AFRICA FOUNDATION

# COMPLAINTS HANDLING

## POLICY & PROCEDURES

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| **APPLICABILITY:** | All Hillsong Africa Foundation Staff, Contractors and consultants, Volunteers and Visitors, Board members, Partner organisations, Beneficiaries, Supporters and Donors, Members of the public |
| VERSION: | Version V0223 (August 2023) |
| **AUTHORISED BY:** | HAF Managing Director |
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# INTRODUCTION

HIllsong Africa Foundation (HAF) recognises that listening to and responding to feedback, concerns and complaints is integral to our commitment to achieving high standards and ensures accountability to all stakeholders.

We recognise that receiving and responding to complaints results in valuable learning and is aligned with our commitment to continuous improvement.

# PURPOSE

This Complaints Handling Policy outlines HAF's responsibilities and response to feedback and complaints and the principles which underpin our approach.

# GUIDING PRINCIPLES

HAF's Complaints Handling Policy is guided by the following principles:

**Principle 1: Visibility and Accessibility**
We will be proactive in providing clear and easily understandable information to our partners and stakeholders as to how and where to make a complaint or provide feedback. We will take measures to ensure that accessible and safe points of contact are made available for people to make complaints or provide feedback including children.

Complaints can be made both verbally or in writing by email, telephone, in person or through other means necessary to ensure inclusivity for people with disabilities or to overcome language barriers. We will endeavor to assist a complainant to put their complaint in writing or write down a complaint provided to us orally as factually and faithfully as possible.

**Principle 2: Responsiveness**
We will respond to complaints and feedback effectively, appropriately and with professionalism.

**Principle 3: Objectivity**
All complaints will be addressed in a fair, equitable and unbiased manner, based on the evidence submitted and uncovered throughout the complaints handling process. Making a complaint will in no way result in prejudice with respect to an individual's future participation in any programs or activities. We will seek to ensure the protection of all parties involved in the complaint or concern.

**Principle 4: Confidentiality**
All complaints and the complaints handling process will be kept strictly confidential. Information will be shared on a needs basis only with those directly involved in the investigation. It is expected that all those involved in the investigation will also uphold strict confidentiality. A complainant's name and personal details will not be disclosed to anyone other than those involved in handling the investigation without first obtaining the complainant's permission.

**Principle 5: Stakeholder-focused approach**
The interests and wellbeing of our stakeholders are foremost in our approach to complaints handling. When a vulnerable person (complainant or individual) is involved, their needs are prioritised. We seek to ensure child friendly reporting mechanisms.

Sexual exploitation, abuse or harassment and child safeguarding complaints will be handled in a manner that balances respect for due process with a survivor-centered approach in which the survivors' wishes, safety, and well-being remain a priority in all matters and procedures. All actions taken will be guided by respect for the safety, choices, wishes, rights and dignity of the survivor. For survivors who require additional support or protection, the Safeguarding Officer will coordinate with and make referrals to relevant social services organisations.

We also seek feedback from our primary stakeholders in the design of complaints reporting mechanisms in our local communities and have formal mechanisms for primary stakeholders to contribute their ideas, feedback and ownership of their own development.

**Principle 6: Accountability**
Accountability for decision making and action pertaining to complaints will be clearly established and communicated.
We are accountable to comply with all relevant legislation including mandatory reporting following the processes outlined in our HAF Child Safeguarding Policy.

**Principle 7: Continual improvement**
HAF is committed to ongoing improvement in all areas of the organisation's work, including our programs and organisational policies and procedures.

## SCOPE

This policy applies to the handling of feedback and complaints relating to all HAF's personnel, programs, partnerships or fundraising activities.
This policy applies to complaints received from the following stakeholders:
Internal stakeholders:

- All HAF **Staff**
- All HAF **Contractors and consultants**
- All HAF **Volunteers and Visitors**
- All HAF **Board Members**
- All HAF **Partner Organisations**

External stakeholders:

- All HAF **Beneficiaries** of projects and programs
- All HAF **Supporters and Donors**
- Members of the **public**

## RELATED POLICIES

Based on the nature of the complaint, it could be directly or indirectly related to other HAF policies such as:

- HAF Child Protection Policy
- HAF Prevention of Sexual abuse, exploitation and harassment Policy
- HAF Financial Wrongdoing Policy

## DEFINITIONS & COMPLAINT CATEGORIES

**DEFINITIONS:**

***Complaint:*** 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:*** A person, organisation or its representative, making a complaint.

***Feedback:*** The systems and processes which enable an organisation to listen to their stakeholders and ascertain if agreed standards, requirements, expectations and needs are being met. Feedback is inclusive of suggestions, comments, opinions and complaints.

***Inquiry:*** A request for information or an explanation.

***Beneficiary:*** People directly engaged in a project or program or benefiting from the activities and outcomes of a program or project.

***Partner Organisations***: Hillsong Africa Foundation Partner Organisations, including any organisation Hillsong Africa Foundation engages to deliver programs and services to Hillsong Africa Foundation beneficiaries.
Those who fall within the scope are required to read and adhere to the HAF Partnership Engagement Policy.
A Partner Organisation does NOT include government departments or ministries that HAF collaborates with to implement program activities, food relief organisations or businesses with whom the transactions are purely financial.

**CATEGORIES:**
Complaints will be classified as either an:

***Inquiry*** - A complaint that is based on a simple misunderstanding or insufficient information, that can be resolved by the provision of information that immediately satisfies the complainant, will be recorded as an inquiry, with the complainant becoming an inquirer.

***Minor complaint*** - A complaint that is not considered to be serious in its nature will be recorded as a minor complaint. Where appropriate, endeavour to resolve minor complaints immediately by correcting misunderstanding or providing missing information, then ensuring that the complainant is completely satisfied with the information and or resolution provided.

***Safeguarding complaint*** - Any complaints relating to breaches the HAF Child Protection Policy or the HAF Prevention of Sexual Abuse, Exploitation and Harassment Policy (PSEAH), and any incidents involving sexual misconduct, including child-related incidents. A safeguarding allegation always necessitates an investigation and resolution. Depending on the severity of the allegation, relevant authorities will be notified who may take over the investigation process.

***Major complaint*** - A non-safeguarding complaint that is assessed as being serious in its nature will be recorded as a major complaint. As a guide, the following types of complaints should always be categorised as major:

- All complaints, including allegations of financial misconduct, fraud, corruption, theft, bribery, money laundering and terrorism financing.
- HR misconduct incidents such as bullying, discrimination or ministers code of conduct breaches; and
- Concerns regarding the quality of project delivery or beneficiary treatment for any HAF programs.

The following considerations will also be referred to when categorising complaints:

- Severity;
- Health (including mental health) and safety implications;
- Financial implications for the complainant or others;
- Complexity, including whether there is more than one issue raised in the complaint and whether each needs to be separately addressed;
- Jurisdiction - multiple jurisdictions or requires reporting to an external body;
- Impact on the individual, public and organisation;
- Potential to escalate;
- Systemic implications;
- The need for, and possibility of immediate action; and
- Whether or not anyone else needs to be consulted in making an assessment.

Providing timely responses to complaints will often require making an initial category assessment based on the limited information available at the time. Further information and details will arise through enquiry and investigation, which may escalate or de-escalate the seriousness of the complaint and result in re-categorisation.

# RESPONSIBILITY AND AUTHORITY

## INTERNAL STAFF & BOARD RESPONSIBILITIES

| | |
|---|---|
| Staff Member | • Directly receiving, registering and responding to minor complaints. Referring major and/or safeguarding complaints to the Managing Director and/or the Board<br>• Ensuring visibility and accessibility to this policy and the complaints mechanisms in all communications and via other relevant platforms.<br>• Ensuring Partners Organisations have sufficient awareness and capacity to implement this policy in the context of their work.<br>• Ensuring programs meet the expectations outlined in this policy. |
| Operations Manager | • Ensuring relevant staff receive appropriate training in implementing this policy.<br>• Responsible for ensuring Inquiries and Minor complaints are responded to in alignment with this policy<br>• Referring Major and Safeguarding complaints onto the Managing Director and relevant external bodies.<br>• Ensuring learning is incorporated into policy review, amendment, and adaptation with respect to organizational practices. |
| Managing Director and Board | • Ensuring implementation of this policy<br>• Responsible for ensuring 'safeguarding' complaints are responded to in alignment with the HAF Child Protection Policy<br>• Receiving major complaints, either by referral or directly. Implementing the required investigation and resolving the complaint according to this and other relevant policies.<br>• Ensuring all complaints are resolved appropriately and resolutions are communicated to the appropriate people.<br>• Identifying and resolving any systemic issues underlying complaints.<br>• Informing the HAF Management team, and HAF board of major complaints under investigation and their resolutions where required by other HAF policies.<br>• Periodic review of HAF Complaints Register and processes reviews<br>• Involvement in major investigations or appeals where appropriate |

## PARTNER RESPONSIBILITIES

**Policies & Procedures**

- Uphold HAF's Complaints Handling Guiding Principles in their third-party programs.
- Maintain child safeguarding complaint handling processes in line with HAF Child Protection Policy
- Maintain SEAH complaint handling processes in line with HAF Prevention of Sexual Exploitation, Abuse and Harassment Policy.
- Commit to providing support for survivors and complainants.

**Accessibility of Policy**

- Ensure accessible context specific complaints and feedback mechanisms are developed and communicated to all stakeholders, in particular project beneficiaries.

**Responding to Complaints**

- Directly receive, register, and respond to minor complaints pertaining to your direct field work.
- Refer major complaints to the HAF Managing Director.
- Notify the HAF Managing Director and Board of all safeguarding and major complaints.
- Keep appropriate records of complaints.
- If required, report complaints to authorities where required by law, and/or at the direction of the HAF Managing Director.
- Communicating outcomes of a major complaint (at the direction of the HAF Managing Director and Board to the complainant where the complainant is in their region or jurisdiction)

# COMPLAINTS HANDLING PROCEDURES

## MAKING A COMPLAINT

Complaints can be made by a complainant or by someone acting on their behalf.

Complaints made anonymously will be accepted as they can alert us to legitimate problems which can be resolved and lead to organisational improvements. It is not however always possible to provide a remedy to the individual in the event of an anonymous complaint.

Complaints can be made orally in person or by telephone, and in writing by letter, email or other electronic means. Complaints can be submitted to a HAF partner, or another HAF employee where the complainant has access to or a working relationship with those personnel, and the complainant is comfortable to do so.

Consideration will be given where additional accessibility requirements or support is needed to enable someone to make a complaint, for example providing this information in alternative format or arranging a translator.

In the case of specific projects and programs, suggestion boxes or post course surveys may be utilized to accept feedback and complaints. This however does not prevent an individual from making a complaint or providing feedback through the other means described above.

Complaints can be submitted to HAF via the following contact details:

- Reports can be made through the link: HAF Complaints Handling Report
- When a report is submitted, it remains confidential and is sent directly to the HAF Managing Director, who will then launch a response with the HAF Board and Hillsong Africa leadership team in alignment to our procedure stated below
- If you have any questions, you can contact reports@hillsongafrica.com
- If the allegation is against the HAF Managing Director, then inform the Human Resource Manager via email: heilana.cilliers@hillsong.co.za (please do not complete the HAF Complaints Handling Report)

## RECORDING COMPLAINT DATA

The HAF *Complaints Register* will record and document:

1. All Minor, Safeguarding and Major complaints; and
2. All Third Party Major and Safeguarding Complaints

HAF staff responsible for receiving a complaint will ensure that the following information is included:

- A date of receipt
- A clear description of the complaint and any relevant supporting data or evidence
- A requested solution
- A description of the project, program, campaign, event or initiative, practice, procedure or personnel that the complaint pertains to
- Due date for a response
- Action already or immediately taken to resolve the complaint

If a written complaint is received which does not contain the above information, or in the case of an oral complaint, we will ensure that this information is documented by HAF personnel.

The HAF Complaints Register Summary will be reviewed by the HAF Managing Director and HAF Board.

## INITIAL ASSESSMENT OF A COMPLAINT

When receiving any complaints we will:

- Assess whether in scope for HAF (see scope for more information) If not in scope – proceed to referral process below;
- 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 complainant the course of action that will follow is dependant on:
  - if the complaint is in our scope;
  - if preliminary enquiries need to be made, or further consideration needs to be given; or
  - if the complaint is to be investigated or not.
- We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint or that a person implicated in a complaint is involved in any way with the handling of that complaint;
- We will also seek to avoid any other conflicts of interest in handling the complaint;
- We will not create false expectations, but assure the complainant 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;

    a. Oral complaints immediately;
    b. Written complaints within 10 days of receiving the written complaint; and
    c. Safeguarding complaints within 2 working days of receiving the complaint.

- Follow up where necessary, and monitor whether the complainant is satisfied; and
- We will register all complaints, except inquiries.

In addition to this, when we take an oral complaint we will:

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

The HAF personnel handling the complaint will conduct an initial assessment to determine how a complaint should be categorised (inquiry, minor, safeguarding, major, referral) and managed. If there is more than one issue raised in the complaint, it may be appropriate to categorise and handle separately.

As a general guide:

- *Inquiries* – can be handled and resolved by any HAF Personnel, with advice from the Operations Manager as appropriate.
- *Minor Complaints* – must be overseen by the HAF Operations Manager, with advice from the Managing Director as appropriate.
- *Safeguarding and Major Complaints* – must be overseen by the HAF Managing Director with advice from the HAF Board.

**Referral Process**
Where the subject or nature of the complaint lays completely outside the scope of HAF for complaints handling (e.g. relates to an employee of another organisation), we will endeavour to refer the complainant onto the appropriate contact for submitting their complaint.

HAF commits to providing appropriate assistance and referrals to survivors (external counselling will be provided if necessary).

## INVESTIGATING A COMPLAINT

HAF is committed to the principles of fair and natural justice and allegations are not proof of breach and parties are innocent until proven guilty. We will make every reasonable effort to investigate all the relevant circumstances and information surrounding all complaints.

The level of investigation will be commensurate with the nature of the complaint including the level of supporting evidence or information provided by the complainant. As appropriate, we will:

- Ensure the immediate safety of the victim/survivor;
- Gather and document information, possibly including consultation with relevant involved individuals;
- Ensure confidentiality for complainant, victim/survivor and alleged perpetrator including being able to de-identify complaints at the request of the complainant or survivor.
- Inform/engage with local law enforcement authorities, (if applicable);
- Complete formal incident report forms (if applicable); and
- Consult and take advice from social development and law enforcement in planning and carrying out an investigation (if applicable).

Where the complaint falls under the jurisdiction of an external body, it may be either appropriate or mandatory for HAF to report or cooperate with that external body or for the investigation to be conducted by that external body.

We will 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 we will inform the complainant of progress and keep them informed of progress every 30 days. However, where an external body is involved in a prolonged investigation, we will establish an appropriate alternative timeframe with the complainant for progress reporting.

## RESPONDING TO AND CLOSING A COMPLAINT

After a complaint is assessed and/or investigated, HAF will determine an outcome and communicate to the complainant:

- the outcome of the complaint and any action taken;
- the reason/s for the outcome;
- the remedy, resolutions or fixes that have been put in place; and
- options for appealing the outcome.

HAF will communicate the decision on a complaint within 7 days, unless there are exceptional circumstances. This communication will be in writing in the appropriate language by email, however, where appropriate, such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language. Where communication is required with multiple parties or cross-cultures, a longer period of time to respond and close may be necessary.

HAF will encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied, they may appeal the decision, including providing any additional information they may wish to have considered.

Based on the decision made in regards to the complaint, we will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes. In addition to this, it may be appropriate to:

- Take further remedial action, including changes to the way in which we operate and improve or undertake further training of staff;
- Counsel or discipline staff or volunteers;
- Review or terminate agreements; and/or

Undertake further reporting to external regulatory bodies or enforcement authorities.

## APPEALS

If a complainant is not satisfied with the resolution offered after a formal investigation they may make an appeal, which will escalate to the HAF Board Chairperson. They may then either choose to investigate the matter further, or inform the complainant that no further action can be taken.

If the complaint requires further investigation the complainant will be notified as such and offered a resolution at the end of the investigation, within 30 days.

If the complainant is not satisfied with the outcome of an appeal, they may be encouraged to pursue other means of airing their grievance, including reporting to the South African Social Development Department.

## COMMUNICATING & DISSEMINATING THE POLICY

HAF is committed to ensuring both internal and external stakeholders, especially primary beneficiaries, are aware that they are encouraged to report complaints and know how to do so. We seek to provide this information in a clear and easily understandable form through a variety of accessible channels.

We are also committed to work closely with our partners to develop active measures to remove barriers that may discourage or prevent complaints being made, especially for vulnerable and marginalised community members including children.

HAF's Strategies include:

- Access to the Policy
    - The Complaints Handling Policy is accessible via the HAF staff team, please speak to a HAF staff member should you wish to view the policy. Or email info@hillsongafrica.com.
- Dissemination to Internal Stakeholders
    - Included in staff and volunteer induction upon commencement of engagement with HAF.
    - Ensuring training of key personnel involved in implementing the complaints handling procedures are trained in all aspects of implementation.
    - Policy training once per year.
- Dissemination to Partners
    - Mentioned in onboarding processes
    - Referenced in Partnership Agreements
    - HAF Partner Feedback Survey

## REVIEW

As part of our commitment to effective complaints handling and to ongoing improvement, HAF will ensure that we monitor the effectiveness of our Complaints Handling procedures on an ongoing basis and appropriately update our policy and procedures based on organisational learning and/or updated best practice regarding complaints handling practices.

This policy will be reviewed every **three years** by the Managing Director in consultation with the HAF Board and relevant staff and stakeholders as appropriate.

## COMMITMENT AND DECLARATION

I, _____ [full name], have read and understood the above Complaints Handling Policy and agree to adhere to it and the associated procedures in their entirety.

Sign: _____ Date: _____