

# Concern Worldwide (UK)

## Complaints Policy

17 February 2021

## 1. Introduction

This document outlines Concern UK's formal complaints and response process. It seeks to provide safe, accessible and effective channels for individuals to exercise their right to raise complaints about the organisation and the work and behaviour of our staff, volunteers, sub-contractors and partners. By adhering to this Policy, Concern UK will ensure that appropriate and timely action is taken in relation to these complaints, both to deal with the situation and put measures in place to stop the same situation happening again. Feedback will be given to all complainants.

## 2. Definition of a complaint

Concern UK and its staff, volunteers, sub-contractors and partners should be held accountable for the promises and commitments we make, what we do, and how we do it. A complaint is an expression of dissatisfaction with an action, service or behaviour on the part of Concern UK or any of our staff, volunteers, sub-contractors and/or partners. A valid complaint is one where Concern UK and those who work with us are responsible for what has happened and it is within our control.

Examples of where Concern UK can respond to a complaint include:

- Adequacy/accuracy of information provided by Concern UK
- Misuse of Concern UK funds
- Use of images and messages in Concern UK communications
- Our Fundraising activities
- Our Campaigning and Advocacy activities
- Human Resources issues, including recruitment and selection
- Suspected abuse of children or vulnerable adults
- Behaviour of Concern UK staff, volunteers, sub-contractors or partners
- Delay and/or failure to make a payment
- Delay and/or failure to respond to correspondence etc.
- Goods sold in our shops
- Issues related to data protection

Where Concern UK receives a complaint outside of its responsibility or control we will, in so far as we reasonably can, assist the complainant to re-direct their complaint appropriately.

## 3. Who can make a complaint?

Any stakeholder can raise a complaint with Concern UK.

This includes:

- Supporters
- Concern UK staff and volunteers
- Organisations with which Concern UK works, including sub-contractors and partners
- Those employed by or volunteering with our sub-contractors or partners
- Beneficiaries of programmes delivered by Concern or its partners
- Customers in our shops
- Our suppliers
- Members of the public

## 4. Confidentiality

Confidentiality is a principle that restricts access to and dissemination of information and helps to create an environment in which people are more likely to raise complaints or to stand in witness against bad practice. The complaints and response processes followed by Concern UK ensure reasonable confidentiality and security of all relevant records and

documents, with information shared on a strict need-to-know basis with a limited number of specified people for the purpose of taking action. Breaches of confidentiality will be taken very seriously and may result in disciplinary action against any staff member involved.

## 5. How to make a complaint

There is information on the Concern UK website which outlines our complaints policy for the public, clearly explains how an individual can complain and includes a link to this document: <https://www.concern.org.uk/making-complaint> In the first instance, anyone who wishes to complain is encouraged to email or speak informally to a member of staff or volunteer. If this does not resolve the matter to the individual's satisfaction, and for all serious complaints, the routes set out below should be used to raise a formal complaint.

Formal complaints can be made either directly by the complainant or someone acting on their behalf. Adjustments to our processes will be made where necessary to ensure everyone who wishes to raise a complaint with us is able to do so.

To make a complaint, Concern UK asks complainants to contact us in one of the following ways:

### a) Fundraising and General complaints

A Fundraising complaint is one that relates to any of Concern UK's fundraising activities. A General complaint is any expression of dissatisfaction about actions taken or a lack of action that is not a Fundraising, Fraud, Whistleblowing or Safeguarding complaint (see below for definitions).

Fundraising complaints could include those about:

- Direct mail
- Door-to-door fundraising
- Retail activities
- Face-to-face fundraising
- Marketing activities
- TV advertising

Examples of General complaints include:

- Problems with completing administrative tasks
- Delay in dealing with a personal data subject request
- Poor behaviour by a member of staff
- Dissatisfaction in a recruitment process
- Omitting to pay a supplier in error
- Failure to cancel a regular direct debit donation
- Unhappiness with an advocacy post on social media
- Lack of fairness in a tender process

The Complaints Coordinator should be contacted through the following channels:

- Using our online contact form: <https://www.concern.org.uk/complaint-form>
- By phone – Freephone 0800 032 4001  
Our phone lines are open from Monday to Friday, 9am to 5pm. Outside of these hours, or if our staff are unable answer your call personally, please leave a message and contact number, and someone will return your call within one working day
- By post – marked 'Private & Confidential' to:  
Complaints Coordinator  
Concern Worldwide (UK)

47 Frederick Street  
Belfast  
BT1 2LW

To assist us in resolving complaints quickly, complainants are asked to include a valid phone number and/or email address so that we can contact them

### **b) Fraud complaints**

Fraud encompasses the theft or misuse of Concern's funds or other resources, by an employee or third party, which may or may not also involve misstatement of financial documents or records to conceal the theft or misuse. Corruption can take many forms, including financial and non-financial crimes such as procurement fraud, nepotism and any other form of abuse of power. Fraud complaints include:

- Theft of funds or any other Concern or donor property
- Falsification of costs or expenses
- Forgery, alteration, destruction or removal of documents or records
- Inappropriate personal use of Concern's assets
- Employees seeking or accepting cash, gifts or other benefits in exchange for preferment of third parties in their dealings with Concern
- Bribery or facilitation payments
- Blackmail or extortion
- Paying excessive prices or fees to third parties with the aim of personal gain
- Abuse of a conflict of interest
- Financing criminality or terrorist acts/organisations
- Cyber-crime

Please see Concern's Anti-Fraud Policy for more information:

<https://www.concern.org.uk/accountability/codes-and-policies>

For fraud complaints, the Head of Internal Audit and Investigations can be contacted through the following methods:

- By email – [fraudmailbox@concern.net](mailto:fraudmailbox@concern.net)
- By phone – + 353 1 479 1326 during core office hours, Monday to Friday, 10am to 4pm (Irish times)

Outside of these hours, please leave a message and contact number, and someone will return your call before midday the next working day

- By post – marked 'Private & Confidential' to:

Head of Internal Audit and Investigations  
Corporate Services  
Concern Worldwide  
52-55 Lower Camden Street  
Dublin 2  
Ireland

### **c) Whistleblowing complaints**

Concern defines whistleblowing as "making a disclosure in the public interest about possible wrongdoing in the workplace". The categories of wrongdoing which may constitute malpractice and give rise to whistleblowing complaints include the following:

- Criminal offences
- Failure to comply with legal obligations
- Miscarriage of justice
- Endangering the health & safety of individuals
- Serious HR complaints e.g. discrimination

- Damaging the environment
- Any sensitive complaint that is not about fraud or safeguarding
- Attempting to cover up any of the above

Please see Concern's Whistleblowing Policy for more information:

<https://www.concern.org.uk/accountability/codes-and-policies>

For whistleblowing complaints, the Head of Internal Audit and Investigations can be contacted through the following methods:

- By email – [whistleblowing@concern.net](mailto:whistleblowing@concern.net)
- By phone – + 353 1 479 1326 during core office hours, Monday to Friday, 10am to 4pm (Irish times)  
Outside of these hours, please leave a message and contact number, and someone will return your call before midday the next working day
- By post – marked 'Private & Confidential' to:  
Head of Internal Audit and Investigations  
Corporate Services  
Concern Worldwide  
52-55 Lower Camden Street  
Dublin 2  
Ireland

#### **d) Safeguarding complaints**

Concern has a zero tolerance policy when it comes to sexual harassment exploitation, abuse and trafficking of children and adults as reflected in our contracts of employment for all staff who commit to adhere to the Concern Code of Conduct and associated policies as part of their terms and conditions of employment (or engagement for consultants, (sub) contractors, relevant suppliers; involvement for volunteers):

<https://www.concern.org.uk/accountability/codes-and-policies>

All safeguarding complaints are taken seriously, including when made anonymously. Confidentiality, safety, dignity, respect and natural justice are core principles applied in how we investigate and address such matters, always with the wishes and best interests of the survivor at the centre of our process.

For suspected safeguarding complaints, the following channels which are monitored by the safeguarding office in Concern's head office, should be used:

- By email – [safeguarding@concern.net](mailto:safeguarding@concern.net)
- By post – marked 'Private & Confidential' to:  
Safeguarding Office  
Concern Worldwide  
52-55 Lower Camden Street  
Dublin 2  
Ireland

## **6. What happens after a complaint is made?**

All complaints will be acknowledged within 2 working days, other than in exceptional circumstances (if we only have a postal address for the complainant, this means posting our reply within 2 working days). The acknowledgment of receipt will give a date by when the complainant can expect to either be informed about the outcome of their complaint or, for more complex complaints, the process that will be followed to handle their complaint. This date will be no more than 10 working days from the date of the complaint was received.

To ensure transparency of the complaints management process, the complainant will be kept informed throughout and advised of the outcome. Although in some sensitive cases, for example potentially resulting in disciplinary action, Concern UK may need to reserve the right to keep the action taken confidential.

If the complaint is about an issue that falls outside of Concern UK's control, this information will be included in the acknowledgment of receipt sent to the complainant. Where possible, the claimant will be assisted to re-direct their complaint appropriately.

## 7. Appeal

If the complainant is not satisfied with the response received, despite having had the opportunity to request further clarification or feedback, s/he can submit a formal written appeal directly to the Executive Director:

- By email – [UKcomplaints.appeals@concern.net](mailto:UKcomplaints.appeals@concern.net)
- By post – marked 'Private & Confidential' to:  
Executive Director  
Concern Worldwide (UK)  
13/14 Calico house  
Clove Hitch Quay  
London  
SW11 3TN

The Executive Director will pass the appeal on to a member of the Senior Management Team (SMT) who has had no involvement in the complaint or its management. The SMT member will review the management of the complaint and determine whether it has been handled properly. This review will include an assessment of the procedures followed, investigations conducted, outcomes and actions taken to date. The Executive Director or SMT member will acknowledge the appeal and keep the complainant informed about the review process.

The response to an appeal is final in terms of the Concern UK's complaints and response process, although the complainant may continue to pursue the matter via alternative routes if they wish.

## 8. Situations where Concern UK will stop responding to a complaint

No complaint will be ignored and everyone who makes a complaint will be treated with courtesy and respect. In return, we expect complainants to raise their complaints fairly and appropriately. In cases where complainants harass staff, behave abusively or unreasonably pursue their complaint, we reserve the right to withdraw our investigation of their complaint. In all such instances, the complainant will be informed by the Executive Director that we do not propose to consider or correspond about the complaint any further and the reasons for this decision.

## 9. Escalation

### Fundraising Regulator

If the complaint is about Fundraising and the complainant feels that it has not been resolved by us satisfactorily, then they may forward their complaint to the Fundraising Regulator within two months of our final response.

Fundraising Regulator  
2<sup>nd</sup> floor, CAN Mezzanine Building

49-51 East Road  
London  
N1 6AH

Telephone: 0300 999 3407

Email: [complaints@fundraisingregulator.org.uk](mailto:complaints@fundraisingregulator.org.uk)

Website: [www.fundraisingregulator.org.uk/complaints](http://www.fundraisingregulator.org.uk/complaints)

### **The Charity Commission**

If the complainant is not happy with our response to their complaint and it relates to any area of our work except fundraising or advertising, they can contact The Charity Commission for England and Wales.

The Charity Commission  
1 Drummond Gate  
London  
SW1V 2QQ

Website: <https://www.gov.uk/complain-about-charity>

Complaints about Concern Worldwide (Northern Ireland) i.e. our retail activities, may be made to:

The Charity Commission for Northern Ireland  
257 Lough Road  
Lurgan  
Craigavon  
BT66 6NQ

Website: <https://www.charitycommissionni.org.uk/concerns-and-decisions/submit-a-concern-about-a-charity/>

### **Advertising Standards Authority**

Although Concern UK would appreciate an opportunity to initially address any complaint about advertising with the complainant, these complaints can be made directly to the Advertising Standards Authority.

Broadcasters are required to keep recordings for specified periods i.e. 42 days after the relevant radio transmission; 60 days after the relevant satellite and cable television transmission; and 90 days after the relevant terrestrial television transmission. Complaints must be made well within these periods. For non-broadcast ads, complaints must be made within 3 months of their appearance.

Advertising Standards Authority  
Castle House  
37-45 Paul Street  
Shoreditch  
London  
EC2A 4LS

Website: <https://www.asa.org.uk/make-a-complaint.html>

## **Northern Ireland Trading Standards Services**

If you feel you were treated unfairly after purchasing goods in one of our Northern Ireland shops you may complain to Trading Standards.

Northern Ireland Trading Standards Services  
176 Newtownbreda Road  
Belfast  
BT8 6QS

Website: <https://www.nidirect.gov.uk/articles/how-complain-business-or-trader>

## **10. Learning from complaints**

Concern UK will use all complaints as an opportunity to learn lessons from what has gone wrong, put things right and change practice to stop the same thing happening again. In addition to the lessons to be learned from individual complaints, all Fundraising and General complaints will be analysed to identify common patterns and themes which need to be addressed to allow the organisation to avoid repeating mistakes.

Separate processes are also in place to learn from Fraud, Whistleblowing and Safeguarding complaints and prevent a recurrence.

## **11. Reporting**

A report on all complaints received by Concern UK will be considered by the SMT and presented to the Board annually, with information on Fundraising and related administrative complaints only also being submitted to the Board of Trustees' Fundraising Sub-committee.

In addition, the SMT will review a six-month report on Fundraising and related administrative complaints received which will be shared with the Fundraising Sub-committee.

Information on complaints received in relation to the retail activities of our shops will be submitted to the Board of Concern Worldwide (Northern Ireland) at each meeting of the Board.

A report on the Fundraising complaints received is included in Concern UK's Annual Report and Accounts, including lessons learned and actions taken to prevent further similar incidents. Likewise, information on Safeguarding complaints is also included in our Annual Report and Accounts.

## **12. Publication**

A summary of this Complaints Policy will be made available on the Concern UK website, together with a link to the full document.