



Childhood Development Initiative



Complaints Policy and Procedures November 2020

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1. Introduction

This document should be read in conjunction with the full suite of CDI Policies.

CDI's Complaint Handling Policy has been developed to ensure compliance with the laws and regulations relating to complaint handling.

This Policy applies to all employees, officers, directors, service providers, funders, suppliers and advisors of CDI and members of the public. CDI is committed to providing a high quality service. We regard complaints as an important source of information for improving our services and provision for the future. A complaint is an expression of dissatisfaction concerning the provision of a service or services by CDI.

This policy enables matters of concern to be brought to the attention of CDI, and to enable investigation of those concerns with the aim of a satisfactory resolution. Most matters can be dealt with through informal processes in a spirit of reconciliation and the procedures for doing this are outlined below. The aim of this procedure is also to enable those complaints that cannot be dealt with informally to be resolved formally in a fair and consistent manner. This process provides welcome feedback to help improve services provided by CDI.

All complaints will be treated promptly, fairly, impartially and in confidence. CDI will ensure that no complaint made in good faith will be used to disadvantage any person in the future. CDI will endeavour to learn from mistakes to ensure that errors are not repeated.

If the complaint is about equality, bullying and/or sexual harassment, the complainant is directed to use the procedures outlined in the CDI Employee Handbook, which specifically deals with these issues.

No staff bringing a complaint in good faith under this Policy, whether successfully or otherwise, will be treated less favourably by any member of CDI than if the complaint had not been brought. If evidence to the contrary is found in this regard the staff member found to be treating the complainant unfavourably may be subject to disciplinary proceedings under CDIs policy, as set out in the Employee Handbook.

The CEO will communicate issues to the Risk Officer (the Office and Finance Manager), as they arise, which may be relevant to the Risk Register of CDI.

2. Purpose and Scope

This Policy's purpose is to minimise damage to CDI's reputation and reduce the risk of litigation by handling complaints in a timely, effective and consistent manner.

The Finance and Officer Manager (OFM) is designated as responsible for the application of this policy, and to review it on a regular basis to ensure that it continues to comply with laws, regulations, guidelines and best practices.

The OFM is also responsible for communicating this policy to all employees, officers, directors, suppliers, funders, service providers and advisors of CDI and members of the public.



3. Definitions

A complaint shall be deemed to mean any written statement alleging a grievance involving the conduct, business or affairs of CDI or any employee, representative, officer, director, service provider or advisor of CDI or member of the public.

Although the definition of “complaint” refers to only written complaints, there may be instances where CDI receives a verbal complaint which will warrant the same treatment as a written complaint. Such situations depend upon the nature and severity of the allegations and require the professional judgment of the individual who received the complaint.

A complaint should include at least one of the three following elements:

- Complaint about CDI;
- Potential damage or damages suffered by the individual; or
- Request for corrective measures.

For greater certainty, errors that CDI accepted to correct are not considered as complaints unless repetition or recurrence causes grievance to an individual.

4. Policy

It is the policy of CDI to:

- a) Handle complaints in a timely, effective, fair and consistent manner.
- b) Record formal complaints centrally in the Complaints Log i.e. A database to track key elements of the complaint process and category in order to identify potential trends or concerns and to produce reports.

5. How to Make a Complaint and how CDI will Respond

A complaint can be made by any service provider, service user or member of the public to CDI in person, or in writing or if your complaint is in relation to fundraising from the public by CDI you may at any stage make your complaint to the Charities Regulator who oversee charities compliance with the Guidelines for Charitable Organisations on Fundraising from the Public.

Any members of staff or the Board can accept a complaint, and will forward it to the CEO to progress.

Complaints will be handled sensitively and with due consideration to confidentiality for all concerned. Any person named in a complaint will be informed of the substance of the complaint and will have the right to reply as part of the investigation. Information contained within the complaint will be made available only to those members of staff involved in its resolution. The relevant Line Manager and CEO will also be informed of the complaint.

6. Informal Procedures



CDI's aim is to resolve as many complaints as possible through the informal process. Informal complaints should be directed initially to the relevant line Manager, who will try to deal with the problem without delay.

If the line Manager cannot resolve the complaint, or the complainant is unhappy with the response, they can ask for the matter to be reviewed by the Programme Manager and/or CEO, who will seek to resolve the complaint by organising a restorative meeting between all affected parties as soon as possible. (See Appendix I for the format for this restorative meeting).

If there is no resolution at this stage, a formal complaint can be processed (see below) using the formal complaints procedures.

It should be noted that in the interest of natural justice to all parties, anonymous complaints cannot be processed.

7. Formal Procedures

All formal complaints must immediately be reported to the OFM, who has responsibility to ensure that all complaints are handled according to the policy. The OFM will bring this to the attention of the CEO and the relevant Line Manager.

All complaints must be logged in the Complaint Log. The Complaint Log must at least include the following information:

- Date of complaint;
- Complainant's name;
- Nature of the complaint and the circumstances;
- Name of the person who is the subject of the complaint; and
- The date and conclusions of the decision rendered in connection with the complaint.

When CDI receives a complaint, an acknowledgment letter must be sent to the complainant within five business days. This letter must include the following elements:

- Name of the person responsible for handling the complaint;
- Key elements of CDI's Complaint Policy; and
- Expected time of the outcome.

The Line Manager/OFM will liaise with the CEO to resolve the complaint. CDI will investigate the complaint and issue a reply to the complainant within 15 working days or, where this is not possible, an interim reply will issue explaining the position and advising when a substantive response will issue.

All conclusions/decisions and recommendations will be communicated in writing to the complainant.

Formal complaints must be maintained in the Complaint Log for a period of five years, following the resolution date.

8. Appeals Stage



If the response to the complaint following completion of the formal procedure is not considered to be satisfactory, the complainant may appeal in writing, within ten working days of notification of the conclusion/decision. The request should be addressed to the CEO outlining why the complainant was not happy with the outcome of the formal process.

Taking into account the substance of the complaint and the previous attempts at resolution, the case will then be reviewed by the Board who will provide the complainant with a decision in writing within one calendar month of receipt of the request under the Appeal Stage. The Board will set out the steps to be taken to remedy the complaint or the reasons why the appeal has failed.

In the event that the complaint relates to the CEO, the complainant can contact the Chair of the Board of Management directly.

9 Compliance with Policy

It is the responsibility of the OFM, the Finance and Risk Sub Committee and the Board to ensure that this Policy is implemented within CDI. This involves monitoring the Complaints Log and ensuring that appropriate measures are taken if necessary and provide recommendations for change in CDI's procedures, if appropriate.

10 Governance Matters

In the event of governance or related matters arising through a complaint, these will be brought to the attention of the CDI Board. Depending upon the nature of the matters which are brought to the Board's attention, an investigation may be warranted and the following arrangements will typically apply:

- Relevant matters or issues of concern may be brought to the attention of the CEO;
- The CEO will appraise the Chairperson of the matters/concerns and an acknowledgement will be provided to the employee or person who has raised the issue;
- The acknowledgement will be provided within 5 days of the date upon which the matters/concerns were raised and will note: (i) the identity of the person(s) assigned to undertake the investigation, (ii) an indicative date by which the investigation is likely to be completed and (iii) an approximate date by which matters may be concluded. Note: where it is necessary to appoint an external investigator, timelines may be affected;
- Investigations will typically be undertaken by a sub-committee of the Board which will be established for this purpose;
- The size of the subcommittee will reflect the need for: (i) balance, (ii) objectivity and (iii) relevant skills/competencies/knowledge – no prescribed size applies but it should not be larger than is absolutely necessary, i.e. in order to ensure that it is focused and the need for knowledge transfer is minimised;
- Any member of the Board who may not be entirely objective or is the subject of matters under investigation will not be a member of this subcommittee, or to be party to Board decisions as they relate to the resolution of the issues/alleged issues;
- Where relevant expertise is likely to be required (e.g. Financial, HR, etc.) the subcommittee should be selected to include those (from amongst eligible Board members) with such knowledge/experience;



- If such knowledge/experience is not available amongst eligible Board members, provision will be made for a relevant (independent) expert to join or advise the sub-committee;
- Terms of reference should be developed for the sub-committee in advance of their first meeting and discussed/agreed at their first meeting;
- The sub-committee will review all information available and may seek further information from the person who has raised the matter, i.e. as required;
- CDI will aim to conclude the investigation as quickly as possible, whilst ensuring all procedures and best practice requirements are adhered to;
- All concerns will be handled sensitively, impartially and with due consideration to relevant confidentiality requirements;
- All conclusions/decisions and recommendations will be communicated in writing to the person who has brought matters to the attention of CDI;
- Records of all matters/concerns will be held on file in CDI for a period of five years, following the resolution date;
- If matters are not addressed to the satisfaction of affected parties, an appeal may be sought within ten working days of notification of the conclusion/decision. The request should be addressed to the CEO outlining the basis for same and why the affected person was not satisfied with the outcome of the process;
- The Board will use its discretion to determine whether an independent investigation is warranted and if so, an external investigator will be appointed to review matters;
- Where an external investigator is appointed, timelines for undertaking the investigation and concluding matters will be relayed to the person who brought the issues/concerns to light;
- Where the Board determines that an external investigation is not warranted, the basis for this decision will be conveyed to the person who brought the issues/concerns to light;
- This policy will be reviewed on an annual basis by the Board.

Appendix I - Format for Restorative Meetings to Address Grievances and Complaints

The RP Facilitator will be a person who has undertaken restorative practices facilitation skills training and who all parties to the restorative meeting agree to have as the facilitator for that meeting.

The RP Facilitator welcomes everyone and checks that everyone understands the process.

1. Everyone is asked:

- What happened?
- What were you thinking of at the time?
- What have you thought about it since?
- What has been the hardest thing for you?
- How could things have been done differently?
- What do you think needs to happen next?

2. Everyone is given an opportunity to say three sentences in response, if they wish.



3. Everyone is then asked: What do you think needs to happen next?

The Facilitator takes notes of any suggested actions.

4. The Facilitator summarises all suggested actions and facilitates specific, measurable, achievable agreements and next steps.

5. The Facilitator thanks everyone for their participation and closes the meeting.