

OCI Foundation International

Sponsors of the: (i) Cyfed Undergraduate Scholarships (ii) CBH Scholarships (iii) IFOMSSA Junior Awards (iv) IFOMSSA Senior Awards and (v) Annual JAMB Awards (vi) ArOY Health Campaign (vii) LAMS Initiative (viii) The Gynocular Project



"...we rise, by lifting others"

POLICY ON COMPLAINT HANDLING (March 2025)

A. Introduction/Background

The OCI Foundation is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling. Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame. People making complaints will be:

- provided with information about our complaint handling process.
- provided with accessible ways to make complaints
- listened to, treated with respect, and supported by staff in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redressal or review.
- Within Australia and overseas, all complaints should be made in writing to: info@ocifoundation.org. The complaints team, headed by the CEO, will then assess and investigate the complaint. Afterwards, the complainant will be provided with a decision and the reasons for that decision.

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will investigate the issues raised where enough information is provided.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our complaints management systems are easily understood and accessible to everyone, particularly people who may require assistance. We will ensure that, where necessary, the concerned program officers translate the complaint-handling procedures to all the stakeholders in their convenient languages.

If a person prefers or needs another person or organisation to assist or represent them in making and/ or resolving their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of parliament, another organisation).

No charge

Complaining to us is free.

B. Responding to complaints

Early resolution

Where possible, complaints will be resolved at first contact with the OCI Foundation.

Responsiveness

- We will promptly acknowledge receipt of complaints within 7 days.
- We will assess and prioritise complaints according to the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security, the response will be immediately escalated appropriately.
- We are committed to managing people's expectations and will inform them as soon as possible (within 10 days of the complaint raised), of the following:
 - the complaints process
 - the expected time frames for our actions
 - the progress of the complaint and reasons for any delay
 - their likely involvement in the process, and
 - the possible or likely outcome of their complaint.
- We will advise people as soon as possible when we cannot deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).
- We will also advise people as soon as possible when we cannot meet our time frames for responding to their complaints and explain the reason for our delay.

C. Managing cases when there are other parties to a complaint

Complaints involving multiple agencies

- a) Where a complaint involves multiple organisations, we will work with the other organisation(s) where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated. Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.
- b) Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.
- c) Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints seriously, not only about the actions of our staff, but also those of our service providers and associates.

Complaints involving multiple parties

When related parties make similar complaints, we will try to arrange to communicate with a single representative of the group.

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff in doing the same in accordance with this policy.

D. Stages to Managing Complaints

The five key stages in our complaint management system are set out below:

1. Receipt of complaint:

Unless the complaint has been resolved informally, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file. The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information and
- any additional support the person making a complaint requires.

2. Acknowledgement of complaint

We will acknowledge receipt of each complaint promptly, preferably within seven days. We will consider the most appropriate medium (e.g., email or letter) for communicating with the person making a complaint.

3. Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed. When determining how a complaint will be managed, we will consider:

- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if the resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

OCI Foundation uses a triage system to classify the complaint level. Its purpose is to:

- Ensure that more urgent complaints are processed to the front of the 'queue' and addressed with greater immediacy than those with lower risk.
- Determine whether a complaint falls within or outside the scope of this policy.
- Determine whether a complaint concerns a high-risk incident (issues relating to PSEA, whistleblowing, terrorism or fraud)
- Guide OCI Foundation's CEO on appropriate responses to varying risk levels.

4. Complaints Triage Framework

The Complaints Triage Framework aims to allocate a risk level to each lodged complaint. Guidelines for how to allocate risk levels, with accompanying examples, are included in the framework table below:

S/N	Risk Levels	Guidelines	Examples
1	Insignificant	<ul style="list-style-type: none"> - Able to be dealt with locally - No external implications - This includes compliments - incidents 	<ul style="list-style-type: none"> - A supporter submits a compliment - A supporter advises the OCI Foundation of their marketing and communications preferences
2	Minor	<ul style="list-style-type: none"> - Requires corrective action on the individual activities - No external implications 	<ul style="list-style-type: none"> - A supporter expresses dissatisfaction about an OCI Foundation fundraising event - A supporter submits advice about how to improve the OCI Foundation's organisational activities
3	Moderate	<ul style="list-style-type: none"> - Requires corrective action at a Project or Program level - Concerns a breach of OCI Foundation policy/laws/regulations - Poses an impact on operations/financial implications - Risk of reputational damage, adverse PR or media attention - Potential interest from external regulatory authorities 	<ul style="list-style-type: none"> - A Partner expresses dissatisfaction about the internal processes of a Project - A Partner expresses dissatisfaction about an OCI Foundation funding decision - We are made aware of a breach of policy, either from their Staff or implementing partners, one that can be rectified through corrective measures
4	Major	<ul style="list-style-type: none"> - The well-being or safety of a stakeholder is at risk - Requires corrective action at an organisational level - Concerns a breach of an OCI Foundation policy/laws/regulations - Poses a significant impact on operations and financial implications - Risk of significant reputational damage, or adverse PR or media attention 	<ul style="list-style-type: none"> - A complaint is made regarding a beneficiary's well-being or safety. - OCI Foundation is made aware of a major policy breach or staff misconduct by our staff or an implementing partner. - Involves a case of financial wrongdoing
5	Extreme	<ul style="list-style-type: none"> - Poses a threat to the viability and future of the OCI Foundation - The well-being or safety of a stakeholder is a risk - Requires corrective action at an organisational level - Concerns a breach of an OCI Foundation policy/laws/regulations - Poses a significant impact on operations/financial implications - Involves a case of financial wrongdoing, risk of significant reputational damage, adverse PR or media attention 	<ul style="list-style-type: none"> - A complaint is made regarding a beneficiary's well-being or safety - A 'high-risk' complaint is lodged (a complaint on cases of PSEAH, whistleblowing, terrorism or fraud)

5. Addressing Complaints

The CEO is required to notify the Board of complaints that have been allocated a risk of major or extreme. The Board and the CEO then conduct the investigation, with assistance from any other OCI Foundation staff members as required.

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about,

or

- Investigate the claims made in the complaint.
- provide appropriate assistance and referrals to survivors (e.g. providing assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services.)

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

We commit to the provision of appropriate assistance and referrals to survivors (e.g. assistance to complainants might include medical, social, legal and financial assistance, or referrals to such services).

6. Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the Privacy and Personal Information Protection Act 1998 and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

7. Closing the complaint, record keeping, redressal and review

We will keep comprehensive records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.
- misconduct complaints, noting the ability to de-identify complaints at the request of the complainant or survivor.
- We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

E. Complaint Referrals: Responding to out-of-scope complaints

When the review and analysis conclude that a complaint cannot be handled by the organisation or is considered to be optimally handled by another organisation, the complaint should be referred to the appropriate entity or person. The process of referral should include:

- Discussing with the referral partner/organisation whether and how they will take up the complaint and ensure compliance with principles such as confidentiality

and protection against retaliation.

- Inform the complainant and seek his/her consent for the referral, including explaining the referral decision and providing contact points. Assure the complainant that they can contact the receiver of the complaint if they change their mind.
- Follow up regularly with the complainant (where appropriate) and the referral partner on the progress of the complaint resolution.
- Provide appropriate support to the referral partner to overcome any challenge in resolving the complaints until the required trust has been established between the parties. This might include setting up confidential conversations or acting as a messenger between the complainant and the referral partner.

If a complainant is dissatisfied with the outcome of the complaint and it concerns a potential breach of ACFID's Code of Conduct, the complainant may also choose to make a complaint to ACFID's Code of Conduct Committee. In such a case, the complaint should:

- Include the complainant's name and contact details
- Set out the basis of the complaint
- Outline which aspects of the Code of Conduct they believe have been breached
- Outline the outcome that they are seeking
- Include all available supporting information.

Note that the complainant will be asked to provide any required information that was not submitted. Any complaints that cannot meet the above criteria may be dismissed. Information about the complaint will be made available to the OCI Foundation. Complaints should be marked 'confidential' and sent to either of the following:

- a) **Email:** Chair, ACFID Code of Conduct Committee at code@acfid.asn.au
- b) **Post:** Chair, ACFID Code of Conduct Committee c/- ACFID, Private Bag 3, Deakin ACT 2600, Australia.

F. Complaints Analysis, Evaluation and Monitoring

The OCI Foundation will record complaints systematically so that information can be easily retrieved for reporting and analysis. Reports will be run on:

- The number of complaints received.
- The outcome of complaints, including matters resolved at the frontline.
- Issues arising from complaints.
- Systemic issues identified.
- The number of requests we receive for internal and/or external review of our complaint handling.

These reports will be analysed regularly to monitor trends, measure the quality of our customer service, and make improvements. All reports and their analyses will be provided to the PCI Foundation's Board for review.

We will also continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints.
- Identify and correct deficiencies in the operation of the system.

G. Continuous Improvement

The OCI Foundation is committed to improving the effectiveness and efficiency of our

complaint management system. Therefore, we will aim to always:

- Support the making of and the appropriate resolution of complaints.
- Implement best practices in complaint handling.
- Recognise and reward exemplary complaint handling by staff.
- Regularly review the complaints management system and complaint data.
- Implement appropriate system changes arising from our analysis of complaints data and continual system monitoring.

H. Review of Policy Document

This policy is subject to review in March 2028, three years after its implementation. Our appraisal tool will be used as part of that review. However, it can be sooner if legislation or other events warrant it.

I. Feedback

- If you have any feedback or complaints on the OCI Foundation on this document, please contact us immediately via the link [**HERE**](#).
- For our various countries of operation, these numbers can also be reached:
 - Australia: +61755808331
 - Nigeria: +2348066092959
 - United Kingdom: +447415676767

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