**Objective**

This policy outlines a clear process for any person or organisation to lodge a complaint in relation to the 10 Deserts Project (the project).

The project is committed to:

* anti-bribery and corrupt practices
* anti-money laundering and terrorism activities
* a safe and healthy working environment
* non-discriminatory practices
* a safe environment for children and vulnerable persons including ensuring no ‘child labour’ is used
* no forced or compulsory labour being used
* an environment where all employees are treated with dignity and respect
* living wages which satisfy at a minimum national legal standards or local industry benchmarks
* freedom of association
* non-sourcing of materials from World Heritage or UUCN protected areas
* sustainable sourcing of biofuels
* acting ethically in its engagement of government officials
* ensuring that any lobbying and politicking is not in breach of US Internal Revenue Code requirements
* compliance with all laws and regulations relating to its project activities.

The project is dedicated to ensuring that all who have contact with the organisation have the right to make a complaint in any form, including face to face, verbal, and written feedback.

**Definitions**

**Complaint** is a written or verbal statement outlining a problem, concern or expression of dissatisfaction. A complaint can be in the form general negative feedback, a concerns, dispute, or complaint

**Complainant** means a person who makes a complaint regarding harassment or discrimination

**Natural justice** means the minimum standard of fairness to be applied in the investigation and adjudication of a dispute

**Project** means the 10 Deserts Project

**Principles**

The project ensures that:

* the process for handling any complaints is consistent with international best practice principles such as the United Nations Guiding Principles on Business and Human Rights (including guiding principles 29 and 31[[1]](#footnote-1))
* its processes are simple and easy to use and are effectively communicated and promoted to all partners and stakeholders and the public in plain English and is made available on its website/s
* all concerns are addressed in a way that guarantees confidentiality, respect, access and equity, fairness, accountability and transparency
* it maintains the confidentiality of parties involved, keeping any information private to those directly involved in the complaint and its resolution
* it respects the rights of complainants to have an advocate present
* complaints being made by or involving traditional owners will be handled in a culturally appropriate manner
* the process is free of any conflict of interest
* natural justice and procedural fairness are applied at all times
* all parties to the complaint are informed of the progress of the complaint
* a complainant is not penalised in any way for making a complaint
* whistle-blowers are encouraged to come forward to report corruption or misconduct and are to do so without fear of retribution or unfair treatment
* a register of complaints/feedback is kept and reviewed by an independent advisor
* it considers all feedback data (both positive and negative) in its organisational reviews and in planning project improvements
* breaches of the policy may result in formal disciplinary action being taken.

**Complaints excluded from this policy**

The following complaints are excluded from this policy:

* matters of a contractual nature – these are to be dealt with under the terms and conditions of any relevant contract
* matters related to any memorandum of understanding (MoU) – these are to be dealt with under the dispute resolution clauses in the MoU
* staff/employee grievances – these are to be dealt with under the relevant organisation’s human resource policies and procedures

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**Reviewing officer**: Peter See, general manager, 10 Deserts Project

**Policy approved**: 29/06/2018

 by:

**Policy amended**: 30/10/2018

1. Business and Human Rights Resource Centre, <https://business-humanrights.org/en/un-guiding-principles/implementation-tools-examples/access-to-remedies-grievance-mechanisms/non-judicial-grievance-mechanisms/company-based-grievance-mechanisms>, accessed 9 Oct 2017. [↑](#footnote-ref-1)