
- Deal with complaints fairly and quickly.
- Not discriminate or cause disadvantage to the person lodging the complaint
- Keep parties involved with lodging the complaint up to date throughout the investigation process.
- Keep details of the complaint confidential.
8. **Methods for lodging a Complaint**

Individuals wishing to lodge a complaint with Sight For All can do so in the following ways:

- In writing to the Executive Officer
- In person with the Executive Officer
- Over the telephone with the Executive Officer
- In person with the Sight For All in-country staff person, contact, Ophthalmic Country Officer, or local area, partner organisation medical officer
- If the complaint is relating to the Executive Officer, the individual may lodge their complaint directly with the Chairman of the Board.
-Anonymous complaints will be accepted, however the anonymity may restrict the investigation process.

9. **Sight For All Responsibilities**

- The Executive Officer is responsible for taking complaints and conducting an investigation.
- The Executive Officer has responsibility for alerting the Sight For All Board of Directors that a complaint has been lodged and will update the Board on the process and outcome of the investigation.
- The Executive Officer will make suitable provision for complaints directed towards Sight For All representative(s) from a source internal to the organisation and in instances whereby the direction is towards the Executive Officer, the Chairman of The Board shall take responsibility for the process.

10. **Complaints handling Method**

When the Executive Officer/Chairman or their delegate takes an oral complaint she/he will:

- Identify themself, listen, record details, and determine what the client wants;
- Confirm that we have understood and received the details;
- Show empathy for the client, but not attempt to take sides, lay blame, or become defensive.

For all complaints we will:

- Seek from the complainant the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
  - if the complaint is out of our jurisdiction;
  - if we may exercise a discretion not to investigate;
  - if preliminary enquiries need to be made, or further consideration needs to be given:
    or
  - if the complaint is to be investigated.
- We will not create false expectations, but assure the client that the complaint will receive full attention;
▪ Give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
▪ Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives.
▪ Ensure that the complaint is appropriately acknowledged;
▪ Follow up where necessary, and monitor whether the complainant is satisfied.
▪ We will register all complaints

Where appropriate we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, Sight For All will assess it in terms of the following criteria:
   a) severity;
   b) health (including mental health) and safety implications;
   c) financial implications for the complainant or others
   c) complexity;
   d) impact on the individual, public and organisation;
   e) potential to escalate;
   f) systemic implications; and
   g) the need for, and possibility of immediate action.

If the complaint is assessed as significant in terms of one or more of these criteria we will classify the complaint accordingly.

11. The Investigation Process
   - Upon receiving details of a complaint, the Executive Officer will commence an investigation.
   - Where criminal allegations have been made, the Executive Officer will alert appropriate authorities (such as SAPOL or police within the partnering country).
   - In the instance of a police investigation, Sight For All’s investigation into the complaint will cease until such time as the police investigation has concluded.

12. Timeframes

On receiving notification of a complaint, the Sight For All Executive Officer will:
   ▪ Record the date and time of all conversations.
   ▪ Record and confirm all details of the complaint
Provide written acknowledgement of the complaint within 5 working days.

- Acknowledge oral complaints immediately.
- Aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

In conducting an investigation, the Executive Officer will:

- Encourage the individual lodging the complaint to talk about the complaint in their own words.
- Assist the individual in clarifying issues and encourage expectations to ensure a positive outcome.
- When required, provide an interpreter to assist the individual in lodging a complaint.
- Keep a written record of all interviews undertaken. At the completion of the interview process, the Executive Officer will ensure that those involved will sign the interview record as a true and accurate account.
- Keep all matters and documentation confidential and safely secured.
- Keep all parties involved with the investigation informed of the progress.

13. Inquiries, minor complaints and jurisdiction
Sight For All will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, that is during the initial phone call or meeting. However, as far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided. On receipt of a complaint we will also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived. If the complainant disputes an assessment that a complaint should not be investigated, the Executive Officer will refer it to the Board of Directors for review. If such a dispute is unresolvable we will refer the complainant to Code Committee of the Australian Council for International Development (ACFID).

14. Resolution
Upon completion of interviews and analysis of investigation results, the Executive Officer will compile a report and make a recommendation to the Board of Directors. Following a response from the Board of Directors, the Executive Officer will advise the individual who make the complaint of the outcome in writing.

15. Recording of Information
The Executive Officer will store a summary of information on file. This will include:

- Details of the complaint
- Date of incident
- Date and times of interviews
- Complaint response time
- Action taken
16. Observance of ACFID Code of Conduct
Sight for All observes the ACFID code of conduct in all activities that are undertaken. Individuals lodging a complaint with Sight For All who believe that the organisation has breached the Code are advised to notify the ACFID Code of Conduct Committee. ACFID can be contacted via telephone on +612 6285 1816 or via www.acfid.asn.au/code-of-conduct/complaints.

17. Unsatisfied Complaints
In an instance where the individual lodging the complaint is unsatisfied, the individual may choose to take their complaint further and lodge their complaint with the ACFID Code of Conduct Committee or an external organisation, such as Ombudsman SA. ACFID can be contacted via telephone on +612 6285 1816 or via www.acfid.asn.au/code-of-conduct/complaints.

18. Review of Complaints
It is the responsibility of the Executive Officer to advise the Board of Directors of any complaint that has been lodged, the investigation process and the outcome. The Executive Officer reports to the Board of Directors via a written report prepared for each Board meeting. Details of any complaints lodged or investigations conducted are included in this written report and are then raised verbally by the Executive Officer at the meeting itself. This allows for the reason for the complaint and manner in which it was investigated and resolved to be reviewed by the Board of Directors and any future recommendations to be discussed and implemented.

19. Continuous Improvement
Sight For All will—

- maintain data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaint handling; • foster a consumer/client-focused approach;
- undertake specific training and retraining of staff to foster better complaint handling practices; • encourage innovation in complaint handling development; and
- recognise and reward exemplary complaint handling behaviour.

We will conduct an internal review of the effectiveness of our complaint handling every year.

We will commission and independent review of the effectiveness of our complaint handling after 3 years and then after 5 years.

20. Review
The Sight For All Complaints Handling Policy is reviewed on an annual basis.
Complaint lodged with Executive Officer (EO)

No criminal allegation

EO provides individual lodging complaint with acknowledgement letter within 5 days. Verbal complaints acknowledged immediately.

EO seeks expected outcome of complainant

EO assesses complaint to determine how complaint should be managed

EO commences investigation

On completing investigation, EO writes report and makes recommendation to Board.

Board response to recommendation made by EO

EO advises individual who has lodged the complaint of outcome in writing.

Individual Satisfied?

No

Individual offered opportunity to lodge complaint with external organisation

Yes

Complaint recorded on SFA register

No further action required

Criminal allegation

EO advises Board of Complaint

Referral to relevant authority

EO commences investigation

Individual lodging complete believes SFA has breached ACFID Code of Conduct advised to notify ACFID Code of Conduct Committee

Complaint recorded on SFA register

EO seeks expected outcome of complainant

EO assesses complaint to determine how complaint should be managed

EO commences investigation

On completing investigation, EO writes report and makes recommendation to Board.

Board response to recommendation made by EO

EO advises individual who has lodged the complaint of outcome in writing.

Individual Satisfied?

No

Individual offered opportunity to lodge complaint with external organisation

Yes

Complaint recorded on SFA register

No further action required