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| Policy | Complaints Policy – External International |
| Owner | CET |
| Version & date | V1.3 June 2024 |
| Audience | External International |
| 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 or the representatives or activities of an organisation CAFOD works with, for example partner organisations. We also welcome complaints from individuals 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. We recognise there may be some circumstances where individuals have good reasons for anonymity (for example fear of retaliation) so we also accept anonymous complaints. 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

3. POLICY DEFINITIONS & SCOPE

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.

This policy only covers complaints. CAFOD considers other types of feedback as important, and has processes to receive and respond to this, but this policy focuses on guidance for managing expressions of dissatisfaction that require further investigation and a considered response. If you prefer a situation to be managed informally, we will try to take a flexible approach wherever possible. In these scenarios we will make a professional judgement based on the information shared and, as far as possible, with the involvement of the person sharing the information. Any type of feedback that suggests a serious breach of our code of conduct by our representatives, would have to be investigated, respecting confidentiality and the safety of any individuals concerned.

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

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| <ul style="list-style-type: none"> • Exploitation of people and communities, staff or our representatives in any form. • Unwanted, inappropriate or disrespectful sexual advances or harassment. • Bullying, perceived threats, intimidation, favouritism, belittlement and/or microaggressions • Hostility to individuals due to race, religion, nationality, gender, sexual orientation, disability, or other characteristic protected by law. • Corrupt or biased decisions to include or exclude people and communities. • Abuse of power or position in the delivery of programmes and projects • Inappropriate disclosure of confidential information • Improper fundraising practices • Campaign and advocacy positions • Fraud, theft, bribes, any corrupt practices. | <ul style="list-style-type: none"> • Situations that endanger health, safety or the environment. • Falsification of expense reports. • Bias, rigging, collusion or other unfair practices in procurement procedures • Fraudulent registration of People and Communities. • Inadequate supplier due diligence • Actual or perceived “conflicts of interest” in CAFOD or partner decision making. • Fraudulent selection of partners. • Theft or diversion of aid or resources • Lax or inadequate monitoring of CAFOD or partner performance or effectiveness. • Any other actions that may harm individuals or discredit CAFOD’s reputation • |
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Table 2: A complaint is not:

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| <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.

7. APPLYING CAFOD POLICY COMMITMENTS IN OUR INTERNATIONAL PARTNERSHIPS

CAFOD have few international programmes or projects where we work directly with people and communities. The majority of our international work is delivered alongside and through partner organisations. Therefore, complaints from people and communities about programme/project activities and/or our representatives are likely to be submitted to our partners directly and managed through their own organisational processes. As complaints from communities are more likely to be received and managed by our partners, CAFOD must be satisfied that the values and standards of personal and professional conduct of our partners align with our own, and that their organisational processes to receive and manage complaints align with our policy commitments. To help ensure this, CAFOD and partners agree through Partner Funding Agreements:

- that partners have a code of conduct, or similar document, in place
- that partners have their own organisational processes to manage complaints
- that CAFOD monitor partner performance in relation to complaints handling
- where required, CAFOD will support partners to develop proportionate and appropriate Complaints Handling Mechanisms
- where appropriate, to adapt practices based on learning from complaints received
- that partners will advise CAFOD of all serious complaints related to CAFOD funded projects or programmes, or about our representatives, within 7 days (this includes but is not limited to allegations of serious misconduct e.g. fraud, corruption, theft, sexual exploitation and abuse of children or adults, and other abuses of power)
- that partners will inform CAFOD of proposals to resolve serious complaints, an expected timeframe, when the complaint has been finalised or if a resolution cannot be found
- that partners accept CAFOD may need to follow-up on specific complaints and provide support
- that complaints that do not fall within the scope of the partner organisation are referred to a relevant authority or organisation as appropriate.

However, CAFOD will welcome reports where a partner organisation does not have a complaint mechanism in place or there are concerns, complaints, feedback on how a partner has handled a complaint, Under the policy, we accept the following:

1. **No complaints mechanism in place:** Reports about a partner organisation or their staff when the organisation does not have a complaints mechanism accessible to the affected communities and individuals.
2. **Inadequate Complaints Process or Follow-Up:** Complaints about a completed internal complaints process that was inadequate for the affected communities or individuals. This includes cases of sexual exploitation, abuse, and sexual harassment (SEAH) or other abuses of power where the case management did not follow the partner organization's adopted policy.

These complaints must have already been filed and addressed by the partner organization in accordance with their complaints policy

3. **Well-founded fear of retaliation:** Reports regarding sexual exploitation, abuse and sexual harassment (SEAH) or other abuses of power where the complainant has a well-founded fear of retaliation by the partner organisation.

For this reason CAFOD's name, logo and contact information must be made available to people and communities, so they can complain directly to CAFOD if needed. In locations where communicating with CAFOD directly is not appropriate, we will work with partners, people and communities to find an appropriate solution. CAFOD seek to ensure partners and communities are satisfied with the complaints mechanisms that are in place and consider adaptations as necessary.

8. 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.

- 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

If for any reason our EthicsPoint platform not appropriate, individuals external to CAFOD can contact a trusted staff member or the named [Complaint Manager](#) for the relevant country directly by phone or email. Where relevant, individuals may also contact their named CAFOD contact as per contractual agreements.

For other matters please call our switchboard on 0044 20 7733 7900 or email cafod@cafod.org.uk. If you need to take the issue outside the organisation you can contact the Charity Commission. All complaints will be managed confidentially and sensitively by a trained complaints handler. 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

9. 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 (e.g. safeguarding, fraud and loss, grievance). 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

Referral: We will report any complaints involving criminal activity to the relevant authorities responsible for further investigation, when safe to do so.

Onward Reporting: We report statistics and individual serious complaints to the relevant regulatory bodies and donors as required.

10. 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.

11. POLICY DISSEMINATION

This policy will be disseminated to all CAFOD staff and referenced in the new starter induction and refresher trainings on Code of Conduct and Safeguarding.

This policy is also available on [CAFOD's public website and the Ethicspoint Platform](#). If you have a specific accessibility requirement you may contact us directly and we will endeavour to accommodate where possible.

Designated Complaints Handlers are given more in-depth training on application of this policy. This ensures that complaints handlers are familiar with key principles:

- Addressing feedback and complaints promptly, fairly, and appropriately, with a priority on safety.
- Tailoring complaints and feedback mechanisms to suit the needs of diverse groups and specific contexts.
- Ensuring individuals and communities understand the complaint process and how it will be managed, including information sharing.

The training distinguishes between sensitive and non-sensitive complaints and provides a clear, step-by-step pathway for each.

12. COMPLIANCE WITH POLICY

The Director of People, Culture and Change (PCC) is responsible for monitoring compliance. If lack of compliance with this policy in terms of handling or resolving complaints is identified by any individual,

please report it immediately to the Director of PCC. If any individual feels unsure about whether a complaint should be made, please contact any member of the People Team, the Internal Audit and Compliance Team or the Safeguarding team. If any CAFOD staff member has any concern regarding the activities or representatives of CAFOD or our partners, this can also be reported through the CAFOD Whistleblowing Policy.

13. TRUSTEES' RESPONSIBILITIES

Trustees are ultimately responsible for reviewing and approving this policy. They must ensure that CAFOD complies with best practice in collecting, handling and reporting on complaints and take all reasonable steps to ensure that there is appropriate transparency and accountability.

14. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES & OTHER RESOURCES

The following policies, procedures, forms, guidelines and other resources may support with the use and application of this policy:

- Policies: Code of Conduct, Safeguarding Policy, Whistleblowing Policy, Fraud and Loss Policy; Counter-Terrorism Policy; Anti Bribery Policy; Anti Money Laundering Policy; Ethical Donations Policy; Security Policy; Information Assurance and Data Protection Policy
- Procedures: Grievance Procedures, Investigation Procedures, Supply Chain Manual
- Forms/Templates: International Complaints Reporting Form, Safeguarding Reporting Form, Fraud Reporting Form
- Other Resources: Investigation Guidelines; Fraud & Loss Guidelines
- Policies for resolving issues in the workplace: Grievance; Whistleblowing; Disciplinary; Dignity in the Workplace Policy

This section is for paper copies only.

I have read and understand the contents of this Complaints Policy:

Signed: _____ **Date:** _____