



Partner Housing Australasia (Building) Incorporated
ABN 88 722 057 429 CFN: 15429
Web: www.partnerhousing.org
Pro-bono professional services and funding for South Pacific
village infrastructure, housing, water, sanitation and training.



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Partner Housing is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

Whistle Blowing



Basis

These policies and procedures set out the means of complying with the requirements of the "Constitution, Policies & Code of Conduct" of Partner Housing Australasia (Building) Incorporated.

Signed

Rod Johnston
President / CEO / Public Officer
Partner Housing Australasia (Building) Incorporated

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Revisions

P21010108-1a 1 February 2022

Correction of minor typographical errors.

Change of name throughout to "Partner Housing Australasia".

Inclusion of Complaints Handling in the policy section.

Policy

Because “Whistle Blowing” policies rely on effective policies and procedures for “Complaints Handling” and “Disciplining of Members”, both are also included in this document. They are also reproduced in separate documents.

95. Complaints Handling Policy

- (a) Partner Housing recognises the importance and value of listening and responding to concerns and complaints. Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work. Partner Housing and its Partner Organisations shall act together to adhere to the Complaints Handling Policy and the Procedures.
- (b) This policy applies to all our people – volunteers and partner organisations – and they are familiarised with it. Those with particular relevant responsibilities are trained in its application.
- (c) Access to the complaint handling process is free of charge to complainants.
- (d) Partner Housing shall address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process.
- (e) Implementation, reporting and monitoring compliance with this policy shall be as set out in the “Procedures”.

102. Whistle Blowing

- (a) Partner Housing Australasia is committed to transparency in its operations and encourages its Members, Volunteers and Staff (there are no paid employees) to speak openly and honestly of the Organisation’s activities. Partner Housing Australasia also is committed to listening and responding to complaints, improvement suggestions and other concerns.

Partner Housing Australasia is committed to ensuring that Members, Volunteers and Staff (there are no paid employees), Contractors and Partners, who are aware of possible wrongdoing, fulfil their responsibility to publicly disclose that information.
- (b) Partner Housing Australasia encourages all people with whom it has dealings, including its Members, Volunteers and Staff (there are no paid employees) and members of the public, to familiarise themselves with the policies and procedures of the Organisation, and with the details of projects in which they are interested. To assist this, Partner Housing Australasia shall make available to any person requested project information. The only exception is information of a personal nature, which is covered by the Privacy Policy.
- (c) Partner Housing Australasia operates, and is committed to, a quality assurance scheme, consistent with the principles of ISO 9001. A fundamental tenet of the quality assurance system is the encouragement of input from diverse sources and the iterative consideration and learning from such feedback. This enables Partner Housing Australasia to achieve continuous improvement, the highest standard of service that is practical, and the highest ethical values and accountability in fundraising and stakeholder engagement.
- (d) Partner Housing Australasia is committed to exceeding the standards set in the ACFID Code of Conduct, upon which this “Constitution, Policies & Code of Conduct” is based.
- (e) Partner Housing Australasia, its Members, Volunteers and Staff are required ensure that all activities are legal (as defined by the legislation and regulation in which we operate) and ethical (as defined in Policy No 3 “Values”).
- (f) The purpose is to:
 - (i) Encourage the disclosure, reporting, analysis and correction of issues that potentially harm other organisations or individuals, through financial or other loss;
 - (ii) Provide Partner Housing Australasia with a workable mechanism and procedures to consider and respond to matters raised by whistle-blowers, such that they are not subjected to any disadvantage and (if requested) their anonymity is preserved;
 - (iii) Ensure the protection of whistle-blowers against disadvantage or reprisal originating from any source, individuals or entities;
 - (iv) Ensure that Partner Housing Australasia, its Member, Volunteers and Staff (there are no paid staff) achieve and maintain the impeccable integrity and the highest ethical standards.

- g) There is no restriction on the issues that may be raised by a whistle-blower. They could include (but are not limited to) alleged corruption, illegal practices, breach of the law or regulation, unfair work practices and breach of any of the policies set out in the “Constitution, Policies and Code of Conduct”.
- h) Whistle-blowers should raise concerns by contacting the Chief Executive Officer (the nominated Whistle-blower Protection Officer) in accordance with the Procedures. If the Chief Executive Officer is the subject of the alleged breach, the whistle-blower may raise the matter with any of the Board Members (Directors).
- i) If a whistle-blower is concerned that Partner Housing Australasia has not adequately dealt with the issue that has been raised, they shall be encouraged to raise the matter with the appropriate legal authority or law enforcement body with jurisdiction in the particular location.
- j) No matter raised by a whistle-blower will be treated as trivial. In the first instance that Chief Executive Officer shall investigate and propose a resolution. Where possible, the resolution shall be implemented as soon as practical.
- k) All matters raised by whistle-blowers, including those already resolved by the Chief Executive Officer, shall be referred to the Board for discussion and resolution at the next scheduled Board Meeting (four per year).
- l) The Board shall –
 - (i) consider any matter raised by a whistle-blower,
 - (ii) recommend remedial action (immediate solution) and corrective action (long term institutional correction) as appropriate;
 - (iii) document the concern and the resulting actions; and
 - (iv) advise the whistle-blower of the outcome and process undertaken.
- m) The Board considerations shall be based on the requirements of the law, regulations, ethics, procedural fairness and natural justice.
- n) Refer also to “Procedures” for the details on how to implement this policy.

18. Disciplining of members

- (a) A complaint may be made to the Board by any person that a member of the Organisation:
 - i. has refused or neglected to comply with a provision or provisions of this constitution, or
 - ii. has wilfully acted in a manner prejudicial to the interests of the Organisation.
- (b) The Board may refuse to deal with a complaint if it considers the complaint to be trivial or vexatious in nature.
- (c) If the Board decides to deal with the complaint, the Board:
 - i. must cause notice of the complaint to be served on the member concerned, and
 - ii. must give the member at least 14 days from the time the notice is served within which to make submissions to the Board in connection with the complaint, and
 - iii. must take into consideration any submissions made by the member in connection with the complaint.
- (d) The Board may, by resolution, expel the member from the Organisation or suspend the member from membership of the Organisation if, after considering the complaint and any submissions made in connection with the complaint, it is satisfied that the facts alleged in the complaint have been proved and the expulsion or suspension is warranted in the circumstances.
- (e) If the Board expels or suspends a member, the secretary must, within 7 days after the action is taken, cause written notice to be given to the member of the action taken, of the reasons given by the Board for having taken that action and of the member’s right of appeal under clause 12.
- (f) The expulsion or suspension does not take effect:
 - i. until the expiration of the period within which the member is entitled to appeal against the resolution concerned, or
 - ii. if within that period the member exercises the right of appeal, unless and until the Organisation confirms the resolution under clause 12, whichever is the later.

Procedures

Complaints Handling

Policy

- (a) Partner Housing Australasia recognises the importance and value of listening and responding to concerns and complaints. Receiving concerns and complaints is one of the most important ways of learning what we need to do to improve our work. Partner Housing Australasia and its Partner Organisations shall act together to adhere to the Complaints Handling Policy and the Procedures.
- (b) This policy applies to all our people – volunteers and partner organisations – and they are familiarised with it. Those with particular relevant responsibilities are trained in its application.
- (c) Access to the complaint handling process is free of charge to complainants.
- (d) Partner Housing Australasia shall address all complaints in an equitable, fair and unbiased manner using evidence submitted by both the complainant and our personnel through the complaint handling process.
- (e) Implementation, reporting and monitoring compliance with this policy shall be as set out in the “Procedures”.

Responsible Personnel

All personnel have a responsibility to ensure that the Policy and Procedures are observed. The personnel with specific tasks designated in the position descriptions, and/or most likely to be involved in implementation are Chief Executive Officer, Resource Development Manager, Administration Manager, Regional Managers and Project Managers.

Context

Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives. To this end Partner Housing Australasia will:

- maintain data collection on complaints for the purpose of identifying trends for the
- purpose of enhancing information management and service provided;
- keep abreast of best practices (both locally and overseas) regarding complaint handling;
- foster a consumer/client-focused approach;
- undertake specific training and retraining of staff to foster better complaint handling practices;
- encourage innovation in complaint handling development; and
- recognise and reward exemplary complaint handling behaviour.

The Organisation will accept complaints relating to our volunteers, our partners, our contracted service providers or anyone else acting on our behalf.

A complaint may be made by a person to whom we deliver services or goods or who is affected by our services or goods, a partner, a local organisation we work, volunteers, donors or a member of the public.

Anonymous complaints can be made, but obviously our ability to investigate them may be limited because of this.

Procedures to ensure the complaint handling policies are understood

- A Memorandum of Understanding, including the relevant policy, shall be signed by each Partner Organisation.
- The Complaints Policy shall be distributed to all Directors and Regional Managers and reviewed in the context of this and other projects at each February Board Meeting.

- A report on any complaints in the context of the Partner Organisation shall be presented to the February Board Meeting and dealt with as per the Procedures.

How the Organisation will handle complaints

When oral complaints are made, Partner Housing Australasia personnel shall:

- Identify ourselves, listen, record details, and determine what the client wants;
- Confirm that we have understood and received the details;
- Show empathy for the client, but not attempt to take sides, lay blame, or become defensive;

For all complaints Partner Housing Australasia personnel shall:

- Seek from the client the outcome/s they are expecting;
- Make an initial assessment of the severity of the complaint and the urgency of action
- Clearly explain to the client the course of action that will follow:
 - if the complaint is out of our jurisdiction;
 - if we may exercise a discretion not to investigate;
 - if preliminary enquiries need to be made, or further consideration needs to be given: or
 - if the complaint is to be investigated.
- The Organisation shall not create false expectations, but assure the client that the complaint will receive full attention;
- Give an estimated timeframe or, if that is not possible, a date by which the Organisation will contact them again;
- Check whether the client is satisfied with the proposed action and, if not, advise them of alternatives.
- Ensure that the complaint is appropriately acknowledged;
- Follow up where necessary, and monitor whether the client is satisfied.
- The Organisation will register all complaints (see section 16)

Where appropriate, the Organisation shall ensure that personnel working in communities we serve have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints so as to take account of cultural and gender sensitivities and to ensure that cases involving children are appropriately handled.

The Organisation will ensure that a complainant is not required to express their complaint to a person implicated in their complaint.

The Organisation shall also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

Initial Assessment of Complaint

The Organisation shall first assess whether there is more than one issue raised in the complaint and whether each needs to be separately addressed.

To determine how a complaint should be managed, the Organisation shall assess it in terms of the following criteria:

- a) severity;
- b) health (including mental health) and safety implications;
- c) financial implications for the complainant or others

- c) complexity;
- d) impact on the individual, public and organisation;
- e) potential to escalate; and
- f) the need for, and possibility of immediate action.

If the complaint is assessed as significant in terms of one or more of these criteria, it shall be classified accordingly.

Inquiries, Minor Complaints and Jurisdiction

The Organisation shall endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person i.e. during the initial phone call or meeting.

However, as far as possible, the Organisation shall ensure that the inquirer or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint, the Organisation shall also attempt to determine expeditiously whether investigation is required or not depending on jurisdictional questions and whether the complaint is ill conceived.

If the complainant disputes an assessment that a complaint should not be investigated, the member of staff handling the complaint will refer it to a more senior colleague for review. If such a dispute is unresolvable the Organisation shall refer the complainant to Code Committee of the Australian Council for International Development (ACFID)

How the Organisation will investigate complaints

The Organisation shall make every reasonable effort to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation will be commensurate with the seriousness and frequency of the complaint.

Timeframes

The Organisation shall acknowledge written complaints within 5 days.

The Organisation shall acknowledge oral complaints immediately.

The Organisation shall aim to resolve complaints as quickly as possible and within 30 days unless there are exceptional circumstances. If a complaint is not resolved within 30 days we will inform the complainant of progress and keep them informed of progress every two weeks.

How the Organisation will respond to and close a complaint

The President or a Board Member delegated by him/her will normally make the decision on a complaint that has required investigation (i.e. not a minor complaint). Decisions on serious complaints may be referred to the Board.

The Organisation shall communicate our decision on a complaint as soon as is practical. Our communication will be in writing in the appropriate language by email and/or post. However, where appropriate such as in the case of a complaint being made by a local community member (in the field) we will also communicate our decision orally and again in the appropriate language.

The Organisation shall encourage the complainant to respond and advise whether or not they are satisfied with our decision. In our decision we will advise that if a complainant is not satisfied we will be prepared to consider any additional information they may provide and to review our decision.

In all cases, the Organisation shall advise that the complaint may be referred to the Code Committee of ACFID. We will provide all necessary information for referral to the Code Committee and offer to assist in referral.

How the Organisation will learn from complaints

The Organisation shall ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, procedures and processes.

The Organisation shall take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of our people. Where needed we will counsel or discipline our people.

Where appropriate the Organisation shall consult and take advice from ACFID and/or other relevant regulatory/enforcement authorities.

Confidentiality

The Organisation shall not reveal a complainant's name or personal details to anyone in or outside our organisation other than the persons involved in handling the complaint without obtaining the complainant's permission. See also the Privacy Procedures

Complaint Data

The Organisation shall register all inquiries and complaints. The Organisation shall ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, record this information ourselves:

- date of receipt
- a description of the complaint and relevant supporting data;
- the requested remedy;
- the service(s) and/or good(s) and/or practice or procedure complained about;
- the due date for a response;
- immediate action taken (if any) to resolve the complaint.

Reporting About Complaints

The Organisation shall immediately escalate complex and/or major complaints to the President or his/her delegate.

All complaints shall be reported at the next Board Meeting.

Minor complaints shall be reported in summary form. Major complaints shall be reported in detail.

Training

Members, Directors, Volunteers and Partner organisations shall be made aware of this policy and these procedures, by:

- Tabling and discussing them at the AGM;
- Tabling and discussing them at the February Board Meeting (as part of the training package);
- Including them with any brief provided to volunteers, contractors or other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff);
and
- Including them with any Memorandum of Understanding with Partner Organisations.

Whistle Blowing

Policy

Partner Housing Australasia is committed to transparency in its operations and encourages its Members and Volunteers to speak openly and honestly of the Organisation's activities.

Responsible Personnel

All Directors, Member and Volunteers are responsible for ensuring compliance with this policy. The person with specific tasks designated in the position descriptions, and/or most likely to be involved in implementation and monitoring of this policy, is the Chief Executive Officer.

Application

This Procedure applies to Directors, Members and Volunteers of Partner Housing Australasia, and to persons acting on behalf of the Organisation in Australia and overseas.

Definition

A whistle blower is a person who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within an organization that is either private or public. The information of alleged wrongdoing can be classified in many ways: violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption. Whistle blower protection in Australia is offered for certain disclosures under a patchwork of laws at both federal and state level. Eligibility for protection depends on the requirements of the applicable law and the subject matter of the disclosure. Not all disclosures are protected by law in Australia. At federal level, whistle blowers face potential imprisonment for making disclosures about certain subjects, including national security and immigration matters. Protection in New South Wales is currently offered by the Protected Disclosures Act 1994 (NSW).

Procedures

Directors, Members and Volunteers of Partner Housing Australasia are encouraged to familiarise themselves with the policies and procedures of the Organisation, and with the details of each of any projects in which they are interested.

To assist this, the Chief Executive Officer shall ensure that the Regional Managers and Project Managers make available to any Member or Volunteer any requested project information. The only exception is information of a personal nature, which is covered by the Privacy Policy.

The Chief Executive Officer shall record and report to the Board:

- any extraordinary requests for information that is not commonly sought and
- any public or private expression of concern that the Organisations policies or procedures are not being correctly observed.

Training

Members, Directors, Volunteers and Partner organisations shall be made aware of this policy and these procedures, by:

- Tabling and discussing them at the AGM;
- Tabling and discussing them at the February Board Meeting (as part of the training package);
- Including them with any brief provided to volunteers, contractors or other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff);
- Including them with any Memorandum of Understanding with Partner Organisations.

Disciplining of Members

Policy

When members breach any of the other policies or procedures, the following procedure shall be invoked.

Responsible Personnel

The personnel with specific tasks designated in the position descriptions, and/or most likely to be involved in implementation are Chief Executive Officer, Regional Managers and Project Managers.

Procedures

- (1) A complaint may be made to the Board by any person that a member of the Organisation:
 - (a) has persistently refused or neglected to comply with a provision or provisions of these rules and the “Constitution, Policies & Code of Conduct” or the “Procedures”; or
 - (b) has persistently and wilfully acted in a manner prejudicial to the interests of the Organisation.
Such behaviour could be a breach of any of the Policies or having and unresolved conflict of interest.
- (2) On receiving such a complaint, the Board:
 - (a) must cause notice of the complaint to be served on the member concerned; and
 - (b) must give the member at least 14 days from the time the notice is served within which to make submissions to the Board in connection with the complaint, and
 - (c) must take into consideration any submissions made by the member in connection with the complaint.
- (1) The Board may, by resolution, expel the member from the Organisation or suspend the member from membership of the Organisation if, after considering the complaint and any submissions made in connection with the complaint, it is satisfied that the facts alleged in the complaint have been proved.
- (2) If the Board expels or suspends a member, the Secretary must, within 7 days after the action is taken, cause written notice to be given to the member of the action taken, of the reasons given by the Board for having taken that action and of the member's right of appeal under rule 12.
- (3) The expulsion or suspension does not take effect:
 - (a) until the expiration of the period within which the member is entitled to appeal against the resolution concerned, or
 - (b) if within that period the member exercises the right of appeal, unless and until the Organisation confirms the resolution under rule 12(5), whichever is the latter.

These provisions are additional to reporting to the Police or DFAT or to any other relevant action as dictated by a duty of care, legal requirement or where designated in the specific Policies and Procedures for Child Protection, Anti-terrorism, Complaints Handling and Non-development Activity.