

# **NFWI Complaints Policy**

#### 1. Introduction

If possible, complaints should be resolved informally. This may involve those involved in the complaint sitting down together, talking through the issue and reaching a resolution, or a neutral person guiding those involved in the complaint to reach a resolution.

Where a matter is unable to be resolved informally and a formal complaint is made, this policy should be followed. However, where a complaint is being made at WI or federation level, the complainant should first check whether the WI or federation have their own complaints policy. If they do, this should be followed in the first instance. WIs and federations are encouraged to frequently review their policies and are welcome to adopt this policy in full or in part. All complaints must be made as soon as possible in writing, either via email or letter.

Appendix A contains guidance on what information should be provided by the complainant before the complaints process begins.

Appendix B contains guidance on what information should be provided to the complainant when the complaints process ends.

Appendix C contains the NFWI Complaint Form. This is also available on request and from My WI.

## 2. Purpose of the policy

The purpose of this policy is to:

- Offer an avenue of redress.
- Ensure complaints are resolved.
- Identify procedures that can be put in place to reduce the risk of complaints from occurring again.
- Ensure support and information is provided where needed.

#### 3. NFWI commitments

The NFWI is committed to ensuring complaints are dealt with professionally, appropriately and in a timely manner. All complaints will be handled in accordance with the following standards:

- Complaints will be treated seriously and managed in a fair and transparent way.
- All those involved in a complaint will be treated with respect, in line with the organisation's values, at all times during the complaints process.



- Complaints will be responded to in a timely manner in accordance with this policy.
- Complaints will be kept confidential as far as possible and where this is not possible those involved will be notified.
- Complaints will be handled without discrimination or judgement and those received from members and non-members will be treated equally and with objectivity.
- Responsibility for the effective management of complaints rests at the level of the organisation most appropriate to the complaint (e.g. the WI, federation or NFWI).
- Please note, when a complaint is received at NFWI level, it will be assessed
  to determine whether the NFWI is the appropriate level to begin processing
  the complaint. If it is found that the complaint should sit at another level of the
  organisation i.e. either WI level or federation level, the complainant will be
  notified of this. This will be in line with this policy as outlined in sections 5.
  Complaints at WI level, 6. Complaints at federation level and 7. Complaints at
  NFWI level.
- Where a complaint is determined to be most appropriate at another level from NFWI, the complainant will be notified and directed to contact the relevant WI or federation. Very important: the complaint remains the responsibility of the complainant to lodge at the correct level. This means they pass the complaint on, not NFWI.
- Where a complaint is received on behalf of another person whether a member or a non-member, the person reporting the complaint will be directed to ask the person for whom they are communicating on behalf of to lodge the complaint directly. Exceptions to this apply if the person making the complaint on behalf of another is that person's carer. We would need proof that either the cared for person gives their permission for the complaint to be made on their behalf or that they lack the mental capacity to lodge a complaint directly. It remains the decision of NFWI whether to accept a complaint from a third party.
- Where a complaint is about an entire WI Committee or Federation Board of Trustees it will be escalated to the next level if appropriate. If this is not an appropriate route given the circumstances, the reason for this will be communicated and an alternative route for achieving a resolution set out.
- External regulatory bodies, such as the Charity Commission and the Information Commissioners Office, will be notified as appropriate depending on the nature of the complaint.

#### 4. Scope



This policy applies to any person wishing to make a complaint. This includes trustees at all levels of the organisation, WI members and non-WI members (members of the public). Where a second (or more) complaint(s) is received about the same concern, the second (and any subsequent) complainant(s) will be informed that there is an open complaint about the same issue. Their complaint(s) will be added to the open complaint and will be dealt with as one complaint. Exceptions to this only apply if the subsequent complaint(s) are made completely independently from the open complaint and the overlapping times are purely coincidental. The investigations may still be combined to avoid confusion and keep disruption to a minimum. It remains the decision of NFWI whether to open any new complaints or combine them.

We do not accept complaints that are broadly the same as a previous complaint from the same complainant. Exceptions may apply if the new complaint is about a fresh incident. NFWI decisions about whether to open a new complaint are final.

Any trustee, member or member of the public can submit a complaint within a 6 month period of the initial incident taking place. There is an understanding that an incident could have taken place before the 6 month timeframe which had an impact on a complaint being made within the timeframe. Therefore, this can be included within the complaint form.

5. NFWI and federation staff should follow their internal grievance policy in the first instance. For assistance with Human Resources (HR) related matters please contact the NFWI HR department: <a href="mailto:hr@nfwi.org.uk">hr@nfwi.org.uk</a> Complaints at WI Level

If you have a complaint about a WI, please send your complaint in writing to the WI secretary and you will receive an acknowledgement in writing within ten working days of receipt where possible.

Your complaint will be dealt with by the officers of the WI and you will receive a written response explaining the decision and outcome within eight weeks of receipt where possible.

If your complaint mentions an officer, they will not take part in the complaints process. If your complaint mentions all of the officers, your complaint should go straight to the federation following the below process.

If you would like to appeal the decision of the WI officers, please send your appeal in writing to the Federation secretary, within 28 days of receiving the WI's decision, following the process below. Your appeal should include all the requisite information, any previous decisions and your grounds for appeal. An appeal can only be made on



the grounds of new evidence that was not originally taken into account or concerns that the relevant complaints policy was not followed appropriately.

Please note where WIs have their own Complaints Policy, the timeframes stipulated in that policy will be applicable.

### 6. Complaints at federation level

If you have a complaint about a federation, or are appealing a complaint, please send your complaint in writing to the federation secretary and you will receive an acknowledgement in writing within ten working days of receipt where possible.

Your complaint will be dealt with by the officers of the federation and you will receive a written response explaining the decision and outcome within eight weeks of receipt where possible.

If your complaint mentions an officer(s), they will not take part in the complaints process. If your complaint mentions all of the officers, your complaint should go straight to the NFWI following the below process.

If you would like to appeal the decision of the federation officers, please send your appeal in writing, within 28 days of receiving the federation's decision,to the Membership Support Officer within the NFWI Membership and Engagement Team following the process below. Your appeal should include all the requisite information, any previous decisions and your grounds for appeal. An appeal can only be made on the grounds of new evidence that was not originally taken into account or concerns that the relevant complaints policy was not followed appropriately.

Please note where federations have their own Complaints Policy, the timeframes stipulated in that policy will be applicable.

#### 7. Complaints at NFWI level

If you have a complaint about the NFWI, or are appealing a complaint, please send your complaint to the Membership and Engagement Team, within 28 days of receiving the outcome of your complaint, using the NFWI Complaint Form and you will receive an acknowledgement in writing within ten working days of receipt where possible. If the NFWI are able to look into your complaint it will be dealt with by the Membership and Engagement Team in conjunction with the relevant department and you will receive a written response explaining the decision and outcome within eight weeks of receipt where possible.

Where appropriate the complaint will be formally investigated. Such an investigation will be supported by a relevant trustee or staff member. Where an investigation is undertaken then the response time is likely to be increased and you will be notified of the revised timescales when the complaint is acknowledged.



If you would like to appeal the decision of the Membership and Engagement Team, please send your appeal in writing to the NFWI CEO, within 28 days of receiving the Membership and Engagement Teams' decision. Your appeal should include all the requisite information, any previous decisions and your grounds for appeal. An appeal can only be made on the grounds of new evidence that was not originally taken into account or concerns that the NFWI complaints policy was not followed appropriately. The NFWI CEO will work on the appeal with the NFWI Board of Trustees where required. You will receive a written response explaining the decision and outcome within eight weeks of receipt where possible. The decision of the NFWI CEO is final.

If the NFWI are made aware of issues, they may choose to follow these up as a formal complaint even where this has not been specifically requested and the complainant will be contacted about this.

## 8. Sensitive complaints

If your complaint is of a sensitive nature, e.g. concerning the NFWI Inclusion Policy, safeguarding issues or whistleblowing, and you feel you are unable to complain following the usual process illustrated above, please direct your complaint to the NFWI Membership and Engagement Team following the process illustrated at section 7.

#### 9. Complaints by non-members

If you are not a member of the WI but have a complaint, please send your complaint directly to the NFWI in the first instance. Your complaint will follow the process illustrated at point 7.

#### 10. Investigations

Some complaints may require an investigation to be carried out at WI, federation or NFWI level. This may be because the complaint is complex, there are several people involved and/or you do not have the necessary information to reach a conclusion. The investigation should therefore help you source further information, obtain relevant evidence and talk to the relevant people about the complaint.

Before starting an investigation, get as much information as possible from the people you are already in contact with about the complaint. This will probably be the person who has made the complaint. This will help when speaking to other people about the complaint, including the person(s) the complaint is about, and sourcing further information/evidence.

It is also helpful to have an understanding of what the complainant wants from the process and to consider whether this is possible and what the alternatives could be. This is to ensure expectations are managed and there is a clear end goal for the process.



Please note, the complainant(s), witnesses and respondent(s) can all ask for a person to accompany them during interviews/conversations. The support person should be another WI member who is not involved with the complaint in any way. The support person is there for moral support, not to speak on the person's behalf, prompt them or take notes. The support person is bound by the same confidentiality as the person being interviewed/having a conversation.

Where the complainant, witness or respondent has care needs, they can ask for their carer to be their support person regardless of whether their carer is a WI member or not. This is a reasonable adjustment that may be accommodated.

Another reasonable adjustment which can be considered is if the complainant, witness or respondent has care needs which requires their support person to speak on their behalf, prompt them or take notes. For example, someone with who takes medication which affects their memory or concentration may need to be prompted.

If a reasonable adjustment is refused the WI/federation making this decision must provide, in writing, the rationale for the refusal. They must also suggest alternative measures to meet the person's needs.

Very important: meeting the care needs of a complainant, witness or respondent in the above way(s) does not mean all interviewees are then given the same reasonable adjustments. Reasonable adjustments are measures provided to meet specific needs, not blanket measures.

Where an investigation is required, this must be carried out and concluded, where possible, within eight weeks from the commencement date of the investigation.

The investigation must be documented in writing and should follow a structure, such as:

- The officers, or other person(s), who have dealt with the complaint decide the purpose of the investigation, what the investigation should cover, who will participate in the investigation and the possible outcomes.
- Those investigating the complaint plan the investigation, understand their roles, and ensure they are able to carry out the investigation appropriately.
- The person who has made the complaint is informed that an investigation is going to take place, the purpose of this, the person(s) who will be carrying out the investigation and the timescales.
- Those investigating the complaint carry out the investigation without undue delay, documenting each stage and asking for assistance from the federation/NFWI where necessary.
- The investigation is concluded within eight weeks unless further time is required (please see section 11 for more information on timeframes).



- The person(s) who have investigated the complaint reports their findings to the officers or other person(s) who are also dealing with the complaint.
- Based on the findings of the investigation, a final decision is made within two weeks where possible and the complainant is informed of the decision in writing.

If you have any questions or would like assistance with investigations, please contact the NFWI Membership and Engagement Team.

#### 11. Timeframes

The timeframes stipulated in this policy must be adhered to as far as possible. If the timeframes cannot be adhered to, the reasons for this must be communicated to the complainant and new timeframes set out. This includes if further time is required for an investigation.

Please note that during August and December some WIs do not meet and federation offices may be closed. Timeframes may therefore need to be adjusted.

As mentioned above, where WIs and federations have their own Complaints Policy, the timeframes stipulated in that policy will be applicable.

#### 12. Serious incident reporting

The Charity Commission requires charities to report serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to your charity's beneficiaries, staff, volunteers or others who come into contact with your charity through its work;
- loss of your charity's money or assets;
- damage to your charity's property; and/or
- harm to your charity's work or reputation.

Therefore, complaints that follow this policy and other incidents may need to be reported to the Charity Commission and the trustees are responsible for this.

Please see the <u>NFWI Serious Incident Reporting</u>: Guidance for federations and WIs for more information.

#### 13. Confidentiality and data protection

All complaints will be handled confidentially and in accordance with applicable data protection legislation. You have the right to contact the <u>Information Commissioner's Office</u> (ICO) about data protection matters. For more information about data protection, please contact <u>dataprotection@nfwi.org.uk</u>.



# 14. The Charity Commission and the Fundraising Regulator

If you are not satisfied with the outcome of your complaint, you have the right to complain to the <u>Charity Commission</u> and/or the <u>Fundraising Regulator</u>.

#### 15. Relevant documents

This policy should be read alongside:

- The NFWI Charter
- The NFWI Code of Conduct
- The NFWI Complaints Handling Guide
- The NFWI Equality, Diversity and Inclusion Policy

These documents can be found on My WI.

## 16. Updating this policy

This policy will be updated annually or as required. Any updates will be communicated to federations, who should cascade this information on to WIs. This policy was updated in November 2022. The following updates were made:

- 1. Introduction: A new first paragraph.
- 3. NFWI commitments: The need to assess which level of the organization a
  complaint sits at, who is responsible for lodging complaints and dealing with
  complaints from a third party has been added. More detail has been given in
  the circumstances of a complaint being about an entire WI Committee or
  Federation Board of Trustees.
- 4. Scope: More detail has been added, including dealing with multiple complaints about the same matter and repeat complaints from the same person.
- 5. Complaints at WI level. A timeframe of 28 days for receiving a request for an appeal has been added.
- 6. Complaints at federation level. As above.
- 7. Complaints at NFWI level: As above and the title of General Secretary has been updated to NFWI CEO, and clarity has been given regarding who makes the final decision in an appeal.
- 10. Investigations: More information has been added regarding why an investigation maybe needed and some guidance on preparing for an investigation. Clarification regarding who can accompany a claimant, witness and respondent in an interview has been given,
- 15. Relevant documents: This is a new section with a list of relevant NFWI documents to be read alongside the Complaints policy.
- 17. Contact us: The contact phone number has been amended.



 Appendix C: NFWI Complaint Form: The contact phone number has been amended.

#### 17. Contact us

If you would like to contact us about this policy, please email <a href="mailto:complaints@nfwi.org.uk">complaints@nfwi.org.uk</a>, call 0207 371 9300 or write to us at NFWI, Membership and Engagement Team, 104 New Kings Road, London, SW6 4LY.

Version	Date created	Last review date	Next review date	Document author
1	November	N/A	March 2021	Central Secretariat
2	2015	March 2021	March 2022	Membership and
3		March 2022	March 2024	Engagement Team
4		March 2024	March 2025	

# Appendix A: Information to be provided by the complainant before the complaints process begins

When making a complaint, the complainant must include the following information:

- Whether they are a member of the WI or not. If they are, their WI and federation.
- The nature of the complaint e.g. breach of the Constitution, discrimination, bullving
- A summary of the complaint including relevant dates and events in chronological order.
- Any supporting documentation that is relevant to the complaint.
- The outcome they would like from the process.



• Whether they have contacted their WI/federation, the NFWI or the Charity Commission about the complaint.

Please note if the complainant is complaining to the NFWI, they must use the NFWI Complaint Form.

# Appendix B: Information to be provided to the complainant when the complaints process ends

When communicating the outcome and decision of the complaint, the complainant must receive the following information:

- The issues that have been looked into.
- Whether an investigation took place and, if so, the reason for this, who carried out the investigation and the outcome.
- The decisions on the issues and overall outcome.
- Any necessary action points and next steps.
- Who has looked into the complaint and who the findings have been communicated to.

# **Appendix C: NFWI Complaint Form**

WIs and federations are welcome to adopt a similar form should they wish to and can use the NFWI form as a template.

# **NFWI Complaint Form**

If you would like to submit a complaint to the NFWI in accordance with the NFWI Complaints Policy, please complete the below form and return it to the Membership and Engagement Team using the contact details below. Please ensure you also include any relevant supporting documentation. This form is also available on request and on My WI.

1.	Name:
2.	Please tell us the best way to contact you e.g. postal address, email address, telephone number:
	•
3.	If you are a member of the WI, please tell us your WI and federation:



- 4. Please tell us the nature of the complaint e.g. breach of the Constitution, discrimination, bullying:
- 5. Please tell us about the key elements of the complaint using bullet points:

•

- 6. If you know the outcome you would like from the complaints process, please tell us what this is:
- 7. Please tell us whether you have complained to a WI or federation about this matter and if so what the outcome was:
- 8. Please tell us whether you have spoken to the Charity Commission about this complaint:

If you would like to contact us about this form, please email <a href="mailto:complaints@nfwi.org.uk">complaints@nfwi.org.uk</a>, call 0207 371 9300 or write to us at NFWI, Membership and Engagement Team, 104 New Kings Road, London, SW6 4LY.

Version	Date created	Last review	Next review	Document author
		date	date	
1	March 2021	N/A	March 2022	Membership and
2		March 2022	March 2024	Engagement Team
3		March 2024	March 2026	