

Health Equity Matters Complaints Handling Policy

Policy no: 049

Version 1

Approved on: 28 August 2025

Approved by: Health Equity Matters Board

1. Introduction

Health Equity Matters is committed to being accountable to the communities it is part of, works with, represents and serves, in line with its values. It recognises the importance of an accessible, efficient and responsive complaints handling approach.

2. Purpose

This Complaints Handling Policy provides the principles and procedures that apply when a person or entity makes a complaint regarding Health Equity Matters' operations and personnel, including its partners, employees, volunteers, contractors, consultants, members, and Board or Committee members. The Policy also applies to individuals employed by the AFAO Foundation.

The purpose of this Policy is to:

- recognise an individual or external organisation's right to raise their concerns about their dealings with Health Equity Matters;
- provide an accessible and transparent process for the resolution of complaints; and
- enable Health Equity Matters to monitor and appropriately respond complaints and to improve the quality and delivery of its work.

3. Scope

This Policy applies to complaints by external stakeholders. It does not cover internal issues and/or complaints by staff, interns or volunteers. These are dealt with in accordance with Health Equity Matters' Grievance Policy.

There is a separate Whistleblower Policy that can be found on the Health Equity Matters website and can be used by either internal or external complainants in instances where the issue relates to suspected unethical, illegal, fraudulent, corrupt, or dishonest conduct.

4. How to Make a Complaint

Complaints can be made through written correspondence, telephone, verbally and the Stopline service.

4.1 Make a complaint via the Stopline

Complaints can be made on an anonymous basis via the [Stopline](#) service available on Health Equity Matters website. The Stopline is an independent, confidential whistleblower hotline and complaints reporting platform who will take full details of

the complainant's concerns via telephone, mail, email or this website. It is also important to remember this service enables individuals to maintain anonymity should they so desire. All complaints made via the Stopline service will be referred to Health Equity Matters' Complaints Officer for follow-up.

Where individuals are providing a complaint in writing, as much information as possible should be provided. Where possible, this should include:

- name and contact details (where the complaint is not made on an anonymous basis);
- details of the concerns, including the location of any incident and the individuals involved;
- the facts leading to the complainant's belief that a breach has occurred; and
- how the complainant would like Health Equity Matters to resolve these concerns

4.2 Contact the Health Equity Matter Complaints Officer

To make a complaint, individuals can contact Health Equity Matters' Complaints Officer directly with the following contact details:

Phone: 1330 30 45 50 and your complaint will be handled accordingly

Address: Level 3, 414 Elizabeth Street, Surry Hills NSW 2010, Australia

4.3 Contact a Health Equity Matters staff or Board member

Individuals may also raise a complaint with any Health Equity Matters employee or Board members in the first instance. In doing so, complainants should explain that they wish the matter to be treated as a complaint and investigated in accordance with this Policy. These complaints will then be referred to Health Equity Matters' Complaints Officer.

4.4 Contact the Australian Council for International Development

Health Equity Matters is a member of the Australian Council for International Development (ACFID) and a signatory to its Code of Conduct. Complaints regarding an alleged breach by Health Equity Matters of [the ACFID Code of Conduct](#) can be made directly to the ACFID. Complaints to ACFID should be marked 'confidential' and sent to:

Chair, ACFID Code of Conduct Committee

Email: code@acfid.asn.au

Address: Private Bag 3, Deakin ACT 2600, Australia

Information about ACFID's handling of complaints is available at: <https://acfid.asn.au/content/complaints>

5. Complaints Handling

5.1 Acknowledging and Triaging Complaints

Within three working days of a complaint being received (and where contact details have been provided), Health Equity Matters will endeavour to:

- acknowledge the complaint in writing;
- provide a copy of this Policy to the complainant; and

- provide an expected timeframe for the complaints handling process to be complete.

Complaints of a more straightforward nature may be resolved quickly. For example, a telephone or written complaint relating to a misunderstanding or miscommunication may be resolved during the initial call or by way of reply to correspondence. All such matters will be recorded in the Complaints and Incidents Register and included in related reporting to the Board.

Complaints of a more serious nature may require a more complex investigation or escalation process. For example, where a serious allegation is identified, Health Equity Matters may:

- as soon as practicable, advise the Health Equity Matters' CEO of the complaint (including all safeguarding complaints) for guidance as to appropriate handling. The CEO will then consult with the Health Equity Matters' President to agree on the appropriate reporting of the matter to the Board;
- consider referring the complaint to the police, and any other appropriate authorities;
- consider the support needs of the complainant and make necessary referrals to support services;
- consider making notifications to donors and regulators, in line with its reporting obligations; and
- conduct an internal investigation of the allegations.

5.2 Conducting an Initial Review of Complaints

Health Equity Matters' Complaints Officer will endeavour to undertake an initial review of the complaint as soon as possible, and within ten working days from receipt of the complaint where practicable. The review will assess relevant issues and determine how the matter will be handled, including:

- determining whether the matter will be treated as a complaint;
- assessing the nature of the matter against the following criteria:
 - severity;
 - health (including mental health) and safety implications;
 - financial implications for the complainant or others;
 - complexity;
 - impact on the individual, public and Health Equity Matters;
 - potential to escalate;
 - systemic implications; and
 - the need for, and possibility of, immediate action.
- considering options for investigation of the matter;
- updating the complainant at the end of this initial review to advise of the outcome and seek their views, including if the matter will not be treated as a complaint, and instead handled in another way.

At this point in the process, some complaints will be resolved, some may be rejected where deemed to be vexatious, and others may be deemed to not be a complaint and be handled under another policy as per the advice by the Complaints Officer (for example the Health Equity Matters' Grievance Policy, where the matter concerns a personal work-related grievance).

Where a complaint is deemed to be outside Health Equity Matters' jurisdiction, Health Equity Matters will advise the complainant and provide assistance in identifying a more appropriate organisation or authority to handle the matter.

6. Investigation Process and Determination

Health Equity Matters' Complaints Officer endeavours to finalise all complaints as promptly as possible and, depending on the circumstances, within 30 days from the initial review of the complaint. This may take longer for more complex matters.

Some complex matters may warrant a thorough investigation based on the assessment. An investigation will be established at the discretion of the Complaints Officer. A Terms of Reference (see the template in Annex 2) will be developed by the Complaints officer and an investigator will be appointed. The investigator is responsible for collecting and documenting evidence, establishing the facts based on the evidence and preparing an investigation report that details the outcome of the investigation and makes findings or recommendations to the Complaints officer. Key considerations in selection the investigator include any actual or perceived conflicts, independence and impartiality as well as experience and expertise.

Health Equity Matters will approach the investigation based on the approach determined in the initial review and with regard to the preferences of the complainant (where they can be contacted) about how the matter is to be handled. This will include any person who is the subject of a complaint having an opportunity to respond to the issues raised.

Once the issues related to the matter are identified and all relevant information gathered and steps taken to resolve the matter, Health Equity Matters will make a determination on the outcome of the complaint.

Where the complainant is contactable, the Complaints Officer will communicate the determination to the complainant either orally or in writing.

7. Reporting and Recording of Complaints

Health Equity Matters' Complaints Officer maintains Health Equity Matters' complaints and eligible disclosure documentation, and monitors complaints and any trends, to identify potential organisational improvements. Proposed changes aimed at strengthening Health Equity Matters systems and practices will be discussed and approved by the Management Team prior to being actioned.

All records of complaints are securely stored online in restricted access areas of Health Equity Matters' network. Complaints may be de-identified on this system upon request by the complainant. A Complaints Register is also maintained which includes de-identified information of all complaints raised, and which can be drawn on for internal reporting purposes.

The Complaints Officer will update the Board and Audit and Risk Committee on the overall number and trends of complaints on a regular basis. Specific high-risk matters may also be escalated to the Board and the Audit and Risk Committee for input and oversight, as required. Mandatory reporting will be carried out in accordance with relevant legislation.

8. Responding to Complaint about a Child/Young Person

Health Equity Matters will treat concerns seriously and ensure that all parties who reports a concern are treated fairly and without bias. All reports made in good faith will be viewed as being made in the best interests of the child / young person, regardless of the outcomes of any investigation. Health Equity Matters will ensure that the interests of anyone reporting child abuse in good faith are protected in accordance with our Safeguarding Policy.

The rights and welfare of the child / young person is of prime importance. Every effort will be made to protect the rights and safety of the child throughout any investigation.

When Interviewing/Talking to Children about their Concern and Complaint

What to bear in mind and do

When a child / young person discloses that he or she has been abused, it is important to keep in mind:

- The child / young person may be feeling scared, guilty, ashamed, angry and powerless. You, in turn, may feel a sense of outrage, disgust, sadness, anger and sometimes disbelief.
- If a child discloses abuse, whatever the outcome, the child must be taken seriously.
- It is important for you to remain calm and in control and to reassure the child / young person that something will be done to keep them safe.
- When a child or young person discloses that they are being harmed, you can show your care and concern for the child / young person by:
 - Listening carefully
 - Telling the child / young person that you believe them;
 - Telling the child / young person that it is not their fault and that they are not responsible for the abuse; and
 - Telling the child / young person that you are pleased they told you about the harm; and
 - Where appropriate, asking the child / young person to disclose their concerns and complaints through drawing or pictures.

What to bear in mind and not to do

- You will not be helping the child / young person if you:
 - Make promises you cannot keep, such as promising that you will not tell anyone.
 - Push the child / young person into giving details of the abuse. Your role is to listen to what the child / young person wants to tell you and not to conduct an investigation (beware of asking any leading questions as this may prejudice any subsequent investigation)
 - Indiscriminately discuss the circumstances of the child / young person with others not directly involved.

If a report is made to you as a staff member / volunteer by a child or young person involving any child protection concerns and/or reports of abuse, follow the Health Equity Matters reporting processes, support, and response guidance in the Safeguarding Policy and Code of Conduct.

9. Managing complaints with our partners and people we work with in international activities

Managing complaints with our partners and people we work with is guided by the following principles:

- Health Equity Matters is committed to upholding high standards of behaviour and best sector practice across all programs and therefore recognises the importance and value of listening to feedback and complaints.
- Health Equity Matters will ensure that partners and people we work with have accessible, safe and discreet points of contact through which to raise concerns or complaints.
- Health Equity Matters is committed to ensuring that feedback and complaints handling processes are effective, safe, confidential and accessible to all, irrespective of age, gender identity, status, disability, or background and without prejudice to future participation.
- Health Equity Matters recognises the importance of equipping staff, volunteers and consultants with an understanding of our commitment to accountability and approach to feedback and complaints and will support them to effectively implement the relevant policies.

In addition to upholding the above-mentioned principles, all Health Equity Matters funded programs/projects will ensure:

Right to provide feedback and make a complaint

Proactively inform stakeholders of this right in an appropriate manner. Where relevant, Health Equity Matters will also advise complainants of their ability to make a complaint regarding an alleged breach of the ACFID Code of Conduct to the ACFID Code of Conduct Committee.

When working through partners, Health Equity Matters will ensure that all Partnership Agreements and MOUs include clauses which outline:

- Safe, accessible and discreet mechanisms for partners and people we work with to submit feedback and complaints to Health Equity Matters, and Health Equity Matters' process for handling feedback and resolution of complaints. This clause will be adapted to reflect the specific feedback and complaints mechanisms appropriate to that context (for example - a local phone number, email address, individual point of contact and mailing address).
- the partner's responsibility for communicating these Health Equity Matters feedback and complaints mechanisms to program/project participants and ensuring that they are aware of how their feedback and complaints will be received, handled and resolved by Health Equity Matters (in line with this Policy).
- the partner's responsibility for establishing and communicating safe, accessible and discreet feedback and complaints mechanisms for program/project participants (for the receipt and response to direct feedback and complaints from program/project participants).
- For any complaints relating to activities which receive donor funding, Health Equity Matters will also report the relevant information to the relevant donor in line with our reporting obligations under the funding mechanisms

Participation in how complaints are managed

Give complainants the opportunity to be consulted in the handling of their complaint

Accessibility

Partners and people we work with should be able to provide feedback and make a complaint as easily as possible.

- Special attention must be paid to ensure the most vulnerable and disadvantaged stakeholders are able to make a complaint.

- Where formal complaints are received through non-written forms, Health Equity Matters should take the responsibility to document this appropriately.
- Where relevant, all feedback and complaints mechanisms should be child friendly and cater to the needs of people with all abilities.

Professionally handled:

Appropriate investigation, timely, written response and confidential handling:

- In case of a complaint, an initial acknowledgement and response must be provided to the complainant within 3 working days of receiving the complaint. This initial response will acknowledge the receipt of the complaint and briefly outline how Health Equity Matters will handle and resolve the complaint.
- The relevant Health Equity Matters delegate or Manager will determine if and how to investigate the complaint.
- Formal response must be given (and explained/communicated as necessary) within 30 working days of receiving complaint.

Learning and accountability

All complaints must be documented, monitored and reported to in line with Health Equity Matters contractual requirements.

- At the project level, all complaints received should be reported through progress reports.
- Undertake more frequent monitoring and reporting on serious complaints from, or disputes with, partners and people we work with which indicate non-compliance with this policy, are a risk to Health Equity Matters, or otherwise require a significant response

10. Roles and Responsibilities

Who	Responsibility
President	<ul style="list-style-type: none"> • Provide discrete point of contact for all complainants making complaints or disclosures about the CEO and manage these matters.
Board	<ul style="list-style-type: none"> • Cultivate a culture that is open and responsive to feedback and complaints. • Oversee and assure the robustness of Health Equity Matters' complaints handling and whistleblowing protection processes. • Approve this Policy and any updates.
Audit and Risk Committee	<ul style="list-style-type: none"> • Review all serious allegations and assure the robustness and integrity of the complaints handling and whistleblowing system. • Review the Complaints and Incidents Register on a six-monthly basis to assure itself that matters are being managed effectively, consistently and in line with this Policy.

Complaints Officer (Principal Director, Corporate Services)	<ul style="list-style-type: none"> • Report serious matters to the Board. • Provide a safe and discreet point of contact for all complainants and whistleblowers. • Assume overarching responsibility for all stages of the complaints handling process. • Finalise all investigations and reporting to the Board. • Ensure this Policy is regularly reviewed every three years. • Provide training to all employees and Board members regarding this Policy to ensure that all such individuals are aware of their obligation to refer on complaints for investigation to the Complaints Officer
Managers	<ul style="list-style-type: none"> • Educate and train Health Equity Matters Personnel and Health Equity Matters Partners regarding the application of this policy across all Health Equity Matters programs and projects. • Ensure Health Equity Matters Partners are aware of this Policy and have appropriate complaints mechanisms in place to implement and upload this Policy.
Health Equity Matters Personnel and volunteers	<ul style="list-style-type: none"> • Responsible for attending mandatory training (including yearly refresher training). • Uphold and ensure their compliance to this policy, as well as the compliance of engaged stakeholders and partners. • Ensure any complaints received from Health Equity Matters stakeholders are forwarded to the Complaints Officer for timely management.

11. Related Policies and Documents

Policy	Title and Hyperlink
011	Anti-Fraud and Financial Wrongdoing Policy
006	Code of Conduct Policy
040	Counter-Terrorism and Anti-Money Laundering Policy
012	Privacy Policy
041	Safeguarding Policy and Code of Conduct
050	Whistleblower Policy
Templates/Tools	
	Complaints and Incidents Register

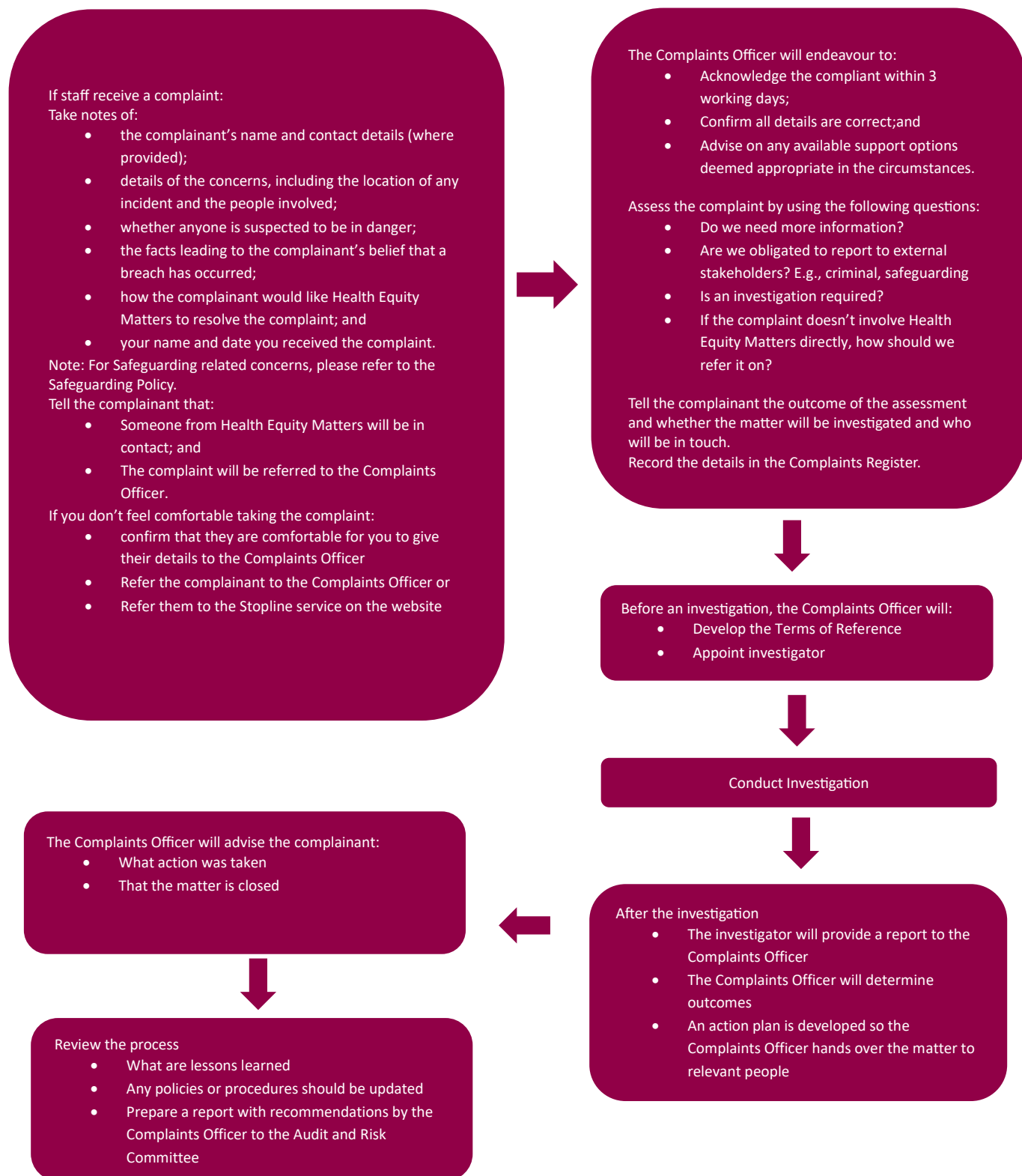
12. Definition of Terms

Term	Definition
Audit and Risk Committee	The Audit and Risk Committee has the delegation to oversee, provide advice and make recommendations to the Board on financial oversight, systems, reporting, compliance, risk, governance and external audit.
Board	The Board of Directors responsible for the governance of Health Equity Matters.
Complaint	An expression of dissatisfaction made to or about an organisation, its services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. (AS/NZ 10002:2014).
Complainant	Complainant means a person, organisation or its representative, making a Complaint.

13. Policy History

Date of update	Version	Key changes	Endorsed by	Approved by	Next review
28 August 2025	1	Previously Policy 042 was a combined policy including both complaints handling and whistleblower. This has now been separated as two policies under number 049 & 050.	Audit & Risk Committee	Board	July 2028

Annex 1: Complaints Handling Procedures for staff who receive a complaint



Annex 2 health Equity Matters Complaints Investigation Terms of Reference Template

1. Details of Investigator

- **Name of Investigator:** [Insert Name]
- **Position:** [Insert Position]
- **Contact Email:** [Insert Email]

2. Details of Complainant

- **Name of Complainant:** [Insert Name]
- **Contact Email:** [Insert Email]

3. Allegations

[Provide a clear and concise summary of the allegations being investigated. Include relevant dates, locations, and individuals involved.]

4. Scope of the Investigation

[Define the boundaries of the investigation. What will be examined, what will not be examined, and any limitations or exclusions.]

5. Proposed Interviewees

Name	Title	Reason for Interview	Date, Time, Place
[Insert]	[Insert]	[Insert]	[Insert]
[Insert]	[Insert]	[Insert]	[Insert]

6. Documents Provided by the Complainant

[List all documents submitted by the complainant relevant to the investigation.]

7. Additional Evidence to Be Collected

[Outline any further documentation, digital records, witness statements, or other evidence that will be sought during the investigation.]

Annex 3 How to speak up and make a complaint - Information for children and young people

Health Equity Matters is committed to the safety and wellbeing of all children and young people and have trained staff who are here to help if you ever feel unsafe or unhappy about something we or someone we are working with has done.

It's important that you provide feedback to us if you are:

- Feeling unsafe around a member of our team.
- Feeling unhappy about something that we have said or done.
- Seeing or hearing behaviour that makes you or others feel unsafe.
- If someone has hurt you, your friends or family or if someone has treated you badly.
- Need to provide other types of feedback to us.

How to provide feedback:

Providing feedback is safe, easy and takes three easy steps:

1. Find support

It's ok if you would like to make a complaint to Health Equity Matters on your own. It can also be helpful to speak to someone you trust who can support you to make a complaint.

- parent or carer
- friend
- teacher
- coach

If you speak another language, you should ask someone who speaks your language to help you.

2. Tell someone you trust about the problem

Talk to the person you trust and try to explain the problem. Tell them:

- what you are not happy about
- how you feel
- What support you're needing or what you would like to happen that might help fix the problem

3. Contact us to provide your feedback

Feedback can be made through written correspondence, telephone, verbally and the Stopline service. If you talk to someone in Health Equity Matters to make a complaint, you can ask them questions.

Health Equity Matters staff member will

- Listen to you and not judge you.
- Answer any questions you have honestly and openly.
- Treat you with kindness and respect.

You should also take notes to remember the conversation. Or a person you trust can take notes for you.

It can be hard to provide feedback, so make sure you get support from someone you trust or an organisation who can support you.