

FEEDBACK AND COMPLAINTS POLICY

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Scope & Policy Statement

ETP values feedback and will use complaints as an opportunity to learn and to improve relevant areas of work.

The policy covers feedback and complaints from individuals external to ETP such as members of the public, programme participants, ETP partner staff and other relevant stakeholders such as private companies and authorities.

- **Feedback** is an expression of praise or dissatisfaction that could be an opinion, reaction, comment, compliment, suggestion or remark about ETP's work.
- **A complaint** is an expression of dissatisfaction about the standards or service, actions or lack of action by ETP or its staff or anybody directly involved in the delivery of our work, including partners. It is a criticism that expects a reply and would like things changed. It is a complaint that has not been possible to resolve informally in the first instance.

While ETP will endeavour to respond to all feedback and complaints received, ETP can only act on those which are related to its work, actions or within its sphere of influence. ETP will also respond to those complaints that are deemed spurious, malicious or unreasonable complaints explaining why these will not be taken further.

This policy applies to all units of ETP; including the UK office, regional offices and any other affiliates, subsidiaries or branches.

Purpose

The purpose of the ETP Feedback and Complaints Policy is to map out a clear pathway for recording, assessing, and responding to feedback and external complaints. This policy is designed to ensure community members we work with feel safe and protected and that all feedback and complaints are taken seriously, handled and responded to in a consistent manner.

Complaints handling principles & procedure

Principles:

- Feedback and complaints may be submitted by any external person, organisation, company or institution, regardless of affiliation with ETP. Complaints can originate from any individual and must be about ETP work, staff or contracted partners.
- Anonymous complaints will be received and processed, however these cannot be investigated if the identity of the complainant remains anonymous.
- Complaints received containing criminal allegations e.g. fraud, assault, child abuse, will be referred to relevant local authorities for handling, ensuring safeguarding principles are respected at any time.
- Complaints that are outside the scope of this policy cannot be addressed. ETP reserves the right to refer the feedback or complaints to authorities where appropriate.

Procedures:

1. Raising complaints with ETP

- Complaints can be communicated in a number of ways:
 - By emailing confidential@ethicalteapartnership.org or using the designated online form available on ETP's website.

Tel: +44 (0)20 3559 6340 etp-global.org

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- By communicating via a country staff member who then documents using the above channels.
- All complaints will be acknowledged within 48 Hrs of submission.
- All complaints will be categorised and investigated as per this procedure and if delays occur in handling and investigations, a follow-up email will be sent to the complainant within 28 days explaining the circumstances.
- If the complaint concerns a safeguarding issue, this will be dealt with according to ETP's Safeguarding policy and procedures. ETP's Safeguarding policy is available on the website.

2. Categorising complaints

ETP will assess the type of submitted complaint(s) and determine whether it is within scope. If within scope, the complaint(s) will be recorded, assessed and then categorised based on risk and vulnerability to the complainant. Based on the complaints level of risk, an investigation may be required. These levels can fall into the following categories:

Type	Level	Handled by	Investigation required/Applicable procedures
Does not meet the criteria	Out of scope: for referral onwards	Operations Lead and explanation sent.	No
Information request or request for support from ETP	Feedback	Operations Lead and forwarded to concerned department for response	No
General programme design and implementation issues.	Level 3	Regional director & Head of Programmes (when applicable)	Optional based on information
Complaints about general misconduct by staff, such as fraud, drug or alcohol misuse, corruption, nepotism, etc.	Level 2	Regional director & Head of Programmes (when applicable) Escalated to Executive Director after fact finding completed.	Optional based on information Led by Regional Director and at least one other staff. Disciplinary Procedures followed and activated dependent on investigation outcome.
Concerns and reports of sexual harassment, emotional or physical harm committed by ETP staff to members of the community where we work.	Level 1	Regional Director & Head of Programmes (when applicable) Immediately notify the Executive Director and Audit and Risk committee.	Required Safeguarding Policy & Procedure followed and activated
Concerns and reports of sexual harassment, emotional or physical harm caused by partner or external contractors to ETP staff, partner staff or community members (*refer to note on partners below)	Level 1	Regional Director & Head of Programmes (when applicable) Immediately notify Executive Director and Audit and Risk committee.	Required But it can be referred to partner to investigate, evidence of investigation must be provided. Safeguarding Policy Procedure followed and activated

3. Investigating & Resolving complaints

Once the case has been categorised ETP will confirm if an investigation is required to respond.

If an investigation is required ETP will:

- Assign a dedicated independent, impartial team of at least two people to handle investigations. The team cannot be implicated in the complaint and cannot be from the country of complainant.
- Ensure that investigations are carried out impartially and fully documented.
- Ensure that all parties involved in the investigation will keep full confidentiality of information.
- Draft an investigation report.
- Take necessary corrective action when applicable. Some complaints will activate ETP's internal disciplinary procedures and in other cases, ETP's Safeguarding Policy, in which instance ETP will honour its obligations specifically in relation to its response to safeguarding concerns, confidentiality of reports received and support available to survivors of such complaints.
- Respond to the complainant with the findings and actions taken. If the investigation takes longer, keep the complainant updated on the progress. ETP aims to conclude an investigation within 30 days of its commencement.

***Note on complaints related to partners:**

It is important to note that programmes and pilots, whilst under the banner of ETP, vary in independence from ETP and sometimes have locally driven governance. ETP in-Country Teams, therefore, have differing degrees of influence over partners. ETP is available to help shepherd the complaint process, but decisions responding to these Complaints will first be taken by the accountable partner. If the complaint is escalated, following an investigation by the partner, ETP's Executive Director will take a decision on corrective action together with the respective ETP Country Manager and/or Regional Director. All escalated complaints will be notified to the Audit and Risk Committee to be logged in ETP's Risk register and actions suggested to manage the reputational risk of ETP.

4. Escalation

- For Level 3 and Level 2: if the complaint isn't resolved following the conclusion of the investigation, the case can be escalated to the Executive Director for taking a decision on corrective or disciplinary actions when applicable.
- For Level 1 complaints: the Executive Director and Audit and Risk committee will be immediately notified and safeguarding procedures activated when applicable

5. Monitoring and reporting.

ETP will:

- Keep a secure and centralised database of all feedback and complaints.
- Periodically review feedback to identify trends and areas for improvement.
- Report on feedback and complaints in annual reports, showcasing transparency and demonstrating commitment to improvement.

6. Referral where appropriate

In some cases, the complaint case will require referral to the authorities and or partner companies. i.e. if the complaint is of criminal nature. Where appropriate, ETP may be

required to comply with the established legal and regulatory procedures in a given country. This requirement takes precedence over all other principles.

7. Appeal procedures

- Appeal requests should be sent to the ETP Executive Director (ED) within 28 days following receiving a written decision. The ED will then re-evaluate the complaint and study all evidence and investigation report(s). The complaint will also be notified to the Audit & Risk Committee for a second evaluation and consideration of all circumstances involving the complaint and associated risks. If the complaint involves a partner of ETP or external stakeholder, ETP will endeavour to resolve the complaint together with the concerned stakeholder while complying with ETP's Safeguarding procedures when applicable. ETP and its partners aim to use the complaint procedure in good faith to identify mutually satisfactory resolutions wherever possible.
- The ED together with the recommendation of the Audit & Risk Committee will communicate any decisions taken to the complainant within 28 days from receiving the appeal request.

Time Limits

ETP commits to recording and responding to complaints in a timely manner.

- Complaints should be logged and categorised within 24 hours of receiving the complaint.
- Complaints should be acknowledged within 48 hrs of receiving the complaint.
- Investigations should be started within 30 days of the complaint being logged and be completed within 30 days of the commencement of the investigation.

Review

The policy and complaints handling process will be reviewed. Policy will be reviewed on need basis.