# Council For International Development -_core - WHITE BACKGROUND

***Note:*** *A Complaints-Handling Policy should be tailored according to the organisation’s size, operations and risk to children. This template can be changed according to organisational context. This template can assist with understanding some of the policy requirements for CID Code of Conduct mandatory obligation* ***D.6 Complaint Handling within signatory organisations*** *and obligation* ***E.3 CID Code of Conduct complaints handling****.*

**[Organisation]**

**Complaints-Handling Policy**

This policy will be reviewed triennially, and details recorded as below.

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| **Version** | **Date** | **Author/s** | **Approved by** | **Review Date** | **Comments** |
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1. **Purpose**

 [ORGANISATION] recognises the importance and value of listening and responding to concerns and complaints. Receiving concerns and complaints is one of the most important ways of improving towards best practice, assisting in holding ourselves accountable and transparent to stakeholders. We will meet our obligations under the Council for International Development (CID) Code of Conduct to ensure our complaints handling process is safe, confidential and accessible.

The purpose of this policy is to guide a fair, clear, timely and documented procedure through which stakeholders may express a concern, provide feedback or make a complaint about [ORGANISATION] and our international development activities.

1. Scope of the policy

This policy is intended to apply to any complaint, regardless of the complainant. Details about the complainant will remain confidential, unless it is a requirement of the law or [ORGANISATION]'s Child Protection Policy obligations, to disclose or report the information; however, this will not preclude [ORGANISATION] obtaining legal advice.

We will accept complaints relating to anyone affiliated with our organisation, including staff, volunteers, partners and contractors. Complaints handling is expected of all staff and volunteers, with the Chairperson responsible for overseeing subsequent investigations.

1. Education and Training

All [ORGANISATION] staff and volunteers receive training on the Complaints Policy and process upon induction and regular trainings. Our trainings will ensure our staff and volunteers can receive and capably respond to complaints from the most vulnerable in communities we serve. A register is maintained to monitor the status of this training and we will convene at least one annual review of our complaints handling procedures.

***Note:*** *The below protocol on handling complaints may or may not reflect the capabilities or structure of your organisation. Adjust the template to specify means of handling complaints.*

1. Publicising the Policy

[ORGANISATION] makes clear the value we place on receiving concerns and complaints in all relevant communications. Where literacy is a constraint, we will orally invite expressions of concern and complaint. We will 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 will take special care to facilitate complaints from vulnerable populations including children and marginalised groups.

All relevant communications explain this and explain our procedures for handling complaints including:

* where or to whom complaints can be made (i.e. [ORGANISATION] contact point)
* 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 information on the status of the complaint
1. Receiving Complaints

We can receive complaints orally (in person) or by any of the means below;

*Post:*

*Telephone:*

*Email:*

*Online:*

Complaints may be made by a friend or advocate of the complainant on their behalf. We recognise that in some circumstances, complainants may wish to remain anonymous. However, it may not be possible to provide a remedy to an anonymous individual.

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.

1. Handling Complaints

***When we take an oral complaint, we will:***

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

***Initial assessment of complaint***

* We 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:
1. severity;
2. urgency;
3. complexity;
4. potential to escalate;
5. implications for the complainant (including health/mental health and financial);
6. implications for [ORGANISATION] or the public (systemic implications)

If we assess the complaint as significant in terms of one or more of these criteria we will classify the complaint accordingly, and if necessary an investigating officer or team will be appointed by the Chairperson.

***For all complaints we will:***

* Seek from the client the outcome/s they are expecting;
* Clearly explain to the client the course of action that will follow:
	+ if the complaint is out of our jurisdiction;
	+ if we may exercise a discretion not to investigate;
	+ if preliminary enquiries need to be made, or further consideration needs to be given;
	+ or if the complaint is to be investigated.
* We will not create false expectations, but assure the client that the complaint will receive full attention;
* Give an estimated timeframe or, if not possible, a date by which we will contact them;
* Check whether the client is satisfied with the proposed action and, if not, advise them of alternatives;
* Ensure that the complaint is appropriately acknowledged;
* Follow up where necessary, and monitor whether the client is satisfied;
* Register all complaints
1. Inquiries and Minor Complaints

[ORGANISATION] will endeavour to deal immediately with inquiries and minor complaints which are made through relevant communications. However, as far as possible, we will ensure that the inquirer or complainant is completely satisfied with the information and/or resolution is 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 senior colleague for review. If such a dispute is unresolvable, we will refer the complainant to Code Committee of CID.

1. Investigating Complaints

[ORGANISATION] 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, and the complaint-handler will decide on what action is required. A more protracted investigation process may involve for example:

* establishing further facts and information;
* conducting interviews with those involved;
* taking legal and/or human resources (HR) advice;
* undertaking internal audit processes.

The Chairperson will appoint an investigating officer who will normally have expertise related to the nature of the complaint. The Chairperson is responsible for ensuring that no material conflict of interest exists for the investigating officer.

The complainant will be informed in writing of the decision to investigate the complaint further and the expected timeframes. The complainant will be notified in writing of any changes to the expected timeframes. If relevant, the person the complaint is about will be given an opportunity to respond to the complaint in writing.

The investigating officer will review the complaint and may, at their discretion, seek additional information as required from the person the complaint is about, the complainant or external experts (as considered necessary). The investigating officer may, if appropriate and at their discretion, attempt to conciliate between the parties or suggest independent conciliation or mediation.

The investigating officer is not limited in their investigation to those issues raised by the complainant and may form their own views on wrongdoing or breaches of [ORGANISATION] policy that may have arisen from the circumstances of the complaint.

The investigating officer will prepare a draft report of the facts and issues of the complaint. Prior to finalisation of the report, a copy of the draft report (without recommendations) will be provided to the person who the complaint is about (if relevant) and the complainant. They will normally have five working days to contest the contents and provide factual corrections.

The investigating officer will consider any response from the person the complaint is about or complainant, finalise the report and make a recommendation to do one of the following:

* Dismiss the complaint
* Review and implement any necessary corrective changes at [ORGANISATION];
* Initiating disciplinary action if [ORGANISATION] employees are involved;
* Initiate an inquiry or a more detailed investigation;
* Refer the complainant to a more appropriate forum

The final report of the investigating officer will be submitted to the Chairperson for final determination. If, as a result of the investigation, it is felt that there is a case to answer by an employee or a volunteer then the appropriate HR policies and procedures should be followed.

1. Timeframes
* All complaints should be acknowledged within 24 hours.
* [ORGANISATION] will strive to resolve minor complaints within five days.
* For more serious or complex complaints, where it is anticipated the investigation and resolution will take longer, the complainant will be advised of the process and the expected timeframe for resolution. In this case, complainants will be updated regularly on the progress of the investigation and expected time for resolution.
1. Outcomes of Complaints

[ORGANISATION] will ensure that all relevant personnel are informed of the outcomes of complaints and the implications for our services, goods, 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 CID and/or other relevant regulatory/enforcement authorities.

1. Recording and Reporting Complaints

[ORGANISATION] registers all inquiries and complaints. We will ensure that the following information is contained in written complaints and if not, and in the case of oral complaints, we will record this information ourselves:

* date of receipt
* a description of the complaint and relevant supporting data;
* the requested remedy;
* the due date for a response;
* immediate action taken (if any) to resolve the complaint.

All new complaints, and progress on complaints being investigated, will be reported to the

Management Committee at the next scheduled meeting. The Company Secretary will escalate any complaint deemed serious to the Chairperson at the earliest opportunity.

1. Appeals

The complainant will be advised that if they are unhappy about the response received from [ORGANISATION] or believe the corrective action has not been adequately implemented, and the complaint relates to a breach of the CID Code of Conduct, they can make a complaint to the Code of Conduct Committee of the CID Board (code@cid.org.nz). We will provide the complainant advice and assistance to do this if required.

1. Resources
* FINZ: [Code of Ethics and Professional Conduct](http://finz.org.nz/uploads/sites/finz/files/Codes%20of%20Practice/FINZ%20Code%20of%20Ethics%20and%20Professional%20Conduct.pdf)
* [CID Code of Conduct D.6 Complaints-Handling within Signatory Organisations](http://www.cid.org.nz/members-only/code-of-conduct/use-the-code/d-organisation/new-members-only-page-6/)
* [CID Code of Conduct Complaints Handling Policy](http://www.cid.org.nz/assets/Members/FINAL-Policy-D-Code-of-Conduct-Complaints-Handling-Sept-2015.pdf)