

- **Burmese Community Development Collaboration (BCDC)**

COMPLAINT HANDLING POLICY

Version 2.0

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1. INTRODUCTION

At Burmese Community Development Collaboration (BCDC), we value the trust placed in us by our communities, partners, donors, and stakeholders. Upholding this trust requires a strong commitment to accountability, transparency, and continuous improvement. Listening to feedback, including complaints, is a critical part of how we demonstrate this commitment.

This Complaint Handling Policy sets out BCDC's approach to receiving, managing, and resolving complaints about our services, activities, people, and operations. We recognize complaints as important opportunities to:

- Understand and address the concerns of those we serve and work with.
- Identify areas where improvements are needed in our policies, practices, and service delivery.
- Strengthen our organizational culture of openness, fairness, and responsiveness.

BCDC is committed to ensuring that all complaints are:

- Taken seriously and treated with respect.
- Handled promptly, fairly, and in a transparent and confidential manner.
- Investigated objectively without prejudice toward any party involved.
- Used as a means for learning and enhancing our programs, governance, and operations.

This policy ensures that all individuals – including beneficiaries, employees, volunteers, contractors, donors, and external stakeholders – have access to a clear and accessible process for raising concerns. It emphasizes that making a complaint will not result in any adverse treatment or retaliation.

In aligning with best practices and international standards, this policy reflects BCDC's commitment to the principles of the Australian Council for International Development (ACFID) Code of Conduct, the Australian Charities and Not-for-profits Commission (ACNC) External Conduct Standards, and broader human rights obligations.

Our ultimate goal is to ensure that concerns are heard and addressed constructively, and that we maintain the highest levels of ethical conduct, professionalism, and community confidence in all our work.

2. SCOPE AND APPLICATION

This Complaint Handling Policy applies to all aspects of BCDC's operations, activities, services, governance, and partnerships, both within Australia and internationally. It provides a clear process for raising and addressing complaints made by any individual or organization that interacts with BCDC.

2.1 Who Can Make a Complaint?

This policy is open and accessible to the following groups:

- Community Members and Beneficiaries: Individuals and communities who benefit from BCDC's programs and services.
- Partners and Donors: Organizations, funding agencies, and individuals who support or collaborate with BCDC.
- Employees and Volunteers: Staff, interns, and volunteers engaged in BCDC's activities.
- Contractors and Suppliers: External entities providing services to BCDC.
- Members of the Public: Any person who has concerns about BCDC's conduct, activities, or operations.

No individual will be disadvantaged or penalized for raising a complaint in good faith under this policy.

2.2 What Types of Complaints are Covered?

The Complaint Handling Policy covers a wide range of issues, including but not limited to:

- Service delivery concerns or dissatisfaction.
- Conduct of BCDC employees, volunteers, Board members, or representatives.
- Breaches of BCDC policies, codes of conduct, or legal obligations.
- Allegations of misconduct, corruption, exploitation, abuse, or fraud.
- Disputes regarding partnerships, contracts, or service agreements.
- Concerns related to privacy breaches or misuse of personal information.

2.3 Limitations and Exclusions

While BCDC is committed to responding to all complaints fairly, the following types of issues may fall outside the scope of this policy:

- Complaints that are primarily employment-related grievances, which are handled through BCDC's separate internal Human Resources policies.
- Complaints against external entities not acting on behalf of BCDC.
- Vexatious, malicious, or repeated complaints without substance, which may be dismissed after careful assessment.

2.4 Geographic Coverage

This policy applies to:

- **All BCDC offices and operations within Australia.**
- **All international activities managed or supported by BCDC**, including projects, partnerships, and funded activities overseas.

Where complaints arise in different cultural, legal, or regulatory environments, BCDC will seek to manage them in accordance with this policy while respecting local laws and practices.

3. PRINCIPLES GUIDING COMPLAINT HANDLING

BCDC's Complaint Handling Policy is founded on a set of core principles to ensure that all complaints are managed fairly, transparently, respectfully, and effectively. These principles are integral to maintaining trust with our stakeholders and strengthening the integrity of our organization.

3.1 Accessibility

- BCDC ensures that complaint mechanisms are visible, accessible, and easy to understand for all stakeholders, including vulnerable groups such as children, people with disabilities, and individuals from culturally and linguistically diverse backgrounds.
- Multiple channels for lodging complaints are available, including in-person, phone, email, online, and through third-party representatives.

3.2 Transparency and Visibility

- Information about the right to complain and the process for handling complaints will be made publicly available through BCDC's website, community meetings, and partner communications.
- Complainants will be informed about how their complaint will be handled and the timeframes involved.

3.3 Fairness and Impartiality

- All complaints will be handled objectively and without bias.
- Decisions will be based on evidence and merit.
- Any conflict of interest will be declared and managed appropriately to maintain the integrity of the complaints process.

3.4 Confidentiality and Privacy

- Complaints will be managed confidentially to protect the privacy and dignity of all parties involved.
- Personal information related to a complaint will be handled in compliance with BCDC's Privacy Policy and relevant data protection laws.
- Anonymous complaints will be accepted, though the ability to fully investigate may be limited.

3.5 Timeliness

- Complaints will be acknowledged promptly and resolved as quickly as possible.
- Clear timeframes for acknowledging, investigating, and responding to complaints will be established and communicated to complainants.

3.6 Protection from Retaliation

- Individuals making a complaint in good faith will be protected from retaliation, discrimination, or adverse consequences.
- BCDC maintains a zero-tolerance approach to victimization or reprisal against complainants.

3.7 Right to Appeal

- Complainants who are dissatisfied with the outcome or process will have the right to request a review or appeal the decision.

3.8 Learning and Continuous Improvement

- Complaints will be viewed as an opportunity to improve BCDC's programs, services, and governance.
- Trends and lessons from complaints will be reported to the Board and incorporated into organizational planning and risk management.

4. TYPES OF COMPLAINTS AND SPECIAL CONSIDERATIONS

BCDC recognizes that complaints may vary widely in nature, complexity, and sensitivity. This policy applies to all complaints, while acknowledging that certain categories require additional protections or specialized handling procedures.

4.1 Types of Complaints

Complaints handled under this policy may include, but are not limited to:

4.1.1 Program and Service Delivery Complaints

- Dissatisfaction with the quality, timeliness, or appropriateness of BCDC's programs, services, or activities.
- Complaints from beneficiaries, partners, or community members regarding project outcomes or service accessibility.

4.1.2 Staff and Volunteer Conduct Complaints

- Allegations of misconduct, unethical behavior, discrimination, harassment, bullying, or breaches of BCDC's Code of Conduct by employees, volunteers, or contractors.

4.1.3 Financial and Resource Mismanagement Complaints

- Concerns regarding fraud, corruption, misuse of donor funds, conflicts of interest, or breaches of financial integrity.
- Complaints related to procurement, asset management, or other financial dealings.

4.1.4 Child Protection Complaints

- Allegations relating to the abuse, neglect, exploitation, or mistreatment of children in connection with BCDC activities, staff, or representatives.
- Complaints in this category will be prioritized and handled in strict compliance with BCDC's Child Protection Policy and legal reporting obligations.

4.1.5 Sexual Exploitation, Abuse, and Harassment (SEAH) Complaints

- Complaints involving sexual misconduct by BCDC personnel or partners.
- SEAH complaints will be managed according to survivor-centered, trauma-informed approaches and confidentiality protocols.

4.1.6 Whistleblower Complaints

- Reports made under whistleblower protections relating to serious wrongdoing, including systemic fraud, corruption, financial irregularities, or breaches of laws and regulations.
- These will be handled in accordance with BCDC's Whistleblower Protection Policy.

4.1.7 External Complaints

- Complaints raised by donors, funding bodies, government agencies, ACFID, or external stakeholders regarding BCDC's operations or compliance with obligations.

4.2 Special Considerations

Certain types of complaints require enhanced safeguards, sensitivity, or referral processes:

- Complaints involving vulnerable populations (e.g., children, persons with disabilities, displaced persons) will receive expedited, confidential handling with appropriate safeguarding measures.
- Anonymous complaints will be accepted but may limit the ability to investigate fully or communicate outcomes.
- Legal and regulatory matters: If a complaint indicates a breach of law or regulation, BCDC may involve external authorities as necessary.
- Conflicts of interest will be managed to ensure complaints are investigated by impartial individuals not connected to the allegations.

4.3 Exclusions

The following are generally excluded from the scope of this policy:

- Employment grievances covered under BCDC's Human Resources Policies (e.g., performance reviews, internal promotions unless linked to misconduct).
- Complaints about the decision not to fund a particular proposal, unless linked to an allegation of unfair process.

5. COMPLAINT CHANNELS AND ACCESSIBILITY

BCDC is committed to providing safe, accessible, and inclusive channels for individuals and communities to raise complaints. We recognize that effective complaint handling requires offering multiple avenues to ensure that all stakeholders, including vulnerable or marginalized groups, can submit complaints easily and without fear of reprisal.

5.1 Channels for Lodging Complaints

Complaints can be submitted through any of the following channels:

5.1.1 In Person

- Individuals can lodge complaints directly with BCDC staff members, volunteers, or representatives during program activities or at BCDC offices.
- **Staff are required to treat all in-person complaints respectfully, confidentially, and in accordance with this policy.**

5.1.2 By Phone

- BCDC provides a dedicated phone line **(0438158647)** where complaints can be reported verbally.

5.1.3 By Email

- Complaints can be submitted confidentially via email to:
(phyudecember@bcdcaustralia.org.au)
- Complaints should include sufficient details to allow for fair assessment and investigation.

5.1.4 In Writing

- Complaints can be mailed to BCDC's official postal address:

**Burmese Community Development Collaboration (BCDC)
124 Paton Street,
Merrylands West, NSW 2160.**

5.1.5 Third-Party Channels

- BCDC will ensure partners and funded entities also establish appropriate complaint mechanisms for individuals engaged in their programs.

5.2 Accessibility Considerations

BCDC is committed to ensuring that all individuals, including people with disabilities, people from culturally and linguistically diverse backgrounds, and those in remote areas, can access complaints mechanisms. We will:

- Provide information about complaint channels in clear, simple language.
- Offer translated versions of complaint information in major community languages (e.g., Burmese, Karen, Chin).
- Make reasonable accommodations for persons with disabilities, such as providing assistance with filling out forms or accepting verbal complaints if literacy is a barrier.
- Enable the use of interpreters if required.
- Allow anonymous complaints where individuals fear reprisal or stigma.

5.3 Cultural Safety and Sensitivity

BCDC will ensure that complaint processes are culturally appropriate and sensitive. Complaint handling will respect the dignity, rights, and cultural values of all complainants, especially those from refugee and migrant backgrounds.

6. RECEIPT AND ACKNOWLEDGMENT OF COMPLAINTS

BCDC is committed to ensuring that all complaints, whether minor or serious, are promptly acknowledged, respectfully handled, and properly recorded. Early and respectful handling of complaints builds trust with stakeholders and demonstrates BCDC's commitment to transparency, accountability, and continuous improvement.

6.1 Channels for Receiving Complaints

Complaints may be received through a variety of channels, including:

- In-person (verbally to any staff member or at a BCDC office)
- Telephone (direct call to the office or complaint hotline)
- Email (via the dedicated complaints email address)
- Written correspondence (letters or completed complaint forms submitted to the office)
- Third-party referrals (through partners, donors, or other agencies)
- Anonymous submissions (through designated anonymous reporting channels)

BCDC will make all reasonable efforts to ensure that these channels are accessible, culturally appropriate, and available in the languages spoken by the communities BCDC serves, especially for vulnerable or marginalized groups.

6.2 Immediate Recording of Complaints

When a complaint is received, the following information must be documented immediately and accurately in the BCDC Complaints Register:

- Date and time of receipt
- Mode of receipt (in-person, email, phone, etc.)
- Name and contact details of the complainant (if provided)
- Details of the complaint, including nature, subject matter, and any individuals or programs involved
- Level of urgency (e.g., immediate risk, safeguarding concern, standard concern)
- Any documents, photos, or supporting evidence attached

If a complaint is made anonymously, all available information will still be recorded to enable further assessment and investigation if possible.

6.3 Timely Acknowledgment of Complaints

BCDC will formally acknowledge the receipt of the complaint within **five (5) working days**. The acknowledgment will be provided in the same communication mode used by the complainant unless otherwise requested, and will include:

- **Confirmation of receipt** of the complaint
- **Brief summary** of the issue as understood by BCDC
- **Explanation of the complaints process**, including timeframes for the next steps
- **Contact details** for the BCDC officer responsible for managing the complaint
- **Assurance of confidentiality** and commitment to respectful handling
- **Information about rights** to escalate if dissatisfied with the process at any point

For complaints requiring immediate protective action (e.g., safeguarding concerns), acknowledgment and action may occur within **24–48 hours**.

6.4 Clarification and Information Gathering

In cases where the complaint is unclear, incomplete, or complex, BCDC may contact the complainant to:

- Seek clarification or additional information
- Understand the complainant's desired outcome (e.g., apology, action, explanation, or correction)
- Explain any limitations on confidentiality if necessary (e.g., mandatory reporting requirements)

This step ensures that the investigation can proceed accurately and fairly.

6.5 Triage of Complaints Based on Severity

Upon acknowledgment, BCDC will assess the severity and urgency of the complaint to determine:

- Whether it should be handled through the standard complaints process
- Whether it requires immediate escalation (e.g., safeguarding, fraud, serious misconduct)
- Whether external reporting obligations are triggered (e.g., reporting to ACFID, ACNC, DFAT)

High-risk complaints will be prioritized for immediate senior management or Board review.

6.6 Respectful and Non-Judgmental Interaction

Every staff member receiving or responding to complaints must:

- Listen actively and empathetically
- Avoid blame, judgment, or assumptions about the complainant's motivations
- Assure the complainant that their concerns are valid and that BCDC values all feedback
- Refrain from defensive behavior or dismissive language

BCDC staff will maintain a professional, courteous, and culturally sensitive approach at all times.

7. COMPLAINT ASSESSMENT AND TRIAGE

After receiving and acknowledging a complaint, BCDC commits to conducting a careful and fair initial assessment to determine the nature, seriousness, and appropriate handling pathway of the complaint.

The purpose of this stage is to ensure that each complaint is dealt with proportionally, appropriately, and in a manner that upholds the rights of all parties involved.

7.1 Initial Assessment of Complaints

Upon receipt, the complaint will undergo an initial review by the Complaints Officer (or designated officer), who will:

- Verify whether the issue falls within the scope of BCDC’s Complaint Handling Policy.
- Identify the primary subject matter (e.g., program services, financial wrongdoing, safeguarding concern, staff behavior).
- Determine the immediacy of risk to any person or organizational asset.
- Ascertain whether the complaint is straightforward, complex, or high-risk.
- Confirm if external reporting obligations exist (e.g., ACNC, ACFID, police, child protection authorities).
- Review whether the complaint is new, repetitive, or relates to a previously closed case.

If the complaint does not fall within BCDC’s remit (for example, if it pertains to an external partner’s operations beyond BCDC’s control), the complainant will be informed appropriately and, where possible, redirected.

7.2 Categorization of Complaints

Complaints will be categorized to help prioritize and guide their management:

Category	Description	Example
Low-Risk	Minor dissatisfaction, can be resolved quickly	Delay in response, administrative error
Moderate-Risk	Substantial concerns requiring internal investigation	Allegation of poor service delivery, minor breach of policy
High-Risk	Serious allegations requiring urgent senior attention	Safeguarding violation, fraud, corruption, serious misconduct

7.3 Escalation Procedures

If during the assessment it is determined that the complaint:

- Involves serious allegations (e.g., child abuse, exploitation, fraud)
- Involves senior management or Board members of BCDC
- Presents significant reputational, financial, or legal risk

The Complaints Officer will immediately escalate the matter to:

- The Chief Executive Officer (CEO), and/or
- The Chair of the Board (if the complaint involves the CEO)

An urgent risk mitigation plan will be activated where necessary.

In cases involving criminal conduct or reportable incidents under regulatory frameworks, external authorities will be notified without delay.

7.4 Assignment for Investigation or Resolution

Following categorization:

- Low-risk complaints may be resolved informally by frontline staff or supervisors.
- Moderate-risk complaints will be assigned to a designated manager for investigation under BCDC's formal complaints process.
- High-risk complaints will trigger a formal, independent investigation process with oversight from senior leadership or an external investigator if required.

Assignment will consider conflict of interest risks; investigators must be impartial and not implicated in the complaint.

7.5 Communication with the Complainant

The complainant will be informed in writing:

- How the complaint has been categorized
- The next steps and expected timeframes for resolution
- Any interim protective measures (e.g., safeguarding protections)
- Their rights to request a review or appeal if dissatisfied with the assessment

BCDC commits to transparency and respectful communication throughout the process.

7.6 Recordkeeping

The assessment decision, rationale for categorization, and assignment records will be entered into the BCDC Complaints Register, ensuring an accurate audit trail for accountability and review.

8. COMPLAINT INVESTIGATION AND RESOLUTION

BCDC is committed to ensuring that all complaints are investigated thoroughly, impartially, and in a timely manner. Investigations will uphold the principles of fairness, confidentiality, and procedural integrity.

The objective of this phase is to **establish the facts, determine whether a breach or wrongdoing occurred, and ensure appropriate corrective actions are taken.**

8.1 Investigation Principles

All investigations conducted by BCDC will adhere to the following principles:

- **Impartiality:** Investigators must not have a conflict of interest or bias regarding the complaint or parties involved.
- **Confidentiality:** Information related to the investigation will be shared only with those who need to know.
- **Procedural Fairness:** Both the complainant and respondent will have the opportunity to provide their version of events.
- **Timeliness:** Investigations will be commenced promptly and completed without unnecessary delay.
- **Evidence-Based:** Conclusions will be based on available evidence, not assumptions or speculation.
- **Supportive Approach:** Both complainants and respondents will be treated with dignity, respect, and support throughout the process.

8.2 Appointment of an Investigator

Depending on the nature and seriousness of the complaint:

- A suitably qualified **internal manager** may be appointed for lower or moderate-risk cases.
- An **external independent investigator** will be appointed for high-risk, highly sensitive, or complex cases (e.g., safeguarding, serious fraud).
- Investigators will be provided with **clear terms of reference** defining the scope, timeline, confidentiality requirements, and reporting obligations.

8.3 Investigation Steps

The general steps for an investigation include:

1. Preliminary Planning:

- Review the complaint and any related documentation.
- Identify key issues, witnesses, and required evidence.
- Prepare an investigation plan.

2. Gathering Evidence:

- Interview the complainant, respondent, and any relevant witnesses.
- Collect documentary, digital, and/or physical evidence.
- Maintain detailed records of interviews and evidence collected.

3. Analysis:

- Assess evidence against relevant BCDC policies, codes of conduct, and applicable regulations.
- Determine whether the complaint is substantiated, partially substantiated, or unsubstantiated.

4. Reporting:

- Prepare a written **Investigation Report** summarizing findings, conclusions, and recommended actions.

5. Management Review:

- The Investigation Report will be reviewed by appropriate senior management or the Board (depending on case severity).
- Decisions will be made regarding outcomes and corrective actions.

8.4 Possible Outcomes

Following the investigation, outcomes may include:

- No further action (if the complaint is not substantiated).
- Apology to the complainant.
- Internal remedial action (e.g., training, process improvement).
- Disciplinary measures (e.g., warning, suspension, dismissal) if misconduct is confirmed.
- Reporting to external authorities (e.g., police, regulatory agencies) if laws have been broken.
- Amendments to organizational policies or procedures to prevent recurrence.

BCDC is committed to learning from complaints and strengthening internal systems.

8.5 Communication of Findings

The complainant and respondent (where appropriate) will be informed of the outcome:

- The outcome will be communicated in writing, explaining:
 - Whether the complaint was substantiated
 - The actions taken (where appropriate, within privacy constraints)
 - Options for appeal or review if the complainant is dissatisfied

Communication will be done sensitively, especially in cases involving safeguarding or trauma.

8.6 Timeframes for Investigation

BCDC strives to:

- **Acknowledge complaints** within **5 working days**.
- **Complete assessments and investigations** within **30–60 working days** for moderate-risk cases.
- **Extend investigations** where necessary for complex cases, with regular updates to the complainant.

Any anticipated delays will be communicated with reasons.

8.7 Documentation and Recordkeeping

All investigation materials, findings, and actions taken will be securely recorded in the BCDC Complaints Register and retained according to privacy and recordkeeping policies. Access to investigation records will be restricted to authorized personnel only.

9. APPEALS AND REVIEW PROCESS

BCDC is committed to ensuring that complainants who are dissatisfied with the handling or outcome of their complaint have access to a fair, transparent, and accessible appeals process.

The purpose of this appeals process is to review decisions to ensure procedural fairness, identify any errors, and uphold confidence in BCDC's complaint management system.

9.1 Right to Appeal

A complainant or respondent may request a review or appeal of a decision if:

- They believe that the **complaint investigation was flawed** (e.g., bias, conflict of interest, procedural error).
- They believe that **important evidence was not properly considered**.
- They have **new and significant information** that could alter the outcome.
- They believe that the **outcome or corrective action was disproportionate or unjust**.

Appeals must be lodged within **20 working days** of receiving the outcome notification.

9.2 Lodging an Appeal

Appeals must be submitted in writing and must:

- Clearly state the reasons for the appeal.
- Identify the aspects of the original investigation or decision that are being challenged.
- Provide any supporting evidence or documentation.

Appeals should be submitted to:

- The CEO (if the original complaint was managed at a departmental or program level).
- The Board Chair (if the original complaint involved the CEO or senior leadership).

BCDC will acknowledge receipt of the appeal within **5 working days**.

9.3 Appeal Review Process

The appeal review process involves the following steps:

1. Preliminary Assessment:

- Determine if the appeal falls within the grounds for review.
- If not, inform the complainant and explain the reasons.

2. Appointment of Reviewer:

- A senior leader not involved in the original decision or an external independent reviewer will be appointed to manage the appeal.

3. Reassessment:

- Review all original investigation materials.
- Consider any new evidence or arguments presented.
- Conduct additional inquiries if necessary.

4. Decision Making:

- Decide whether to uphold the original decision, modify it, or overturn it.
- Recommend corrective actions if necessary.

5. Communication of Outcome:

- Provide written notification of the appeal decision to the complainant, including:
 - Whether the appeal was upheld or rejected
 - The reasons for the decision
 - Any additional steps that will be taken

9.4 Timeframes for Appeal Process

BCDC strives to:

- Acknowledge receipt of appeals within 5 working days.
- Complete appeal assessments and reviews within 30 working days.
- Communicate any necessary extensions and keep the appellant updated.

9.5 External Review Options

If the complainant remains dissatisfied after the BCDC internal appeal process, they have the right to escalate their complaint externally.

External options include:

- Australian Council for International Development (ACFID): Complaints related to Code of Conduct breaches can be made to ACFID's Code of Conduct Committee.
- Australian Charities and Not-for-profits Commission (ACNC): For complaints about compliance with Australian charity law.
- Other relevant government, regulatory, or funding bodies.

BCDC will provide information and assistance to complainants who wish to pursue an external review.

10. CONFIDENTIALITY, PRIVACY, AND RECORD MANAGEMENT

BCDC is committed to ensuring that all information related to complaints, complainants, respondents, and investigations is handled with the utmost confidentiality, in accordance with Australian privacy laws, ethical standards, and BCDC's internal policies.

The purpose of this section is to protect the dignity, safety, and privacy of all individuals involved while maintaining transparency and accountability in complaint handling.

10.1 Confidentiality Principles

BCDC will:

- Maintain strict confidentiality throughout the complaint handling process.
- Share information strictly on a 'need-to-know' basis with those directly involved in the management and resolution of the complaint.
- Take all reasonable steps to protect complainants, respondents, witnesses, and investigators from any potential adverse consequences of disclosure.
- Ensure confidentiality obligations continue even after a complaint has been resolved.

Exceptions to confidentiality may apply if:

- Disclosure is required by law (e.g., mandatory reporting to police or regulatory authorities).
- There is an imminent threat to the health, safety, or security of any individual or the public.
- Informed consent is obtained from the complainant to disclose information.

BCDC will always aim to inform the complainant if disclosure is required.

10.2 Privacy and Data Protection

BCDC will:

- Collect only the personal information necessary for managing the complaint.
- Use personal information solely for the purposes of investigating and resolving the complaint.
- Store all complaint records securely, protecting them from unauthorized access, use, or disclosure.
- Retain complaint records in accordance with BCDC's Recordkeeping and Privacy Policies and relevant legal obligations.
- Allow complainants to access their personal information where appropriate, subject to legal or operational considerations.

All actions will comply with the **Privacy Act 1988 (Cth)** and Australian Privacy Principles (APPs).

10.3 Record Management

All complaints, whether formal or informal, must be properly documented and securely maintained.

BCDC will:

- Maintain a **centralized complaints register** that records:
 - Date of receipt
 - Nature and subject of complaint
 - Parties involved
 - Key steps taken during investigation
 - Findings and outcomes
 - Any appeal and review actions
 - Resolution date
- Store complaints records separately from general personnel files to ensure additional confidentiality.
- Ensure that only authorized personnel (such as the CEO, designated Complaints Focal Point, or the Complaints Management Team) have access to complaint records.
- Retain complaint records for at least **seven (7) years** or in accordance with applicable statutory requirements.
- Destroy or de-identify complaint records securely when the retention period ends, unless legal or regulatory requirements mandate otherwise.

10.4 Protection of Records During Investigations

During an ongoing investigation, all evidence, records, communications, and interview notes will be securely managed to:

- Prevent tampering, alteration, or destruction.
- Maintain the chain of custody if required for legal or external reviews.

11. MONITORING, EVALUATION, AND CONTINUOUS IMPROVEMENT

BCDC is committed to maintaining the highest standards in complaint handling and ensuring that our practices remain responsive, transparent, and effective. To achieve this, BCDC actively monitors, evaluates, and improves its complaints management system. Continuous improvement is essential not only for enhancing our complaint handling processes but also for building greater trust and accountability with stakeholders, beneficiaries, and the wider community.

11.1 Ongoing Monitoring of Complaints Handling

BCDC will implement a system of continuous monitoring to:

- Track and assess the number, nature, and outcomes of complaints received.
- Identify trends, recurring issues, and systemic challenges across the organization.
- Monitor adherence to complaint handling timelines and procedural fairness standards.
- Ensure that actions and resolutions arising from complaints are implemented and completed.

The designated Complaints Focal Point will conduct quarterly reviews of the complaints register and provide updates to the Executive Team and the Board.

11.2 Evaluation of Complaints Handling Performance

At least annually, BCDC will formally evaluate the performance of its complaints handling system to ensure:

- **Accessibility:** Whether the complaints mechanism is visible, widely known, and easy to access for all stakeholders, including vulnerable groups.
- **Responsiveness:** Whether complaints are handled in a timely, respectful, and fair manner.
- **Effectiveness:** Whether resolutions are appropriate and implemented correctly.
- **Compliance:** Whether the process complies with BCDC's Complaint Handling Policy, ACFID Code of Conduct requirements, and applicable laws.

The evaluation may include:

- Analysis of complaints data and trends.
- Review of stakeholder satisfaction feedback, including surveys of complainants and staff.
- Assessment against key performance indicators (KPIs) set internally for complaints management.
- Benchmarking against sector best practices.

11.3 Continuous Improvement Measures

Findings from monitoring and evaluation activities will be used to:

- Update and strengthen complaint handling procedures where gaps or weaknesses are identified.
- Improve awareness and accessibility initiatives, including communication in multiple languages or formats if needed.
- Develop targeted training programs for staff on best practices in complaints management.
- Implement changes to systems or resources to enhance responsiveness and efficiency.
- Strengthen organizational culture around complaints as a valuable feedback tool for improvement.

All corrective actions and process improvements will be documented and, where appropriate, shared internally with staff and volunteers to promote a learning culture.

11.4 Reporting to the Board

BCDC's Executive Management will provide at least an annual report to the Board of Directors summarizing:

- Number and types of complaints received.
- Resolution status and outcomes.
- Any significant risks or systemic issues identified.
- Recommendations and actions for improvement.

This reporting ensures leadership accountability and organizational oversight in maintaining an effective complaints management system.

12. PROTECTION FROM REPRISAL AND MANAGING RETALIATION

BCDC is firmly committed to ensuring that individuals who make complaints or raise concerns are protected from any form of retaliation, victimization, or reprisal. Ensuring a safe environment where stakeholders feel free to express grievances without fear is critical to upholding transparency, accountability, and human rights principles.

Any act of retaliation or intimidation against complainants, witnesses, or those involved in the investigation process is strictly prohibited and will be treated as a serious violation of this policy and BCDC's Code of Conduct.

12.1 Commitment to Complainant Protection

BCDC ensures that:

- Complainants are treated respectfully, confidentially, and fairly throughout the complaint process.
- Individuals are not disadvantaged or subjected to adverse consequences for raising a complaint in good faith, regardless of the outcome.
- Individuals who make malicious or knowingly false complaints will be addressed separately under disciplinary procedures, ensuring balance between protection and fairness.

12.2 Preventive Measures

To prevent retaliation:

- Complaint handling procedures will be confidential, with access limited strictly to those directly involved in managing and investigating the complaint.
- The identity of complainants will be protected to the fullest extent possible unless disclosure is legally required or necessary to investigate the complaint effectively (in which case, the complainant will be informed first).
- Communication with the complainant will include assurances of protection against retaliation at the outset of the complaint process.
- Investigators and responsible officers will be trained to recognize signs of intimidation or victimization.

12.3 Responding to Retaliation

If retaliation is reported or suspected:

- BCDC will promptly assess the situation and, if warranted, initiate an independent investigation.
- Immediate measures will be taken to protect the complainant, which may include:
 - Adjusting reporting lines
 - Providing psychosocial support
 - Implementing no-contact orders or temporary transfers if necessary
- Disciplinary action, up to and including termination of employment or engagement, will be taken against individuals found to have engaged in retaliatory behavior.

12.4 Support Mechanisms for Complainants

BCDC will offer appropriate support to complainants and whistleblowers, including:

- Access to an independent support person, where appropriate.
- Counselling services or referrals for external support.
- Regular check-ins to monitor the complainant's well-being and ensure they are not subjected to subtle forms of isolation, bullying, or pressure.

12.5 Organizational Culture Against Retaliation

BCDC fosters a culture where:

- Raising concerns is viewed as an essential part of organizational learning and improvement.
- Retaliation is recognized and condemned as a breach of organizational values.
- Leadership at all levels reinforces the message that protection of complainants and witnesses is non-negotiable.

Senior Management will periodically communicate BCDC's anti-retaliation stance through training, meetings, and awareness campaigns.

13. REVIEW AND CONTINUOUS IMPROVEMENT

13.1 Regular Policy Review

BCDC is committed to ensuring that its Complaint Handling Policy remains current, effective, and aligned with national and international best practices, including ACFID standards, legal obligations, and sector expectations.

To achieve this:

- The Complaint Handling Policy will be formally reviewed every two (2) years by the BCDC Executive Team in consultation with relevant stakeholders.
- An earlier review may be triggered in response to:
 - Significant changes to ACFID Code of Conduct, ACNC regulations, or relevant laws.
 - Substantial changes in BCDC's operations, programs, or risk environment.
 - Lessons learned from complaint trends, investigations, audits, or critical incidents.
- Any recommended amendments to the policy will be submitted to the **Board of Directors** for approval.

13.2 Monitoring the Effectiveness of the Complaints Process

BCDC will continually monitor and assess the effectiveness of its complaints handling system by:

- Tracking the number, type, and outcomes of complaints received.
- Monitoring response times, resolution rates, and complainant satisfaction.
- Identifying systemic issues or trends arising from complaints.
- Seeking feedback from complainants (where appropriate) about the handling and resolution of their complaint.

Findings from monitoring activities will be incorporated into regular management reports and used to guide policy and process improvements.

13.3 Continuous Improvement and Learning

BCDC is committed to using complaint data and stakeholder feedback to drive continuous improvement by:

- Reviewing internal systems, practices, and service delivery in response to identified trends and gaps.
- Sharing learnings with staff, volunteers, and partners to enhance organizational performance and culture.
- Providing ongoing training and capacity building for staff and volunteers involved in complaints handling.
- Strengthening governance structures and risk management practices where necessary.

BCDC views every complaint not merely as a challenge, but as a valuable opportunity to:

- Build trust with stakeholders.
- Strengthen transparency and accountability.
- Enhance the quality, safety, and effectiveness of our work.

14. CONCLUSION

BCDC is fully committed to upholding the highest standards of accountability, transparency, and responsiveness through its Complaint Handling Policy. This policy reflects our organization's deep respect for the rights of individuals and communities to raise concerns, to have their voices heard, and to seek redress without fear of retaliation.

Through the effective implementation of this policy, BCDC aims to:

- Foster a culture of trust, openness, and continuous improvement.
- Ensure that all complaints, regardless of their nature or source, are handled fairly, promptly, and confidentially.
- Strengthen organizational integrity, credibility, and community confidence.
- Support good governance and reinforce compliance with relevant legal obligations, donor requirements, and the ACFID Code of Conduct.

This Complaint Handling Policy is a living document, reviewed and updated regularly to remain fit for purpose and responsive to the evolving needs of our stakeholders. Every staff member, volunteer, contractor, and partner plays a critical role in making our complaints system work effectively, and BCDC is committed to providing the training, support, and leadership necessary to embed these standards into our daily operations.

Together, through listening, learning, and acting, we can continuously enhance the quality and impact of BCDC's work, and ensure we remain a trusted and accountable organization dedicated to serving the communities we support.

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