

Feedback and Complaints Policy (Program Partners and Beneficiaries)			
Type	Program Policy	Effective	November 2015
Author	Program Performance Unit	Supersedes	NEW
Scope	OAU funded Programs	Review	November 2018
Approved by	Directors Program and Public Engagement	Page	1 of 7

Purpose

This policy aims to ensure that Oxfam Australia (OAU) recognises the value of listening to and responding to feedback and complaints, as a key component of ensuring that our programs accomplish minimum quality standards and accountability to partners and beneficiaries. This policy defines the key principles, minimum requirements, responsibilities and approach of OAU to fulfilling our mandatory and ethical commitments to accountability, and managing feedback and complaints relating to our program work from program partners and beneficiaries to a high standard.

Scope

This policy applies to the handling of feedback and complaints from program partners and beneficiaries (regarding OAU's programs) that are addressed to OAU, its staff, partners, volunteers or anybody directly involved in the delivery of our programs. This policy applies to all program activities, including long term development programs, humanitarian response, advocacy and campaign activities, whether implemented in Australia or internationally. The policy applies equally to programs directly implemented by OAU or those implemented through partners or other Oxfam affiliates.

The handling of compliments and complaints from OAU supporters is covered under Oxfam's *"Supporter Compliments and Complaints Handling Procedure"*. Internal complaints issues such as whistle blowing and grievances are covered by the *"OAU Whistleblowers Policy"*.

Rationale

OAU aspires to make a sustained and significant positive impact on poverty and injustice, and believes it is only through collaboration and the collective effort of many actors that this goal can be achieved. As such, partnership is a critical foundation of our work articulated through the *"Oxfam Partnership Principles"*. Accountability to partners and beneficiaries is part of that commitment and Oxfam has a long history of seeking input and feedback from partners and beneficiaries on our performance, including through Oxfam's participation in the *"Keystone Partnership Survey"*, ensuring that the value of complaints is recognised.

An important aspect of accountability is the ability for stakeholders to report or lodge a complaint about conduct that breaches OAU's commitments and guiding principles, and Oxfam recognises the importance and value of listening and responding to complaints. This enables program partners and beneficiaries to hold OAU to account for our actions and decisions by providing a process where these can be queried and a response obtained. This policy ensures that partners and beneficiaries who identify or suspect the existence of inappropriate behaviour or incorrect practices on the part of OAU are able to describe and communicate these concerns without this having any bearing on their position and responsibilities.

Approach

This policy aligns OAU's approach with the Oxfam International (OI) *Complaints Policy* (in draft), *OI Accountability Framework* (in draft), and the *OI Common Approach to MEL and Social Accountability*. Within the framework of this policy, OAU has a number of approaches to feedback, complaints handling and accountability at the partner and beneficiary levels. These different mechanisms exist and are managed where programs are implemented, both in Australia and overseas through Oxfam Country Offices. OAU ensures that different and flexible approaches (both formal and informal mechanisms) for feedback and complaints handling are used based on specific cultural and country contexts. These different mechanisms for receiving and resolving complaints are summarised in *Annex A - Partner and Beneficiary Feedback and Complaints Procedure*.

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Relevant Standards, Codes and Obligations

Australian Council for International Development (ACFID) Code of Conduct for Non Government Development Organisations	OAU is signatory to this voluntary code of conduct and has committed to regular self assessment to ensure compliance. <u>Section D.6 Complaint-handling within signatory organisations</u>
Oxfam International Program Standards	<i>These minimum standards apply to all Oxfam programs around the globe.</i> Program Standard 11: Programs are accountable to stakeholders Oxfam conducts annual Program Quality Reviews against the OI Program Standards to ensure that programs are accountable to stakeholders.
Other Oxfam International requirements	This policy aligns OAU's approach with the Oxfam International (OI) <i>Complaints Policy</i> (in draft), <i>OI Accountability Framework</i> (in draft), and the <i>OI Common Approach to MEL and Social Accountability</i> .
INGO Accountability Charter (2006)	This charter sets out core values and operating principles for international agencies, against which Oxfam gauges and reports publicly on our economic, environmental and social performance.
The Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief (1994)	The Red Cross Code of Conduct is a voluntary code outlining key standards for international development and humanitarian programming. Oxfam is a signatory to the code. <u>Principle 9:</u> We hold ourselves accountable to both those we seek to assist and those from whom we accept resources.
The Sphere Handbook – Humanitarian Charter and Minimum Standards for Disaster Response (2011)	Sphere standards apply to humanitarian responses, providing minimum standards of performance and operation. <u>Core Standard 1:</u> People-centred humanitarian response: <i>People's capacity and strategies to survive with dignity are integral to the design and approach of humanitarian response.</i> Key action: Enable people to lodge complaints about the programme easily and safely and establish transparent, timely procedures for response and remedial actions.
Core Humanitarian Standard on Quality and Accountability (CHS) (2014)	As a core standard, the CHS describes the essential elements of principled, accountable and high-quality humanitarian action. <u>Standard 5:</u> Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.

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Definitions

For the purposes of this policy and OAU's approach to feedback and complaints handling for programs, the following definitions apply:

Accountability: Processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision making processes and activities, and delivers against this commitment.

Beneficiary: People who are either directly or indirectly engaged in a program and who benefit from the activities of the program. For example, they may receive a product or service.

Complainant: Person or organisation making the complaint.

Partners: Individuals, groups of people or organisations that collaborate with OAU to achieve mutually agreed objectives in aid and development activities. This may include affiliates.

Feedback: The systems, processes, attitudes and behaviours by which an organisation can really listen to their stakeholders, to find out if it is meeting their needs, desires, and agreed requirements or standards, which includes:

- Opinions and suggestions
- Complaints

Complaint: An expression of dissatisfaction made by an individual or organization external to OAU about the standards of service, actions or lack of action by OAU or its staff, volunteers or anybody directly involved in the delivery of our work. It is a criticism that expects a reply and would like things to be changed. A complaint has to be about an action for which OAU is responsible or is within our sphere of influence.

Complaints could include:

- Concern from someone we work with/for about the quality of program delivery.
- Concern from someone we have criticised in a policy paper because he/she feels it is unfair
- Concern about the behavior of staff, volunteers or contractors including felonies such as theft or fraud, endangering the environment, abuse of power, etc.

A complaint does NOT include where partners or beneficiaries disagree with our policy/ approach. Moreover, a complaint is not:

- A general query about Oxfam's work
- A request for information
- A contractual dispute

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Key Principles

Oxfam Australia's Feedback and Complaints Policy (Program Partners and Beneficiaries) and Partner and Beneficiary Feedback and Complaints Procedure are guided by the following principles:

1. OAU is committed to upholding the highest possible standards of behaviour and minimum quality standards across all programs, and therefore recognises the importance and value of listening to concerns and complaints.
2. OAU is committed to ensuring that feedback and complaints handling processes are effective, safe, confidential and accessible to all, irrespective of gender, status or background and without prejudice to future participation.
3. OAU will ensure that partners and beneficiaries have accessible, safe and discreet points of contact through which to raise concerns or complaints.
4. OAU will proactively provide clear, easily understandable information to partners and beneficiaries about our complaints handling procedures.
5. OAU recognises the importance of equipping staff, volunteers and consultants with an understanding of OAU's commitment to accountability and approach to complaints response and will assist them to effectively implement the relevant policies.
6. OAU will ensure that all complaints handling processes and decisions are responsive, fair and reflect OAU's principles and guiding values.

Minimum Requirements

In addition to upholding the above mentioned principles, Oxfam Australia will ensure:

a) Right to make a complaint (including a complaint to ACFID): Proactively inform stakeholders of this right in an appropriate manner.

In the case that OAU is working through partners, all OAU Working Agreements must include clauses which outline:

- a safe, accessible and discreet mechanisms for partner and beneficiary complaints to be submitted to OAU, and OAU's process for handling and resolution of complaints. This clause will be adapted by each country office and programming unit to list the specific complaints mechanisms appropriate to that context (for example - a local phone number, email address, individual point of contact and mailing address).
- the partner's responsibility for communicating these OAU complaints mechanisms to program beneficiaries and ensuring that beneficiaries are aware of how their complaints will be received, handled and resolved by OAU (in line with this policy).
- the partner's responsibility for establishing safe, accessible and discreet complaints mechanisms for beneficiaries (for the receipt and response to direct complaints from beneficiaries).

In the case that OAU is directly implementing projects, these safe, accessible and discreet OAU complaints mechanisms must be established and communicated by Oxfam staff directly to beneficiaries (as above, in relation to the setup, handling and resolution of complaints).

Advise complainants of their ability to make a complaint regarding an alleged breach of the ACFID Code of Conduct to the ACFID Code of Conduct Committee.

b) Participation in how complaints are managed: Give people the opportunity to be consulted in the handling of their complaint.

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c) Accessibility: Complainants should be able to make a complaint as easily as possible (through the use of appropriate language and visuals) to ensure the most vulnerable and disadvantaged stakeholders are able to make a complaint (including ensuring complaints mechanisms are child-friendly). Complaints can be received through written correspondence, e-mail, telephone or verbal complaints), or through other communication mechanisms depending on the context (as outlined in *OAU Disability Inclusion Policy*).

d) Professionally handled: Appropriate investigation, timely, written response and Confidential:

- Initial response provided to any complaint made by a complainant within 48 hours.
- Any investigation work necessary to be decided by owner of the ‘business unit’ and their line manager.
- Formal response to the feedback given (and explained/communicated as necessary) within 15 working days of receiving complaint.
- Oxfam definition of confidential is ‘need to know’ - this will be explained to complainant at time of making complaint.

e) Learning and accountability: Log and monitor all complaints and their outcomes, and complete a once yearly lesson learning activity across all received complaints and report these as per OI requirements (as per OI Complaints Policy (*in draft*)). Annual reporting to the OAU Leadership as required. Undertake quarterly monitoring and reporting on serious complaints from, or disputes with, partners and beneficiaries which indicate non-compliance with this policy, are a risk to Oxfam, or otherwise require a significant response.

f) Non-discrimination: Nobody making a complaint against OAU will be discriminated against in any way.

Related Documents and Implementation

All volunteers and staff will receive an induction on OAU’s Feedback and Complaints Policy (Program Partners and Beneficiaries), including as part of regular Program Quality Training. The recently revised Oxfam Australia Program Management Procedure (PMP) outlines OAU’s approach to accountability, feedback and complaints handling throughout the Project management cycle.

Responsibility and Authority

Accountable	Responsible for ...
Program/ Project Officer	Directly receiving, responding to and registering feedback and complaints on project and program (including escalating complaint where required)
Program Manager/ Coordinator	Ensuring that these policy guidelines are adhered to and implemented through our programs, and that the required capacity to implement is built into the program.
Line Manager	Ensuring all program and project staff read this policy, understand how it relates to their areas of work and are equipped to receive and respond to complaints
Country Director	Ensuring that safe, discreet and accessible complaints mechanisms are established and communicated to partners and beneficiaries in a timely manner Ensuring relevant program staff have adequate awareness and capacity, and support to effectively implement this policy (including trend analysis of all complaints and related reporting to OI and/or OAU) Ensuring all complaints received relating to the country program/partners are resolved appropriately Escalating complaints to Program Director as required, and reporting on all serious complaints

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	Incorporating consideration of this policy country level planning, budgeting and resource allocation
Portfolio Managers	Ensuring that all program designs adhere to this policy and that implementing program staff are aware of the policy implications and incorporate into their work
Contract Management Coordinators	Ensure that contracts entered into with Oxfam affiliates and other partners ensure compliance with this policy, including reporting on identified issues and processes
ATSIPP Manager	Ensuring that safe, discreet and accessible complaints mechanisms are established and communicated to partners and beneficiaries in a timely manner Ensuring relevant program staff have adequate awareness and capacity, and support to effectively implement this policy (including trend analysis of all complaints and related reporting to OI and/or OAU) Ensuring all complaints received relating to the ATSIP program/partners are resolved appropriately Incorporating consideration of this policy into planning, budgeting and resource allocation
Public Policy and Advocacy (PPA) Manager/ Campaigns Manager	Ensuring that safe, discreet and accessible complaints mechanisms are established and communicated to partners and beneficiaries in a timely manner Ensuring that public policies and statements, where relevant, reflect the commitment to accountability and handling complaints to a high standard Ensuring relevant staff have adequate awareness and capacity, and support to effectively implement this policy (including trend analysis of all complaints and related reporting to OI and/or OAU) Ensuring all complaints received relating to PPA/campaigns work/partners are resolved appropriately Incorporating consideration of this policy into planning, budgeting and resource allocation
Management Assistant, Program Director	Annual reporting on complaints to OI and/or OAU as per requirements. Undertaking quarterly monitoring and reporting on serious complaints
Program Director	Ensuring programs meet the principles and expectations outlined in this policy Ensuring all complaints escalated to their level are resolved appropriately
Executive Director	Holding Program Director accountable to implement this policy and promoting policy principles, as appropriate, in the Oxfam International Confederation

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Annex A – Partner and Beneficiary Feedback and Complaints Procedure

