Internal Complaints, dealing with misconduct (in addition to code of conduct) and other policy breaches Policy and Procedure

Hengistbury Head Outdoors, has many people involved with its ownership, governance and delivery. These include members, volunteers, Trusted Advisors, Employees, Directors and self-employed practitioners. We want to nurture the cooperative, respectful and comradely relationships that best embodies a community at its best. In order to do this we need people to bring to our attention, anything which has been done wrongly or could be done better.

We have a number of policies regarding conduct, financial integrity and accountability, managing conflicts of interest, and this Policy runs alongside the Grievance and Disciplinary Policy which is more focused on employer and employee relations

This policy and procedure sets out how Hengistbury Head Outdoors' will deal with internal complaints.

Scope

Our internal complaints policy covers complaints about:

- the behaviour and policy complaints of Staff
- the behaviour and policy compliance of Directors
- the behaviour and policy compliance of Trusted Advisor
- the behaviour and policy compliance of volunteers
- the behaviour and policy compliance of service providers
- any action, or lack of action by any person engaged on Hengistbury Head Outdoors business

Our complaints policy does not cover:

- dissatisfaction, comments or complaints about our policies, decisions or strategic approaches to our work
- complaints about people we do not either employ, have a service contract with or who are not on our HHO volunteer accredited list ,
- matters that have already been fully investigated through this complaints procedure
- complaints which are vexatious, obviously unreasonable or abusive
- hypothetical or anonymous complaints (You can request that your complaint is treated confidentially).
  We may conduct an internal investigation if an anonymous complaint raises issues we were not aware and we will record the outcome of any investigation and resulting decisions

Resolving concerns and complaints

As with many other organisations, most concerns that are raised can be quickly resolved through either a telephone call or email to one of the Hengistbury Head Outdoors team. We would encourage anyone who feels uncomfortable or unhappy with the behaviour or policy compliance of any one involved with HHO to try aand resolve their concerns locally and discuss with a Director or employee.

If you are unable to do that or feel at risk of misrepresentation or even bullying, we would like you to put your concerns in writing. This is not a replacement for a whistle blowing Policy but an addition for issues that you might not consider whistle blowing.

We prefer to receive complaints in writing so if you make a complaint in person or over the phone you may be asked to follow this up in an email.

We keep a record of all correspondence relating to complaints, of the processes by which we dealt with it and of the final outcome.

We may report data on complaints to our Board of Directors and members.

Anyone making a complaint can expect to be treated with courtesy, respect and fairness at all times. We expect that you will also treat those Directors or staff dealing with your complaint with the same courtesy, respect and fairness.

We will deal with your complaint promptly and will not treat you less favourably than anyone else because of your sex or legal marital or same-sex partnership status: this includes family status, responsibility for dependants, and gender (including gender reassignment, whether proposed, commenced or completed); sexual orientation; colour or race (this includes ethnic or national origin or nationality); disability; religious or political beliefs, or trade union affiliation or any other unjustifiable factors, for example language difficulties, age, pregnancy and maternity.

If you feel your complaint has not been resolved to your satisfaction you will be provided with an opportunity to escalate the complaint within a reasonable time-frame.

The process for escalation is provided in the Complaints Procedure below.

A central log of all complaints received will be kept by the Society Secretary and anyone involved in a complaint will retain all relevant correspondence until after all escalation routes have been exhausted, a final decision has been made and communicated (this is in line with our data retention policy).

There may be circumstances where an internal complaint process has not been concluded, but the person steps back or resigns. This does not mean the complaint is concluded. A process of investigation may still continue.

Internal Complaints Procedure

This procedure is designed to offer a quick and meaningful response to any complaint not excluded above.

A Complaint or concern should be given in writing on line (through the website or by email) or by hand to the Society Secretary and the contact details of the Complainant given with the complaint. This should be addressed to the Complaints Officer or Society Secretary. If it is about either of these people it may be given to another Directors
Stage 1:
Acknowledgement to the complainant of the complaint or concern will be sent within 5 working days.
This complaint will be reviewed against the Rules, Policies, Procedures and any other legal responsibilities for which HHO Directors, Employees and volunteers are accountable.
If the Complaints Director or Society Secretary is the person whom the Complaint is against, it will be processed by the Director who is not the subject of the complaint.
If it is against multiple Board members, Trusted Advisors or Volunteers, the Board will hold a special meeting to consider the response. be sent to a Director or member of the Management Team to review.
In some cases, a complaints sub-committee may be created to give full weight to the level of the complaint.
A full response sent within 20 working days, or if a Complaints sub committee has been established a response will be made within 40 days.
Are you happy with the response?

It maybe in the case of a complaint regarding an elected or appointed person (Director or Trusted Advisor) that they may be asked to stand down or take up some other role. In this case the Complainant and the person against whom the complaint is made, should agree whether this closes the complaint.

Yes: Complaint closed, records kept and any lessons noted. This record will be held in a folder only accessible to Directors and senior employees.
No: You can ask for a review of our response by a complaints subcommittee

Stage 2
If you regard the initial response is not sufficient, or if a person resigns as a result of a complaint, and investigation we will provide an acknowledgement within 5 working days or in the case of a person resigning, instate an complaints sub-committee

The Complaint and Stage 1 response escalated to an internal complaints sub committee or for a continued investigation into the issues of the complaint.

The detail of an investigation will be effected by the nature of the complaint. a. However it should include;
a. That any person subject to an investigated complaint should be able to see the complaint(s) against them and have the opportunity to explain the decisions, actions or conduct that are the subject of the complaint.
b. Clear and accurate information that is recorded for future reference. (Note, subject to data retention requirements)
c. If the person has resigned or stepped down from their position as part of HHO, they may be written to or contacted by phone or email to ask for their input. The complaints should be anonymised and the responses by the person(s) who is/are the subject of the complaint is entitled to ask someone to support them in making their response. The complaints committee can recommend to the Board the following sanctions

The following sanctions will be available, subject always that the sanction is provided for in the rules, and which may be amended from time to time:

• A reprimand and / or a request for an apology.
• Temporary suspension from the management committee.
• Temporary prohibition from attending general meetings.
• Removal from the management committee.
• Expulsion from the co-operative, **subject always to a vote at a general meeting**

A complaint may result in legal action being taken by the Society to Sue the person for any loss incurred by their action.