

Complaints Resolution Policy

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Update History

Version	Who updated	When updated	Details
v 9 -19	NS	13 Sep 19	Amend 2.2 to incorporate ACFID feedback'
v10-19	NS	11 Oct 19	1.1 Add reference to separate PSEAH policy
v 11-19	IJ	1 Nov 19	Address handling of whistleblowing complaints
v 01-20	IJ	24 Jan 20	Delete reference to 'Whistleblowing'
v 02-21	EH	Feb 21	Remove references to Whistleblowing (now in separate policy)
v11-21	EH	Nov 21	Add email address as avenue for complaints
v11-22	EH	Nov 22	Additional information to incorporate ACFID feedback; clarification of escalation and investigation procedures; confidentiality of complainant

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1. INTRODUCTION

1.1 Background

These policies and procedures are designed to ensure compliance with the Complaints Handling obligations which apply to World Education Australia Limited (Good Return) as a signatory to the Australian Council for International Development (ACFID) Code of Conduct, and as a holder of Australian Financial Services Licence (AFSL) 504804.

These Complaints Handling procedures do not apply to matters which fall under the Prevention of Sexual Exploitation Abuse & Harassment (PSEAH) policy. Such complaints are dealt with under the PSEAH policy, which can be accessed [here](#).

1.2 Guiding Principles

Good Return is an organisation with an open ethos, and its key objective in the area of complaints is to attempt to resolve them without delay in an efficient, responsive, transparent, fair and timely manner with as little formality as possible. These procedures include special consideration for those complainants who are from minority groups, who are in any way disadvantaged, or who may be in some way vulnerable.

Further, we not only encourage the open dialogue mentioned above, but also require that all staff report instances of wrongdoing as soon as they become aware of them (this is contained in our Staff Code of Conduct).

Where a breach or potential breach of the ACFID Code of Conduct or of Good Return's AFSL obligations is involved, the complainant is always offered the option of accessing ACFID's Code of Conduct Committee, or of referring the matter to the Australian Financial Complaints Authority (AFCA) where a breach of Good Return's AFSL obligations is involved or alleged.

2. COMPLAINTS RESOLUTION POLICY

2.1 Definition of a Complaint

Good Return has adopted this definition of a complaint from the Australian Standard (*ISO 10002 2006 Customer Satisfaction – Guidelines for complaints handling in organisations*):

“An expression of dissatisfaction made to an organisation, related to its products or services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected”.

Good Return considers a “complainant” to be:

“Any natural person (including staff and volunteers), or a corporate entity, who, in its dealings with Good Return or its intermediaries, has encountered or experienced an unresolved complaint or has been left dissatisfied in relation to Good Return's services in respect of its charitable activities or (in the case of Good Return Loans Program) in relation to its financial services”.

2.2 Commitment and Accessibility

The guiding principles adopted by Good Return in relation to complaints handling are set out above. Good Return requires a similar commitment from its local intermediaries appointed under partnership agreements in relation to complaints made about their products or services. To this end, it is part of Good Return's partner assessment procedure to ensure that our local partners themselves have a credible complaints handling policy in place, that it is adequately staffed and that

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it is being adhered to. Good Return expects its partners to comply with Smart Campaign principles, where appropriate¹.

This Complaints Policy is published under the 'Legal' tab on the Good Return website and can be accessed by all staff, authorised fundraisers, and customers and recipients of Good Return's services. Any of these persons has the ability to lodge a complaint with ACFID to report a breach of the ACFID Code of Conduct, either [via their website](#), email code@acfid.asn.au or telephone 02 6281 9220.

Complaints may be made to any member of the Good Return team or via the support@goodreturn.org mailbox. A complainant can ask to speak to a specific senior executive, whose duty it is to make sure the concern is addressed in an appropriate, discreet and confidential manner.

All complaints, questions or comments will in the first instance be actioned by a Good Return team member as soon as possible.

We are a signatory to the Australian Council for International Development (ACFID) Code of Conduct. Details of the provisions of the Code can be viewed at the ACFID website (<https://acfid.asn.au>). In the event that the issue entails a potential breach of the Code, there is the option of escalating it to the ACFID Code of Conduct Committee. For issues relating to our Loan Program, the appropriate body is the Australian Financial Complaints Authority (ACFA), who provides a free, independent complaint resolution service.

Online: www.afca.org.au Email: info@afca.org.au Phone: 1800 931 678

2.3 Resources

Existing Good Return staff have been made aware of the procedures outlined in this policy and are therefore conversant with our requirements should they receive an initial notice of a complaint and attempt resolution. Where early resolution is not possible by the staff member receiving the initial complaint, the matter should be readily escalated to a more senior official. Additionally, serious incidents should immediately be escalated to a member of the management team. This is likely to include allegations of misconduct involving vulnerable people, breaches of Child Protection policy, financial wrong-doing and potential reputational risk to Good Return or the sector. Any such complaint must also be shared with the CEO, or the Board Chair if the CEO is themselves the subject of the complaint.

Good Return provides access to complaints-handling free of any charge to all complainants.

New starters, including volunteers, are all made aware of the policy during the induction process. All individual fundraisers acting for Good Return are appointed in writing; the correspondence makes clear reference to Good Return's Complaints Policy and the requirement to adhere to its terms.

2.4 Coverage

These procedures cover all complaints arising from Good Return's products or services in Australia and in Asia Pacific countries where Good Return has agreements with local partners. Those local partners will themselves have complaints handling procedures in relation to complaints about their products or services, and this policy does not address such complaints. If the complaint does not relate to Good Return's products or services, and is therefore outside the scope of the policy, the Complainant will be informed of this, suggesting that they contact the relevant company directly. If appropriate, details of local support or assistance services will be provided.

¹ See <http://www.smartcampaign.org/>

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It should be noted that for a complaint to be eligible to be considered by the ACFID Code of Conduct Committee, it must involve a breach or potential breach of that Code, and for a complaint to be eligible for consideration by AFCA, it must relate to Good Return's Loan Program.

2.5 Receiving Complaints

For both oral and written complaints received, where a complaint is resolved to the customer's complete satisfaction by the end of the fifth business day after the complaint has been received, a 'final response' in writing to the complainant is not required unless specifically requested.

Where the complaint cannot be resolved immediately to the complainant's satisfaction, the Good Return official handling the matter will explain the complaints resolution process available to them. During discussions with the complainant, the official will always endeavour to empathise with the complainant and deal with them in a courteous, even handed manner.

2.5.1. Oral Complaints

Where a complaint is received by telephone or in person, Good Return will ensure the complainant has the opportunity to speak to an official who has received suitable training, is authorised to respond to the complainant, and is not the direct cause of the complaint. That official will:

- Identify himself or herself;
- Ascertain and record the facts relevant to the complaint, using the Complaints Database in order, as far as possible at this early stage, to appropriately categorise the matter;
- Ascertain and record the nature of the complaint and, in particular, whether it concerns an alleged contravention of any law or regulatory requirement.

2.5.2. Written Complaints

Where a complaint is made in writing from the complainant, the correspondence will be reviewed by a senior official within Good Return. That person will acknowledge receipt of the complaint within 5 working days. This acknowledgement will be provided via the complainant's indicated preference for correspondence.

2.5.3. Assistance

Good Return is committed to providing assistance to complainants to enable their complaint to be considered fairly. Examples of assistance include but are not limited to:

- Assistance with completing forms for those with limited literacy skills; and
- Assistance for people with a disability; and
- Allowance by Good Return staff for any cultural beliefs held by the complainant

2.6 Investigating Complaints

Where, upon receipt of the complaint, all the relevant information (being any information that, in the reasonable opinion of the official investigating the complaint, is required to make a decision on the matter) has not been received from the complainant, the official will communicate with the complainant, specifying what further information is required.

Where, after 10 working days, no response has been received to the request for further information, the official will send a follow-up communication advising the complainant that no further action can be taken until all relevant information is provided.

The investigating official will collate the required information, consulting with others as required. They will document their decision, explaining the rationale for the decision. Should this be outside the official's normal authority level, this would be positioned as a recommendation to someone with the appropriate level of authority.

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2.7 Responding to Complaints

Where the official has all the necessary information, a final decision will be provided to the complainant within 15 working days of receiving the complaint, unless a reasonable alternative timeframe can be agreed.

Good Return seeks to resolve all complaints at the earliest possible time, but in no case later than 45 days after the complaint was first registered. Where we have reached a final determination, we will advise the complainant in writing and provide the reasons for our determination.

Our correspondence will include details on how to refer the complaint to the ACFID Code of Conduct Committee or, where relevant, to AFCA, and advise that the service is free, subject to ACFID and AFCA eligibility criteria.

2.8 Recording information about complaints

Good Return records and maintains a register of all complaints received. It is the responsibility of each official who may handle a complaint to ensure that its details are properly recorded in the register contained in the Policies & Procedures directory or in an equivalent approved database. In doing so, an appropriate level of confidentiality should be maintained, including the ability to de-identify complainants at their request. Details recorded in the register can be reported to the Good Return Board and any relevant regulators as may be requested.

Complaints offer an opportunity to identify systemic issues that may continually cause issues for Good Return or our Local Partners. It is for this reason that complaints and complaints history must be analysed in an attempt to identify any recurring issues.

The Compliance Advisor will analyse complaints data and report to the Good Return Board on a regular basis, considering trends, consistencies and possible systemic issues.

The Compliance Advisor shall be responsible for reporting to ACFID in accordance with their requirements per E.3.1 of their Code of Conduct; and similarly where AFCA requires reporting.

2.9 Types of remedies

In determining remedies, the official will take into account the following:

- What is fair and reasonable in the circumstances
- Our legal obligations (including under our AFSL)
- Our current interpretation of the ACFID Code of Conduct and of our AFSL licence obligations
- Good industry practice including that in the country of origin of the complainant.

Good Return has identified that the following remedies may be used depending upon the individual circumstances: loan redemption; instalment refund; provide loan information, explain product details; provide compensation; an apology; or overturn an earlier complaints decision.

2.10 Review

This Complaints Resolution Policy is to be comprehensively reviewed by the Compliance Advisor every three years.