

KEY PRINCIPLES

- Caritas Internationalis Management Standard 1.7 provides that member organisations have a Complaints Handling Policy as a formal appropriate feedback mechanism that is agreed with key stakeholders and properly communicated.
- The Policy is intended to encourage us to listen to the needs, concerns and views of our supporters, donors, partners and the communities where we work. It means that we strive to improve the quality, learning and effectiveness of our work.
- The Policy is an integral component of Caritas's risk management framework whereby all external and internal risks (e.g. operational, reputational, legal and financial risks) undergo assessment on probability and impact.

DEFINITIONS

Anyone may make suggestions for improvement of our practice. However, a complaint is a documented expression of dissatisfaction about the processes or practices of Caritas Aotearoa New Zealand that needs a response. Complaints will be accepted in any format.

POLICY / PROCEDURES

1 Why do we want to hear complaints?

Caritas is committed to being as effective as we can be in the work we do and the communities we serve. We listen to the needs, concerns and views of those involved in our New Zealand and international programme work and activities. This will include our programme partners and the communities and individuals involved in the activities we fund or interact with. Throughout our work, Caritas puts systems in place to safeguard and protect individuals from any form of harm as a result of our activities. However, we recognise that mistakes can happen and we are committed to being accountable for those mistakes. We want to hear people's concerns, and to respond appropriately to those concerns.

By listening and responding to complaints Caritas aims to:

- Build relationships of trust with partner organisations and programme participants

- Ensure the respect and dignity of those wishing to raise a concern or complaint about Caritas
- Be alert to problems in our work and rectify mistakes quickly
- Help us continuously to learn and improve
- Raise awareness amongst partners, programme participants and other parties about their rights.

Nothing in this policy should be understood as taking away the right of any individual, group or organisation to seek redress under any relevant legislation.

2 What kinds of complaint?

We invite feedback about any aspect of our work. In the first instance the concern should be raised with the Caritas staff (or their manager) closest to the specific work concerned.

A concern or complaint to which we can respond has to be about an action for which Caritas is responsible, or one that is within our sphere of our influence. For example:

- Implementation of projects Caritas supports or implements
- Behaviour of staff, volunteers or representatives
- Behaviour of partner staff supported by Caritas funding
- Funding or programme decisions by Caritas
- Misuse of funds by Caritas or partner staff
- Caritas's process of arriving at a public policy, submission or an advocacy position.

What is not covered?

- All internal employment issues, such as employment conditions, which are covered by Caritas's internal staff complaint/grievance procedures
- Issues not under the scope of Caritas's work
- Issues related to an organisation not supported by Caritas
- Issues related to matters between Caritas and other entities within the NZCBC Group.

Types of Complaints

Caritas's Complaints Handling Mechanism (CHM) can handle complaints that are both Non-Sensitive and Sensitive (Sexual Exploitation or Abuse - SEA or Safeguarding; fraud and corruption).

A non-sensitive complaint is typically about the implementation of activities or programme decisions, or an advocacy/policy position taken by Caritas or a partner organisation.

A sensitive complaint is typically a complaint about corruption, sexual exploitation or abuse or other gross misconduct, malpractice or gross violation of Caritas's staff rules.

Caritas will accept anonymous complaints, although following up and acting upon such complaints can be more difficult. Full disclosure will be required in order to properly investigate allegations.

Caritas will endeavour to ensure that there is no retaliation against individuals in response to complaints made against Caritas or a Caritas partner. Programme partners are covered under Caritas's Whistle Blowing Policy.

3 Confidentiality

The CHM ensures that all complaints are handled in a confidential manner. To ensure this, complaints are only handled by designated staff members.

Caritas will send confirmation of receipt of any complaint to the individual either by email, or letter. The person handling the complaint will then forward the complaint to the most relevant manager.

All information regarding complaints is considered confidential and information is shared on a need-to-know basis. All information regarding sensitive complaints is filed in a secure restricted-access system within Caritas.

4 Handling of Complaints

All complaints are handled by a Complaint Receiver and a Complaint Manager. These two functions can be handled by the same person, for example, the Programmes Manager can be both the Complaint Receiver and the Complaint Manager. The Complaint Manager is responsible for managing how the complaint will be processed, investigated, reported and monitored. Assigned staff and people with necessary technical qualifications are responsible for investigating and resolving complaints. Complaints of a sensitive nature are fast-tracked and escalated to the Director.

4.1 Procedures for handling non-sensitive complaints

If a complaint is classified as non-sensitive, it is managed by a team manager (Community Engagement, Advocacy & Research, Programmes or Operations). The Complaint Manager can choose to delegate the authority to handle the complaint to others as appropriate.

Decision

The manager is responsible for deciding how the complaint will be processed, what actions will be taken and the outcome of the complaint. Complaints that affect a wider issue in Caritas's programming will be forwarded to the Director for review.

The complainant will be informed of Caritas's response and the outcome of the complaint, and can be asked for further clarification of information where necessary. The complainant will be asked for feedback on the final outcome and to confirm the complainant is satisfied with the process.

4.2 Procedures for handling sensitive complaints

If the complaint is classified as sensitive and involves issues of SEA, fraud or corruption, it is forwarded to the Director. If the complaint involves staff misconduct but not of a sexual nature, the complaint is managed by the manager but the Director is kept fully informed of all actions. If the complaint involves the manager, the complaint is directed to the Director. There will be a limited number of persons informed and involved in managing sensitive complaints.

Complaint Investigation Team

Depending on the nature of the complaint (SEA, fraud, corruption) a team of Caritas senior management, with the relevant professional and technical qualifications, will be responsible for investigating the complaint. In addition, a person with relevant professional and technical qualifications may be co-opted to the team. The Complaint Manager will draw up a Terms of Reference describing the rules and principles for the investigation. The principles of the investigation are based on confidentiality, objectivity and strict reporting lines in line with Caritas's investigation procedures.

Decision

The Investigation Team will report to the Complaint Manager who will decide the final outcome of the complaint and inform the complainant accordingly.

4.3 Procedures for Handling Complaints about Partner Organisations

Caritas will work together with its partners to handle complaints arising. If Caritas receives a complaint about a partner, the Manager will manage the complaint.

Each partner has an agreed practice with Caritas as to how complaints or concerns are raised between each other about any issues arising including about the partnership, ways of working, our programmes and the behaviour of our staff. When Caritas and a partner sign a Grant Agreement, a CHM is put in place with agreed standards.

If the complaint is classified as non-sensitive, the complaint is referred to the partner to manage within their own system and agreement is reached with regard to who will advise the complainant. Caritas and the partner will discuss any programme issues that need to be adapted or changed to prevent similar issues from happening in future programmes. The partner is responsible for processing, investigating and resolving the complaint.

If the complaint is classified as sensitive, the Manager works directly with the Partners' Senior Management to process, investigate and resolve the complaint. Where the complaint is about the Partner's Senior Management or the complaint poses risks to other Partner staff members, the Programmes Manager and Director of Caritas Aotearoa New Zealand will investigate the complaint, to work out the options for the best outcome of the complaint.

If the complaint is sensitive, Caritas will need to decide on the best way to handle the complaint in line with the principles set out in this policy. If sensitive, but of a nature that can be handled under the partner's own organisational policies and procedures, Caritas will support the partner in the process. If the complaint is sensitive and more serious in nature and poses greater risk to all involved, it will be necessary for Caritas to handle and investigate with the complainant directly. Caritas will agree the processes to be followed with the partner CEO or Chair of the Partners' Board (if the CEO is unable or unwilling to address the issue).

5 Appeal

If the complainant does not accept the outcome of the complaint, he/she can appeal the outcome to Caritas Director or Board, in that order.

6 Recording, Monitoring and Reporting

Information on the complaint, follow-up and outcomes of the process will be kept on file.

For non-sensitive complaints, a manual log is kept in the office with information regarding the complaint, the process, actions taken and outcome.

Sensitive complaints are escalated through a secure system within Caritas. All information regarding sensitive complaints is filed in a secure restricted system.

Complaints are recorded and tracked in Caritas's logs or system in order to monitor progress on how complaints are managed, to identify serious issues in our work and areas of improvement in our people and programme management.

Complaint Reports containing information on the type of complaint, where the complaint was generated, the issue involved, how the complaint was managed and the outcome of the process are produced in order to monitor complaints over time. Reports covering non-sensitive complaints are distributed to Caritas's Management Team, while reports covering all complaints are distributed to the Finance, Risk and Remuneration Committee for review.

A Complaints Report, including statistical and narrative information and recommendations for improvement will be reported annually to the Board and NZCBC. Information about sensitive complaints will be made anonymous in the report.

7 Learning from Complaints

Complaints are used as feedback to Caritas to identify issues that need to be addressed in our programmes or the way we work. Caritas aims to adapt and evolve in response to all feedback received.

8 Handling Complaints about Other Organisations

If Caritas receives a complaint about the activities or staff of a non-Caritas funded programme or organisation, and if appropriate then the complainant may be asked to take the complaint to that other organisation. There may be times when it is considered appropriate to refer the complaint directly to the senior management of the organisation concerned.

If the complaint is sensitive and is about the Senior Management of the organisation, Caritas will either refer the complaint to the organisation's Office as appropriate, or to a local ombudsman or local governmental authority as appropriate and where safe to do so. Where feasible, Caritas will help the complainant to identify specialised organisations that they can go to for specific support (e.g. shelter, medical support, legal support).

Document Control

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