Complaints Policy for RFUK

Version 1

Approvals
Approved by the Board of Trustees on 12 March 2024.

Review
This policy is reviewed every two years by the Board of Trustees to ensure that it is achieving its objectives.

Target audience
Employees, partners, consultants and individuals associated with RFUK.

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Policy

1. Objective and Policy statement
1.1. Rainforest Foundation UK (RFUK) recognises that anyone who engages with its activities, people or programmes, has the right to raise a complaint.
1.2. RFUK will take seriously any complaint received and will assess and respond to it promptly, with the aim of seeking a resolution as quickly as possible. Information received as part of the complaint will be treated confidentially and with respect for sensitive information.
1.3. RFUK’s Complaints Policy and Procedures aims to provide clear guidance on how to raise a complaint, how complaints are handled and what to do if a complaint is not satisfactorily resolved.

2. Definition
2.1. A complaint is any expression of dissatisfaction by individual(s) or organisation(s), whether justified or not. Individual(s) or organisation(s) may make a complaint if they consider that RFUK:
   - Failed to deliver activities to an acceptable standard or conducted activities inappropriately.
   - Failed to act in a proper way.
   - Failed to meet its obligations.

3. Scope and limitations of the policy
3.1. Complaints can relate to any aspect of RFUK’s activities, including third parties with a direct relationship with RFUK. The Complaints Policy and Procedures are publicly accessible and can be used by any person or organisation that engages with RFUK. This includes, but is not limited to:
   - Staff members
   - Board members
   - Programme partners
   - Consultants carrying out work on behalf of RFUK
   - Contractors carrying out work on behalf of RFUK
   - Donors and other organisations in contact with our work

3.2. RFUK’s Complaints Policy does not cover:
   - Complaints against RFUK Board members, staff members and partners, which are not related to their work with RFUK, unless they constitute a breach of RFUK’s code of conduct.
   - Incidents of sexual abuse, or exploitation, which are covered by RFUK’s Safeguarding Policy.
   - Complaints covered under RFUK’s Whistleblowing policy such as incidents reported by RFUK staff pertaining to wrong-doing of public interest.
3.3. RFUK staff are encouraged to use internal HR processes instead of the external complaints procedure to raise any concerns.

4. Partner Organisations and Service Providers

4.1. Partner organisations and service providers are required to have their own mechanisms in place to manage complaints relating to their own organisation. If RFUK receives a complaint that would ordinarily be dealt with by a partner organisation’s own processes, the person making the complaint will be informed that it is outside of RFUK’s scope and, with their permission, the complaint will be forwarded to the partner organisation to be dealt with appropriately.

4.2. If a complaint refers to a matter which, if verified, would constitute a breach of a partnership/service-level agreement, or a safety concern, RFUK will investigate the complaint and take action according to RFUK’s internal processes. The original complaint will not be forwarded to the partner organisation/service provider unless as part of the evidence presented during the investigation. This is in order to ensure the protection of the person making the complaint.

5. Confidentiality

5.1. Confidentiality will be maintained at all times. This means that the identity of the person making the complaint will only be made known to those who need to know about it in order to review, make a decision on appropriate actions or implement corrective actions.

5.2. Complaints received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

6. Data management and protection

6.1. To process a complaint, RFUK will hold personally identifiable data about the person making a complaint and others involved. Data will be held securely in line with the RFUK’s Data Privacy Policy and only used to address the complaint.

7. Policy dissemination and related policies and procedures

7.1. This policy and procedures will be disseminated to all staff upon adoption, included into the core reading list for all new joiners and a briefing provided during the staff induction.

7.2. RFUK will ensure that staff will receive refresher training pertaining to this policy on an annual basis to maintain awareness and understanding.

7.3. To complement and support the application of this policy, the following policies, guidelines, and resources are available:

- Anti-Bribery Policy
- Code of Conduct
- Conflict of Interest Policy
- Gift and Hospitality Policy
- Safeguarding Policy
- Whistleblowing Policy
Procedure

1. **Raising a complaint**
   1.1. **Ways to report** – complaints can be raised verbally, or in writing, by:
   - Sending an email to the designated email address: complaints@rainforestuk.org. The individuals with access to this mailbox will be clearly identified online, ensuring transparency and enabling stakeholders to know the most up-to-date recipients.
   - Completing the online form on RFUK’s website.
   - Talking to a member of staff directly.
   - Via RFUK’s central telephone number +44 (0) 207 485 0193 where the complainant can select the designated option from the menu.
   1.2. **What to report** – the person raising a complaint should provide the following information:
   - Name(s) of person(s) making the report (optional) and contact details
   - Name(s) of person(s) involved in complaint if appropriate
   - Description of complaint
   - Date(s), time(s) and location(s)

2. **Receiving a complaint**
   2.1. Any staff member who is approached with a complaint relating to RFUK, its people, activities or programmes must forward this complaint within 72 hours to the complaints@rainforestuk.org inbox. The designated recipient of this mailbox will:
   - Review complaints received, validating their admissibility, and transmitting the complaint to the relevant Resolution Focal Point;
   - If applicable, request any missing or additional information from the person making a complaint in order to assess admissibility;
   - Inform the person making the complaint of next steps.
   2.2. Complaints Resolution Focal Points are representatives from each function at RFUK (Operations, Programmes, Finance, Communications and Fundraising) who are responsible for managing any complaint related to their function and ensuring this is done via the appropriate internal processes. There are usually at least two focal points per function to avoid a single point of failure. These comprise a member of the Senior Management Team as well as one other staff member.
   2.3. Once a complaint has been received, the Complaints Resolution Focal Points will conduct initial enquiries into the complaint to determine whether an investigation will be required.

3. **Investigations**
   3.1. If it is considered that the information raised will require an investigation, the person making a complaint will be informed of this and the investigation process will be started within 21 days of the person being informed, with the intention of reaching a resolution as fast as possible.
   3.2. If an investigation is required, the Complaints Resolution Focal Points will inform the
Executive Director and appoint an investigation team. Depending on the severity and circumstances of the complaint, investigations may be carried out internally or with the support of third-party experts.

3.3. Investigations may include conducting interviews with those involved and collecting and reviewing evidence. At the conclusion of an investigation, an investigation report will be produced with recommendations for actions based on internal procedures and best sector practices.

4. Decision-making group

4.1. The investigation report will be presented to a decision-making group comprising the Executive Director and other staff as relevant to the case. The Decision-Making Group will review the investigation report and, based on the information presented to them, decide whether to follow the recommendations of the investigation team or to pursue a different course of action.

4.2. This decision, and any relevant resulting actions, will be communicated to those involved, including the person who made the complaint. If confidentiality is requested, it will be upheld throughout the proceedings, ensuring that specific details of the decision may not be disclosed to all parties involved.

5. Escalation to the Board

5.1. In some instances, the involvement of some, or all, of RFUK’s Board may be required in order to appropriately address a complaint. This will only occur in instances where the complaint is of sufficient severity that the Board’s involvement would be appropriate. Most of these instances are likely to fall under the purview of RFUK’s Whistleblowing Policy. However, whether they are raised as a complaint or through the Whistleblowing Policy, they will be investigated and considered accordingly.

5.2. The following are examples of when the RFUK’s Board would ordinarily be involved:

- Complaints relating to members of the Senior Management Team
- Complaints relating to a Board member
- Criminal proceedings
- Significant financial misconduct
- Any complaint representing a substantial risk to the organisation, including financially, reputationally, ethically, etc.

6. Closing a Complaint

6.1. Upon resolution of the complaint, the Resolution Focal Point will advise those involved of the final outcome and any solution proposed to address the concern raised. All information related to the complaint will be kept for record purposes in strict compliance with RFUK’s Data Privacy Policy (see Data Management and Protection above).
7. **Appeals**

7.1. If the person making a complaint is not satisfied that the organisation is appropriately addressing their complaint, they have a right to an appeal.

7.2. In order to make an appeal the person must:
   - Send an email to complaints@rainforestuk.org
   - Clearly state the grounds for the appeal in the body of the email

7.3. Appeals will be reviewed by an Appeals Decision-Making group comprising different people than those who initially reviewed the complaint, including the Executive Director, unless the complaint is directed against them, in which case a member of the Board will be appointed.

7.4. Where possible, appeal reviews will be conducted within 30 days of an appeal being logged.

7.5. The appeal may be adjourned if RFUK needs to carry out further investigations in light of any new points raised at the appeal review.

7.6. Appeals can be escalated to the Board by the Appeals Decision-Making Group in consultation with the Executive Director.

7.7. The person making an appeal will be notified of the outcome of their appeal in writing as soon as practicable, normally within 10 working days of the date of the appeal hearing. The decision on the appeal will be final, with no right to further appeal.

8. **Learning**

8.1. After a complaint is raised and resolved, RFUK will implement lessons learned and any required improvement processes in order to avoid similar occurrences in the future. RFUK will conduct an annual review of agreed remediation and preventative measures taken.

9. **Reporting**

9.1. RFUK’s Board and any donors or other bodies that RFUK is required to report to will be provided with a high-level summary of the complaints received.

9.2. These will include the number and types of complaints received, and the countries where the complaints originated. This information will also be included in RFUK’s annual reports.

9.3. No identifying information will be shared, and the aggregation of complaints data will only be used to improve RFUK’s processes and ensure transparency with stakeholders.