



Complaints Policy

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1. Policy Statement

ShelterBox is committed to upholding its value of integrity and using feedback to achieve our goals and demonstrate our values. ShelterBox therefore welcomes feedback on our actions or the actions of those directly involved with ShelterBox and the delivery of our work. ShelterBox will take all complaints seriously, and we will maintain a transparent, well-publicised, effective, and timely process for making and handling a complaint and that all complaints are handled constructively, impartially, and effectively.

Receiving feedback and responding to complaints is an important part of improving ShelterBox's accountability. The effective handling of complaints, and the learning opportunity from dealing with them, is important to the success of ShelterBox.

2. Purpose

ShelterBox recognises that to improve the quality of our work, we must ensure that our stakeholders can hold us to account. ShelterBox strives to meet expectations in everything that we do, but we recognise that this cannot always be the case. When we make a mistake, we want and need to be informed. We will use the information provided within complaints to endeavour to put things right and help us to become more effective. The purpose of this policy is:-

- To provide a mechanism of complaint and to ensure accountability and the effective handling of complaints received by ShelterBox.
- To enable and encourage organisational learning and improvement.
- To ensure internal and external transparency of the complaints handling procedures.

Further, this policy is intended to ensure that ShelterBox complies with the requirements set by external regulatory bodies, including the Charity Commission and Fundraising Standards Board.

3. Scope

This policy applies to ShelterBox and is global in application. It includes the process of external complaints from supporters, partners, suppliers, contractors, or any member of the public, whether an individual, company or other entity, in the UK or anywhere else in the world.

This policy applies to: -

- Complaints about ShelterBox programmes and aid delivery from anybody observing ShelterBox operations, or from a Project Partner,
- Complaints about ShelterBox's fundraising practises,
- Complaints about anybody representing ShelterBox¹,
- General complaints about ShelterBox and any other service we provide.

This policy does **not** apply to: -

- Complaints made by Project Participants. Complaints and Feedback made by Project Participants are not covered by the scope of this policy and instead are subject to the *Feedback, Complaints and Response Mechanism (FCRM) Policy*.
- Complaints that are subject to current investigation by any regulatory body, or other legal/official authorities in the UK, or in other countries in which we operate. The relevant regulatory body will deal with such issues.
- Complaints made by ShelterBox staff and volunteers (both current and former), including those relating to misconduct. Applicable policies include the *Grievance Procedure* (within the Employee Handbook), the *Resolving Differences Policy* (volunteers), the *Anti-harassment and Bullying Policy*, the *Disclosure of Malpractice (Whistleblowing) Policy* and the *Safeguarding Policy*. This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

A complaint is an expression of dissatisfaction about the standards of service, action or lack of action, by ShelterBox employees, volunteers or any other ShelterBox

¹ In addition to employees and volunteers, ShelterBox representatives may include trustees, affiliates, partner organisations, consultants, contractors (including freelance photographers, drivers, fixers etc.), casual labourers, donors, Rotarians, and anyone else who is representing ShelterBox.

representative¹. It is a criticism that expects a response; either in the form of a reply or by ShelterBox taking steps to improve or rectify the situation.

Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with (e.g. a Project Partner) over the quality of our programme delivery.
- Concern from a member of the public or supporter about a particular fundraising approach or campaign action.
- Concern about the behaviour of employees, volunteers or other ShelterBox representatives.

A complaint is **not** the following (which again is not an exhaustive list):

- A general enquiry about the work of ShelterBox (including comments of disagreement with ShelterBox's operational decisions)
- A request for information
- A contractual dispute
- A disagreement with ShelterBox's funding model
- A request to amend records e.g. to correct personal details.
- A request to unsubscribe from a ShelterBox service e.g. campaign newsletter/emails, or comments about the perceived cost and/or frequency of marketing communications.
- Feedback or complaints from Project Participants who have received ShelterBox aid. This is covered by ShelterBox's *Feedback, Complaints and Response Mechanism (FCRM) Policy*.

This policy is concerned with formal complaints. It is hoped that employees or volunteers at a local level can deal with most complaints or concerns about ShelterBox's work or behaviour informally. However, it is recognised that not all issues can be resolved in this way. A formal complaints mechanism is required for those occasions when an individual or organisation wishes to make their complaint a matter of record and to receive a formal response.

Complaints that are raised through any of the channels detailed in Section 5 but which relate to an action for which ShelterBox is not responsible or which is not within our sphere of influence would be dealt with in a different manner. Complainants would

have their complaint acknowledged and ShelterBox would exercise duty of care by ensuring that the complaint was shared appropriately.

4. Roles and Responsibilities

ShelterBox:

- Are responsible for ensuring that accountability is ensured by the effective handling of complaints and associated organisational learning and improvement.
- Will ensure compliance with the requirements set by external regulatory bodies, including the Charity Commission and the Fundraising Standards Board.

The Executive Team:

- To review a summary of all complaints received on a quarterly basis.
- Will take responsibility for ensuring compliance with regulations concerning complaints and their handling, and for ensuring that action is taken in the light of the outcome of any investigations.
- Are responsible for reviewing and updating this Policy annually, and in line with legislative and organisational developments (with the Board of Trustees).

The Board of Trustees:

- Has a monitoring role and will receive and consider a quarterly update regarding complaints.
- Are responsible for reviewing and updating this Policy annually, and in line with legislative and organisational developments (with the Executive Team).

The Human Resources (HR) Team:

- Are responsible for receiving all complaints that are not safeguarding-related and for the initial handling of the complaint.
- Are responsible for keeping an organisational record of all formal complaints, and to compile a summary of all complaints received on a quarterly basis to submit to the Executive Team.

Safeguarding Advisor/Focal point :

- Are responsible for receiving complaints that are safeguarding-related and for the initial handling of the complaint.
- safeguarding@shelterbox.org

5. Reporting a Complaint

All formal complaints should be made by the individual/organisation making the complaint, or via someone acting on their behalf. Complaints can be made using one of the following methods:

- Email: complaints@shelterbox.org
- Telephone: +44 (0) 1872 302600. Our phone lines are open Monday to Friday from 9am to 5pm. Outside of these hours you can always leave us a message and a contact number, and someone will return your call.
- Post: Complaints, C/o HR Department, ShelterBox HQ, Falcon House, Truro, Cornwall TR1 2PH. A member of our HR team will acknowledge all complaints.
- Independent Whistleblowing Service: if you don't feel able to report malpractice to ShelterBox directly, we have an independent, confidential reporting mechanism provided by Safecall where you can raise your concerns. Any matters raised will be treated in strict confidence. Please include your name and contact details in correspondence, however you can remain anonymous if you wish. You can contact Safecall 24 hours a day, seven days a week:
 - By freephone:
 - UK: 0800 9151571
 - Philippines: 1800 14410499
 - Other numbers are also available – please visit the Safecall website (below) for further details.
 - Via the web: www.safecall.co.uk/report/

Safeguarding

If your complaint is related to safeguarding, please utilise one of the following methods:

- Email: safeguarding@shelterbox.org
- Post (see above)

- Independent whistleblowing service (see above)

Anonymous reporting

We treat anonymous complaints as seriously as non-anonymous complaints but reporting anonymously may limit our ability to pursue concerns.

Information to Share

At the point of raising a concern, it would be useful for the complainant to share information describing:

- What has happened? Provide notes of dates, times, people and places.
- Who is involved?
- Whether anyone is at immediate risk of harm?
- How do you know about it? When were you first concerned about it?
- Have you told anyone about it?
- Was any action taken?

The complainant is requested to include their name, address and contact telephone number in correspondence so that we can get back in touch. Please note that anonymous reporting is, however, possible (see above).

6. Triaging Complaints

Upon receipt of the complaint, the decision will be made on whether it is appropriate to handle the complaint under this policy. See section 3 for information on complaints that do not fall within the scope of this policy.

Critical Incidents: A critical Incident will be initiated if the reported incident represents a current risk to people in contact with ShelterBox or to the reputation of ShelterBox.

Safeguarding: If the complaint is related to safeguarding, the Safeguarding Advisor will be informed, and steps taken will include ensuring the immediate safety and welfare of survivor(s).

7. Investigation Procedure

If an investigation is initiated, the following key actions will be taken:

- Appoint an Investigation Management Team and an Investigation Manager
- Plan the investigation (write an Investigation Plan with Terms of Reference) and undertake a risk assessment.
- Gather and study background material and documentary evidence.
- Update the Investigation Plan and draft interview questions.
- Interviews conducted (subject of the complaint is interviewed last)
- Write investigation report and management outcome report.
- Conclude the investigation, submit to Case Management Team (or Crisis Management Team) for appropriate follow-up.
- Allocate budget.
- Decision to investigate communicated to Survivor / Complainant
- Seek legal guidance.
- Decision made on what and who to inform: key external (including formal reporting to donors) and internal stakeholders as well as statutory referrals.
- Gathering of physical evidence

8. Timeframe

All complaints will be dealt with in a timely and efficient manner. The complainant will receive formal confirmation of their complaint within **5 working days** from the date received. Note: if the Complainant has included a postal address for correspondence, communication may take longer.

The Complainant will be informed whether the complaint has or has not been substantiated. The timeframe for this will depend on several factors such as whether an investigation is carried out.

If an investigation is required, the aim will be to conclude the investigation within **6 weeks** of the receipt of the complaint wherever possible.

9. Resolving Complaints

Options for resolving complaints:

- an apology where the complaint is justified
- fixing the specific problem
- improving the aspect of service that led to the problem

Outcomes following the raising of complaints may include:

- Ensuring appropriate support has been provided to the survivor utilising the survivor-centred approach
- Disciplinary action

10. Information Sharing and Storing

The principle of sharing information on a need-to-know basis will always be adhered to. Confidentiality implications will always be considered – whether sharing information internally or externally.

All complaints will be handled on a confidential basis. In some cases, it may be necessary to disclose information to third parties. This will be decided on a case-by-case basis ShelterBox will adhere to the regulations of all regulatory bodies (such as the Charity Commission and the Fundraising Standards Board) and any incidents will be reported as required.

An organisational record is kept of all formal complaints. All original documents must be returned to the complainant unless required.

All data will be stored in accordance with Data Protection requirements.

11. Learning from complaints

At ShelterBox, complaints allow us to learn and improve. ShelterBox regularly review the complaints we receive to identify any trends or wider learning. In reviewing complaints, ShelterBox will always consider what lessons can be learnt and how we can improve our service and the experience of any of our stakeholders.

Quarterly reports on all fundraising based complaints and feedback received are shared with all relevant team managers and the Executive Team. The Board of Trustees will also receive and consider condensed quarterly updates on complaints. After understanding any patterns or incidents of complaints and negative feedback, suggested actions are taken by key stakeholders to ensure that the supporter experience is improved. This could include actions such as reviewing policies and procedures, training courses or system updates.

If a complaint received is related to abuse or exploitation, a report is submitted to the Executive Team and the Board of Trustees immediately whilst the case is being investigated. In addition, an annual report is also provided on the case management of safeguarding cases. For incidents in programmes and projects which do not relate to abuse or exploitation, it is managed at programme level.

The Board of Trustees will receive and consider quarterly updates on any complaints received. The relevant Executive Team member will ensure the relevant actions are taken and learnings enforced.

12. Internal Appeals and External Escalation of Complaints

Internal appeal process: If the complainant is not satisfied with the response, the complainant can ask the issue to be escalated as follows:

- Internal escalation:
 - The ShelterBox CEO. The CEO will respond within ten working days from the date the complaint is received.
 - If the complaint is against the CEO, the complaint will be submitted to the Chair of the Board of Trustees. The Chair of the Board of Trustees will respond within ten working days from the date the complaint is received.
- External escalation:
 - If we are unable to resolve the complaint satisfactorily, the complainant may wish to escalate the complaint externally. Details of appropriate organisations or bodies can be found below:

Fundraising Regulator

ShelterBox is committed to the highest standards in fundraising practices. We promise to be honest, fair and open about our fundraising and are registered with the

Fundraising Regulator. We fundraise in a responsible way, in line with our [Supporter Promise](#). We take it seriously if you don't think we're meeting these high standards and will always try to resolve your concerns through our complaints process. However, if we have not managed to address your complaint to your satisfaction you can contact the fundraising regulator.

We will work closely with the Fundraising Regulator to resolve any complaints that are raised with them. <https://www.fundraisingregulator.org.uk/complaints/>

Advertising Standards Authority

If you have a complaint about advertising, the Advertising Standards Authority can help. As the regulatory body for advertising, they can investigate advertising campaigns that you may feel are inaccurate, offensive or deceptive or the way that the charity communicates with you. <http://www.asa.org.uk>

The CHS Alliance

The CHS Alliance accepts complaints against its member organisations who fail to apply their own commitments and/or the principles and commitments of the Core Humanitarian Standard. <https://www.chsalliance.org/complaints/>

Information Commissioners Office (ICO)

The ICO is a UK based independent authority that regulates various legislation governing information rights including the EU General Data Protection Regulation (GDPR), Data Protection Act 2018 (DPA) and Privacy and Electronic Communications Regulations (PECR). If you have concerns about an organisation's information rights practices, the ICO can help. <https://ico.org.uk>

The Charity Commission

Alternatively, if your complaint is related to another area of our work and you do not feel completely satisfied by our response then you can contact The Charity Commission. <https://www.gov.uk/complain-about-charity>.

Other agencies include the Police, the Environment Agency, Health and Safety Executive or Social Services Department.

13. Communication of the Procedure

A dedicated webpage can be found on the ShelterBox website giving information on raising complaints and details of this will be shared with ShelterBox stakeholders, including employees, volunteers and other ShelterBox representatives. Members of the public will also be able to access this information. The number of complaints received from supporters is also published in our Annual Report each year.

Partners will be informed of our Complaints Policy at the outset of the partnership or where the partnership was already established before the Complaints Policy was in existence, partners will be informed at the earliest opportunity.

Members of the affected community in which we work will be informed of complaints and feedback mechanisms available within the communities through our partners . Care will be taken to ensure that requirements for filing a complaint take into consideration the needs of the most vulnerable and considers minority and disadvantaged stakeholders.

14. Associated Policies and Procedures

Code of Conduct

Critical Incident Management Plan

Disclosure of Malpractice Policy (Whistleblowing)

Feedback, Complaints and Response Mechanism (FCRM)

Gathering Content Policy

Harassment and Bullying Policy

Managing Safeguarding Reports Policy

Reference Policy

Reporting Serious Incidents Policy

Safeguarding Policy

Other policies and procedures as appropriate

15. Annexure

- Annex 1: Formal External Complaints Process - Flowchart

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