



1. Title of Policy

MITGF Complaints Handling Policy.

2. Introduction

MIT Group Foundation Ltd (MITGF) is a not-for-profit, non-governmental organisation and a registered Australian Charity with the Australian Charities and Not-for-profits Commission (ACNC). MITGF undertakes activities that fall within the scope of its objects including relief and development activities in developing countries.

3. Purpose of policy

This Policy sets out the principles and procedures which MIT shall adopt to manage complaints effectively and efficiently and to use feedback to improve MITGF's accountability, identify areas requiring improvement and enhance relationship with stakeholders.

4. Definitions

ACFID means the Australian Council for International Development.

ACFID Code of Conduct means the code of conduct published by ACFID, and as amended from time to time.

Board means the Board of Directors of MITGF.

Complainant means the person making the complaint.

Complaint means an expression of dissatisfaction against MITGF or a Personnel of MITGF in connection with the relief or development activities carried out by MITGF.

Partner Organisation means any organisation or person that MITGF works with, or is involved with, in connection with any relief or development programs or projects.

Personnel: Personnel are either employed by an organisation (whether full-time, part-time, or casual), engaged by an organisation on a subcontract basis, or engaged by an organisation on a voluntary basis.

5. Principles

The following principles shall apply to the handling of complaints:

- **Accessibility:** Complaints handling process should be easily accessible to all complainants. There is readily available information about the process of making and resolving a complaint.
- **Natural Justice:** All parties to a complaint shall have the right to be heard.
- **Responsiveness:** Complaints will be responded to in a timely manner and handled in a fair and objective manner.
- **Confidentiality:** The confidentiality of complaints shall be safeguarded as far as reasonably practicable.
- **Relevance:** Relevant matters shall be considered and irrelevant matters shall not be taken into account.
- **Objectivity:** The decision maker shall not be biased or appear to be biased and if any issues of conflict of interests are identified appropriate steps are to be taken to ensure objectivity.
- **Continuous Improvement:** Use of feedback and complaints as a means of improving MITGF's operation.

6. Scope of the Policy

This Policy applies to any complaint in connection with any relief or development activities undertaken by MITGF. A complaint may cover:

- the action or services provided by MITGF;
- the behaviour of MITGF's personnel;
- the action of Partner organisation; or
- the behaviour of a partner organisation's personnel; or
- anyone else acting on MITGF's behalf

which relates to the relief or development activities undertaken by MITGF.

7. Awareness and Accessibility of the Policy

- (a) MITGF shall use its best endeavours to make stakeholders aware of its complaints handling policy and to make the complaints handling process easily accessible.
- (b) The complaints handling policy shall be made available through the MITGF website.
- (c) MITGF shall distribute a copy of the complaints handling policy to all its personnel.
- (d) MITGF shall provide partner organisations with a copy of the complaints handling policy.
- (e) MITGF shall require partner organisation to assist with publicising and implementing the complaints handling policy in the country where MITGF undertakes a relief or development project, so that local stakeholders are aware of, and have access to the complaints handling policy. This shall include providing information on the complaints handling process in a clear manner and in appropriate forms and media, which is culturally sensitive, and takes into consideration the needs of vulnerable, minority and disadvantage stakeholders. For example, where appropriate, translating in local languages, the use of pictorial means of communication, and child-friendly procedures where children are stakeholders.

- (f) MITGF shall monitor how effectively it is publicising its complaints handling policy and will make improvements as appropriate.

8. Education and training

MITGF shall communicate its complaints handling policy to all its personnel through its induction and training programs.

Staff directly involved in handling complaints are fully trained in all aspects of this policy and its implementation.

Training will also be provided to MITGF staff following any significant update or change to this policy.

9. Procedures and processes

MITGF shall adopt the following processes and procedures to handle a complaint.

How Complaints may be made?

- (1) A complaint should be made in writing to MITGF at:

Post: Level 6, 284-294 La Trobe Street, Melbourne 3000

Email: shesh.ghale@mit.edu.au

A complaint may also be made by phone:

Tel: +61 3 8600 6762

- (2) A complaint can be made directly to MITGF and in country beneficiaries may also make a complaint via a partner organisation.
- (3) A complaint must include sufficient details to enable MITGF to understand the substance of the complaint. The complainant should also include the outcome or remedy which they wish to see resulting from the complaint.
- (4) MITGF reserves the right to decline a complaint which is deemed to be vexatious or frivolous, not made in good faith, misconceived or lacking substance or is outside the jurisdiction of MITGF.
- (5) MITGF will be mindful of the needs of the vulnerable, children and marginalised people who make a complaint, as such complainants may require special assistance to articulate their complaint.
- (6) Where the complaint is regarding an alleged breach by MITGF of the ACFID Code of Conduct, the Complaint may complain directly to the Code of Conduct Committee of ACFID following the procedures set out by ACFID, details of which are outlined at:

<https://acfid.asn.au/content/complaints>

Acknowledgement

- (7) MITGF shall use its best endeavours to acknowledge a complaint within 10 working days of receipt of the complaint.
- (8) All complaints received shall be treated as confidential and complainants shall be treated with respect.

Initial assessment of complaint

- (9) Complaints may take many forms. A complaint may be minor or serious. A complaint may be vexatious or frivolous or it may be outside the jurisdiction of MITGF.
- (10) MITGF shall make an initial assessment of the complaint to determine the type of complaint and whether to accept the complaint. This may include determining:
 - whether the complaint is vexatious or frivolous, not made in good faith or misconceived or lacking in substance;
 - if the complaint is outside MITGF's jurisdiction;
 - whether further enquiries need to be made before accepting the complaint;
 - whether the matter should be referred to an appropriate authority (for example, if the complaint involves a criminal offence it may need to be referred to the police); or
 - whether the complaint should be investigated.
- (11) If MITGF declines accepting a complaint, MITGF will provide feedback to the complainant on the reasons why.

Responding to and closing a complaint

- (12) Where a complaint is accepted by MITGF, MITGF shall use all reasonable effort to investigate the complaint. The level of investigation and the manner of determining the complaint will depend on the particular complaint having regards to the following criteria:
 - Severity
 - Health and safety implications;
 - Financial implications for the complainant or MITGF
 - Complexity;
 - Impact on the individual, public and MITGF;
 - Potential to escalate;
 - Systematic implications; and
 - The need for, and the possibility of immediate action.

- (13) Complaints may be determined by the President of MITGF or by a personnel delegated by the President to handle and determine complaints. Decisions on serious complaints may be referred to the Board for determination. As a general principle, any personnel implicated in the complaint shall not be involved in the handling of the complaint.
- (14) MITGF shall use its best endeavours to resolve a complaint within 30 working days. If this time frame cannot be met (for example, the matter is more complex, requiring further investigation) MITGF shall inform the complainant accordingly and keep them informed of the progress of their complaint.
- (15) Following an investigation of the complaint, the President, or a personnel delegated by the President or the Board (as the case may be) shall make a decision on the complaint, including, if required, any proposed remedial action.
- (16) MITGF will notify our decision to the complainant as soon as is practical. The notification shall be in writing and sent to the complainant by either email or post. Where appropriate, MITGF will communicate the decision verbally.
- (17) If deemed appropriate, MIT will follow up with the complainant if there is any unresolved concerns.
- (18) In all cases, MITGF shall advise the complainant that if they are not satisfied with the decision, they may refer their complaint to the Code of Conduct Committee of ACFID

Learning from complaints

- (19) MITGF will consider the outcomes of complaints and the implications, if any, for its activities, procedures and processes.
- (20) MITGF will take remedial action if required. MITGF is committed to improving its operations and is prepared to change the way in which it operates, or to undertake further training of personnel. Where appropriate, MITGF will counsel or discipline personnel and consult and take advice from ACFID or other relevant regulatory authorities.

Record-keeping, reporting and continuous improvement

- (21) MITGF shall maintain a record of all complaints, which shall include the following information:
 - Date of receipt of complaint;
 - Description of the complaint;
 - The requested remedy;
 - The decision on the complaint
 - The outcome of the complaint including any remedial action taken
- (22) On a regular basis, complaints and the outcomes of complaints shall be reported to the Board of Directors at board meetings. An analysis of the complaints will be included in the complaints report, identifying in particular, any key issues or trends arising from complaints. The reporting of complaints will enable the Board to identify any systemic

issues and to review the effectiveness of MITGF's complaints handling process and to inform improvements. Any recommendations made by the Board of Directors arising from the reporting shall be adopted and implemented in a timely manner

10. Policy review

MITGF's Complaints Handling Policy will be reviewed on an annual basis, or as otherwise determined by the Board.

Acknowledgements:

- *ACFID Guidelines for the Development of a Complaints Policy*