

1. Purpose

The purpose of this policy is to articulate procedures for complaints and whistleblowing and why we need these procedures.

2. Summary

Edge Effect is committed to providing the highest standards in humanitarian and development programs and working in an effective, transparent and accountable way. In a continuous effort to achieve the highest standards, we strive to meet the expectations of all of stakeholders. Where we do not meet those expectations, we need to find that out, and to work out how we can do better. We also need to comply with all legislative, contractual and ethical obligations of a company working in the development and humanitarian aid sector.

Edge Effect commits to complaints and whistleblowing procedures that:

- Are documented in a clear and accessible manner.
- Provide accessible, safe and confidential points of contact for internal and external stakeholders in each country in which the Edge Effect operates, including the general public.
- Provide time bound processes for investigation and response, in accordance with the principles of respect, accessibility, timeliness and transparency.
- Provide for prompt, firm, and fair corrective action where wrongdoing is identified.
- Expressly prohibit penalties or retaliation against anyone who makes a complaint or assists in minimising wrongdoing, as long as they act in good faith, on reasonable grounds, and in accordance with the designated process.

3. What's a Complaint?

A complaint may include (but is not limited to) concerns about:

- Unfair, inappropriate or incorrect conduct by individuals associated with Edge Effect.
- Any breach of Edge Effect policies or procedures, including this policy.
- Organisational practices, policies or procedures, or the absence of policies and procedures.
- Concern over the design, implementation or other aspects of program delivery.
- Concern over inappropriate use of funding.
- Concern from a member of the public or supporter/donor about a publicity, fundraising or marketing campaigns.
- Threat of or actual legal/insurance action resulting from Edge Effect activities.
- Breaches of legislation applying to Edge Effect activities.

4. How do you make a complaint?

Internal complaints should initially be directed to your manager, unless you wish to make a confidential complaint or escalate a complaint. Confidential complaints may be sent using the complaints form on the Edge Effect website and will be directed to the Managing Director only. Non-confidential internal

escalations or complaints from outside of Edge Effect should be emailed to complaints@edgeeffect.org.

5. What happens when a complaint is received?

Your complaint will be acknowledged with 5 working days.

Internal complaints will be assessed and if necessary, investigated by the relevant manager. Where it is not appropriate for the manager to investigate, the complaint will be escalated to the Managing Director. Complaints sent confidentially or via complaints@edgeeffect.org will be assessed and if necessary, by the Managing Director. All complaints received will be addressed in an equitable, fair, confidential and unbiased manner using evidence submitted by both the complainant and other involved persons through the complaint handling process. Findings of investigations will be provided in a written report to the complainant within 30 working days. Edge Effect will be as transparent as possible about investigations and findings, to the extent possible while respecting confidentiality, safety and fairness. Investigations assessed as not requiring an investigation will be addressed through 2-way communication, however if the complainant is not satisfied they may request an investigation. If complainants are not satisfied by the report, they may escalate the complaint to the Managing Director, who will assess the need for re-investigation and if needed, provide findings within 30 days.

6. What happens after investigations and appeals are completed?

Where appropriate Edge Effect will:

- Review and amend relevant practices, policies or procedures and provide training on changes.
- Counsel individuals associated with Edge Effect or undertake disciplinary procedures (up to and including dismissal)
- Provide support for complainants.
- Publish findings and measures taken in response to findings.

7. Whistleblower Reports

Edge Effect will provide confidential mechanisms for whistleblowers to raise concerns. On receiving a confidential report/complaint Edge Effect management:

- Will acknowledge the report/complaint raised within 5 working days (if requested).
- Will carefully review all reports/complaints raised in good faith, ie all except those that:
 - are trivial, frivolous or vexatious; or
 - are lacking in substance or credibility; or
 - have already been investigated.
- Will report findings within 30 working days.

No action will be taken against a staff member reporting concerns in good faith, regardless of the findings.

Disciplinary measures will be taken against staff:

- For retaliating against a colleague who reports concerns in good faith or who otherwise cooperates with an investigation.
- For maliciously and falsely reporting misconduct.

- For not cooperating with an investigation.

If the findings do not satisfy the whistleblower an appeal may be made to the Managing Director, specifying specific grounds, and will be treated using the same process as a new issue.

8. Other Avenues for Making Complaints and Whistleblowing

While Edge Effect will seek to address all complaints using these procedures, some matters may also be raised with other entities. Matters regarding:

- the Corporations Act may also be reported to ASIC.
- fraud should be reported to DFAT via fraud@dfat.gov.au.
- human rights violations may be reported to the Australian Human Rights Commission.
- workplace matters may be reported to the Fair Work Ombudsman.

9. Publicising the Policy

This policy will be posted on the Edge Effect website and a confidential form is available on the website for making reports.

10. Awareness and Training

All staff will receive a copy of this policy during on-boarding, with training in how to implement the policy. Managers will receive specific training in responding to complaints. External stakeholders may contact complaints@edgeeffect.org to seek advice on using our policy and procedures.

11. Record Keeping

A record of all complaints, findings and resulting actions will be maintained, with confidentiality for whistleblowers. Findings and actions resulting from complaints will be accessible to Edge Effect stakeholders.

12. Policy Approval and Review

This policy is approved by Lana Woolf, Managing Director.

This policy will be reviewed by 31 March 2023.



Complaints and Whistleblower Policy

Complaints and Whistleblower Policy Declaration

I have read, understood, and agree to abide by the Edge Effect Complaints and Whistleblower Policy.

Signature: Date:

Please Print Name: