



Empower with an education to prevent sex trafficking

Complaints and Feedback Policy

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COMPLAINTS AND FEEDBACK POLICY

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1. PURPOSE

Free To Shine (FTS) values complaints and feedback as essential to accountability, learning, improvement and safeguarding. This policy sets out FTS's commitment to receiving and responding to complaints and feedback in a way that is safe, fair, accessible, confidential, and responsive.

This policy should be read together with the Whistleblower Policy, Child Protection Policy, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, Code of Conduct, and other relevant FTS safeguarding and governance policies.

Consultation & Development

FTS has developed this policy and the related Complaints and Feedback Procedure after community consultation with girls, family members, community members in Cambodia and the wider FTS network. This consultation helped FTS understand how people prefer to raise concerns, what barriers they may face, who they trust to speak to first, and what is needed to make complaints processes safer, more accessible, and more responsive to the needs of children, families, and communities.

2. SCOPE

This policy applies to all Free To Shine (FTS) operations in Australia and Cambodia.

This policy applies to all Free To Shine (FTS) 'Employees and Associates' as defined below:

- All members of FTS's governing Board
- All FTS employees, whether full-time, part-time, or casual
- All volunteers (office-based, field-based, event-based), interns, and students on placement with FTS
- Any organisations working in partnership with FTS
- Any representatives acting in the name of FTS

This policy is available to anyone who wishes to raise a concern, make a complaint, or provide feedback about FTS, including:

- Children
- Young people
- Families
- Community members
- Partner organisations
- Supporters and donors
- Members of the public

This policy covers complaints and feedback related to any of FTS:

- Programs
- Services

- Conduct
- Decisions
- Operations

Where a concern involves suspected serious or systemic wrongdoing, including fraud, corruption, criminal conduct, serious abuse of power, or deliberate concealment of wrongdoing, FTS may manage the matter under the Whistleblower Policy rather than this policy. A person does not need to decide which policy applies before reporting a concern.

Operational steps for receiving, assessing, investigating, responding to, and recording complaints are set out in a separate *Complaints and Feedback Procedure*.

Policy Commitments

FTS will maintain a complaints and feedback system that is accessible, child-safe, culturally appropriate, and responsive. Information about how to raise a complaint will be available in plain language, in Khmer and other suitable formats.

FTS is committed to designing and communicating its complaints and feedback process based on what we learn from consultations. FTS recognises that people prefer familiar, practical ways to speak up. This includes talking with a trusted adult, face-to-face conversations, making a phone call, or finding clear information on local posters, guides, cards or leaflets.

FTS commits to:

- taking all complaints seriously and responding in a way that is safe, respectful, and fair
- protecting confidentiality as far as possible
- prohibiting retaliation against any person who raises a concern in good faith or helps with a complaint process, and
- prioritising the safety and best interests of children.

FTS will use complaints and feedback to strengthen safeguarding, improve programs and conduct, and support accountability to children, families, communities, employees, partners, and supporters.

3. DEFINITIONS

Term	Definition
Complaint	A statement that a person is unhappy with FTS services, conduct, decisions, operations, or the handling of a complaint, and expects a response or resolution.
Feedback	A suggestion, comment, concern, or input (positive or negative) about FTS programs, services, or operations.
Complainant	A person or group making a complaint or raising a concern, including anonymously or through a third party.
Confidentiality	Protecting personal information and sharing it only with people who need it to do their role.
Child	Any person under 18 years of age.
Safeguarding complaint	A complaint about abuse, exploitation, harassment, unsafe behaviour, or other conduct that may cause harm, especially to children or vulnerable people.
Whistleblower disclosure	A report made in good faith about suspected serious or systemic wrongdoing, managed under the Whistleblower Policy.
Good faith	A concern raised honestly, even if it is later not substantiated.
Anonymous complaint	A complaint made without the complainant identifying themselves.
Retaliation	Harm, threats, intimidation, unfair treatment, or disadvantage because a person made a complaint or helped with a complaint process.

4. GUIDING PRINCIPLES

FTS will manage complaints and feedback in line with the following principles:

Safety first: The safety and wellbeing of children, survivors, employees, volunteers, and communities are the priority. Immediate action will be taken where there is a risk of harm.

Accessibility: People can raise concerns through safe and accessible channels. Information will be available in plain language, and in appropriate languages and formats for children, people living with disabilities, people with low literacy, and others who may face barriers to speaking up.

Good faith: FTS encourages people to raise honestly held concerns without needing to prove them before reporting. Concerns raised in good faith will be taken seriously.

Confidentiality: FTS will protect identities and sensitive information as far as is possible and lawful. Information will only be shared on a strict need-to-know basis.

No retaliation: FTS will not tolerate retaliation against any person who makes a complaint, raises a concern, makes a whistleblower disclosure, or participates in a complaint process or inquiry in good faith.

Fairness to all parties: Complaints will be handled respectfully, impartially, and in a way that is fair to complainants, respondents, and witnesses. Respondents will be treated with dignity and given an opportunity to respond, subject to safety, confidentiality, and legal considerations.

Child-centred and survivor-centred practice: Where children or survivors are involved, FTS will prioritise their safety, best interests, dignity, voice, and support needs. Processes will be adapted to be trauma-informed and age-appropriate.

Transparency and accountability: FTS will explain the process as clearly as possible, keep appropriate records, and use anonymised information to identify lessons, trends, and systemic issues.

Appropriate referral and escalation: FTS will assess each matter and decide which policy or procedure applies. Matters may be referred to the Whistleblower Policy, Child Protection Policy, PSEAH Policy, human resources procedures, external authorities, donors, or regulators where appropriate.

5. ROLES AND RESPONSIBILITIES

5.1 Board

The Board provides oversight of the effectiveness of FTS's complaints and feedback framework and supports a culture in which speaking up is encouraged, safe, and supported.

The Board receives reporting on serious or systemic issues, monitors trends and organisational learning, and ensures adequate governance oversight of complaints handling.

The Board Chair receives and oversees any complaints that involve the Managing Director, or a Board member or where a complaint involves governance matters.

5.2 Managing Director

The Managing Director is responsible for overseeing this policy and for ensuring that appropriate procedures, resourcing, training, and reporting arrangements are in place.

The Managing Director receives or oversees complaints relating to Australia-based employees, programs, or operations and ensures that serious or systemic matters are escalated appropriately.

The Managing Director may oversee complaint resolution or delegate handling in line with this policy and the related procedures, provided there is no conflict of interest.

The Managing Director reports serious matters to the Board and must escalate any complaint involving the Board or the Country Director to the Board Chair.

5.3 Country Director

The Country Director is responsible for implementing this policy in Cambodia and ensures that concerns are responded to appropriately, sensitively, and in line with Cambodian law and FTS policies.

The Country Director must ensure that child protection, safeguarding, serious misconduct, and potential whistleblower matters are escalated promptly under the relevant policy and procedure. The Country Director may coordinate local follow-up and support actions, provided this does not compromise safety, confidentiality, or procedural fairness.

The Country Director receives complaints relating to Cambodia-based employees, programs, or operations and supports the HR Officer and Child Protection Officer in receiving complaints, and determines outcomes for complaints where appropriate.

5.4 Child Protection Officer (CPO)

The CPO must ensure that children's safety and best interests remain the priority and that concerns involving abuse, exploitation, trafficking, grooming, or other child safeguarding risks are acted on urgently.

The Child Protection Officer is the lead contact for child protection and safeguarding complaints and concerns and has overall responsibility for managing these complaints.

The CPO supports immediate protective action, reporting to authorities where required, referral, and coordination under relevant safeguarding policies and procedures.

The CPO works closely with the Country Director, Program Manager, and HR Officer where matters overlap with complaints, misconduct, or whistleblower disclosures.

5.5 Human Resource Officer (HR) - Complaints Coordinator and Whistleblower Protection Officer

The HR Officer, as Complaints Coordinator and Whistleblower Protection Officer, is a key contact for receiving complaints, feedback, and whistleblower disclosures. The HR Officer supports the confidential receipt, secure recording, coordination, monitoring, and reporting of matters raised under this policy and the Whistleblower Policy, and helps ensure each matter is directed to the appropriate person, policy, or process.

The HR Officer maintains secure records, supports timely handling and communication, monitors progress, and escalates safeguarding, serious, systemic, or conflict-of-interest matters as required.

The HR Officer must not investigate, determine, or manage matters where there is an actual, potential, or perceived conflict of interest, and must immediately refer those matters through an alternative reporting pathway.

Complaints that cannot be reported to the HR Officer, may be reported directly to the Country Director or Managing Director.

5.6 Managers and supervisors

Managers and supervisors must respond appropriately and sensitively when concerns are raised, support safe reporting, maintain confidentiality, and promptly escalate complaints or concerns through the correct channels. They must not discourage a person from speaking up or attempt to resolve matters outside approved procedures where the issue requires formal handling.

Managers and supervisors are responsible for helping employees and participants understand reporting options and for supporting timely referral of safeguarding, misconduct, or potential whistleblower matters.

Managers and supervisors must cooperate with complaint procedures and follow directions about confidentiality, safety, and recordkeeping.

5.7 All FTS employees, volunteers, and representatives

All employees, volunteers, and representatives must act ethically, comply with FTS policies, and treat complaints and feedback seriously.

All employees must know how to receive complaints safely and respectfully, support anyone making a complaint or raising a concern in good faith, protect confidentiality, and cooperate with complaint procedures when required.

Employees must:

- not investigate complaints themselves, unless formally authorised to do so
- only discuss complaints with those who need to know, must never retaliate against complainants, whistleblowers, witnesses, or any person participating in an inquiry.

All employees, volunteers and representatives must complete training on complaints, feedback, safeguarding, and speaking-up procedures relevant to their role.

6. TYPES OF COMPLAINTS

FTS may receive complaints or concerns about:

- Child protection, safeguarding and sexual exploitation, abuse or harassment (SEAH)
- Program quality, inclusion, access, and service delivery
- Governance, financial integrity, misuse of resources, fraud, corruption, or policy non-compliance.
- Employees, or partner conduct
- Any other matter affecting people, communities, or the integrity of FTS

7. REPORTING CHANNELS

FTS will provide multiple safe, accessible, and confidential ways for people to make a complaint or provide feedback. A person may choose any option that feels safe and appropriate for them, including making a complaint anonymously or through a trusted third party.

Community consultation has shown that many Cambodian community members prefer to raise concerns in person, including during community visits or activities, or by phone, including through Telegram. FTS will maintain these options as part of an accessible and locally appropriate complaints process.

FTS also recognises that children, caregivers, and community members may first speak to a trusted person rather than use a formal reporting channel. This may include a mother, another family member, a female employee, a teacher, a village or community leader, or

another trusted adult. Where this happens, FTS will support safe and confidential referral into the appropriate complaints, safeguarding, or reporting pathway.

FTS applies a **no wrong door** approach to complaints and feedback. This means a person does not need to know the most appropriate reporting pathway before speaking up. If a concern is raised through any channel, including in person, by phone, via Telegram, email, social media, or another informal contact method, FTS will respond respectfully, protect confidentiality as far as is possible and lawful, and will help direct the matter to the appropriate person or procedure.

Method	Contact Details
In-person	Visit the FTS office or speak with a FTS employee during community visits or activities. A private space will be offered where needed.
By phone/ Telegram	Call or message the FTS office or nominated employee and ask to speak privately with a manager or the Child Protection Officer on 088 55 388 91
By email	speakup@freetoshine.org Mark the email "Confidential" where appropriate.
Anonymous / Third party	A complaint may be made anonymously through a trusted family member, community member or other representative.
Online form	Submit via contact us https://www.freetoshine.org/contact-us

What to include in a complaint

A complaint can include:

- A name and contact details
- Where and when the concern happened
- Who was involved
- A short description of what happened
- Any requested outcome
- Any supporting information available

A person does not need to have all of this information before speaking up.

8. INFORMATION AND ACCESSIBILITY

FTS will make information about how to complain or provide feedback easy to find, understand and use. Information will be available in forms that are appropriate for the people and communities FTS works with. It will be displayed at offices and program locations, published on the FTS website, shared during induction and community engagement, and made available in child-friendly and community-friendly formats.

FTS will use communication methods informed by community consultation, such as posters, simple guides, leaflets or cards, community meetings, and child-friendly materials. These resources will clearly explain who people can speak to, how to make a complaint, and where to seek help. Contact details for relevant focal points will be clearly provided, and information will be shared in ways that are practical, visible, and easy to understand.

FTS will take reasonable steps to make complaints and feedback accessible to children and young people, people living with disabilities, people with low literacy, people living in remote areas, people with trauma or safety concerns, and people who prefer to complain anonymously or through a third party. This will include translated materials, verbal reporting options, pictorial or simple-language resources, child-friendly communication, private spaces, trauma-informed support, and accessible community information materials such as posters, leaflets, cards, and Khmer “how to complain” guides.

FTS recognises that barriers to speaking up may include shame, embarrassment, fear of retaliation, fear of violence, fear of losing support, lack of trust, not knowing how to complain, distance, and limited confidence in formal systems. FTS will use a range of safe and practical approaches to reduce these barriers.

9. TRIAGE AND INVESTIGATION

FTS will assess all complaints and feedback promptly to understand the issue, identify any immediate safety concerns, and decide the most appropriate response pathway. This includes deciding whether the matter should be managed as a child protection matter, a safeguarding concern, a whistleblower disclosure, another serious incident, a general complaint or feedback.

If there is an immediate safety concern, FTS will act quickly to protect people from harm and will escalate the matter to the appropriate person, authority, or process without delay.

Where a complaint involves child protection, safeguarding, or PSEAH, FTS will follow the Child Protection Policy, the PSEAH Policy, and any related procedures. This includes immediate protective action, referral, mandatory reporting, and survivor or child-centred support as appropriate.

FTS recognises that confidence in complaints systems depends on timely, respectful, and clear responses, and will communicate next steps and updates as promptly as possible, taking into account safety, confidentiality, and the needs of the people involved.

Complaints requiring further review will be handled fairly, impartially, confidentially, and in a way that is proportionate to the seriousness of the matter. Investigations or inquiries may be undertaken internally or by an appropriate independent person, depending on the nature of the complaint, the level of risk, and any conflict of interest.

Detailed triage, investigation, escalation, and recordkeeping processes are set out in the Complaints and Feedback Procedure and related safeguarding, whistleblower, and FTS risk management approach.

10. MANDATORY REPORTING

FTS will report matters to external authorities when required by law or safeguarding obligations. This may include, for example, reporting child abuse, sexual exploitation, trafficking, criminal conduct, serious workplace violations, or financial crime to the relevant authority in Australia or Cambodia.

11. ANTI-RETALIATION

FTS strictly prohibits retaliation against anyone who raises a safeguarding concern, makes a whistleblower disclosure, makes a complaint, provides feedback, participates in a complaint process, or supports another person to raise a concern in good faith.

Retaliation may include threats, bullying, harassment, intimidation, victimisation, dismissal, demotion, exclusion, reputational harm, denial of opportunities, unfair treatment, or any other disadvantage linked to a person speaking up.

FTS will take concerns about retaliation seriously, act promptly to stop and address it, and treat proven retaliation as serious misconduct.

12. CONFIDENTIALITY & DATA SECURITY

FTS is committed to protecting the privacy, dignity, and safety of complainants, respondents, witnesses, whistleblowers, and others involved in a complaint or feedback process. Information will be handled confidentially and shared only with those who need it to assess, respond to, investigate, support, or oversee the matter.

Complaint records will be stored securely and managed in line with FTS recordkeeping, privacy, safeguarding, and data protection requirements. FTS will take reasonable steps to protect personal and sensitive information from unauthorised access, loss, misuse, or disclosure.

FTS will respect requests for anonymity where possible, noting that anonymity or confidentiality may sometimes limit the action that can be taken or the feedback that can be provided. Information may be disclosed without consent where required by law or where necessary to protect a child or another person, or to meet safeguarding, donor, regulatory, or reporting obligations.

13. REVIEWS AND EXTERNAL PATHWAYS

FTS is committed to ensuring all complainants feel heard, respected and are treated fairly. If a complainant is dissatisfied with how their complaint was handled or with the outcome, they have the right to request an internal review.

Internal reviews

A complainant may request an internal review within 10 working days of being told the outcome. They can do this by sending a short written request, for example by email, message, or letter, including through a trusted third party, explaining why they disagree with the decision and what they would like FTS to review.

Review requests can be sent to speakup@freetoshine.org. The review will be conducted by someone more senior, and independent from, the original decision-maker. A decision will usually be made within 20 working days. If there is a delay, FTS will explain the reason and provide an updated timeframe.

External pathways

A person can also choose to raise their concerns with an external organisation at any time. This may be especially important where the concern involves child protection or safeguarding, criminal conduct, fraud or corruption, serious misconduct, or where the person does not feel safe using FTS internal processes.

FTS will not stop or discourage anyone from using an external pathway and will comply with relevant legal and safeguarding reporting obligations.

14. TRAINING

FTS will ensure that all employees receive appropriate training to effectively implement this policy and respond to complaints and feedback in a safe, respectful, and confidential manner. This includes understanding how to receive concerns, provide appropriate support, and refer matters through the correct pathways, in line with the Complaints and Feedback Procedures.

All employees will receive training on this policy during induction, including their roles and responsibilities in handling complaints and feedback. Refresher training will be provided on an annual basis to reinforce knowledge, address emerging risks, and ensure continued compliance with good practice.

15. ORGANISATIONAL LEARNING

FTS views complaints and feedback as opportunities to learn and improve. De-identified information from complaints and feedback will be reviewed at a minimum every three years to identify patterns, risks, strengths, and areas for improvement in safeguarding, programs, systems, and organisational practice. Learning from complaints will inform employee training, management action, and service improvement.

16. POLICY REVIEW

This policy will be reviewed every three years, or sooner if required by changes in legislation, donor or regulatory requirements, significant breaches or incidents, audit findings, or FTS's operational needs.

17. RELATED POLICIES AND LEGAL FRAMEWORK

This Confidentiality Policy should be read alongside:

- Child Protection Policy
- Code of Conduct
- Confidentiality Policy
- Privacy Policy
- Whistleblower Policy
- PSEAH Policy

These documents together set out FTS's expectations for safe, ethical, and lawful conduct, including how concerns about privacy or confidentiality can be raised and addressed.

REVISION LOG

Version	Date	Summary of Changes	Author
1	June 2026	Initial policy release	Sarah Rogers, Country Director

APPENDIX A: How To Make A Complaint or Give Feedback

Free To Shine: How To Make A Complaint or Give Feedback

Free To Shine (FTS) wants children, families, and community members to feel safe to speak up. This summary is based on the FTS Complaints and Feedback Policy and reflects community consultation about trusted ways to raise concerns, barriers to speaking up, and preferred reporting options.

You can speak up

You can tell FTS if:

- Something made you feel unsafe.
- You are unhappy with a service, activity, decision, or staff behaviour.
- You want to share feedback, a concern, or an idea.
- You are worried about a child, safeguarding issue, or sexual exploitation, abuse, or harassment.

You do not need proof before speaking up. You do not need to know the right policy or the right person first.

Ways to complain or give feedback

You can choose the way that feels safest for you:

- Talk to FTS staff in person.
- Speak during a community visit or activity.
- Call or message by phone or Telegram: **088 55 388 91**
- Send an email to **speakup@freetoshine.org**
- Ask a trusted person to help you, such as a mother, family member, teacher, female staff member, community leader, or other trusted adult.

Make a complaint anonymously if you do not want to give your name.

What FTS will do

- FTS will take complaints and feedback seriously and respond respectfully. FTS will keep your information private and only share it with people who need to know.
- If someone is in danger, especially a child, FTS will act quickly to help keep people safe.
- FTS may need to report some serious matters to authorities when required by law or safeguarding obligations.
- FTS will not allow retaliation against a person who speaks up in good faith or helps with a complaint.
- FTS will explain what happens next and give updates as soon as possible.

If you feel worried

Sometimes people feel shame, fear, embarrassment, or worry about what might happen if they complain. Some people worry about violence, losing support, not being believed, or not knowing how to complain. FTS understands these concerns and will try to make the process safe, simple, and respectful. You can speak to someone you trust first and ask them to help you contact FTS.

If you are not happy with the response

If you are not happy with how FTS handled your complaint, you can ask for it to be looked at again. You can also contact an external organisation or authority if you do not feel safe using FTS processes or if the matter is very serious.

Contact details

- In person: speak with FTS staff or during a community visit.
- Phone / Telegram: **088 55 388 91**
- Email: speakup@freetoshine.org
- Trusted person: ask a family member, teacher, female leader, or other trusted adult to help you.

FTS will also share information through posters, simple guides, leaflets, cards, community meetings, and Khmer materials to make it easier for people to know how to get help.

APPENDIX B: Complaint and Feedback Form

Use this form if you want to make a complaint or give feedback to Free To Shine (FTS). FTS wants people to feel safe to speak up. You can fill in as much or as little as you can. You do not need to complete every part to speak up. The more information you give us the better we can investigate. You can give your name or stay anonymous.

1. About you

Name: _____

Phone number: _____

Email address: _____

Address or village: _____

Do you want to stay anonymous?

☐ Yes

☐ No

If this form is for a child, what is the child's name and age (if known)?

2. How can we contact you?

How would you like FTS to contact you?

☐ Phone call

☐ Telegram/message

☐ Email

☐ In person

☐ Through a trusted person

☐ Do not contact me

Best time to contact you: _____

If you want FTS to contact another person instead, write their name and contact details below:

3. Your complaint or feedback

What happened?

When did it happen?

Where did it happen?

Who was involved?

Anything else you would like us to know?

4. What type of issue is this?

Tick any that apply:

- ☐ Feedback or suggestion
- ☐ Complaint about a service or activity
- ☐ Complaint about staff or volunteer behaviour
- ☐ Child safety concern
- ☐ Safeguarding concern
- ☐ Sexual exploitation, abuse or harassment concern
- ☐ Fraud, corruption, or misuse of money/resources
- ☐ Other: _____

5. Is anyone in immediate danger?

- ☐ Yes (If yes, please contact emergency services)
- ☐ No
- ☐ Not sure

If yes or not sure, please explain:

6. What would you like FTS to do?

7. Do you have any documents, photos, messages, or other information to share?

- ☐ Yes
- ☐ No

If yes, please list them or attach them:

8. Privacy and support

Would you like support from a trusted person during this process?

☐ Yes

☐ No

If yes, who would you like to support you?

Do you have any safety or privacy concerns about FTS contacting you?

9. Details

Name: _____

Signature: _____

Date: _____

If completed by someone helping the complainant, write your name and role:

For FTS use only

Date received: _____

Received by: _____

How received:

☐ In person

☐ Phone

☐ Telegram/message

☐ Email

☐ Online

☐ Other: _____

Complaint reference number: _____

☐ Immediate action needed:

☐ Yes

☐ No

Referred to:

Date referred:

Notes: