**Brien Holden Foundation**

**COMPLAINTS HANDLING POLICY & PROCEDURES**

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| policy |

Brien Holden Foundation (the Foundation) is committed to continuous improvement in accountability to all stakeholders. This is managed through the complaints handling procedure outlined in this policy.

The Foundation will ensure that complaints from stakeholders are heard, recorded, and resolved in an effective and professional manner. The Foundation believes that having well-managed mechanisms can improve the quality of our work, enhance the trust and confidence of stakeholders and identify areas of work that needs improving.

The Foundation aims to:

* Deal with complaints in accordance with its Complaints Handling Policy
* Ensure the respect and dignity of those wishing to raise an issue, concern or complaint about the Foundation
* Raise awareness amongst partners, stakeholders and other parties’ right to raise concerns and complaints with the Foundation
* Ensure that intended partners, stakeholders and staff understand the complaints handling procedures
* Allow us to correct mistakes and alert us to problems in our work
* Help us to continuously learn and improve
* Strengthen the relationships between partners and stakeholders
* Implement procedures in order to receive and respond to complaints from partners

This Policy demonstrates:

**Commitment**We are committed to efficient and fair resolution of complaints by stakeholders.

**Responsiveness**All complaints and constructive feedback will be taken seriously and handled as swiftly as practicable. All complainants will be treated courteously and kept updated on the progress of their complaint through the complaints-handling process.

**Fairness**  
Confidentiality is respected at all times. Complaints are to be managed in an open and transparent manner that is open for review whereby:

* Decision makers act fairly and provide reasons for decisions
* The person affected is given a fair hearing and opportunity to review
* All relevant information and arguments are considered

**Visibility**  
Information about the process for making a complaint will be clear and well publicized. Information on how to make a complaint will be accessible on the website and within other appropriate communications such as partner agreements and displaying through IEC material at projects sites

**Accountability**All complaints will be recorded through one central point before action is taken. The Foundation will have appropriate documentation and reporting of the complaints handling process.

**Assistance to survivor**

The Foundation will provide appropriate assistance and referrals to the survivors and complainants. The assistance includes but not limited to medical, social, legal and financial assistance and referrals to such services.

This Policy deals with external grievances. Internal issues and grievances made by staff are dealt with in accordance with the Foundation’s Grievance Policy and Procedures.

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| STANDARDS |

The Foundation’s handling of complaints will meet the following minimum standards:

1. All complaints will be acknowledged as soon as possible and ideally within five working days by the recipient.
2. All complainants will receive a response giving the outcome of their complaint as soon as possible and ideally within thirty working days of receipt. If the matter is more complex a further acknowledgement will be sent explaining what further investigation is required to resolve the complaint and the likely timeframe.
3. All complaints should be recorded on a Complaints Record Form (Appendix A).
4. All complainants will be treated respectfully.

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| CONFIDENTIALITY |

Where possible all personal information including the fact that complaint has been made will be kept confidential. The extent to which the names of the complainant and the respondent, the fact of the complaint and any enquiry can be kept confidential will depend on the nature and seriousness of the complaint and the positions and responsibilities of the parties. In order to investigate the complaint an appropriate amount of information may need to be disclosed to those involved in the investigation

In all cases the overriding responsibility of the Director, Designated Officer and ultimately the CEO is to act in the public interest consistent with maintaining privacy and maintaining the assumption that any accused is innocent until proven guilty.

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| definition of A COMPLAINT |

A complaint is any expression of dissatisfaction with a service the Foundation offers or provides. This includes matters such as:

* Unfair, inappropriate or incorrect management
* Improper behavior, misuse of authority or partiality by a Foundation staff member towards a stakeholder
* Abrupt, rude or aggressive behavior by a Foundation staff member to a stakeholder, either in person or via the telephone
* Breach of existing Foundation policy and procedures

A complaint is not:

* A general query about our work
* A request for information
* A contractual dispute
* A request to amend records e.g. to correct an address, cancel a donation

A request to unsubscribe from a Foundation service e.g. a campaign newsletter  
Complaints should not be vexatious in nature, servicing only to cause annoyance and being without sufficient grounds.

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| WHO CAN MAKE A COMPLAINt? |

Any person, group of persons, organisation, project staff or partners can provide feedback about the Foundation program, activities, staff, implementing partners.

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|  | **Complaints about** | **Possible complainants** | **Who to complaint** | **Level of complaint redressal** |
| 1 | Partners or projects | Beneficiaries, BHF partners staff, BHF staff | Country Manager/ Complaints Officer | Country |
| 2 | BHF project staff | Beneficiaries, BHF partners staff | Country Manager/ Complaints Officer | Country |
| 3 | BHF country management | Beneficiaries, BHF partners staff, BHF staff | Complaints Officer | Head office |
| 4 | BHF head office staff | Country team, BHF partners staff, other stakeholders | Complaints Officer | Head office |
| 5 | BHF management | Head office staff, country management | Complaints Officer | Head office |
| 6 | BHF Board | Head office staff | CEO/Complaints Officer | Head office |

**How an external complainants can register her/his complaints?**

At the country level; through

1. complaint boxes installed at the project locations such as optical shops
2. writing emails or phone calls to the country’s complaints officer - email addresses and phone numbers will be disseminated through wall posters displayed at the project locations
3. writing emails or phone calls to BHF complaints officer - email addresses and phone numbers will be disseminated through BHF website
4. projects beneficiaries can visit BHF country offices to register complaints
5. BHF partners can register their complaints through quarterly and annual review meetings or special meetings with the country management
6. where practicable, BHF team will proactively call some beneficiaries especially of eye health services to seek their feedback on services and products

At head office level; through

writing emails or phone calls to the BHF complaints officer

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| complaints handling PROCEDUREs |

The Brien Holden Foundation welcomes complaints and constructive feedback. Complaints and constructive feedback will be accepted verbally, in writing, via the BHF website or by telephone.

General complaints about the Brien Holden Foundation (Foundation) can be sent to the Director who is the Complaints Officer.

Mobile: +61 414 071149  
Email: [complaints@bhvi.org](mailto:complaints@bhvi.org)Postal: Director of Foundation,

Brien Holden Foundation, PO Box 6328, UNSW Sydney 1466

Telephone: +61 414 071149

* Feedback and complaints can also be lodged in each of the countries in which the Foundation has a presence. These are provided as **Appendix C**. If a complaint is received directly to a country office the country manager must forward the complaint onto the Director.
* Special care will be taken to facilitate complaints from vulnerable populations including children and marginal groups.
* Where appropriate complain/suggestion boxes (e.g. in Vision Centres) will be used. The Foundation recognises that in some circumstances complainants may wish to remain anonymous. Because such complaints can flag problems that need fixing, they will accepted, though clearly it may not be possible to provide a response or remedy to the individual.
* Complaints about the Director should be sent to Chief Executive Officer (CEO). If the complaint is not resolved or the complainant is not satisfied with the outcome, he or she may appeal to the Chairman of the Board.
* The Director is the focal point for all complaints made and has responsibility to delegate, initiate and coordinate the response in consultation with the CEO. Every reasonable effort will be made to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.
* The Foundation is committed to taking all reasonable measures to monitor and regulate organization practices to fully adhere to the Australian Council for International Development (ACFID) Code of Conduct. In the event you wish to take matters regarding breaches of the Code of Conduct to ACFID, please visit the complaints section at: www.acfid.asn.au.

**Informal Investigation Procedures**

In some cases, the Foundation’s complaints officer or management may prefer to use information complaint redressal procedures. There may be different scenarios where information complaint handling procedures may be followed, such as, the complainant wants to follow an informal procedure or the complaint is not intense or severe up to the level of formal inquiry. Following are some of the methods for informal complaint handling;

* A direct private discussion can be conducted between the complainant and the respondent.
* A third person or mediator can be engaged to facilitate the discussion between the two parties.
* The complaint can be resolved by clarifying the position of parties and where the respondent admits his/her inaccuracy and the complainant agrees to the justification.

**Formal Investigation Procedures**

1. Receiving, acknowledging and registering the complaint

When a complaint is received, details of the complaint will be recorded in accordance with the complaint record form (Annex A). All relevant records (such as email, documents, pictures etc) will also be filed. The complaint officer will acknowledge the receipt of the complaint and will provide a receipt (if demanded) to the complainant.

1. Assessing complaints

After registering a complaint, the complaints officer will assess whether the complaint filed is relevant or not. Complaints will be assessed on the following criteria,

* Is there any communication problem that caused this complaint
* Is the complaint relevant to the Foundation or it should be referred to the partner, Government, policy, or other law enforcement agencies
* Is the complaint connected to a time-bound issue and there seems no benefit to further investing to resolve/address the complaint

Minor complaints will be resolved through discussions.

1. Risk assessment

If the complaint officer/relevant person or team decides to consider the complaint worth investing time to inquire and investigate, a rapid risk assessment will be completed to identify the risks associated with the people connected to the complaint. Based on the following criteria, the Foundation can refer a person for assistance.

* Severity
* Urgency
* Complexity
* Health and safety implications
* Impact on the individual, the general public and/or the organisation
* Potential to escalate

1. Conduct an inquiry or investigation

Based on the type of complaint, the complaints officer in consultation with the Director of the Foundation nominates a committee to conduct an inquiry or investigation of the complaint. The Foundation may recruit external investigators depending on the nature of the complaint. For example, if the complaint is about fraud or financial corruption, a financial fraud expert will be recruited

1. Collect and secure evidence

The inquiry team will collect relevant evidence in the form of witnesses (people), documents such as emails, letters, laws, Facebook posts, etc and other physical evidence such as objects etc. The team will conduct necessary interviews and visit desired sites to collect the evidence. The respondent will be provided sufficient time to explain his/her position over the disputed matter.

After all the possible evidence has been collected, the team will examine those, and identify the weakness and areas for further inquiry. It is important to secure the collected evidence until the complaint is resolved.

1. Making findings, decisions and reporting

The inquiry team after collecting all the evidence, document their finding and make decisions. The findings and decisions will be properly and clearly documented. The inquiry report can be further presented to an external expert to check whether the inquiry has been conducted appropriately. Relevant evidence will be attached to the inquiry report.

**Flow Chart of Handling Complaints**

Complaint received at the head office

Complaint received at the country level

Initial assessment – worthy for inquiry/investigation

No

Close

Yes

Yes

Assistance and referrals

Immediate risk assessment

No immediate risk **Who will conduct?**

i- PSEAH committee

ii- Special inquiry committee

Conduct an inquiry / investigation

iii- Complaints officer

iv- safeguarding officer

v- CEO

vi- Board

Make findings, decisions and reporting

Inform complainant

Refer complaint/finding to external agencies

People, document, other physical evidence

Collect and secure evidence

1. Informing the complainant and others

Draft inquiry report can be shared with the complainants and other persons seemed to engage in this matter. This will provide all relevant persons with an opportunity to know the findings, and decisions of the inquiry committee. However, this sharing is subject to the sensitivity of the matter and the privacy of the complainant.

1. Referring complaints/finding to the external agencies

In some cases, law enforcement agencies such as police or other agencies may become involved during a complaint investigation so in accordance with the best practice and local laws, findings can be shared with. Moreover, in some cases, the complaint if considered as a crime, would require to forward to the law enforcement agencies or police for investigation.

**Appeals**

The decision of the CEO becomes final 30 days after it is announced. A complainant who is not satisfied with the decision of the CEO may appeal in writing to the Chairman of the Board within 30 days of the announcement. The Board may appoint an independent person or panel to deal expeditiously with an appeal in accordance with administrative law principles. The independent person or law panel will deliver its findings in writing to the Board.

If the complainant is still dissatisfied with the outcome, the complainant is not prohibited from complaining to other relevant bodies or seeking relief in a court with appropriate jurisdiction.

Everyone who makes a complaint to the Foundation will be treated with courtesy and respect. In return we expect people who make a complaint to communicate their concerns fairly and appropriately. Where complainants harass staff, behave abusively, or unnecessarily pursue complaints the Foundation reserves the right to withdraw or modify its complaints process.

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| Related documents |

This policy should be read in conjunction with the following documents;

1. Code of Conduct
2. Code of Conduct of Working with Children
3. Child Safeguarding Policy
4. PSEAH Policy
5. Child Protection SOPs
6. Anti-discrimination and Harassment Policy
7. Anti-fraud Policy and Procedures
8. Conflict of Interest Policy
9. Disciplinary Policy
10. Privacy Policy
11. Whistle Blowing Policy

Briefing and Induction

As part of implementing the policy and procedure the Foundation’s Complaints Handling Policy will be part of the induction process for all new staff, board members, consultants and volunteers.

Reviewing Information

The Foundation will keep a log of all complaints received. This log will include summary information only and not reveal any information considered to be of a personal nature or confidential.

This information will be reviewed annually by the Foundation’s Global Management. This will allow us to:

* correct mistakes and alert us to problems in our work
* help us to continuously learn and improve

**Document Control**

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| Date | Revision Description | Approved by Board | Next Review |
| June 2020 | Revised by: Education Officer Reviewed by: Director of Foundation |  | July 2021 |
| February 2021 | Revised by: Global Project Officer, Compliance. Rebrand of Logo |  | March 2023 |
| May 2023 | Revised by: Head of Programs and Compliance  Reviewed by: Director of Foundation |  | July 2024 |

**Appendix A**

**CONFIDENTIAL**

**Complaints Record Form**

All complaints about the Brien Holden Foundation, whether written or verbal, are to be recorded on this form. Forms need to be submitted to the Complaints Officer.

**DATE: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**COMPLAINANT DETAILS**

**Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**City: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ State: \_\_\_\_\_\_\_\_\_\_\_\_\_\_ Post Code: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Phone Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Email Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**COMPLAINT DETAILS:**

***(Please provide as much details and evidence as possible)***

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**OUTCOME:**

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**Has the Form been entered on the Complaints Handling Log:**

**Appendix B**

**Complaints Handling Log**

All complaints are to be logged on this Form. This log will be provided to the Global Management Team annually for review/analysis.

This should include summary information only and not reveal any information considered to be of a personal nature or confidential.

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| **Date** | **Complaint** | **Outcome** | **Further information** |
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**Appendix C**

Contact details for the lodgement of feedback and complaints in which the Foundation has a presence are:

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| **GLOBAL HEAD OFFICE - AUSTRALIA** | **PAPUA NEW GUINEA** | **PAKISTAN** | **VIETNAM** |
| Level 4 North Wing  Rupert Myers Building  Gate 14 Barker Street, UNSW, Sydney, NSW 2052 AUSTRALIA  (+61) 2 9385 7516 | PNG Eye Care  Lions National Resource Centre for Eye Health  School of Medicine and Health Sciences  Taurama Campus, Taurama Road, 3Mile  Port Moresby, NCD, 111 PAPUA NEW GUINEA    T: +675 7821 6301  E: [gm.pngec@gmail.com](mailto:gm.pngec@gmail.com)  Contact: Ben Zuvani | Brien Holden Foundation  Plot number 05, Basement, Street number 09, Fayyaz Market, Sector G-8/2 Islamabad 44000 PAKISTAN    +92 51 8483435  +92 51 8483436  Contact: Khalid Saifullah | Brien Holden Foundation  8th Floor,  53A Le Van Huu,  Hai Ba Trung District, Hanoi  VIETNAM  (+84) 4 3944 8512 Contact: Huynh Phuong Ly |
| **TANZANIA** |  |  |  |
| Brien Holden Foundation  Msasani Tower, 6th Floor – Wing A,  Kimweri street, Kinondoni District,  Dar es Salaam  TANZANIA  +255 222 923 339  +255 755 651 111  +255 785 948 949  Contact: Eden Mashayo |  |  |  |