COMPLAINTS HANDLING POLICY

1. Intent

Sight For All recognises the rights of individuals and organisations that it is connected 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 welcomes feedback from Visionaries, volunteers, partner organisations, Fellows, project participants and associated businesses, to play a role in monitoring the service that the organisation provides.

This policy applies to Sight For All Board Directors, staff, consultants, Visionaries, Fellows, In-Country Visionaries, volunteers, and project participants.

For the purposes of this policy, "Organisational Leader" refers to the most senior employed officer of the organisation (e.g. Chief Executive Officer or General Manager), as appointed by the Board of Directors.

2. Scope

Sight For All commits to managing complaints is a respectful, fair, and responsive way. Complaints will be investigated confidentially, and any information shared will be done so with the permission of parties involved.

Sight For All takes a survivor-centred approach and plays an active role in ensuring child safeguards for children and young people, preventing sexual exploitation, abuse and harassment, and in investigating complaints. Individuals making a complaint will be treated with respect and without prejudice. As outlined in this policy, Sight For all commits to acknowledging receipt of a complaint as soon as possible, and ideally within one business day. Parties involved in the complaint investigation process will be kept informed of actions being taken and progress of the investigation, subject to applicable legislation and legal advice.

Sight For All aims to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. Complaints are recorded on the Master Register maintained by the Organisational Leader.

Individuals who are unsatisfied with the way in which a complaint has been investigated, or the outcome of the investigation, are able to contact the ACFID Code of Conduct Committee (www.acfid.asn.au/code-of-conduct/complaints). 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, can make a complaint directly to the ACFID Code of Conduct Committee. As per the ACFID Code of Conduct, Sight For All recognises the importance of and value of listing to and responding to complaints and concerns.

3. Guiding Principles

Confidentiality

Sight For All understands that individuals feel safer in making a complaint if they know their confidentiality will be maintained. Sight For All will not share the identity of the complainant (such as name and other details) wherever possible and appropriate.

As much as possible, Sight For All handles complaints subject to requirements of procedural fairness. When making a complaint to Sight For All, the individual can choose to be identified, maintain confidentiality, or remain anonymous. Where an anonymous complaint is made, Sight For All will record the complaint and report it to the Board of Directors as anonymous, feedback will not be able to be provided to the complainant, however any matters for attention will be further investigated and, where required, will be reported to the appropriate authorities.

There are some instances where some information must be shared with others. Sight For All commits to maintaining confidentiality and only sharing information with as few people as required, and only with people who need to know. Information that is shared will also be de-identified as much as possible.

When third parties are required to assist in the resolution of a confidential complaint, Sight For All will judge these instances on a case-by-case basis and with agreement from the complainant.

Procedural Fairness
When a complaint is lodged against a Board Director, staff member, contractor, Visionary, In-Country Visionary, volunteer, Fellow, or project participant, Sight For All will provide sufficient details of the nature and circumstances of the allegations made. This allows an opportunity for the individual to fully respond to allegations. In such instances, the identity of the complainant may need to be disclosed, with the complainant's full consent.

Victim/Survivor Centred
Sight For All commits to a 'do no harm' approach, prioritising the safety of others, while ensuring procedural fairness. Individuals making a complaint will be kept informed throughout the investigation process, and assistance will be provided to access other services if required. Where required, Sight For All will assist in accessing other support services, including health or psychological services, and address any need for immediate protection assistance and/or rehabilitation.

De-identification of Complainants
Sight For All respects the wishes of complainants to protect their identity. In these instances, personal information that identifies the complainant will only be disclosed when required by law. During investigating and reporting processes, all reasonable efforts will be taken to de-identify the individual.

Responsibilities
The Sight For All Organisational Leader will acknowledge receipt of the complaint as soon as possible and ideally within one business day. Reports of child safeguarding or sexual exploitation, abuse or harassment are required to be made within the time frames as specified in those respective policies.

Accessibility
Sight For All's Complaints Handling Policy is available via the following methods:
- On the Sight For All website
- Via Good Development Practice Workshops conducted for new Board Directors, staff, Visionaries, volunteers, In-Country Visionaries, Fellows, and project participants
- As addendums to Head Agreements and Project Agreements
- Via Fellow, Visionary and In-Country Visionary Handbooks

Sight For All has complaints forms available in countries where active projects are being undertaken. These forms are translated into Burmese, Khmer, Laotian and Mongolian,
Sight For All understands that making a complaint can be difficult and as such provides a number of methods in which to do this. Methods of lodging a complaint are outlined at Section#6 of this policy.

Accountability
The Sight For All Organisational Leader has responsibility for investigating complaints, recording complaints and reporting complaints to the Board of Directors. Where the complaint involves the Organisational Leader, the Chair will take on the investigative responsibilities.

Continuous Improvement
Sight For All is committed to continuously improving the complaints handling process. This Complaints Handling Policy is reviewed on a biennial basis and lessons learnt are incorporated into future policies.

4. 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, respecting the wishes of the complainant to be de-identified

5. Rights When Lodging a Complaint

Complaints Initiated by Children

Sight For All recognises that children and young people have the right to raise concerns or make a complaint about matters that affect them, without fear of retribution. Sight For All takes all complaints seriously, treats them with respect and handles them in a timely and transparent manner. An age appropriate and culturally safe child and young person friendly poster has been produced which contains information about how concerns can be raised and that it is ok to make a complaint. These posters are translated into the local language where the project is being held, and on display in Sight For All supported eye units in Cambodia, Fiji, Lao, Mongolia and Papua New Guinea.

In investigating complaints, initiated by a child or young person, Sight For All will ensure support is available throughout the process and that all interactions prioritise safety, wellbeing and dignity.

The process for investigating complaints made by a child or young person is the same as the process for all complaints.

6. Sight For All Responsibilities

The Organisational Leader is responsible for taking complaints and conducting an investigation. The Organisational Leader has responsibility for alerting the Board of Directors that a complaint has been lodged and updates the Board on the process and outcome of the investigation. Where a complaint involves the Organisational Leader, the Board Chair will be responsible for the investigation and communication with the Board of Directors.

Sight For All is committed to providing assistance to, and referring individuals making a complaint, should they require medical, social, legal assistance or referrals to such supportive services.

7. Methods for Lodging a Complaint

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

- In writing
  Via post:
  The Organisational Leader
  Sight For All
  PO Box 7028, Hutt Street
  Adelaide, South Australia 5000
  Via email: ccarrillo@sightforall.org

- In person with the Organisational Leader,
  Available at the Royal Adelaide Hospital,
  Level 6G, Ophthalmology Department, Port Road, Adelaide, South Australia

- Over the telephone with the Organisational Leader
  By telephoning +61 (0) 428 049 888

- In person with the Sight For All Country/Project Officer

- If a complaint is relating to the Organisational Leader, the individual may lodge their complaint directly with the Chair of the Board
  Via email: Casson.Robert@gmail.com

- Anonymous complaints will be accepted, however their anonymity may restrict the investigation process.

8. Complaints Handling Process

To determine how a complaint should be managed, the Organisational Leader assesses the complaint in terms of the following criteria:

a) severity
b) health (including mental health) and safety implications
c) financial implications for the complainant and others

d) complexity
e) impact on the individual, public and organisation
f) potential to escalate
g) systemic implications
h) the need for, and possibility of immediate action.

Where the assessment determines a high degree of severity with significant implications, the complaint process will be escalated by the Organisational Leader. This will involve immediately contacting the Chair of the Board, Vice Chair or Legal Board Director. A special out-of-session Board meeting may be convened to address the complaint as a matter of urgency.

Where complaints are in relation to the protection of children and young people, or prevention of sexual exploitation, abuse and harassment, they are investigated in line with the requirements as outlined in the Sight For All Child and Young Person Protection Policy and Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy.

When the Organisational Leader /Chair or their delegate takes a verbal complaint she/he will:

- Identify themself, listen, record details and determine what the complainant wants
- Confirm understanding and receipt of the details
- Show empathy for the individual making the complaint, without attempting to take sides, lay blame or become defensive.

For all complaints, Sight For All will:

- Seek from the complainant the outcome/outcomes they are expecting
- Make an initial assessment of the severity of the complaint and the urgency for action
- Clearly explain to the individual the course of action that will follow:
  - If the complaint is out of Sight For All's jurisdiction
  - If Sight For All may exercise a discretion not to investigate
  - If preliminary enquiries need to be made, or if further consideration needs to be given
- Give an estimated timeframe, or a date by which they will be contacted again
- Check whether the individual is satisfied with the proposed action and, if not, advise them of alternatives
- Ensure the complaint is appropriately acknowledged
- Follow up where necessary and monitor whether the individual is satisfied
- Register all complaints on the Master Register.

Where appropriate, Sight For All will ensure that personnel working in-country will have the necessary training to encourage and handle inquiries, expressions of concern and lodging complaints, so as to take into account cultural and gender sensitivities.

For complaints received in a language other than English, Sight For All will arrange for an independent translator to translate the complaint into English and forward to the Organisational Leader. The complaint will then proceed through the investigation process as outlined in Section #8 of this Policy.

Sight For All will ensure that the individual making the complaint is not required to express their complaint to a person implicated in their complaint. Sight For All will also ensure that a person implicated in a complaint is not involved in any way with the complaint investigation.

9.The Investigation Process

Upon receiving notification of a complaint, the Organisational Leader will:

- Record the date and time of all conversations
- Record and confirm all details of the complaint
- Provide written acknowledgement of the complaint within one business day
- Acknowledge verbal complaints immediately

- Aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days, Sight For All will inform the individual of progress at least on a two-weekly basis.

In conducting an investigation, the Organisational Leader will:

- Encourage the individual to talk about the complaint in their own words
- Ask the individual for clarification when required, and encourage expectations to ensure a positive outcome
- When required, provide an interpreter to assist the individual
- Keep a written record of all interviews undertaken
- Keep all matters and documentation confidential and safely secured
- Keep all parties involved with the investigation informed of the progress.

Where criminal allegations have been made, the Organisational Leader will alert appropriate authorities. 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.

10. Referring Complaints

There may be situations where complaints do not fall into the scope of this policy and are required to be referred to other organisations.
This may include:

- Complaints against another organisation, government department or their personnel will be referred to that organisation
- Matters involving child safeguarding or sexual exploitation, abuse and harassment will follow the reporting process outlined in those policies. This may involve referral to DFAT, ACFID or appropriate law enforcement authorities
- Where individuals believe that Sight For All has breached the ACFID Code of Conduct, a complaint can be made directly with the ACFID Code of Conduct Committee (www.acfid.asn.au/code-of-conduct/complaints).

11. Resolution

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

12. Reporting and Recording

Upon completion of the investigation, the Organisational Leader will compile a report to the Board of Directors. This report will be de-identified should that be the wish of the individual lodging the complaint. The individual making the complaint will receive a response to in writing. Details of the complaint will be recorded on the Master Register.

13. Unsatisfied Complaints

In an instance where an individual is not satisfied with the outcome of the complaint, they may choose to take the complaint further with the ACFID Code of Conduct Committee. The ACFID Code of Conduct Committee can be contacted via email to code@acfid.asn.au or posted to Chair, ACFID Code of Conduct Committee, ACFID, Private Bag 3, Deakin ACT 2600. The ACFID Code of Conduct Committee will investigate complaints made against the Code.

14. Accessing the Complaints Handling Policy

Sight For All recognises the importance of Board Directors, staff, volunteers, contractors, Visionaries, In-Country Visionaries project participants and partners being aware of this Complaints Handling Policy and knowing how to access it

This Complaints Handling Policy is available in the following ways:

- On the Sight For All website (https://sightforall.org/our-checks-and-measures/). This includes translated fact sheets in Khmer, Burmese, Laotian, Mongolian, Tamila & Sinhala
- Circulated to Board Directors, staff, Visionaries, volunteers, Fellows, and project participants as part of Good Development Practice Workshops
- Circulated to in-country partners via Head Agreements and Project Agreements
- Via Fellow, Visionary and In-Country Visionary Handbooks.

15. 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. Complaints can include general matters, sensitive matters or whistleblower complaints.
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 complaints handling process.

16. Related Documents

- Sight For All Master Register
- Sight For All Child and Young Person Protection Policy
- Sight For All Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Sight For All Privacy Policy
- Sight For All Reporting & Investigating Incidents, Concerns and Allegations Policy
- Sight For All Transparency Policy

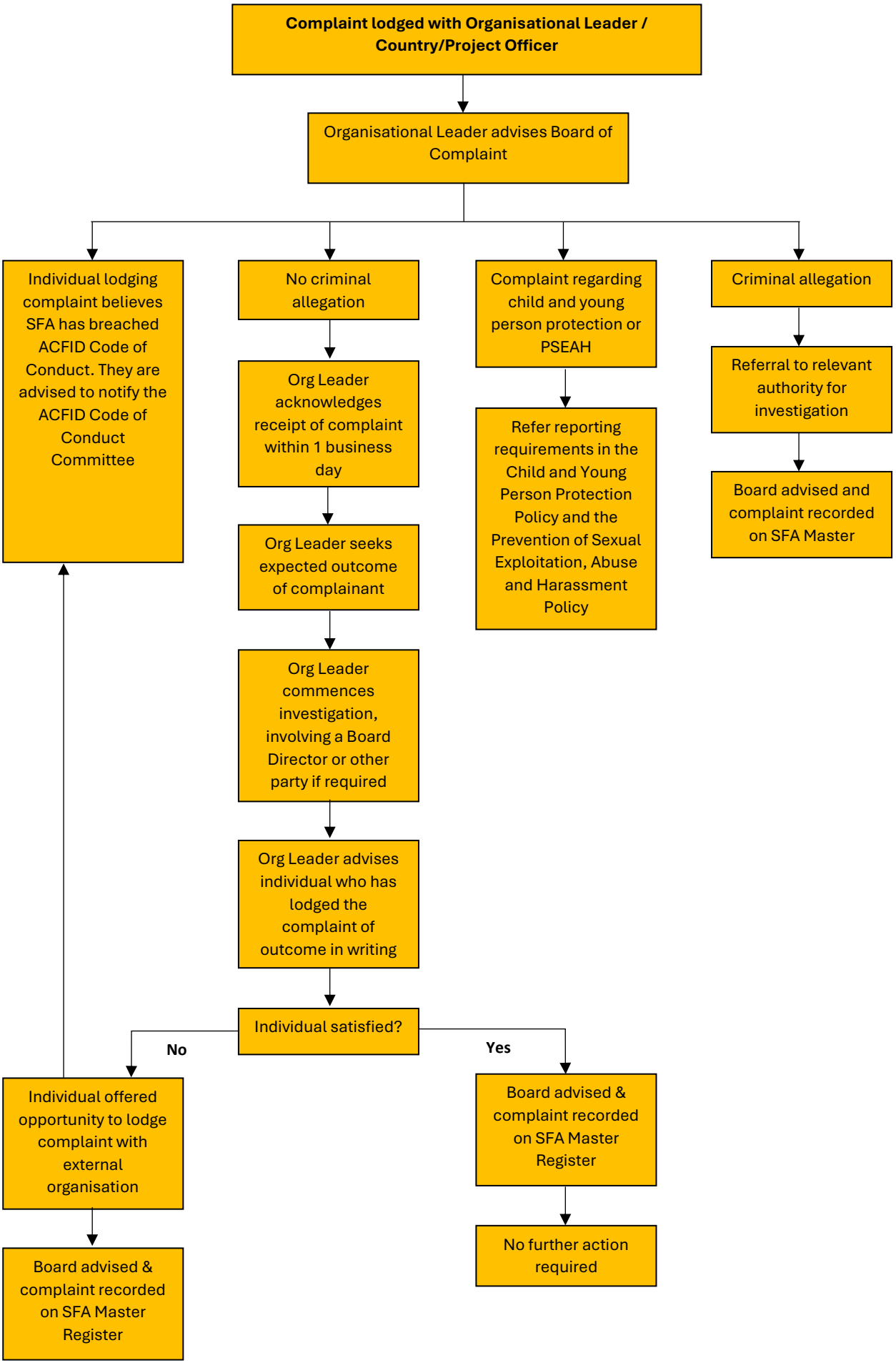
16. Review

The Sight For All Complaints Handling Policy is reviewed on a biennial basis.

Sight For All Complaints Handling Policy
Approved by the Board of Directors
Version 13

Document Revision History		
Document Name	**Version #**	**Date Approved**
Grievance Policy	1	1 April 2014
Grievance Policy	2	3 February 2015
Grievance Policy	3	2 June 2015
Grievance Policy	4	9 August 2016
Complaints Handling Policy	5	21 November 2017
Complaints Handling Policy	6	4 February 2020
Complaints Handling Policy	7	8 July 2021
Complaints Handling Policy	9	16 November 2021
Complaints Handling Policy	10	28 February 2022
Complaints Handling Policy	11	19 March 2024
Complaints Handling Policy	12	5 August 2025
Complaints Handling Policy	13	24 February 2026

APPENDIX A


Complaint lodged with Organisational Leader / Country/Project Officer
Organisational Leader advises Board of Complaint
Individual lodging complaint believes SFA has breached ACFID Code of Conduct. They are advised to notify the ACFID Code of Conduct Committee
No criminal allegation
Org Leader acknowledges receipt of complaint within 1 business day
Org Leader seeks expected outcome of complainant
Org Leader commences investigation, involving a Board Director or other party if required
Org Leader advises individual who has lodged the complaint of outcome in writing
Individual satisfied?
No
Yes
Individual offered opportunity to lodge complaint with external organisation
Board advised & complaint recorded on SFA Master Register
Board advised & complaint recorded on SFA Master Register
No further action required
Complaint regarding child and young person protection or PSEAH
Refer reporting requirements in the Child and Young Person Protection Policy and the Prevention of Sexual Exploitation, Abuse and Harassment Policy
Criminal allegation
Referral to relevant authority for investigation
Board advised and complaint recorded on SFA Master