

Policy	Complaints Policy – External Version for England & Wales
Owner	CET
Version & date	V1.3 June 2024
Audience	Staff and Volunteers
Next Review Due	June 2026

1. POLICY STATEMENT.

In fulfilling its mission, CAFOD upholds its values and high standards of professional and personal conduct.

Our [Values](#) commit us to respect the intrinsic dignity of every person and create relationships of mutual respect with all people, regardless of race, gender, religion, sexual orientation, age, ability or beliefs. They also commit us to be good stewards of the resources entrusted to us, including environmental resources, and to be transparent in, and accountable for, our work.

Our [Code of Conduct](#) makes explicit commitments that the personal and professional conduct of anyone who carries out work for, or represents, CAFOD ('Our Representatives'), is, and is seen to be, of the highest standards.

We recognise that sometimes our values, and requirements on conduct, may not be upheld to the standard expected, and issues may arise that result in dissatisfaction among our employees, supporters, partners and communities with whom we work, or other stakeholders.

If this is the case, we want to be informed. We welcome the information to address the issue, try and put things right and improve our quality and effectiveness. CAFOD is committed to ensuring the accessibility of our Complaints Policy, procedures, and systems across the breadth of our work.

2. WHO CAN COMPLAIN?

We welcome complaints from any individual, group of individuals, or organisation who wants to complain about CAFOD's representatives or activities (such as fundraising) or the representatives or activities of an organisation CAFOD works with, for example, partner organisations who implement our programmes. We also welcome complaints from individuals making a complaint on behalf of another person, if asked to do so for reasons such as a fear of repercussions, safety concerns or language barriers.

3. POLICY DEFINITIONS

Our Representatives, for the purposes of this policy, include employed staff, volunteers, consultants and any other person who is asked or authorised to carry out work for, or represent, CAFOD

Feedback is information shared about any aspect of a person's experience with CAFOD or an organisation with whom CAFOD works. It can be positive, negative or neutral. It can encompass compliments, comments, suggestions, and concerns.

Complaint is an expression of dissatisfaction that needs further investigation and a considered response. It is the need for investigation and response that makes a complaint distinct from other types of feedback and can cause some types of feedback, for example a concern, to *become* a complaint.

Table 1 lists example scenarios individuals can complain about. Table 2 lists scenarios that would not be considered as a complaint. These lists are not exhaustive.

Table 1: Example scenarios people can complain about

<ul style="list-style-type: none"> Abuse of power or position in the delivery of programmes and projects Inappropriate disclosure of confidential information Improper fundraising practices Campaign and advocacy positions 	<ul style="list-style-type: none"> Inadequate supplier due diligence Any other actions that may harm individuals or discredit CAFOD's reputation
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Table 2: A complaint is not:

<ul style="list-style-type: none"> A general query about CAFOD's work or requests for information Information shared with us about matters unrelated to CAFOD 	<ul style="list-style-type: none"> Related to contractual disputes A request to amend records, for example, to correct an address, cancel a donation or unsubscribe from a CAFOD 'service' such as a campaign newsletter or email.
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4. POLICY COMMITMENTS

In welcoming and addressing complaints, CAFOD commits to:

Accountability

- Welcome and accept all complaints, take them seriously, and manage them in a timely, fair and appropriate manner.
- Ensure our complaints handling process is documented and in place and covers complaints about the delivery of our work, sexual exploitation and abuse, and other abuses of power.
- Communicate how our mechanism can be accessed and the scope of issues it can address.
- Resolve complaints as far as possible, seeking to provide restitution for any loss or damage that cannot be replaced or repaired.
- Report complaints to the relevant regulatory bodies and donors as required.
- Refer any complaints that do not fall within the scope of our organisation to a relevant party in a manner consistent with good practice. For example, any complaints that indicate a possible criminal offence has been committed, must be referred to the statutory authorities responsible for investigating such matters, when it is safe to do so.

Transparency & Accessibility

- Ensure the people and communities we work with are provided with appropriate information about our organisation, the principles we adhere to, how we expect our representatives to behave, the programmes being implemented and what they intend to deliver.
- Ensure the people and communities we work with are aware of the expected behaviour of our representatives, including organisational commitments made on the prevention of sexual exploitation and abuse.
- Ensure communication is in languages, formats and media that are easily understood, respectful and culturally appropriate for different members of the community, especially vulnerable and marginalised groups.

- Ensure policies for information sharing are in place and promote a culture of open communication.
- Consult with the partners, people and communities we work with on the design, implementation and monitoring of complaints handling processes.

Confidentiality & Safety

- Manage complaints in a manner that prioritises the safety of the complainant and those affected at all stages.
- Ensure information related to the complaint is only shared on a need-to-know basis among those directly handling or overseeing the complaint. As a general rule, names or personal details of alleged survivors, perpetrators, complainants or others involved will not be shared. If it is necessary to disclose information to 3rd parties this is decided on a case-by-case basis and, as far as possible, with the agreement of the person who has raised the complaint, except in cases of criminal activity.
- Mitigate risks to those who make a good faith report of wrongdoing by assessing the legal and practical safeguards available in each jurisdiction and implementing measures to mitigate those risks to the fullest extent possible.

Monitoring, Reporting and Learning

- Regularly monitor complaints to ensure they are proactively managed
- Review and adapt or revise practices in light of analysis of complaints received and ongoing conversations with stakeholders to mitigate risks and continuously improve
- Pay particular attention to inclusivity by considering the demographics of those raising complaints.
- Use analysis of anonymised complaints information as part of continuous improvement processes.

5. HOW TO RAISE A COMPLAINT WITH CAFOD

There are several channels of communication for anyone wishing to complain. Complainants can choose the channel they feel most comfortable with. All complaints will be managed confidentially and sensitively by a trained complaints handler.

- England and Wales: Supporter and fundraising related matters can be submitted by phone to our Supporter Care Team between 9.30am and 5.30pm Phone Number: 0303 303 3030. or email cafod@cafod.org.uk
- For all other matters we encourage individuals to make a report through our confidential and secure EthicsPoint webform. EthicsPoint is an independent hotline and confidential case management system run by NAVEX Global, a third-party company. All reports will be directed to the appropriate trained Complaints Manager. You can submit a report/complaint by
 - going to www.cafod.ethicspoint.com
 - scanning the QR code to the right with a smartphone

To take the issue outside the organisation individuals can contact the Charity Commission or other relevant regulatory bod.

Making a complaint on behalf of another person: Individuals can make a complaint on behalf of another person, if they have been asked to do so for reasons such as a fear of repercussions, safety concerns or language barriers.

Anonymous complaints. It is helpful if names and contact details are provided by complainants as this allows those responding to be in contact if additional information is needed, and to keep individuals updated where appropriate. It can also help us ensure that individuals do not experience any negative consequences for raising a complaint in good faith. However, we recognise there may be some circumstances where individuals have good reasons for anonymity (for example fear of retaliation). If a complaint is raised anonymously it is especially important that detailed information is provided as it may not be possible to pursue cases that lack enough information. It may not be possible to provide updates for anonymous complaints.

Timescale for making a complaint: Ideally, complaints are made no later than 6 months from the date the individual became aware of the incident. However, we recognise that the circumstances of some complaints might make it difficult for individuals to come forward and therefore CAFOD will investigate all sensitive cases without time limit.

6. HOW WE RESPOND TO COMPLAINTS

We manage complaints in accordance with the relevant internal policies and procedures. Complaints are assessed and triaged to the relevant case handler depending on the category of complaint. All procedures commit us to:

- Acknowledge complaints within a set timeframe (usually within 5-7 business days)
- Provide the complainant with a contact point within the organisation and an outline of next steps
- Investigate all complaints in a manner appropriate to the content of the complaint, avoiding unnecessary delays.
- Keep the complainant updated of progress and resolution, unless:
 - the situation means we must respect the privacy of individuals who may be affected
 - the complainant has expressly indicated a preference not to receive a response
 - the complaint has been made anonymously and this is not possible

7. APPEALING A COMPLAINT DECISION

Individuals who have raised a complaint and who are unsatisfied with CAFOD's response to that complaint have the right to appeal. CAFOD's Leadership Team will review the complaint records before responding fully. This can be done via the EthicsPoint webform or telephone system submitted as a new complaint, or in writing, by letter or e-mail, to the following addresses:

- Director – Christine Allen , Email: callen@cafod.org.uk Address: CAFOD, Romero House, 55 Westminster Bridge Road, London, SE1 7JB. Phone +44 (0)207 095 5500
- Chair of the Trustees - Rt. Rev. Stephen Wright, Bishop of Hexham and Newcastle, Email: bishop@diocesehn.org.uk

After an Appeal

After the internal appeal, there is no further internal process. Individuals may however still contact our UK Regulator, The Charity Commission. Outside the UK, we will notify the complainant if there is an external procedure, but in any event, individuals may contact the UK [Charity Commission](http://www.gov.uk/complain-about-charity) following the procedures on their website www.gov.uk/complain-about-charity.