

Policy No.	P03
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COMPLAINTS MANAGEMENT POLICY

1. Introduction

- 1.1 Building East Timor Through Education/ Resources (“BETTER”) seeks to resolve difficulties and complaints in a prompt, impartial and just manner.
- 1.2 Complaints may arise from any aspect of BETTER’s operations, including service delivery, governance, fundraising, or conduct of personnel.
- 1.3 This policy applies to the Board Directors, permanent or casual employees, suppliers, visitors, sponsors, donors, as well as volunteers and interns at BETTER (“Personnel”), whether based in Australia, Timor-Leste or elsewhere.
- 1.4 This Policy should be read in conjunction with our Privacy and Confidentiality Policy, our Whistleblower Protection Policy, and our Governance Policy (all found on our website www.bettertimor.org).

2. Purpose

- 2.1 The purpose of this policy is to provide a clear framework for managing complaints in a way that is transparent, accessible, and responsive.
- 2.2 Having an effective and timely process to manage complaints will support BETTER’s mission by maintaining positive relationships with stakeholders, building trust in the community, and improving service delivery.

3. Principles

- 3.1 Fairness and Impartiality: All complaints will be handled respectfully, without discrimination, and assessed objectively. BETTER is committed to ensuring that no complainant experiences retaliation for raising a concern in good faith.
- 3.2 Confidentiality: Complainants’ identities will be kept confidential wherever possible, except where consent is given, disclosure is required by law, or necessary to protect individuals.
- 3.3 Accessibility: BETTER will ensure that its complaints process is clear, easy to use, and accessible to all stakeholders, including beneficiaries with limited literacy.
- 3.4 Compliance: All complaints will be managed in accordance with Australian and Timor-Leste laws, including ACNC Governance Standards.
- 3.5 Continuous Improvement: Information from complaints will be analysed to identify trends and drive improvements in BETTER’s practices and systems.

4. Appointment of Complaints Officer

- 4.1 BETTER shall designate a Complaints Officer responsible for receiving and managing all complaints and suggestions, and overseeing their effective resolution.
- 4.2 The Complaints Officer:
- i. shall have authority to coordinate investigations, interview witnesses, review relevant documentation, request additional evidence, and make recommendations for resolution in accordance with this Policy;
 - ii. must act independently and without undue influence from any party involved in the complaint;
 - iii. shall ensure compliance with applicable laws and ACNC Governance Standards; and
 - iv. must complete annual training on complaints handling and confidentiality requirements.
- 4.3 The Complaints Officer, or any individual involved in the complaint process, must promptly disclose any actual or perceived conflict of interest to the CEO or Chair of BETTER's Board, and immediately remove themselves from further involvement. The CEO or Chair shall then take over management of the complaint.

5. Making a Complaint

- 5.1 This policy applies only to formal complaints; allegations that BETTER, its Personnel, or its processes have failed to meet expected standards, caused harm, or breached legal, ethical, or contractual obligations. It does not apply to general feedback, suggestions, or opinions intended to improve services. Where uncertainty exists, BETTER will treat the matter as a complaint to ensure fairness and transparency.
- 5.2 Formal complaints may be made in any language and submitted:
- i. By email to: info@bettertimor.org;
 - ii. By post to: PO Box 1468 Lane Cove NSW 1595, Australia; or
 - iii. In person: during the quarterly community meetings that BETTER holds with its beneficiaries in Timor-Leste.
- 5.3 If a complainant requires assistance to submit a complaint, they may seek help from any BETTER staff member or volunteer who will help them detail their complaint.
- 5.4 Each complaint should include:
- i. Name and contact details (where possible);
 - ii. A clear description of the complaint and any supporting evidence; and
 - iii. Details of any steps already taken to resolve the matter.
- BETTER will also consider anonymous complaints, provided they contain enough information to allow a fair and thorough investigation.

6. Complaint Management Process

- 6.1 Process: Complaints will be managed in accordance with the following:
- i. Acknowledgement: The Complaints Officer will aim to acknowledge receipt within 14 days and

will seek to resolve issues or grievances promptly where possible.

- ii. Investigation: Investigations should be completed within 28 days, unless exceptional circumstances require additional time. If delays are likely, the complainant will be informed.
 - iii. Response: BETTER aims to provide a formal response to complainants within 35 days of receipt.
- 6.2 Communication of Outcome: BETTER will advise the complainant of the outcome and whether action has been taken. However, specific details of the actions taken may not always be disclosed to protect individual privacy and comply with governance obligations.
- 6.3 Escalation: If after the initial steps the complaint is unresolved, a complainant may request that the matter be escalated to the CEO. If a satisfactory response is not received, the complaint may be referred to the Chair of the Board of Directors for consideration.
- 6.4 Training: BETTER will ensure that our Personnel are familiar with this Policy and can provide guidance to potential complainants.
- 6.5 Record Keeping: Complaints will be recorded by the Complaints Officer and a summary will be presented to the Board regularly for review.
- 6.6 Whistleblower Protection: BETTER is committed to protecting individuals who raise complaints or concerns in good faith. No complainant, witness, or person assisting in an investigation shall suffer retaliation or adverse consequences for doing so. These protections are detailed in BETTER's Whistleblower Protection Policy, which includes specific provisions for whistleblower confidentiality and non-retaliation.

7. Further Review

- 7.1 A complainant should make use of the escalation path detailed in section 6.3 if they are unsatisfied with the initial outcome of their complaint.
- 7.2 If a complainant does not feel that BETTER has made good faith efforts to resolve the matter, or has mishandled their complaint, they may reach out the appropriate authorities:
- i. In Australia, this includes the Australian Charities and Not-for-profits Commission (ACNC):
 - ii. In Timor-Leste, this includes the Ministry of Education or the Secretariat of State for Vocational Training and Employment (SEPFOPE).