អង្គការសិក្សាឥតព្រំដែន

StudyBeyondBorders Organisation

Policy

COMPLAINTS AND FEEDBACK HANDLING POLICY

Change begins with Education

Contents

1. STUDYBEYONDBORDERS OVERVIEW 2
2. DOCUMENT PURPOSE 2
3. SCOPE 2
4. GENERAL POLICY OBJECTIVES 3
5. GUIDING PRINCIPLES 3
6. DEFINITIONS 3
7. POLICIES IN PRACTICE 4
7.1 SCOPE 4
7.2 ORGANISATIONAL AWARENESS AND READINESS TO RECEIVE COMPLAINTS AND FEEDBACK 4
7.3 PUBLICISING OUR POLICY 4
7.4 WHERE AND HOW COMPLAINTS AND FEEDBACK CAN BE MADE 5
7.5 HOW WE HANDLE COMPLAINTS AND FEEDBACK 5
7.6 INITIAL ASSESSMENT OF COMPLAINT 6
7.7 INQUIRIES, MINOR COMPLAINTS, PROPER COMPLAINTS AND JURISDICTION 6
7.8 HOW COMPLAINTS ARE INVESTIGATED 7
7.9 OUR TIMEFRAMES 7
7.10 HOW WE WILL RESPOND TO AND CLOSE A COMPLAINT 7
7.11 HOW WE WILL LEARN FROM COMPLAINTS AND FEEDBACK 7
7.12 RESPONDING TO DISCLOSURE OR COMPLAINT BY A CHILD/YOUNG PERSON 8
7.13 CONFIDENTIALITY 8
7.14 REGISTER OF COMPLAINTS 8
7.15 CONTINUOUS IMPROVEMENT 8
8. POLICY MANAGEMENT 9
APPENDIX 1 – COMPLAINT SEVERITY LEVELS 10

COMPLAINTS AND FEEDBACK HANDLING POLICY

1. STUDYBEYONDBORDERS OVERVIEW

Study BeyondBorders in Cambodia (**SBBC**) is a local Cambodian non-government organisation operating in rural areas of Battambang and Siem Reap Provinces. The organisation is supported by an alliance of registered development organisations in Australia (SBBA), the UK (SBBUK), and Ireland (SBBI).

SBBC aims to build capability within Cambodian education policy-making, leadership, mentoring, and training to equip and motivate teachers to provide quality education to children. The organisation is committed to supporting systemic change so that educators are proud to work in the teaching profession and are highly respected by parents, communities, and peers. To this end, **SBBC** conducts programs to mentor education leaders, upskill teachers, engage parents and communities, and develop resources that together enable the delivery of quality education to schoolchildren. The organisation seeks to embed all its work at the school, district, provincial, and national levels.

2. DOCUMENT PURPOSE

SBBC recognises the importance and value of listening and responding to concerns and complaints. We are committed to achieving the highest standard we can in every area of our work and to continuous improvement. This applies to our program delivery, fundraising and accountability to our stakeholders generally.

SBBC is committed to achieving and maintaining a workplace that fosters a productive, safe and harmonious environment for all employees, volunteers and visitors. **SBBC**'s Personnel are encouraged to raise concerns about unethical and unacceptable conduct and can do so in a safe environment. This also applies to our beneficiaries and stakeholders through the program and projects that we deliver.

This document sets out to establish clear guidelines and procedures for how we handle complaints and feedback in general. Receiving feedback and complaints is one of the most important ways of learning what we need to do to improve our work and we seek input and feedback from stakeholders regularly.

The purpose of this policy is to strengthen our core values by empowering all staff, interns and volunteers who wish to report any wrongful acts in good faith.

3. SCOPE

This policy applies to all **SBBC's** Personnel, defined as:

- Board trustees
- current staff and volunteers
- external consultants and contractors (paid or voluntary)
- contracted staff or personnel of contracted organisation and services
- project team participants

Any other person working for or on behalf of **SBBC**.

This policy also applies to other individuals and third parties who through their association with **SBBC** may visit our project activities (i.e. donors, Partner Organisations, service providers) although the management process for these groups may differ in certain aspects given their involvement.

4. GENERAL POLICY OBJECTIVES

SBBC seeks to resolve difficulties and complaints in a prompt, impartial and just manner and views complaints and feedback as providing an opportunity to review and improve its services, policies and processes.

This policy is intended to apply to any complaint or feedback where specific follow-up action is required, regardless of who makes it. Complaints and feedback can be made anonymously, but this may limit our ability to be able to investigate them.

5. GUIDING PRINCIPLES

SBBC has adopted the following principles for our complaints and feedback handling policy and procedures.

Principle 1: Visibility – We clearly publicise information about how and where to complain or to provide feedback.

Principle 2: Accessibility – We ensure that our complaints handling process is as accessible as we can practically make it to all complainants.

Principle 3: Responsiveness – We respond to complaints according to our complaint procedures timeline.

Principle 4: Objectivity – We address all complaints and feedback in a fair, equitable and unbiased manner using evidence submitted by the complainant and our personnel.

Principle 5: Charges – Access to the complaints and feedback handling process is free of charge.

Principle 6: Confidentiality – We observe strict confidentiality in handling all complaints and feedback.

Principle 7: Beneficiary and stakeholder focused approach – The interests of our beneficiaries and stakeholders are foremost in our approach to handling complaints and feedback.

Principle 8: Accountability – We ensure there is clear accountability and reporting on the action and decisions with respect to complaints and feedback.

Principle 9: Continual improvement – We always ensure that complaints and feedback we receive are used to continually improve the quality of our program and projects.

Beside this all **SBBC's** personnel have an obligation to report wrongful acts or suspected wrongful acts in accordance with this policy

- All **SBBC's** personnel have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal
- **SBBC** will respond in a timely, respectful and confidential manner to all disclosures of wrongful acts
- **SBBC** will prosecute or apply other appropriate sanctions against those who have committed fraud and engaged in corrupt conduct.

6. DEFINITIONS

Complaint: an expression of dissatisfaction made to **SBBC** or any organisation, related to **SBBC** programs or the delivery of its projects, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected.

Complainant: a person, organisation or its representative, making a complaint.

Inquiry: a request for information or an explanation.

Feedback: opinions, comments, suggestions and expressions of interest in **SBBC** programs or projects or the complaint handling process.

Stakeholder: a person or group having an interest in **SBBC** and its programs and projects.

Survivor: person who has suffered difficulties or abuse.

SBBC recognises that feedback and critical comments are an important part of improving the quality of our programs and projects and, as such, these would not be viewed as complaints unless specific action was requested.

7. POLICIES IN PRACTICE

7.1 SCOPE

Any person associated with **SBBC** and **SBBC** activities can make a complaint or submit feedback. A complaint can be about:

- Any aspect of a program or project provided by **SBBC**,
- Any of **SBBC** workplaces, courses, workshops, or project trips,
- Any incident arising from the workplace, courses, workshops, programs, projects or project trips,
- The behaviour or decisions of staff, volunteers, project team participants, visitors or any third Party engaged with the organisation,
- **SBBC**'s policies or procedures.

For clarification, this scope embraces any direct or indirect connection between an interested party and **SBBC** and does not restrict a complaint to be about direct impact suffered by the complainant. On the contrary, this scope also embraces complaints regarding situations witnessed by the complainant where another party (a survivor) is impacted either directly, e.g. a person being abused by a person associated with a **SBBC** program, or indirectly through the in action of **SBBC** resulting in a failure to implement a process as undertaken by the organisation.

Note that members of **SBBC's** Senior Leadership Team are also members of **SBBC** staff and are therefore in no way excluded by the scope of this policy from having a complaint raised about their behaviour, approaches, or attitude.

7.2 ORGANISATIONAL AWARENESS AND READINESS TO RECEIVE COMPLAINTS AND FEEDBACK

All **SBBC's** Board trustees, staff, volunteers, visitors, contracted personnel and project team participants receive a copy of the complaints handling policy and are orientated on the complaints handling process and how to respond to complaints and feedback in a sensitive manner. This is done at the point of induction and through annual policy reviews and briefing sessions.

Anyone directly involved with handling complaints or feedback is given full training on the organisation's procedures.

7.3 PUBLICISING OUR POLICY

SBBC makes clear the value we place on receiving feedback and complaints in all relevant communications and we make every effort to disseminate information to all stakeholders. We use the words 'complaint' and 'feedback' and their equivalent in Khmer. Our website has a prominent section within the 'contact us' page with information on how to make a complaint or feedback and a link to this policy.

Where literacy is a constraint **SBBC** will orally invite expressions of concern, complaint and feedback on a regular basis. We take care to give this invitation in a way that is culturally appropriate, recognising that in some cultures people require greater encouragement to make a complaint. We take special care to facilitate complaints from vulnerable populations including children and marginalised groups. If required we will make use of pictorial means of communication. We ensure that making a complaint to us is as easy as possible. We take complaints orally in person, over the phone and by any written means. We do our very best to assist a complainant to put their complaint in writing or to write it down ourselves as faithfully as we can.

All relevant communications, for example **SBBC** website, annual report, partnership agreements and staff policies, explain our procedures for handling complaints including:

- where or to whom complaints can be made
- information to be provided by the complainant
- the process for handling complaints
- time periods associated with various stages in the process
- the complainant's options for remedy, including external means
- how the complainant can obtain feedback on the status of the complaint.

7.4 WHERE AND HOW COMPLAINTS AND FEEDBACK CAN BE MADE

SBBC is able to receive complaints and feedback orally in person or by telephone and in writing by post, email or online via **SBBC's** website or social media pages. Where complaints or feedback are given verbally, we will ensure our write up of the issue contains all the information the complainant wishes to provide. Please see the references below.

Complaints may be made by a friend or advocate of the complainant on their behalf.

Where appropriate we may utilise complaint/suggestion boxes or a dedicated telephone number that beneficiaries and stakeholders are made aware of through publicity at our program or project sites.

We recognise that in some circumstances survivors may wish to remain anonymous. Because such complaints can alert us to problems that need fixing we will accept them though clearly it may not be possible to provide a remedy to an individual.

Website:	**Email**:	**Telephone**:	**In Writing**:
www.seebeyondborders.org – Contact Us Page	feedback@seebeyondborders.org	(Cambodia) +855 76 6666 011	Cambodia: StudyBeyondBorders, Street 26, Wat Bo Village, Sangkst Sala Kamreuk, Siem Reap City,, Cambodia

7.5 HOW WE HANDLE COMPLAINTS AND FEEDBACK

When we take an oral complaint, we will:

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

For all complaints we will:

- Seek from the complainant 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 complainant the course of action that will follow:
  - if we may exercise a discretion not to investigate
  - if preliminary enquiries need to be made, or further consideration needs to be given
  - if the complaint is to be investigated
  - if the complaint is to be escalated.
- If the complaint is outside the scope of the policy, we will explain why and we will explain how we will refer it onto an appropriate party (eg if the complaint is against an employee of another organisation)
- We will not create false expectations, but assure the complainant that the complaint will receive full attention
- Give an estimated timeframe or, if that is not possible, a date by which we will contact them again
- Check whether the complainant is satisfied with the proposed action and, if not, advise them of alternatives
- Ensure that the complaint is appropriately acknowledged
- Complete a Complaints and Feedback form and escalate the complaint appropriately (Appendix 2)
- Follow up where necessary, and monitor whether the complainant is satisfied
- We will register all complaints on the SBB complaints register.

Where appropriate we will 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.

We will ensure that a complainant is not required to express their complaint to a person implicated in their complaint. We will also ensure that a person implicated in a complaint is not involved in any way with the handling of that complaint.

7.6 INITIAL ASSESSMENT OF COMPLAINT

SBBC will 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, we will assess it in terms of the following criteria:

a) severity (minor, moderate, major, extreme – see **Appendix 1**)
b) health (including mental health) and safety implications
c) financial implications for the complainant or others
d) complexity
e) impact on the individual, public and organisation
f) potential to escalate
g) systemic implications
h) the need for, and possibility of immediate action.

Where appropriate, **SBBC** will refer complainants or survivors to appropriate assistance, which may include referral to medical, legal, financial, or social assistance.

7.7 INQUIRIES, MINOR COMPLAINTS, PROPER COMPLAINTS AND JURISDICTION

SBBC will endeavour to deal immediately with inquiries and minor complaints which are made orally by telephone or in person during the initial phone call or meeting. However, as far as possible, we will ensure that the inquirer

or complainant is completely satisfied with the information and or resolution provided.

On receipt of a complaint we will 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 the **Managing Director** for review or directly to the **Board** if the complaint involves the Managing Director.

If such a dispute is unresolvable we will refer the complainant to an independent body in the corresponding country.

7.8 HOW COMPLAINTS ARE INVESTIGATED

SBBC will 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.

7.9 OUR TIMEFRAMES

SBBC will acknowledge written complaints within 5 days. We will acknowledge oral complaints immediately.

We 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.

7.10 HOW WE WILL RESPOND TO AND CLOSE A COMPLAINT

Complaints may be received by any **SBBC's** personnel, however the focal person who leads the investigation and response will forward investigation of all complaints to the Senior Leadership Team (or Managing Director or equivalent). In some circumstances, depending on the severity of the complaint, it may be appropriate to assign a complaints committee or refer the complaint to the Managing Director in the first instance who may refer it to the relevant Board of Trustees to handle. Any complaint involving the Managing Director will be referred to the Senior Leadership Team and/or directly to an appropriate Board member.

SBBC will communicate the 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 who may have only basic literacy skills, we will also communicate our decision orally and again in the appropriate language.

SBBC will 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 any review will be directed in the first instance to the Managing Director and then to the Board.

7.11 HOW WE WILL LEARN FROM COMPLAINTS AND FEEDBACK

We will ensure that all relevant personnel are informed of the outcomes of complaints and feedback and the subsequent implications for our programs, projects, procedures and processes. We will take all required remedial action. We will be prepared to change the way in which we operate and improve or undertake further training of staff. Where needed we will counsel or discipline staff or volunteers. Where appropriate we will consult and take advice from the relevant regulatory or enforcement authorities.

We will endeavour to routinely collect feedback from beneficiaries and to review this with our personnel through team meetings and program reviews. Feedback will help us to shape the design of our programs and projects.

7.12 RESPONDING TO DISCLOSURE OR COMPLAINT BY A CHILD/YOUNG PERSON

SBBC will treat all concerns raised seriously and ensure that all parties will be treated fairly where the principles of natural justice will be a prime consideration. All reports will be handled professionally, confidentially and expediently.

Please refer to the child and vulnerable people protection policy in section 9 : Responding to disclosure by a child/young people.

7.13 CONFIDENTIALITY

SBBC will not reveal a complainant's name or personal details to anyone in or outside our organisation other than staff involved in handling the complaint without obtaining the complainant's permission.

7.14 REGISTER OF COMPLAINTS

SBBC holds a register of all complaints that we receive. This will be maintained by the General Manager Shared Services.
We contain the following information 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 programme and project and/or practice or procedure complained about
- the due date for a response
- immediate action taken (if any) to resolve the complaint
- date a response was provided
- any review or follow up action required.

We commit to de-identifying complaints held on this register if requested by the complainant or the survivor.

7.15 CONTINUOUS IMPROVEMENT

On a continuing basis **SBBC** will monitor the effectiveness of our complaint handling and make improvements as appropriate.

SBBC will:

- maintain data collection on complaints for the purpose of identifying trends for the purpose of enhancing information management and programs and projects
- keep abreast of best practices regarding complaint handling
- foster a beneficiary and stakeholder focused approach
- undertake specific training and retraining of staff to foster better complaint handling practices
- encourage innovation in complaint handling development
- endeavour to collect feedback from beneficiaries on a regular basis
- recognise and reward exemplary complaint handling behaviour.

8. POLICY MANAGEMENT

This policy has been approved by the Board of Trustees of SBBC as noted below.

Amendments will be recommended to the Managing Director from time to time as deemed appropriate by the General Manager Shared Services, usually annually.

Formal reviews are recommended every three years from the anniversary date of approval by the Board.

Recommendations for minor changes can be approved by the Managing Director before the Board review every three years.

Reference Code	CFHP/02/2025/V1.0
Executive Owner	The Managing Director
Policy Manager	The General Manager-Shared Services
Effectiveness Approval Body	SBB Cambodia Board
Date Approved	Reviewed/May/2025; Approved/07/May/2026
Effective Date	07/Feb/2025
Next Formal Review	19/Feb/2028
Version Number	V1.0

APPENDIX 1 – COMPLAINT SEVERITY LEVELS

Impact

Minor	Moderate	Major	Extreme
The complainant or survivor has experienced a very low level of annoyance, frustration, worry or inconvenience.	The complainant or survivor has experienced moderate distress, inconvenience or pain.	The complainant or survivor has experienced distress or difficulties that have a significant impact on the way he/she lives his/her life.	The complainant or survivor is in immediate and significant danger or has raised a complaint that is so serious that it could be referred for legal action.

Period of time the issue has been ongoing

One-off	1-2 weeks	1-2 months	3-6 months	6 months +

	Minor	Moderate	Major	Extreme
One-off	1	1	2	3
1-2 weeks	1	2	3	4
1-2 months	2	2	3	4
3-6 months	2	3	4	4
6 months +	3	3	4	4

Actions/ Escalation Required:

In all instances, our first priority will be to ensure the complainant/survivor is safe and has been removed from any immediate danger.

4 = Immediate Risk: Immediate action required. This complaint should be escalated immediately to the Managing Directorwho will escalate it immediately to the Board. It is highly likely that a complaint of this severity will be referred to appropriate regulatory or enforcement authorities.

3 = High Risk: A Senior Leadership Team member must undertake a detailed investigation and report the results of that investigation to the Managing Director within 48 hours of receiving the complaint.

2= Moderate Risk: A Senior Leadership Team member will undertake an investigation and propose a resolution to the complainant/survivor within 5 days.

1 = Low Risk: Manage using routine procedures and ensure the complainant/survivor is satisfied with the resolution.

All complaints will be reviewed by the Board at quarterly meetings, but all Level 4 complaints and certain Level 3 complaints at the discretion of the Managing Director, will be escalated to the Chairperson immediately to allow the Board to be involved in the resolution.