



POLICY ON COMPLAINTS

INTRODUCTION

This policy applies to UPP globally.

Ensuring that our stakeholders can hold us to account will improve the quality of our work.

When we make a mistake we want and need to be informed. We will use the information to endeavour to put things right and to help us to become more effective.

UPP is committed to ensuring the accessibility of its Complaints Policy, procedures and systems for making a complaint, across the breadth of our work.

INTERACTIONS WITH OTHER POLICIES AND PROCEDURES

Whenever the content of complaint should fall within the meaning of other policies, such as PSEA, Whistleblowing, Anti-Fraud, Anti-Corruption, Anti-Terrorism or others such as any suspicion of breach of Standard of Conduct and ICRC CoC, the receiver will immediately refer and manage the complaint under the provisions of those policies.

SCOPE OF IMPLEMENTATION

A complaint can be made by any supporter, partner organisation, community or individual with whom we work or any member of the public whether an individual, company or other entity anywhere in the world.

While UPP does not impose the Principles, Definitions and Procedures of this Policy to Partners working with UPP, it ensures sensitization and orientation to Partners willing to endorse such principles.

In case a partner is delivering pieces of common work with UPP to beneficiaries (regardless their nature of individuals or entities) then that Partner, when missing own Complaints Policy and Standards, will immediately refer any complaint arising in the carrying out of those shared activities and/or related to under the provisions of UPP Complaints Policy. The latter to establish with a specific clause in the MoU that UPP sets with the Partner(s).

DEFINITIONS

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action by UPP or its staff, volunteers or anybody directly involved in the delivery of our work.

It is a criticism that expects a reply and would like things to be changed.

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

- Concern from someone we work with about the quality of UPP programs or coordination;
- Concern from a member of the public or supporter about a particular fundraising approach or campaign;
- Concern about the behaviour or staff, volunteers, contractors, or associates in the carrying out that role.

A complaint has to be about an action for which UPP is responsible or is within our sphere of influence.

A complaint is not:

- A general query about UPP's work
- A request for information



- A contractual dispute
- A request to amend records e.g. to correct an address, cancel a donation
- A request to unsubscribe from an UPP 'service' e.g. a campaign newsletter or email.

PRINCIPLES

Accessibility: Complainants should be able to make a complaint as easily as possible: written correspondence, email, telephone, verbally, via a third party, etc.

We are committed to making communication with us as easy as possible.

Timeliness: UPP aims to resolve complaints within 15 days of receipt.

In the event that a complaint cannot be resolved within this timeframe the complainant will be informed about the progress made to date and when they can expect to receive a response.

Complaints should be made within 6 months of the relevant incident.

In exceptional circumstances UPP may be able to respond to a complaint that is older, although the passage of time may make it harder to resolve the complaint satisfactorily.

Confidentiality: Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint.

However in some instances we might judge that the complainant will be better served if others are involved in the resolution of a complaint. Third parties will only be included in the resolution of confidential complaints on a case-by-case basis and with the agreement of the complainant.

Documented. Some complaints may be both made and resolved verbally, e.g. by telephone or face to face. Where they are unable to be resolved verbally, complaints must be made in writing. If you need assistance to do this UPP will help you to present your complaint.

Right to appeal. Complainants who have launched a well-founded complaint and who are unsatisfied with UPP's response to that complaint have the right to appeal. Appropriate appeal processes are outlined in UPP Staff Handbook and will be shared with the complainant.

After the internal appeal, there is no further internal process. You may however still contact our Italy Regulator, The Charity Commission.

Mutual Respect. Everyone who makes a complaint to UPP will be treated with courtesy and respect. In return, UPP expects people who make a complaint to communicate their concerns fairly and appropriately.

Where complainants harass staff, behave abusively, or unreasonably pursue complaints, UPP reserves the right to withdraw or modify its complaints process.

PROCEDURES GUIDELINES

As UPP represent a variety of conditions in its infrastructure we provide the general guidelines on how to set up and handle a complaint mechanism in all conditions and contexts.

UPP local missions and offices shall develop and put in place an operating system that is in line with these guidelines.

HoMs and HoOs are directly responsible for the compliance on these guidelines at country of operation level.



At HQ level, the Communication Head of Department and the IT expert together with the Executive Director are responsible for a fair establishment of these guidelines and their rolling out.

Channels to report complaints should allow all potential complainants to report their grievances. They include email addresses, online and offline reporting tools, helplines, personal conversations, SMS reporting.

The reporting mechanisms should be tailored to the needs of the potential users. For example, a walk-in office or a phone message service might be more accessible for some communities.

Particular efforts should be made to build trust in the various channels.

The reporting mechanism should

- Be free of charge.
- Be easily accessible to communities and seek to reduce the barriers for persons in fear or people with a special need to access the mechanism.
- Provide a range of contact options. All methods should be carefully considered, depending on availability of appropriate infrastructure among communities.
- Allow for the submission of complaints anonymously.
- Be auditable and transparent.

In order to build trust in the mechanism, the complaint handling procedure should be publicised. The way it is publicised should take into consideration cultural characteristics and accessibility needs of the respective location or country.

Information to be publicised:

- Who can submit a complaint.
- Where, how and when can a complaint be submitted.
- Limitations to the scope of the mechanism (what can be complained about, any limitations to the process etc.) if applicable
- What outcomes can be expected from the handling of the complaint, and what not.
- Which department and senior management function are accountable for the proper handling of the complaint.
- What are the timelines and steps for the handling of the complaint.
- What rights and protection are guaranteed, including confidentiality and anonymity.
- Where and how can the complainant follow up (including appeal process).
- How the organisation handles disclosure of information and reporting on complaints
- What other bodies can receive a complaint
- Statistics on complaint submissions and resolution: number of complaints received, handled or rejected
- Contact details

Incoming complaints handling should be done with care, in line with processes established, in time and should be well recorded.

The process for handling incoming complaints includes

- i) receiving and recording complaints and
- ii) initial screening of complaints and handling of out-of-scope complaints.

i) Receiving and Recording



Record all complaints with an identifier (e.g. complaint number), date of complaint, first actions to be considered and a timeline for response.

Acknowledge receipt of the complaint as soon as possible, and inform the complainant on potential follow-up and timeline

Identify complaints that are out of the scope of the complaint mechanism, based on clear pre-defined criteria in other policies.

Apply the principle that two staff conduct independent reviews of the complaints (“four eyes principle”) for decision-making as per each UPP procedure and mechanism throughout.

If necessary, inform complainants when their request is out of scope, provide them with reasons necessary for this decision and possible alternative channels to pursue their grievance.

Prevent that the complaint be referred or disclosed to any person accused or potentially involved in the alleged malpractice without the explicit consent of the complainant, unless required by law.

ii) Processing:

Complaints that are in-scope require a detailed review and analysis, including fact-finding, to have a sound basis for the decision on how to proceed with the complaint.

This review should be independent, objective and impartial.

Analysis and fact-finding: please follow UPP procedures on Investigation process in paragraph 4.7.1 of UPP Staff Handbook.

When possible and appropriate, the complaint should be handled directly by the receiving organisation which has the duty to find the best possible approach towards solving the complaint.

This process requires flexibility as there is no “one size fits all” solution.

- Consider resolution options that are adapted to the social, political and economic environment, the subject and nature of the complaint and the person who lodged it.
- Consider data protection and data security issues.
- Collaborate, where applicable, with law enforcement bodies or other competent institutions or interested parties.
- Regularly discuss progress with the complainant, inform about envisaged corrective actions and advise on further possible actions, consultations, mediation and follow up options with relevant stakeholders.

When the conclusion of the review and analysis is that a complaint cannot be handled by the organisation or is considered to be optimally handled by another organisation, the complaint should be referred to the appropriate entity or person.

For the referral:

- Discuss with the referral partner whether and how they will take up the complaint and ensure compliance with principles such as confidentiality and protection against retaliation.
- Inform the complainant and seeking his/her consent for the referral, including explaining the referral decision and providing new points of contact.
- Follow up regularly with the complainant and the referral partner on the progress of the complaint handling.
- Provide support to the referral partner to overcome any challenge in the resolution of the complaints.



- Build constructive relationships with relevant referral partners. If possible, a memorandum of understanding should be concluded for future similar cases.
- Advise and exchange with referral partners on good practice for complaint mechanisms to report corruption.

Once a complaint is solved and/or the corrective actions are completed and communicated to the complainant, a case can be closed.

Where applicable, provide complainants with information that their complaint helped to identify a problem with larger impact on society and/or development and therefore actions could be taken up to achieve lasting change of relevant policies and practices.

- Collect evidence that the corrective actions have been taken (e.g. photos or documents, a record of resolution, an agreement with the complainant, a confirmation from the complainant).

There should be an appeal process whereby a review by an independent panel can verify the result of a complaint or of a decision on a complaint.

Please follow the set of procedures provided in UPP Staff Handbook at paragraph 4.7.2 for the appeal.

All complaints, follow-up actions and contacts with complainants should be recorded.

This allows good management of the relationship with the complainant.

It also helps effective management of the complaint itself.

Recording complaints and related data also provides the necessary basis for reporting about progress and results and compliance monitoring. On an aggregated level, statistics can be obtained, which can be utilised to advocate for change in policies and practice to effectively address the issues raised by complainants.

FOLLOW UP and LEARNING

Compliance monitoring is vital to determine whether the mechanism is in line with the principles defined, and assesses the level of effectiveness and efficiency of the complaint mechanism.

It is a constant process of proper reviews and amendments and offers an opportunity to discover deficiencies in a timely manner and correct them accordingly.

Reports provide valuable information for feedback reports to the organisation's management, communities and other stakeholders.

UPP will log and monitor all serious complaints and results of such complaints and this information will be brought, regularly, to the attention of appropriate of all staff in order that we learn from what we do and how we do it.

This information will not necessarily be available to the public.

**Approved by the Executive Director
Novella Mori**

On the 3rd January 2018.