

# Complaints Policy

|                        |                                                             |
|------------------------|-------------------------------------------------------------|
| Effective Date:        | 02/12/2020                                                  |
| Date of Last Revision: | 08/2025                                                     |
| Version No.:           | 4.0                                                         |
| Policy Contact:        | policies@destinyrescue.org                                  |
| Next Review Date:      | 08/2030                                                     |
| Applies To:            | DRA Staff, Stakeholders, Volunteers, Contractors & Partners |

## 1. Purpose

- 1.1. Destiny Rescue International (DRI) and Destiny Rescue Australia (DRA) are committed to the highest standards of **Christian integrity, accountability, and transparency**. To uphold these values, we provide a structured **complaints management process** that ensures stakeholders can voice concerns in a **safe, fair, and effective manner**.
- 1.2. DRA must manage complaints **within its national jurisdiction** while ensuring alignment with DRI's global policies and priorities.

## 2. Scope

- 2.1. This policy applies to **all stakeholders**, including:
  - 2.1.1. Employees, volunteers, and contractors of **DRA**.
  - 2.1.2. Any individuals or organizations interacting with **DRA programs**.
  - 2.1.3. Any complaints related to **DRA personnel, activities, or policies**.
- 2.2. Complaints related to **DRI's global governance, leadership, or policies** must be escalated to **DRI's designated authority**, ensuring that DRA does not overstep its jurisdiction.

## 3. Policy Statement

- 3.1. DRI and DRA affirm the following **core commitments**:
  - 3.1.1. **Accountability:** We handle complaints **honestly, fairly, and in alignment with Christian values**.

- 3.1.2. **Confidentiality:** We protect complainants, ensuring that **reports are managed securely and discreetly.**
- 3.1.3. **Integrity:** Complaints are handled with **honesty and Biblical principles**, avoiding retaliation or bias.
- 3.1.4. **Transparency:** Stakeholders have access to **clear avenues for submitting concerns.**
- 3.1.5. **Alignment with DRI:** DRA's complaint process operates under the **authority and direction of DRI.**
- 3.2. This policy will be **publicly available** on DRA's website and provided to all staff.

#### **4. Complaints Process & Reporting Avenues**

- 4.1. DRA's stakeholders may make complaints via the following avenues:
  - 4.1.1. Your direct supervisor or HR if you are an employee or volunteer.
  - 4.1.2. Written complaints form.
  - 4.1.3. A complaint form available on the website.
- 4.2. Where a complaint relates to staff misconduct, the [Misconduct Investigation Process](#) must be followed.
- 4.3. In the event that a staff member is concerned about retaliation, they can request that adequate protections are in place to ensure the complainant is not treated unfairly because of a complaint made in good faith.
- 4.4. DRA staff are encouraged to put more serious complaints in writing as well as meet with HR (or the CEO if HR is implicated in the complaint) if they deem it necessary.
  - 4.4.1. Where a complaint is regarding suspected or alleged child abuse, the complainant must contact the CEO immediately and refer to the complaints handling process in the **Child Protection Policy (see appendix 12.2)**.
  - 4.4.2. Where a complaint is regarding suspected sexual exploitation, abuse or harassment the complainant must contact the CEO immediately and refer to the complaints handling process in the [Vulnerable Persons Policy](#) (see appendix 12.3).
- 4.5. DRA will include the complaints handling process as part of the induction material for all new staff and volunteers.
- 4.6. It is mandatory that all DRA stakeholders report wrongdoing following this process.

- 4.6.1. DRA staff are expected and obligated to report all suspected or alleged child abuse and sexual exploitation, abuse and harassment (SEAH) concerns. Failure to report may result in disciplinary measures. Destiny Rescue Australia has a zero-tolerance policy towards child abuse and SEAH.
- 4.7. Complaints will be handled in a timely manner:
  - 4.7.1. Complainants will be issued an acknowledgement of the complaint (via email where possible) within three business days of the complaint being made.
  - 4.7.2. An initial review of the complaint must be conducted within seven business days of the initial acknowledgement. With expected timelines provided to the complainant at this time.
  - 4.7.3. The investigation process must begin within 10 business days of the start of the review process.
    - 4.7.3.1. If the complaint is about staff misconduct, then the [Misconduct Investigation Process](#) must be followed.
  - 4.7.4. An appeal regarding the outcome of the investigation may be made up to 30 days after the complainant has been notified of the outcome.
- 4.8. Records must be kept of all complaints amounting to misconduct. The records may be deidentified at the request of the complainant or survivor as required.
- 4.9. Serious complaints (e.g. sexual misconduct, abuse, fraud) should be reported to the board of DRA, with safeguarding being a standing agenda item.
- 4.10. Where a complaint may fall outside the scope of this policy, DRA will take reasonable steps to refer the complainant to the appropriate place to make that complaint.
- 4.11. **Escalation to DRI (if necessary)** – Complaints beyond DRA's jurisdiction are referred to DRI's CEO.
- 4.12. For **serious misconduct** (e.g., child abuse, fraud, harassment):
  - 4.12.1. The complaint **must** be immediately escalated to the **CEO and Board of DRA**.
  - 4.12.2. The **DRI CEO must be notified directly** by Telegram message if the complaint relates to a matter outside of Australia.
  - 4.12.3. **Anonymous Reporting:** Employees or stakeholders who fear retaliation can report anonymously via DRA's [Whistleblower Policy](#).

## 5. Mandatory Reporting & Special Cases

- 5.1. DRA is required to report the following issues **immediately**:

- 5.1.1. **Child abuse allegations** → Must be escalated in accordance with DRA's **Child Protection Policy**.
- 5.1.2. **Sexual exploitation, abuse, or harassment (SEAH)** → Managed under DRA's [Vulnerable Persons Policy](#).
- 5.1.3. **Fraud or financial misconduct** → Must be reported to the **DRA Board**.
- 5.1.4. **Legal violations** → If the credible complaint involves **criminal conduct**, it must be reported to **law enforcement**.
- 5.2. Failure to report any of the above may result in **disciplinary action**.

## 6. Complaint Handling Timelines

- 6.1. **Acknowledgment of Complaint:** Within **3 business days**.
- 6.2. **Initial Review:** Within **7 business days**, with timeline updates to the complainant.
- 6.3. **Investigation Start:** Within **10 business days** of the review.
- 6.4. **Appeal Window:** Complainants may appeal **within 30 days** of receiving a final decision.
- 6.5. **Record Keeping:** All complaints must be logged, with **de-identified records** available upon request.

## 7. Investigations & Appeals

- 7.1. If a complaint **requires formal investigation**, the process will be managed as follows:
  - 7.1.1. **Assigning an Investigation Team** → DRA Board appoints an **independent review panel**.
  - 7.1.2. **Review of Evidence** → Interviews, document analysis, and consultation with relevant stakeholders.
  - 7.1.3. **Findings Report** → A formal report is provided to **HR, the CEO, and (if necessary) the Board**.
  - 7.1.4. **Remedial Action & Follow-up** → If a complaint is substantiated, appropriate **corrective actions** are taken.
  - 7.1.5. **Appeals Process** → If a complainant disagrees with the outcome, they may **request an independent review**.
- 7.2. If the complaint concerns **DRA governance or leadership**, the **DRI board will appoint a committee to conduct the investigation**.

## 8. Working with Partners

- 8.1. DRA partners **must maintain their own complaint-handling systems** while ensuring alignment with:

- 8.1.1. **DRA's complaints principles** (fairness, confidentiality, accountability).
- 8.1.2. **Local laws and cultural contexts**, while upholding **Christian values**.
- 8.1.3. **Reporting requirements** for severe issues such as abuse or fraud.
- 8.2. DRI will monitor and support partners in their compliance with this policy.

## 9. Compliance & Continuous Improvement

- 9.1. DRA's **complaints system will be regularly reviewed** to ensure:
  - 9.1.1. **Effectiveness in responding to concerns.**
  - 9.1.2. **Alignment with legal requirements** in Australia.
  - 9.1.3. **Continuous improvement in stakeholder engagement.**
  - 9.1.4. **Compliance with ACNC & ACFID standards**, where applicable.
- 9.2. **Annual Reports:** DRA's Board will receive **annual complaint summaries** to review trends and systemic issues.

## 10. Escalation & External Authorities

- 10.1. If a complainant is **dissatisfied with DRA's handling**, after all DRA complaints and appeals processes are completed, they may escalate their complaint externally:
  - 10.1.1. **ACNC (Australian Charities and Not-for-profits Commission)** → For concerns related to DRA's governance.
  - 10.1.2. **ACFID (Australian Council for International Development)** → If DRA is in breach of ACFID's Code of Conduct.
  - 10.1.3. **Law Enforcement** → If the complaint involves criminal conduct.

## 11. Policy Review & Further Assistance

- 11.1. This policy will be **reviewed at a minimum every five years or as required by legal and regulatory changes**.
- 11.2. For questions or further clarification, contact [policies@destinyrescue.org](mailto:policies@destinyrescue.org).

## 12. Appendix

- 12.1. [Whistleblower Policy](#)
- 12.2. Child Protection Policy
- 12.3. [Vulnerable Persons Policy](#)
- 12.4. [Misconduct Investigation Process](#)

|          |         |                |                        |              |
|----------|---------|----------------|------------------------|--------------|
| Version: | Author: | Revision Date: | Description of Change: | Approved by: |
|----------|---------|----------------|------------------------|--------------|

|     |              |            |                                                     |                           |
|-----|--------------|------------|-----------------------------------------------------|---------------------------|
| 1.0 | Brent Kirwan | 24/11/2020 | Updated for ACFID Compliance and PSEAH Requirements | Fiona Berkin              |
| 2.0 | Various      | 23/06/22   | Policy review                                       | Tony Kirwan               |
| 3.0 | Various      | 11/2/2025  | Review + Update                                     |                           |
| 4.0 | Various      | 08/2025    | Policy Review and Approval                          | Tony Kirwan and DRA Board |