

<u>Approval required from</u>	<u>Name</u>	<u>Date approved</u>
Policy Owner:	Head of HR	March 17
Responsible Director:	Finance Director	March 17
Board approval	Board of Trustees' Meeting	March 17

Queries on policy content: Contact the Policy Owner
 Permission for derogation from this policy: Contact the Responsible Director

Internal Ref/Version No: GOV6/002.08 **Scope: All Staff**
Effective Date of Policy: April 2017

GLOBAL COMPLAINTS FRAMEWORK

Please contact the Policy Owner if you have any questions or queries on this policy.

Policy: (please see next page for start of Policy).

Approval Process for Policy:

Any derogations from, this policy require the approval of the Responsible Director in the first instance who shall report these to, and where appropriate seek formal approval of a Revised Policy from, the Practical Action Board of Trustees.

Agreed Derogations to policy:

None

Language translations available:

- Spanish
- Bangla
- Arabic
- Nepali

Previous Versions of Policy:

Policy Version	Effective from:	Effective To:
1 - New Policy	1 April 2017	N/A

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1. Introduction

This framework intends to guide individuals should a situation arise of needing to raise a concern or complaint.

Practical Action is committed to being a transparent, accountable organisation that is willing to listen and respond to feedback. In line with that commitment, we expect individuals who have concerns about an aspect of our work to raise those concerns. We hope that with good communication and collaboration we can informally identify and address issues to improve the way we work. However, we also recognise that there may be occasions when a formal process is required.

Not all complaints or concerns need to be dealt with in the same way and Practical Action has a suite of policies and procedures designed for staff, donors, beneficiaries, partners or members of the public to raise issues of concern they may have and have them dealt with in a fair and transparent way. This applies whether individuals are in the UK, a regional/country office or any other location in which Practical Action operates. Practical Action staff have a responsibility to speak up about matters of concern and we encourage any other individuals to raise concerns that they may have.

If an individual has a complaint or concern, they should use this framework as a guide. This framework aims to:

- a) encourage individuals to speak up and raise concerns
- b) support informal resolution of concerns (where appropriate)
- c) direct individuals to the most relevant formal policy
- d) outline important principles when considering and responding to concerns

This framework also contains the organisation's Complaint (Whistleblowing) Policy.

2. Why do we want to hear complaints?

Having a well-designed and well managed mechanism for handling concerns or complaints will:

- identify areas of our work which need to be improved
- enable Practical Action to learn from feedback
- improve the quality of our work
- enhance the trust and confidence of our stakeholders
- safeguard and protect individuals or resources
- help us manage risk and promote good governance

3. What is a complaint?

In the context of this framework, a complaint is an expression of concern or dissatisfaction. It is a specific concern of anyone who believes that Practical Action, or a representative of Practical Action, has failed to meet a stated commitment or acceptable standard. For example, this may relate to our programme work, how employees or individuals acting on behalf of Practical Action have behaved, how we use our resources or any other issue within the control of Practical Action. Practical Action will respond to all formal complaints.

Informal feedback differs from a complaint, as feedback can be either a positive or negative opinion. We encourage individuals to be open and share feedback with Practical Action on

an ongoing basis. Feedback may be shared for action or information only and does not constitute a complaint, nor does it require a formal response.

4. Confidentiality

Confidentiality will contribute to creating an environment in which people feel able to raise concerns, therefore information regarding complaints will be considered confidential and shared only on a need to know basis. The identity of an individual making a complaint will be kept confidential so long as it does not hinder or frustrate any investigation.

5. Recording and Monitoring Complaints

Practical Action will analyse and report on the types of complaints received through this framework to the Finance, Audit and Risk Committee. They will provide oversight and assurance that we are responding to complaints, adapting and evolving our practices as necessary. As a minimum, trustees will also be advised of any significant issues raised.

6. Complaints about other organisations

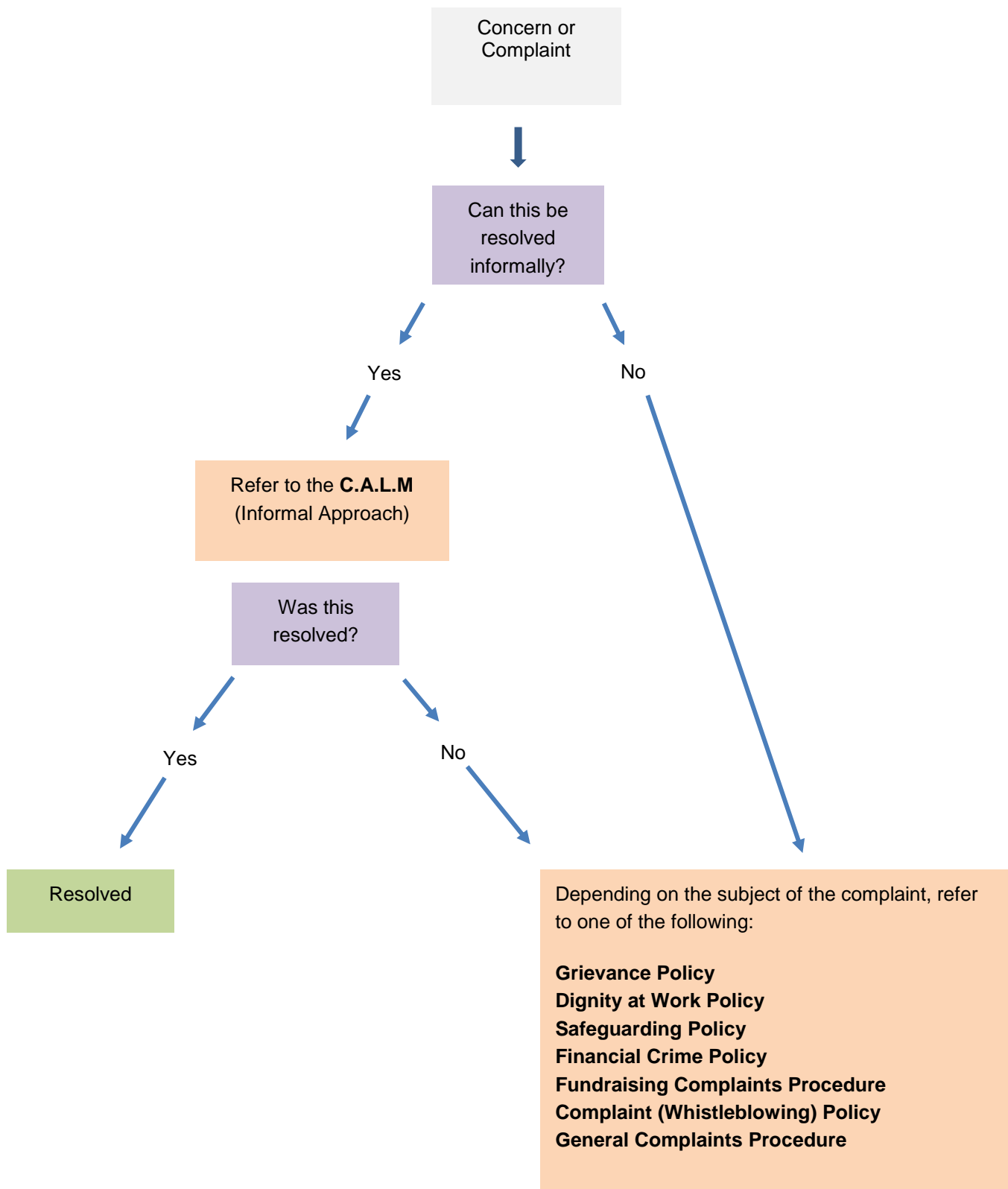
If Practical Action receives a complaint through this framework about the activities of another organisation, this concern will be referred to a senior manager of the relevant organisation.

7. Mechanisms for raising a complaint

Practical Action understands that raising a complaint can sometimes be difficult and this document aims to provide a supporting framework through which issues can be raised.

The first section suggests addressing the issue informally and without need for formal process. Where this informal approach does not resolve the issue or (due to the nature of the issue) it is not considered appropriate, this framework will guide individuals towards the most suitable formal policy/process that will enable issues to be dealt with in the most effective way.

Individuals who remain unclear about which policy to use may discuss the matter with their Line Manager or HR contact; alternatively, we encourage individuals to refer to the Complaints (Whistleblowing) policy (which is contained in section 10 of this framework). Practical Action are committed to hearing genuine concerns, regardless of the mechanism through which they are raised.



8. Informal resolution of complaints

C.A.L.M (Informal) Approach

Where possible, dealing with a complaint informally is the best way to sort out a problem. Individuals can do this by asking for a meeting with their line manager, or the relevant individual, to explain concerns and discuss suggestions that might help resolve the problem. If an individual feels that they cannot speak with their immediate manager, then they can speak to a member of the HR Department.

To help structure a productive discussion and with a view to resolving concerns, individuals should follow the C.A.L.M process as follows:

CLARIFY – Clarify the concern, what impact it is having and what examples support this.

ASK – Ask questions together about how the situation could be resolved and offer suggestions.

LISTEN – Listening is one of the most critical communication skills, collaboration and finding effective solutions requires active listening.

MOVE FORWARD – When concerns have been shared, consider ways to move forward. Identifying the best option for moving forward is more likely if the above steps have been followed.

Sometimes more serious issues cannot be resolved informally e.g. some bullying or harassment cases or where a complaint relates to the line manager. Where informal resolution is not possible, or appropriate, individuals should refer to the most relevant formal process detailed below.

9. Formal resolution of complaints

Grievance Policy	If an employee of Practical Action is unhappy about working conditions, arrangements or relationships with colleagues, a formal grievance can be raised via the internal Grievance Procedure.
Dignity at Work Policy	If an individual has a concern about unwanted behaviour such as harassment or bullying, they can raise a formal complaint in line with the grievance policy. Please contact your HR person for guidance. All complaints relating to dignity at work will be handled sensitively.
Safeguarding Policy	If an individual has a concern about the physical or psychological abuse or sexual exploitation of a child or vulnerable adult, they should refer to the Safeguarding Policy.
Financial Crime Policy	If an individual has a concern about irregularities or illegal activities characterised by intentional dishonesty or deception, whether or not there is personal benefit to the fraudster, they should refer to the Financial Crime policy. This includes concerns relating to the offering or acceptance of bribes and money laundering.
Fundraising Complaints Procedure	If an individual has a concern about any fundraising activity or material carried out/produced by Practical Action in pursuit of its fundraising, a complaint can be made via the fundraising procedure by contacting the UK Supporter Services unit. <i>Please note that this process only applies for UK fundraising complaints.</i>
Complaint (Whistleblowing) Policy	If an individual has a concern about illegal, immoral, irregular, dangerous or unethical activity under Practical Action's control which could cover a broad range of matters, including mismanagement, terrorist activities or health and safety failures etc., they should refer to the policy set out in section 10 of this framework.
General Complaints Procedure	If an individual has any other concern about an aspect of the operation, activities, management or governance of Practical Action not covered by the policies above, a general complaint can be made to the Chief Executive; see section 11 for details of how to complain.

10. Complaint (Whistleblowing) Policy

The Complaint (Whistleblowing) policy applies to all employees of Practical Action globally. Other individuals, related to the Practical Action's activities, are encouraged to use it and may include beneficiaries, consultants, contractors, volunteers, employees of partner organisations, or third party service providers.

This policy is intended to encourage and enable individuals to raise genuine concerns **within** Practical Action first rather than overlooking a problem or raising complaints outside the organisation in the first instance.

Concerns covered by this policy may relate to illegal, immoral, irregular, dangerous or unethical activity under Practical Action's control and could cover a broad range of matters, including mismanagement, fraud, terrorist activities or health and safety failures including¹:

- committing a criminal offence;
- failing to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage; or
- concealing any information relating to the above

Matters relating to individual employment arrangements should be raised through the internal Grievance Procedure, not this policy.

Concerns covered by this policy could relate to acts that have happened in the past, are happening now or are expected to happen in the future. For example a disclosure may include environmental damage that has happened, is happening, or is likely to happen.

Individuals are not expected to prove the truth of an allegation but there needs to be demonstrable and reasonable grounds for concern. Maliciously making a false allegation is a disciplinary offence. Individuals who are not sure whether to raise a concern through this policy may discuss the matter with their Line Manager or HR contact.

No individual will be victimised for raising a matter under this procedure e.g. continued employment or opportunities for future promotion/training will not be affected because a genuine concern has been raised. Practical Action will consider any victimisation of an individual for raising a genuine concern as a disciplinary offence.

An instruction to cover up wrongdoing is also considered a disciplinary offence. If individuals are told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent. They should report the matter to a director.

Anonymous Complaints

Practical Action encourages individuals to put their name to any complaints they make, however Practical Action will accept anonymous complaints and recognises that they may represent genuine concerns. There may be reasons why the complainant does not want to disclose their identity; it does however mean that complaints will be more difficult to follow up, investigate and respond to.

¹ in the UK, and for some complaints, reference should be made to relevant Whistleblowing legislation; contact a member of the HR team for more information

How to raise a complaint

A concern can be raised orally or in writing. Individuals should report concerns at the earliest opportunity to allow action to be taken. Practical Action would normally expect an individual to raise a concern internally in the first instance and, if appropriate, through the line management structure.

If the matter is of a more serious nature, or where it is not appropriate to raise with the individual's line manager, or if the individual is not a staff member of Practical Action, individuals may contact the company's designated confidential external service designed to deal with complaints. The individual should state at the time of reporting if they want to raise the matter in confidence.

Online Reporting Tool

Individuals can report a concern through the external web reporting tool. This can be accessed through: <https://wrs.expolink.co.uk/practicalaction>

Telephone Service

A concern can be reported by calling the Freephone external service line. This service is offered 24 hours per day, 7 days per week, and 365 days per year. When calling the service line, an individual will be able to speak with someone who speaks the same language.

Country	Telephone
Bangladesh	000 800 091 031
India	000 800 440 1286
Kenya	0800 723 132
Malawi	reverse charge available
Nepal	reverse charge available
Peru & Bolivia	0800 53611
Rwanda	reverse charge available
Sudan	reverse charge available
Zimbabwe	86 4404 1044 (local rate number)
Senegal	reverse charge available
United Kingdom	0800 374 199

Where a Freephone telephone number is not available, an individual can use the reverse charge option. To reverse a charge an individual must:

1. Dial the country operator
2. Ask for an international reverse charge to: 0044 1249 661 808

If the country does not have a country operator, the individual can directly dial 0044 1249 661 808, however this would be chargeable to the individual. If the individual dials this number, the external service line will be able to call the individual back if they request this.

Other Reporting Channels

Alternately, you can report a concern via email, free post or fax:

- **Email:** practicalaction@expolink.co.uk
-
- **Freepost:** Hotline Manager – Private and Confidential

Expolink Europe Ltd, 6 Greenways Business Park, Bellinger Close, Chippenham,
Wiltshire, SN15 1BN
(UK complaints only)

- **Fax:** +44 (0) 1249 661608

How will the matter be investigated?

Once a concern is raised the individual will receive acknowledgement of receipt, normally within five working days. All complaints received through the external service will be passed to the Director of Finance and Services and the International Director. If the complaint relates to either of these individuals, the complaint will be directed to the Chief Executive. If the complaint relates to the Chief Executive, it will be directed to the Chair of Trustees.

Practical Action will then make preliminary enquiries to decide whether a full investigation is necessary. If a full investigation is necessary then, depending on the nature of the complaint, concerns will be either:

- Investigated internally (delegated to management or trustees appointed for that purpose) or
- Referred to the appropriate external person (for example the external auditors, the Charity Commission, police or health and safety executive) for investigation.

To allow full investigation information regarding the complaint may need to be shared with other internal or external parties. Where appropriate, and subject to legal or other relevant constraints, Practical Action will inform the individual of the outcome of preliminary enquiries, investigation and action taken within 28 calendar days.

If misconduct is discovered as a result of an investigation under this procedure the organisation's disciplinary procedure will be followed, in addition to any appropriate external measures.

What if an individual is unhappy with the way Practical Action has dealt with a complaint?

If the individual is unhappy with the outcome of an investigation Practical Action would prefer that, where possible, the individual pursues their concern through the internal grievance procedure in the first instance. If the individual is still not happy they may wish to raise their concern with an external organisation, such as the Charity Commission, a recognised Health and Safety body, the (relevant countries) Tax office or Police.

11. General Complaints Procedure

If there is concern about any other aspect of the operation, activities, management or governance of the organisation a complaint can be made. To make a general complaint, contact the Chief Executive's Office at:

Practical Action
Chief Executives Office
The Robbins Building
25 Albert Street
Rugby
Warwickshire
CV21 2SD

ceo.complaints@practicalaction.org.uk