

	<u>Policy Family:</u> Human Resources
	<u>Policy Name:</u> Complaints Policy
<u>Issuing Department:</u> Human Resources	<u>Policy Number:</u> HFP23
<u>Approved by:</u> HFHF Board	<u>Approval Date:</u> 26 Sep 2024
<u>Last Review Date:</u> N/A	<u>Next Review Date:</u> 26 Sep 2024
Scope This Complaints Policy and procedures document is mandatory and applies to all Habitat for Humanity Fiji staff, volunteers, affiliates, and trustees.	

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A - Purpose

The purpose of our complaints policy is to ensure transparency, fairness, and efficiency in addressing and resolving any concerns or grievances raised by our stakeholders, including Habitat for Humanity (HFHF) Board and committee members, staff, volunteers, affiliates, contractors, beneficiaries, and the public. This policy aims to provide clear guidelines and procedures for lodging complaints, investigating issues thoroughly, and implementing appropriate resolutions promptly. By fostering a culture of accountability and continuous improvement, HFHF will strive to enhance trust, satisfaction, and loyalty among our stakeholders while promoting positive relationships and organisational excellence.

B - Background

HFHF recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard and continuous improvement in every area of our work. This applies especially to delivery of services, seeking donations and accountability to stakeholders. We are committed to working according to or above the standard required by our Ethics and Code of Conduct Policies. Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work. Having a complaints process in place which enables stakeholders to make complaints to HFHF in a safe and confidential manner is of paramount importance at HFHF and is a vital part of our overall approach to accountability and safeguarding.

C - Definitions

1. **Complaint:** Means an expression of dissatisfaction made to HFHF, related to its people, products or services, or the complaint handling process itself, where an organisational response or resolution is explicitly or implicitly expected.
2. **Complainant:** Means a person, organisation or its representative, making a complaint.
3. **Feedback:** Means opinions, comments, suggestions, and expressions of interest in the products or the complaint handling process.
4. **HFHF:** Habitat for Humanity Fiji.
5. **HFHI:** Habitat for Humanity International.
6. **Inquiry:** Means a request for information or an explanation.
7. **Stakeholder or Interested Party:** Means a person or group having an interest in the performance or success of the organisation.

D - Policy

1 - Complaints Policy, Training & Monitoring

- i. Our Complaints Policy is published on our website and is referenced in the HFHF Employee Handbook and in the HFHF Partner Handbook and in Partnership and Activity Agreements with implementing partners. The Complaints Policy is also made accessible to other stakeholders in annual reports and other communications.
- ii. We require any HFHF Board and committee members, staff, volunteers, affiliates, and contractors who may be involved with a complaint to formally signify their commitment to this Policy.
- iii. To familiarise people with this policy HFHF runs induction programs for our Board members, staff, volunteers, affiliates, and contractors. Personnel directly involved in complaints handling are fully trained in all aspects of this policy and its implementation. We take exceptional care to inform field personnel in implementing countries and HFHF staff meeting with partners and beneficiaries in the field regarding this policy and encourage them to receive and handle complaints taking account of language issues and cultural sensitivities.
- iv. HFHF management will monitor the effectiveness of our complaints handling in practice and make improvements as appropriate.
- v. The HFHF Board will review this policy and the effectiveness of our complaint handling procedures at least every 2 years.

2 - Publicising the Policy

- i. HFHF makes clear the value we place on receiving concerns and complaints in all relevant communications. Our website has a “Contact Us” option that is across all our website pages which links to this Policy and to information on how to make a complaint. Where literacy is a constraint, we will orally invite expressions of concerns and complaints. We will take care to give this invitation in a way that is culturally appropriate, recognising that in some cultures people require greater encouragement to make a complaint.
- ii. We ensure that making a complaint to HFHF is as easy as possible. We will take complaints orally in person, over the phone and by any written means. We will do our absolute best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can. All relevant communications (for example, website, newsletters, annual report, partnership agreements, employee/staff policies) should help explain this and explain our procedures for handling complaints, which includes:
 - (a) Where or to whom complaints can be made
 - (b) Information to be provided by the complainant
 - (c) The process for handling complaints
 - (d) Time periods associated with various stages in the process
 - (e) The complainant's options for remedy, including external means
 - (f) How the complainant can obtain feedback on the status of the complaint
- iii. In addition to regular reviews of our complaint handling processes we will monitor how effectively we are publicising our Complaints Policy on a continuing basis and make necessary improvements in its communication, where appropriate.

3 - Where and How Complaints Can be Made

- i. HFHF can receive complaints orally in person or by telephone, and in writing by post, email or online via our website. Where complaints are made orally, we will ensure our write-up of the complaint contains all the information the complainant wishes to provide. All complaints should be directed in the first instance to HFHF. If no satisfactory resolution is achieved, then an alternate route is Habitat for Humanity International (HFHI), which handles complaints relating to an alleged breach of the Code of Conduct by a member organisation.
- ii. Complaints may be made by a friend or advocate of the complainant on their behalf.
- iii. In countries outside of Fiji, due to the specific nature and/or geographical location of their activities, HFHF's National Director or their designee is responsible for responding to complaints relating to HFHF's operations in that country.

- iv. Country Offices may develop additional procedures to fulfill the Policy's objectives and principles, including putting in place appropriate mechanisms for people to express complaints in a practical and safe manner.
- v. Receiving complaints in another country can be done in a range of ways, and decisions must be made (with the local community as appropriate) as to what is most appropriate. To establish what the complaint is and its validity, interpreters might be needed. Some complaints about programs and/or staff ways of working may not be able to be resolved easily, and in-country staff may require additional support from HFHI.
- vi. HFHI has provided a mechanism for raising in good faith any suspected violations of the law or of HFHF policies. It is called the Habitat Ethics and Accountability Line, and is a hotline and website provided by a third-party service. This system can be used when the complainant wishes to remain anonymous or when the regular means of reporting concerns have not resolved an issue. Habitat Ethics and Accountability Line can be used to report the following concerns:
 - (a) Discrimination
 - (b) Harassment/bullying
 - (c) Sexual exploitation and abuse
 - (d) Conflict of interest
 - (e) Misstatements in financials
 - (f) Criminal activities
 - (g) Legal or regulatory violations
 - (h) Bribery or kickbacks
 - (i) Worksite violence or serious bodily injury or death
 - (j) Any significant or chronic compromise of work site safety
 - (k) Whistleblower retaliation
 - (l) Data security breaches
 - (m) Falsification of official records or reporting.
- vii. Complaints can be made online or via telephone 24 hours a day, 7 days a week:
 - (a) Within the United States, call toll-free **(844) 539-2350**
 - (b) Outside the United States, call collect **(+1) 720 514 4400**
 - (c) Online at Habitat Ethics and Accountability Line – healmobile.habitat.org
- viii. HFHF's Complaints Policy, specifically highlighting the following crucial points for all complaints, and is publicised on HFHF's website.
 - (a) General complaints about any aspect of HFHF and its work should be sent to the email address: **complaints@habitatfiji.org.fj**
 - (b) Postal complaints can be sent to the National Director to the below postal address: **Habitat for Humanity Fiji, 1 Foster Road, Walu Bay, Suva, Fiji.**
 - (c) Complaints about the National Director should be sent to the Chair of the Board to the below address: **Habitat for Humanity Fiji, 1 Foster Road, Walu Bay, Suva, Fiji.**
- ix. For complaints which do not fall within the scope of this policy, HFHF will assist where possible in referring the matter to the appropriate organisation or Government authority.

4 - How Complaints are Handled

- i. When we take an oral complaint, we will:
 - (a) Identify ourselves, listen, record details, and identify what the complainant wants.
 - (b) Confirm that we have understood and received the details.
 - (c) Show empathy and respect for the complainant, and attempt to not take sides, lay blame, or become defensive.

- ii. For all complaints we will:
 - (a) Seek from the complainant the outcome(s) they are expecting.
 - (b) Make an initial assessment of the severity of the complaint and the urgency of action.
 - (c) Clearly explain to the complainant the course of action that will follow:
 - (1) If the complaint is out of our jurisdiction.
 - (2) If we may exercise discretion not to investigate.
 - (3) If preliminary enquiries need to be made, or further consideration needs to be given.
 - (4) If the complaint is to be investigated.
 - (d) We will not create false expectations but assure the complainant that the complaint will receive full attention.
 - (e) Give an estimated timeframe or, if that is not possible, a date by which we will contact them again.
 - (f) Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives.
 - (g) Ensure that the complaint is appropriately acknowledged.
 - (h) Follow up where necessary and monitor whether the complainant is satisfied.
 - (i) We will register all complaints.
 - (j) We will report relevant matters to law enforcement authorities where appropriate.
- iii. We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.
- iv. Where appropriate, we will ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.
- v. We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in handling that complaint.
- vi. **Initial assessment of complaint**
 We will first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed. To determine how a complaint should be managed, we will assess it in terms of the following criteria:
 - (a) Severity
 - (b) Health (including mental health) and safety implications
 - (c) Financial implications for the complainant or others
 - (d) Complexity
 - (e) Impact on the individual, public and organisation
 - (f) Potential to escalate
 - (g) The need for, and possibility of immediate action
- vii. Where possible, complaints will be resolved at the first contact with HFHF. Our staff should resolve complaints promptly and with as little formality as possible where appropriate.
- viii. If we assess the complaint as significant or serious in terms of one or more of these criteria, we will classify the complaint accordingly. Examples of significant or serious complaints are reporting a matter to do with child protection or child labour, sexual exploitation, or abuse of a person(s), an immediate risk to safety or security of a person, a fraud or misappropriation of funds including terrorism or money laundering, a complaint about a functional manager and a complaint about or a matter with a government affiliate.

5 - Inquiries, Minor Complaints and Jurisdiction

- i. We will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person, during the initial phone call or meeting. As far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and/or the resolution provided. When appropriate, we may offer an explanation or apology to the person making the complaint.
- ii. On receipt of a complaint, we will also attempt to determine expeditiously whether an investigation is required, depending on jurisdictional questions or whether the complaint is ill-conceived.
- iii. If the complainant disputes an assessment that a complaint should not be investigated, the staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable, we will refer the complainant to the ND who may decide to convene a complaints committee.

6 - How Complaints are Investigated

- i. We will make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint.
- ii. The level of investigation will be commensurate with the significance or seriousness of the complaint. A significant or serious complaint will follow the procedure(s) described in Attachment II of this Policy.

7 - Timeframes

- i. We will acknowledge written complaints within 5 working days of receipt.
- ii. We will aim to resolve complaints as quickly as possible within 30 working days unless there are exceptional circumstances. If a complaint is not resolved within 30 working days, we will inform the complainant of progress and keep them informed of progress every two weeks.

8 - Responding and Closing a Complaint

- i. The ND or their designee will normally make the decision on a complaint that has required investigation (that is not a minor complaint). Decisions on serious or significant complaints will be reported to the HFHF Board.
- ii. HFHF will communicate the decision on a complaint as soon as is practical. HFHF's communication will be in writing in the appropriate language by email and/or post. 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.
- iii. We will encourage the complainant to respond and advise if they are satisfied with HFHF's decision. In the decision, we will advise that if a complainant is not satisfied, we will be prepared to consider any additional information they may provide and review our decision.
- iv. In all cases, we advise that the complaint be referred to HFHF's Complaint Committee and to the Habitat Ethics and Accountability Line complaints mechanism of HFHI. We will provide all necessary information for referral to HFHF's Complaints Committee and offer to assist in the referral.

9 - Outcomes of Complaints

We are committed to learn from complaints by taking the following steps:

- i. We will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures, and processes.
- ii. We will take all required remedial action. We will be prepared to change how we operate and improve or undertake further training of our personnel. Where needed, we will counsel or discipline our personnel.
- iii. Where appropriate, we will consult and take advice from relevant sponsors, donors, and regulatory/enforcement authorities.

10 - Confidentiality

We will not reveal a complainant's name or personal details to anyone in or outside our organisation other than the HFHF Board members, ND, the worker involved, or an advisor we may engage and who will commit to keeping any information confidential in handling the complaint, without obtaining the complainant's permission.

11 - Recording Complaint Data

We will register all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, as in the case of oral complaints, record this information ourselves:

- i. Date of receipt
- ii. A description of the complaint and relevant supporting data (to include location, who is involved, witnesses, how many times it happened, supporting documents)
- iii. The requested remedy
- iv. The person(s), service(s) and/or good(s) and/or practice or procedure complained about
- v. The due date for a response
- vi. Immediate action taken (if any) to resolve the complaint.

[At a complainant's request, information can be de-identified once the complaint has been resolved.]

12 - Reporting Complaints

- i. We will immediately escalate complex or significant or serious complaints to our ND or their delegate, refer to Attachment II.
- ii. All complaints will be reported at HFHF management team meetings and Board meetings (for serious matters) as detailed in the Complaints Register. Minor complaints will be reported in summary form. Significant or serious complaints will be reported in detail. Names and personal details of complainants will not be included in such reports.
- iii. An analysis will be included in the complaints report provided with the complaint data.

E - Other Considerations

1. Any exceptions to this policy must be approved by the ND.
2. When HFHF is not able to comply with, or meet the intent of this policy, the HFHF ND (or their delegate) must document the reasons for their inability to comply and submit alternative actions.
3. HFHF reserves the right to update, revise, or modify this policy as necessary to ensure compliance with evolving laws, regulations, best practices, or internal requirements. Updates may be made at the discretion of HFHF Trustees or the National Director without prior notice to users, employees, volunteers or other stakeholders. It is the responsibility of individuals subject to this policy to regularly review the latest version available to ensure adherence to the most current guidelines and procedures. Continued use of HFHF's services, facilities, or engagement with its policies constitutes acceptance of any updates or modifications made thereto.

F - Revision History

Date	Modification	Approved by
TBD	Creation of the HFHF Complaints Policy from HFHI source material	HFHF Board

20 th September, 2024	Complaints contact details and minor edits	

G - Attachments

- Attachment I - Complaint Record Form
- Attachment II - Complaints Procedure
- Attachment III - Policy Acknowledgement Form

Attachment I - Complaint Record Form

All complaints about HFHF or any of its people from an external individual, group, or organisation, whether verbal or written, are to be recorded on this form. Please discuss this matter with the ND as soon as possible after receiving a complaint and seek advice from them to complete this form and identify the next steps required.

Date: [Date complaint is received]	
Personal Details: [Name, contact details, if appropriate]	
Nature of Complaint: [Brief outline of the complaint]	
Detail of Complaint: [A detailed description of the complaint the person has made]	
Location:	
Who is involved:	
Witness/es (if any):	
How many times it happened	
Relevant documents submitted	
Requested remedy: [A description of how the reporter wants the complaint remedied]	
Who dealt with it: [Name of person who is or has responded to the complaint]	
How it was dealt with: [Action taken to handle the complaint]	
When is the response expected to be completed?	
Outcome: [Outline of what has happened because of the complaint]	
Follow up required: [Any action required because of the complaint. This may include a change to HFHF's procedures and policies]	

Attachment II - Complaints Procedure

The procedure to assess a significant or serious complaint is as follows:

1. Any complaint is to be reported to a HFHF manager or the ND and if appropriate the Child Protection Officer (CPO). For all complaints of breaches, the manager (and CPO) will make an initial assessment of the severity of the breach and the urgency of action including notifying the ND when necessary. The HFHF Board Chair will be notified that an investigation has started, depending on the severity of the breach. If the complaint is about the ND, the manager and if appropriate the CPO will notify the Board Chair directly. Any relevant donors or third parties (such as DFAT or MFAT) will be informed as required by agreement with them, where a breach involves an activity that is supported by such a donor or third party.
2. The HFHF ND will appoint a team to conduct a formal investigation into the complaint. The investigation team may include HFHF staff (such as Managers and a CPO) or members of the HFHF Board. The investigation team will treat all complaints seriously. The investigation will be handled professionally, in confidence and in a timely manner. Procedural fairness will be applied, and all decisions made will be in the best interests of the person(s) involved. HFHF will ensure that the person who raises the complaint is not required to express their suspicion to the person implicated. Individuals who report a suspected breach are not responsible for investigating their concern.
3. If the alleged perpetrator is an HFHF employee, the HFHF ND has the right to stand them down on full pay (if appropriate), until an investigation has been completed. If the alleged perpetrator is associated with HFHF in a volunteer capacity, they must cease HFHF activities until the investigation has been completed. If the allegations are from a previous involvement with HFHF, the alleged perpetrator is not able to reengage with HFHF until the investigation has been completed.
4. If the breach concerns a HFHF stakeholder overseas or one of our overseas partners; HFHF will work with the relevant overseas partner and local Habitat for Humanity office to investigate the matter and to manage the allegation. If it involves a HFHF stakeholder on a Global Village team, HFHF will work with the Host Coordinator, Team Leader, and other team members (when required) to investigate the issue.
5. The team that conducts the investigation will provide a written report to the HFHF ND setting out what the investigation has discovered and recommendations of action to address the matters raised by the investigation.
6. Once an outcome has been determined by the HFHF ND, the people involved will be informed including (where appropriate) the person or in the case of a child, the family, and alleged perpetrator. Anyone else actively involved will be informed on a need-to-know basis consistent with confidentiality requirements. Appropriate support will be provided to any complainant survivor and any cultural sensitivities and language barriers will be considered.
7. All necessary steps will be taken after the investigation has been completed to address the outcome. This may include:
 - (a) Compensation for any person including a child harmed/misrepresented
 - (b) Reinstatement of a staff or volunteer member
 - (c) Necessary actions to address any damaged reputation or confusion amongst HFHF staff, volunteers, and stakeholders
 - (d) Dismissal of the perpetrator
 - (e) Disciplining of a staff member
 - (f) Steps to end engagement of a volunteer with HFHF
 - (g) Requiring any associated organisation such as an affiliate or donor to carry out appropriate steps including those set out above.

8. HFHF will keep a record of all complaints and the investigation and outcomes of those complaints. This record should be appropriately kept to protect confidentiality.

Policy Acknowledgement Form

Complaints Policy

Name: _____

Position: _____

INSTRUCTIONS

1. HFHFs Complaints Policy must be read in its entirety, you the trustee, employee, volunteer or affiliate must then name, sign and date this form, to confirm you have understood the policy and agree to abide by its terms and meet the intent of the policy, then the acknowledgement form must be forwarded to the Human Resources department. HFHF must retain the original form for documentation purposes.
2. If you are not able to comply with or meet the intent of HFHFs Complaints Policy, then an exception must be requested in advance and sent to the ND for authorisation, and this must include: a) the section of the policy for which the exception is being requested; b) references to any local laws or business justifications; and c) the proposed alternative.

I hereby certify that I have read HFHFs Complaints Policy and therefore:

- I acknowledge and confirm that I have fully understand all the sections and requirements of the document and agree to abide by the terms of the policy, and that failure to do so can result in disciplinary action, up to and including dismissal.
- I acknowledge and confirm that I will immediately notify my Direct Supervisor or HFHFs ND if I see or suspect anything that can be considered an exception to this policy.

Acknowledgement:

(Signature)

(Date) dd/mm/yyyy)