Policy Approver:	**Board**
Policy Owner:	**Chief Executive Officer**
Policy Lead:	**Chief Legal, Risk and Sustainability Officer**
Date Last Approved:	**27 October 2026**

Complaints Policy

Overall purpose: This policy explains WWF-Australia's commitments and requirements for receiving, managing and resolving complaints about WWF-Australia, our personnel, our partners and our activities and work. It sets out how complaints are made, handled and escalated. It also explains how concerns that fall outside the scope of this policy are managed under other WWF-Australia policies.

1 What This Policy Covers

This policy covers complaints about WWF-Australia, our personnel, partners, our activities and work or your experience with WWF-Australia.

Complaints may be made under this policy by members of the public, supporters, donors, affected communities, program participants and beneficiaries, partner organisations and their personnel, government entities, contractors, suppliers, WWF-Australia personnel and their family members, as well as children and young people with appropriate age-based support.

This policy does **not** apply to the following matters, which are managed under separate policies and processes:

- **Fraud, corruption and counter-terrorism concerns or complaints:** Any concern relating to fraud, corruption, bribery, money laundering, terrorism financing or related misconduct is managed under the Fraud, Corruption and Counter-Terrorism Policy.
- **Privacy concerns or complaints:** Any concern or complaint about how personal information is collected, used, disclosed, stored or protected is managed under the Privacy Policy.
- **Safeguarding concerns or complaints:** Any complaint involving child safety or sexual exploitation, abuse and harassment is managed under the Safeguarding Policy and its procedures.
- **Whistleblower disclosures:** Any disclosure of serious wrongdoing that may qualify for whistleblower protection in accordance with federal law is managed under the Whistleblowing Policy.
- **Workplace grievances:** Any internal, work-related grievance involving WWF-Australia personnel is managed under the Workplace Grievance Policy.

2 Legal and Regulatory Framework

This policy is guided by the following:

- **Australian Charity and Not-for-profit Commission (ACNC) Governance and External Standards** – Core governance requirements for Australian Charities.
- **DFAT Child Protection Policy and DFAT PSEAH Policy (2025)** – Australian Government policies setting mandatory safeguarding standards for organisations receiving Australian aid funding, including accessible complaints mechanisms and mandatory reporting of any suspected, alleged or known incident to DFAT within 24 hours.
- **Australian Council for International Development (ACFID) Code of Conduct** – Industry code promoting ethical and accountable practices in international development
- **WWF Network Speak Up Core Standard** v3.0 (December 2025) – network-wide minimum expectations for whistleblowing and complaints management.

3 Important Definitions

In this policy, certain key terms are defined for clarity. For common definitions used across multiple policies, please refer to **Annexure A – Glossary of Terms** at the end of this document.

- By "**complainant**" we mean a person, organisation or their representative making a complaint.
- By "**complaint**", we mean an expression of dissatisfaction about WWF-Australia, our personnel, our partners, or our activities and work, where a response or resolution is expected. It may relate to the quality of our services, the conduct of our people, the impact of our programs, or how we handled an earlier complaint.
- By "**victim-survivor**" we mean a person who is, or has been, subject to exploitation, abuse or harassment. The term 'victim-survivor' acknowledges both the harm suffered (victim) and the resilience or agency of the individual in coping with the aftermath (survivor).

4 Our Commitments and Guiding Principles

This section outlines the core principles that guide WWF-Australia's approach to complaints, and the commitments we make to uphold these principles in our work.

Guiding principles

- **Speaking up culture**: We aim to encourage a speak up culture where people feel comfortable raising genuine concerns. This enables us to address concerns appropriately and learn, improve and strengthen our practice.
- **Integrity:** We live by the principles we advocate, handling complaints with honesty, accountability and transparency.
- **Accessibility:** We make it clear and accessible for anyone to raise a concern, regardless of language, literacy, disability, age, location or connectivity. Information about this policy, including how to raise a complaint, is provided in plain language. We endeavour to provide information in different languages and accessible formats, including child-friendly options where children may be involved.

- **Confidentiality:** We protect the identity and information of complainants and people who raise concerns, sharing only on a need-to-know basis, with consent or where required by law.
- **Fairness:** We handle every complaint consistently and impartially. All parties, including any person who is the subject of a complaint, are treated with respect and given a fair opportunity to be heard.
- **Responsiveness and timeliness:** We acknowledge complaints promptly and respond within reasonable timeframes (outlined in section 5 below).
- **Victim-survivor centred:** We prioritise the safety, dignity, confidentiality, rights, needs and wishes of victim-survivors. For children, decisions are further guided by the best interests of the child.
- **Non-retaliation:** We do not tolerate retaliation against anyone who raises a complaint or cooperates in an investigation.
- **Learning and improvement**: We act on complaints and use them as opportunities to learn, improve our practices, strengthen relationships and prevent issues from recurring.

Organisational commitments

- **Accessible reporting channels**: We provide accessible, safe and confidential channels for any person to raise a complaint about our organisation, our personnel, our partners or our activities and work.
- **Support for complainants and victim-survivors**: We offer appropriate assistance and referrals to victim-survivors to support their safety and wellbeing.
- **Effective complaints mechanisms**: We regularly review the effectiveness, accessibility and visibility of our complaints channels to ensure stakeholders are aware of them and able to use them.
- **Learning and improvement**: We regularly review and analyse complaints to identify systemic issues, improve our practices and support reporting to the Executive Team and Board, including reporting on serious complaints and their management.
- **Transparency**: We make this policy and information on how to raise concerns or make a complaint publicly available on our website, in plain language and accessible formats.
- **Accountability**: We take complaints seriously, investigate concerns where appropriate, and take action to address issues, improve our practices and hold people accountable where standards are not met.

5 Implementing This Policy in Practice

This section describes how the principles and commitments of this policy are implemented in practice. It includes the key requirements we must meet and identifies any supporting procedures or tools that help ensure compliance.

How to make a complaint

Anyone can make a complaint under this policy, including members of the public, supporters, donors, affected communities, program participants and beneficiaries, partner organisations and their personnel, government entities, contractors, suppliers, WWF-Australia personnel, and their families, and children and young people with age-appropriate support.

We accept anonymous complaints and complaints made on behalf of another person. We will assess and respond to them based on the information available, although we may not be able to provide updates or outcomes if we cannot contact the complainant.

Concerns covered by another WWF-Australia policy will be managed under that policy.

Complaints can be made through any of the following channels. Complaints received through any other WWF-Australia email address, phone line or social media account will be managed and escalated in accordance with this policy:

Channel	Details
Email	hello@wwf.org.au or complaints@wwf.org.au
Phone	1800 032 551 (within Australia) +61 2 8000 0303 (from overseas)
Post	Complaints, GPO Box 528, Sydney NSW 2001
Online	Online form at wwf.org.au/contact-us Includes child-friendly reporting options
In person	By speaking with WWF-Australia personnel at a project site or office, including a program-level Safeguarding Focal Point where relevant.
WWF Global Reporting Channel	EthicsPoint: wwfinternational.ethicspoint.com Anonymous lodgement is available
WWF Office of the Ombudsperson	info@wwfombudsoffice.org This is the independent WWF Network channel for concerns relating to environmental or social safeguards, more information can be found at https://www.wwfombudsoffice.org/
Via our partners	Complaints can also be made locally in the communities where we work, including through a partner organisation's complaints channels. Complaints relating to WWF-Australia, our personnel, partners or activities and work will be escalated to WWF-Australia in accordance with this policy.

Assessing and categorising complaints

We take all complaints seriously and handle them with care. When we assess a complaint, we consider its seriousness, urgency and potential impact, including any

risk to a person's health, safety or wellbeing. We identify whether the complaint should be managed under this policy or referred to another WWF-Australia policy or process. Where there is an immediate risk of harm, we take appropriate action without delay. For matters involving children, we act in the best interests of the child.

If the complaint is covered by this policy, we categorise the complaint and allocate the appropriate response:

Category	Description	Examples	Response
Routine	Complaints that can usually be resolved by the relevant team.	Service quality concerns, donation or fundraising concerns, communication issues, or routine operational matters.	Managed by the relevant team and overseen by the relevant manager or Head of(s).
Serious	Complaints that may indicate systemic issues, significant impacts or reputational risks.	Repeated complaints, partner conduct concerns, cultural safety concerns, environmental concerns or incidents, breaches of this policy, or other matters involving heightened risk or complexity.	Escalated to the relevant Executive, who may decide to commence formal investigation and/or escalate the matter further.
Critical	Complaints involving an immediate or significant risk to people, communities, WWF-Australia, our partners or our activities and work.	Serious harm to persons or environmental harm, major legal or regulatory issues, significant reputational risks, or other matters requiring urgent action.	Escalated immediately to the Chief Executive Officer or the Board as appropriate. Relevant authorities may also be notified where required.

Complaints managed under other policies

Some concerns are managed under specialist policies. During assessment, complaints involving fraud, safeguarding, whistleblowing, privacy or workplace grievances will be referred to the relevant policy and process.

What happens after a complaint is received

We handle every complaint fairly, promptly and with care. We keep complainants informed about the progress of their complaint and what they can expect next.

Below is our complaint management process:

- **Acknowledgement**: We acknowledge every complaint we receive promptly, normally within 3 business days of receiving it.
- **Assessment**: We assess the complaint, decide how it will be handled, and advise the complainant of the next steps, normally within 15 business days. If an

allegation relates to potential criminal conduct, we may refer the matter to police or seek advice from relevant authorities before commencing, or continuing with, any internal assessments and/or investigations.

- **Investigation**: Where an investigation is needed, we will explain the process and provide an indicative timeframe. We may determine the investigation should be undertaken internally or by an independent third party. We keep complainants informed of significant developments, where appropriate and consistent with privacy, confidentiality and legal obligations. Any person interviewed during an investigation, including a person who is the subject of a complaint, may have a support person or interpreter present.
- **Resolution**: We aim to resolve complaints as soon as reasonably practicable. While many complaints can be resolved within 30 business days, more complex matters may take longer. If additional time is needed, we will explain why and provide an updated timeframe.
- **Outcome**: We communicate the outcome of the complaint, including any actions taken where appropriate, subject to privacy, confidentiality and legal obligations.
- **Escalation**: If a complainant is not satisfied with how their complaint has been handled, they may request that WWF-Australia review the matter or raise it with the Chief Executive Officer. They may also refer the matter to an appropriate external body, including the ACFID Code of Conduct Committee (code@acfid.asn.au or acfid.asn.au/complaints). Depending on the nature of the complaint, this may also include the Department of Foreign Affairs and Trade (DFAT) (for DFAT-funded activities), or the police (for suspected criminal conduct).
- **Withdrawal of complaints**: Anyone can choose to withdraw their complaint at any stage during the process. We reserve the right to continue to pursue any concerns that may adversely impact WWF-Australia and/or others.
- **Reporting**: We will use complaints data to identify trends and improve our processes and practices. De-identified and confidential reports are provided regularly to executives and the Board. We may also report externally where required to meet contractual, legislative, and WWF Network obligations.

Supporting procedures and resources

- **How to Raise a Concern at WWF-Australia**: A plain-language matrix that introduces and helps identify the best way to raise a concern, showing what each relevant policy covers, who can use it, how to raise a concern under it, and who handles it.
- **Complaints Register**: The Legal, Risk and Sustainability team maintains a complaints register (or equivalent) that records all serious and critical complaints received, the actions taken, and their outcomes and resolutions, taking care to protect the privacy and confidentiality of all involved. A complaint may be recorded on a de-identified basis at the request of the complainant or victim-survivor. Teams may keep their own front-line records of the complaints they receive.
- **Investigation Procedure:** A procedure that sets out how complaints are assessed, investigated, documented and managed, including requirements for record-keeping, privacy and confidentiality.
- **Easy Read Complaints Guide**: A public-facing guide that explains this Policy in plain and simple language with graphics, and helps people understand how to raise a complaint, access support and understand the complaints process.

6 Consequences of not following this policy

Not following this policy can lead to consequences, depending on how serious the issue is.

- **For WWF-Australia personnel**: If you do not meet this policy's requirements (including failing to provide necessary information or disclosures), it may be considered misconduct or serious misconduct under our HR policies. Depending on the situation, this could lead to coaching, formal warnings or termination of employment or engagement (in serious cases).
- **For partner organisations or other external parties**: If a partner organisation, downstream partner or other external organisation breaches this policy, we will immediately discuss the breach with them, monitor activities, pause or stop certain work, or end contracts or partnerships.

We will always aim to respond in a way that reflects the seriousness of the situation and complies with our agreements and legal obligations.

7 Partner and Third-Party Obligations

This section outlines what we expect from the external organisations and individuals we work with.

- **Partner organisations:**
    - We require our partner organisations (including downstream partners) to either follow this policy or maintain equivalent complaints arrangements, including complaints management processes and reporting channels that are accessible, safe, confidential and locally appropriate (including child-friendly options where children are involved).
    - Partners must promptly pass on any complaints received relating to WWF-Australia's personnel or activities and work.
    - We are committed to providing guidance or training as needed to support compliance.
- **Contractors, suppliers and/or other third parties:** We take a risk-based approach when working with contractors, vendors and other third parties. Depending on the nature of the work and the level of risk, we may ask these parties to follow this policy (in full or in part) as part of their contract or agreement with us. These expectations will be clearly outlined in the relevant contract or project documents, and we will offer further clarification or support to third parties to help them meet any such obligations.

8 Communication and Training

We are committed to making sure this policy is well understood and followed by everyone it applies to.

- **Where to find it**: The latest version of this policy will be made publicly available on the WWF-Australia website and will also be accessible to personnel via our internal Wiki or intranet. This helps ensure transparency and allows external stakeholders (such as partners or donors) to understand our commitments.

- **Personnel training and awareness**: All new WWF-Australia personnel will be introduced to this policy as part of their induction. Existing personnel will receive refresher training at least each time the policy is updated, or sooner if needed. Training may include workshops, e-learning modules, or team discussions, with a focus on how to apply the policy in day-to-day work.
- **Partner and stakeholder awareness:** We will communicate the requirements and expectations of this policy to our partners and relevant third parties. This may include:
    - Adding relevant obligations to contracts, agreements or project documents.
    - Discussing and highlighting this policy in partner briefings or training sessions, especially when starting new projects.
    - Providing summaries or guidance to help ensure the policy is understood, regardless of language or cultural background.
- **Ongoing communication:** As needed, we will share updates, reminders or lessons learned through internal newsletters, team meetings or partner communications. This helps keep the policy active and relevant in our day-to-day work.

9 Roles and Responsibilities

Clear roles help make sure this policy is followed effectively. Key responsibilities include:

- **Policy Approver:** The Board approves this policy and any major updates.
- **Policy Owner:** CEO. This Executive team member sponsors and is accountable for this policy. They are responsible for making sure the policy is properly implemented and overseeing compliance.
- **Policy Lead:** The Chief Legal, Risk and Sustainability Officer. This person manages the policy day-to-day. They develop any needed procedures, tools or training, track compliance (including reporting on key metrics or incidents), and are the main point of contact for questions. They escalate significant issues to the Policy Owner and support with investigations or reviews.
- **Executive team**: Responsible for modelling compliance with this policy and promoting a culture that upholds its principles.
- **All personnel**: All WWF-Australia personnel are expected to understand this policy and follow it in their daily work. This includes asking for help when unsure, using the tools and guidance provided to implement the policy, helping others understand the policy and reporting any concerns or breaches.

For more detailed role descriptions, see the WWF-A Policy Governance Framework.

10 Records and Policy Review

Keeping records

We will keep accurate and secure records related to this policy and its implementation. This includes reports made under the policy, investigations and their outcomes, training records, and reviews or audits of policy compliance.

These records will be kept for at least seven (7) years**,** or longer if required by law or our internal policies. All records will be stored securely to protect confidentiality and privacy.

Reviewing and updating the policy

The Chief Executive Officer and Chief Legal, Risk and Sustainability Officer are responsible for monitoring the effectiveness of this policy and ensuring it stays current.

This policy will be formally reviewed at least **every five (5) years**, or sooner if there are major changes in our work or applicable laws. Reviews will consider changes in legislation, lessons learned from any incidents or reports, and updates in best practice within WWF or across the sector.

Between formal reviews, the Chief Executive Officer can suggest updates if new risks come up or improvements are needed. Major changes must be approved by the Board. Minor edits (like fixing typos or updating references) can be approved by the Chief Legal, Risk and Sustainability Officer as needed.

During a policy review, all procedures and any other associated materials must also be reviewed to ensure consistency.

For more detail on how we manage policies, see the WWF-Australia Policy Governance Framework.

11 Related Policies and Resources

Use this policy together with the following related policies and resources:

- **Code of Conduct:** Sets out overarching expectations for ethical behaviour aligned with WWF Values and forms part of WWF-Australia's Safeguarding Framework.
- **Fraud, Corruption and Counter-terrorism Policy**: Sets out our commitment to complying with relevant laws and any contractual obligations applicable to us relating to fraud, corruption, bribery, anti-money laundering and counter-terrorism.
- **Privacy Policy:** Covers the handling of personal information, which may be relevant if this policy involves data or confidentiality aspects.
- **Safeguarding Policy:** Explains WWF-Australia's commitments and requirements for safeguarding children and other people in vulnerable situations and preventing sexual exploitation, abuse and harassment.
- **Whistleblowing Policy (formerly Speak Up Policy):** Provides an alternative channel for reporting serious wrongdoing and protections for those who report.
- **Workplace Grievance Policy:** Sets out our commitment to resolving workplace grievances and the rights and responsibilities of our personnel in this regard.

12 Version Control and Approval History

Action:	Date of Board meeting:
Approval and adoption of policy by the Board	27 October 2026

Annexure A – Glossary of Terms

(a) By '**activities and work'**, we mean our programs and projects and other activities resourced by WWF-Australia (such as funding or in-kind support).

(b) By '**contractor**' or '**supplier**' we mean an external entity that provides services to WWF-Australia under an agreement, and is not otherwise classified as WWF-Australia personnel or a partner organisation. This includes vendors, service providers, consultancy firms and other suppliers.

(c) By '**downstream partner**' we mean an external entity that is engaged by a partner organisation to undertake activities and work. This includes grant recipients, vendors, service providers, consultancy firms and other suppliers.

(d) By '**independent contractor or consultant**' we mean an individual with an individual/sole trader ABN (or equivalent unique identifying number in the country/area the individual is based in) who provides services to WWF-Australia.

(e) By '**official visitor**' we mean a person invited by or permitted by us to participate directly in our activities or work or visit any of our offices or project sites. This includes but is not limited to donors, campaign ambassadors, government representatives, corporate partner personnel, grantee representatives and auditors.

(f) By '**partner organisation**' we mean an organisation that is directly responsible for undertaking conservation, regeneration and/or aid and development activities and work resourced by WWF-Australia.

(g) By '**personnel**' we mean our Board directors, employees, interns, students on vocational placement, volunteers and independent contractors or consultants.

(h) By '**volunteer**', we mean an individual who is formally engaged by WWF-Australia to willingly give their time without financial gain (other than reimbursement of reasonable out-of-pocket expenses), and who performs activities on behalf of and under the direction of WWF-Australia. Volunteers are not employees, independent contractors or consultants of WWF-Australia. This definition does not include individuals participating in corporate, group or ad hoc volunteering activities unless they are formally engaged as volunteers by WWF-Australia. This policy applies to volunteers only to the extent that its requirements are relevant to their volunteering activities for WWF-Australia.

(i) By '**we**', '**us**', **'our**', '**WWF**', '**WWF-A**' or '**WWF-Australia**', we mean World Wide Fund for Nature Australia, unless otherwise specified.