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1 PURPOSE

- (1) The purpose of this External Complaints Policy (Policy) is to guide a fair, clear, timely and documented process through which anyone may make a complaint about The Fred Hollows Foundation (NZ) Group (FHFNZ Group).
- (2) The FHFNZ Group recognises the importance and value of listening and responding to complaints. Receiving complaints is one of the most important ways of improving towards best practice, assisting in holding ourselves accountable, and being transparent to stakeholders.

2 SCOPE

- (1) People who engage with the FHFNZ Group have the right to raise a complaint, have that complaint addressed in a timely manner and receive an accurate and thoughtful response. This includes partners, representatives, supported students and anyone else in contact with or influenced by the FHFNZ Group and anyone who has observed wrongdoing by the FHFNZ Group. Complaints can also be made on behalf of another person if that person is in fear of reprisal. Every effort will be made to resolve all complaints in a respectful, timely and satisfactory manner, keep the complainant informed and keep the complainant's identity confidential.
- (2) We will accept complaints relating to anyone affiliated with our organisation, including Workers, Representatives and Partners, irrespective of who makes them or the nature or subject of the complaint.
- (3) Complaints that do not fall within the scope of this Policy include:
 - (a) a general enquiry or feedback about the FHFNZ Group's activities.
 - (b) a request for information, or an opinion, comment, suggestion, or expression of interest.
 - (c) an initial request to amend donor records.
 - (d) a request to unsubscribe or be removed from the database; and
 - (e) internal complaints (including work-related grievances) raised by workers as they are dealt with in accordance with the terms of their individual employment agreement and/or the Whistleblower Policy.



3 DEFINITIONS

Complainant	A person, organisation or their representative, making a complaint.
Complaint	An expression of dissatisfaction made to an organisation, related to any aspect of its operations.
Chief Complaints Officer	The person assigned to take primary responsibility for managing the external complaints process. This is the People, Culture & Capability Manager of the FHFNZ Group.
In-Country Complaints Officer	The in-country person who takes primary responsibility for managing the in-country complaints process.
Complaints Register	A centrally held record of all complaints received and is maintained by the Chief Complaints Officer.
FHFNZ Group	Includes The Fred Hollows Foundation (NZ) (FHFNZ), its subsidiary The Fred Hollows Foundation NZ Pacific Eye Institute Limited (FHFNZ-PEI), and its controlled entities The Fred Hollows Foundation PNG Inc. (FHF-PNG) and The Fred Hollows Foundation NZ SI Trust Board (Incorporated) (FHFNZ-SI).
Partner	People or entities that the FHFNZ Group conducts significant business with, including but not limited to programme partners.
Representative	Any person (excluding Workers) representing the FHFNZ Group, including but not limited to ambassadors.
Serious Complaint	A complaint that is serious in nature and is assessed as significant in relation to at least one of the following categories: severity; urgency; complexity; potential to escalate; implications for the complainant (including health/mental health and financial); implications for the FHFNZ Group or the public (systemic implications). Serious complaints include but are not limited to: clinical services, sexual harassment, exploitation or abuse, privacy, dishonesty, fraud or corruption, bribery or suspected terrorist engagement or involvement, illegal acts or unethical actions.
Worker	Any individual who carries out work in any capacity for the FHFNZ Group in any jurisdiction including: employers; employees; trustees; contractors; people with responsibility for work and workplaces; volunteers doing work activity; people receiving work experience; people receiving on-the-job training; people working from home and mobile workers.

4 GUIDING PRINCIPLES

The guiding principles of this Policy are as follows:

- (1) We recognise the importance and value of listening and responding to all complaints.
- (2) The complaints handling process is effective, safe, responsive, fair, confidential (subject to the FHFNZ Group's compliance with other legal obligations) and accessible to all including the most vulnerable. It considers minority and disadvantaged stakeholders irrespective of their gender, age, sexual orientation, ability, ethnicity, religion, or location, whether in New Zealand, Fiji, Papua New Guinea, Solomon Islands or in other countries where we work, and without prejudice to their future participation.
- (3) We review and analyse complaint information to ensure continuous improvement.



5 COMMITMENTS UNDER THIS POLICY

- (1) The FHFNZ Group is committed to the following standards:
- (a) **Accessibility:** The complaints handling process is clear, easily accessible and is publicised on the FHFNZ website and through in-country communication tools. There will be readily accessible information about the process of making and resolving complaints with the FHFNZ Group in a range of formats, so no complainants are disadvantaged. Where literacy is a constraint, we will orally invite expressions of complaint on a regular basis. 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. We will aim to take special care in relation to complaints from vulnerable populations including children and marginalised groups. The FHFNZ Group also aims to ensure that complainants are afforded the flexibility to call, write, e-mail or raise complaints in person in the countries in which we have workers, representatives, and partners.
 - (b) **Responsiveness:** The FHFNZ Group aims to take all complaints seriously and handle them both appropriately and as quickly as practicable. All complainants will be treated courteously and respectfully and the FHFNZ Group will keep complainants updated on the progress of their complaint through the complaints handling process, where appropriate.
 - (c) **Timeliness:** All complaints will be acknowledged as soon as possible, ideally within five working days by the recipient. The target response time is within two working days. All complainants will receive a response to their complaint giving the outcome (within applicable legislation, legal advice and Code practice requirements) as soon as possible and, as a standard rule, at least within 30 working days from receipt. The target response time is within 15 working days. If the matter is more complex and this timeframe proves impossible, the complainant will be notified of the likely timeframe for resolution.
 - (d) **Objectivity:** All complaints are addressed in a fair, equitable, objective, and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified and appropriately managed to ensure objectivity. 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 any way with the handling of that complaint.
 - (e) **Confidentiality:** Confidentiality and anonymity relating to the complaint will be safeguarded so far as reasonably practicable. On occasion, it may be necessary for complaint information to be used and disclosed for the purposes of investigating, reporting or continuous improvement. In that case the FHFNZ Group will use all reasonable efforts to de-identify information not required for the purpose of the disclosure.
 - (f) **Stakeholder-focused approach:** The FHFNZ Group has a strong stakeholder-focused approach to our complaints handling. Should there be any issues, the FHFNZ Group encourages complaints and is committed to actively resolve all complaints within our control. Where appropriate, the FHFNZ Group will provide information on assistance available for complainants, e.g., medical, social, legal support, etc.
 - (g) **Accountability:** Accountability for handling complaints and reporting on complaints-related actions and decisions of the FHFNZ Group with respect to complaints handling will be clearly established.
 - (h) **Continuous improvement:** The FHFNZ Group is committed to the continual improvement of the complaints handling process and the quality of the FHFNZ Group's work. As such we will record all complaints. The commitment is practically supported by: the collection and classification of complaint trends; analysis and reporting of complaints trends; monitoring of complaints handling processes; and auditing/management reviews. Further, the FHFNZ



Group recognises the learning that we can gain from inviting feedback and responding to complaints, which is considered a key driver of improvement in our work.

- (i) **Organisational commitment:** The FHFNZ Group will ensure that appropriate resources and expertise are provided to handle complaints. Workers, Representatives, and Partners will be briefed on the Policy and senior managers and other recipients of complaints are adequately trained to receive and handle complaints. Complaints will be handled in accordance with the FHFNZ Group's policies and procedures and in accordance with New Zealand laws and regulations and with local law as applicable.

6 COMPLAINTS

(1) How to make a Complaint

- (a) The FHFNZ Group encourages all stakeholders to set out any complaints to the FHFNZ Group in the first instance so that we may have an opportunity to address any complaints directly. As contact details change from time to time, we outline our contact details and how to make a complaint on our website at <https://www.hollows.org.nz/contact>.
- (b) If you would like to speak with someone about the process of making a complaint you can also call us on 0800 227 229 from within New Zealand or +64 9 304 0524 from outside New Zealand between the hours of 9am-5pm on weekdays or email us at info@hollows.nz.
- (c) The FHFNZ Group can receive complaints by any of the means below:
 - (i) in person;
 - (ii) post;
 - (iii) telephone;
 - (iv) email; or
 - (v) online
- (d) When we take an oral complaint, we will:
 - (i) Identify ourselves, listen, record details, and determine what the complainant wants;
 - (ii) Confirm that we have understood and received the details;
 - (iii) Show empathy for the complainant, but not attempt to take sides, lay blame, or become defensive.
- (e) If the complainant reasonably believes that the Chief Complaints Officer and/or the In-Country Complaints Officer is involved in the complaint or has a personal relationship or association with someone who is involved in the complaint, the complaint should be made to the Chief Executive Officer (CEO).
- (f) Complaints may be made by a friend or advocate of the complainant on their behalf as we recognise that in some circumstances, complainants may wish to remain anonymous but that it may not be possible to provide a remedy to an anonymous individual.
- (g) Details about the complainant will remain confidential, unless it is a requirement of the law or the FHFNZ Group's Child Safeguarding Policy obligations, to disclose or report the information; however, this will not preclude the FHFNZ Group obtaining legal advice.

(2) What the FHFNZ Group will do when a complaint is received

- (a) Upon receipt of a complaint, the FHFNZ Group will address the complaint in a way the FHFNZ Group deems appropriate having regard to the terms of this Policy, the external



complaints procedure, the Council for International Development (CID) Code of Conduct, and any relevant legislation.

- (b) If the FHFNZ Group does not resolve a complaint to the individual's satisfaction, escalation is available to one of the following national industry bodies at no cost.
- (c) The FHFNZ Group is a signatory organisation under the CID Code of Conduct. Unresolved complaints against the FHFNZ Group or in cases where complainants are unhappy with the response received, and the complaint relates to a breach of the CID Code of Conduct, complaints can be made to the CID Code of Conduct Committee of the CID Board (code@cid.org.nz). We will provide the complainant advice and assistance to do this if required. Contact details are available on our website (<https://www.hollows.org.nz/partners/council-for-international-development>) or CID's own website (<https://www.cid.org.nz/make-a-complaint>).
- (d) The FHFNZ Group is a member of the Fundraising Institute of New Zealand (FINZ) and a signatory to the FINZ Code of Conduct. If the unresolved complaint relates to fundraising it can be escalated to FINZ. More information can be found here <https://www.finz.org.nz/ethics/complaints-process>.
- (e) The FHFNZ Group is a member of the Public Fundraising Regulatory Association NZ. If the unresolved complaint relates to face-to-face fundraising it can be escalated to PFRA. More information can be found here <https://www.pfra.org.au/>.
- (f) The FHFNZ Group is a member of the New Zealand Marketing Association (MA). If the unresolved complaint relates to marketing or use of your data, it can be escalated to the MA. More information can be found here <https://marketing.org.nz/mailbox-complaints>.

7 ACCOUNTABILITIES AND RESPONSIBILITIES

- (1) The Board:
 - (a) oversees a quarterly report from management on the number, nature and status of complaints received and any supporting analysis, and ensures that they have been handled satisfactorily, on a timely basis, that appropriate corrective action has been implemented, and that trends are identified and addressed; and
 - (b) in certain circumstances, including very serious complaints, and/or if a complaint involves the CEO, the FHFNZ Board Chair may be required to oversee or investigate a complaint.
- (2) The CEO:
 - (a) ensures this Policy is upheld and will inform the Board of any concerns relating to complaints and dispute resolution, that may present risk to the FHFNZ Group, its workers, beneficiaries, representatives, partners, reputation, operations, or other activities;
 - (b) ensures a report in relation to complaints across the FHFNZ Group is included in quarterly reporting to the Board; and
- (3) The Chief Complaints Officer:
 - (a) maintains the effective and efficient operation of the complaints-handling process, including the recruitment and training of appropriate personnel, technology requirements, documentation, setting and meeting target time limits and other requirements, and process reviews;
 - (b) maintains the FHFNZ Group complaints register;



- (c) compiles the quarterly report on the number, nature and status of complaints received and ensures that they have been handled satisfactorily, that appropriate corrective action has been implemented, and that trends are identified and addressed;
 - (d) refers complaints related to partners immediately to them and informs relevant authorities where appropriate; and
 - (e) if the complaint involves the CEO, notifies the CEO and refers the complaint to the FHFNZ Board Chair.
- (4) The In-Country Complaints Officers:
 - (a) refers complaints related to partners immediately to them and informs relevant authorities where appropriate; and
 - (b) immediately report all complaints to the Chief Complaints Officer. If the complaint is against, or involves, the Chief Complaints Officer, the complaint must be referred directly to the CEO or Board Chair; and
 - (c) where appropriate, lead the in-country complaint handling, including investigation and resolution.
- (5) The Safeguarding Officer:
 - (a) ensures any complaint that involves Sexual Exploitation, Abuse, or Harassment (SEAH), and/or involves the welfare of children, will be handled in a way that maintains protection, dignity, confidentiality; and
 - (b) ensures that handling of complaints related to SEAH and/or the welfare of children adheres to our Child Safeguarding Policy and other relevant policies and procedures.
- (6) All Workers:
 - (a) adhere to the principles and commitments under this Policy and the external complaints procedure and will take all reasonable care to ensure that their actions or omissions are not in breach of this Policy nor directly or indirectly encourage others to breach this Policy.
- (7) Representatives and partners:
 - (a) are responsible to understand and abide by the principles and relevant commitments under this Policy and to advise their primary contact point within the FHFNZ Group promptly of any complaints that may arise.

8 BREACH OF POLICY

- (1) A breach of this Policy may be assessed by the FHFNZ Group as constituting misconduct, serious misconduct, or fraud.
- (2) Depending upon the severity of the breach, the FHFNZ Group may invoke internal disciplinary action and, where considered appropriate in its discretion, action by an external enforcement agency.
- (3) In addition, the FHFNZ Group may seek the reimbursement of direct and indirect consequential losses or costs from the individual(s) concerned.
- (4) Workers who wish to raise a wrongdoing about another Worker's actions or behaviour in relation to this Policy, may do so under the FHFNZ Group Whistleblower Policy. Workers raising a wrongdoing will be protected from possible reprisals or victimisation if they have a reasonable belief that they have made the disclosure in good faith.



9 POLICY REVIEW

- (1) It is intended that this Policy will be reviewed at least every five years. This is not intended to constrain or limit the Board's ability to amend this Policy as it sees fit at any other time.

10 RELATED LEGISLATION AND DOCUMENTS

FINZ: Code of Ethics and Professional Conduct

CID Code of Conduct

CID Code of Conduct Complaints Handling Policy

Child Safeguarding Policy

External Complaints Procedure (internal document)

Whistleblower Policy

Document control and amendment history

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