



## Donor and General Public Complaint Policy

### I. RATIONALE FOR POLICY

Children Believe (CB) strives to uphold the highest standards of excellence and integrity. In pursuit of our mission, we are committed to providing our stakeholders – members, program beneficiaries, funders and donors, child sponsors, partner organizations, collaborating organizations, the general public and any other individuals with a vested interest in the organization – with a high level of service as we carry out our mission. We recognize that from time to time there may be concerns and complaints about our work or our people. When we make a mistake, we want and need to be informed. We value and welcome comments, suggestions and complaints from stakeholders with respect to their interactions with the organization. We will use the information to endeavor to correct things, help us become more effective and improve our services and operations.

This policy and related processes enable CB to meet the requirements for compliance with the Imagine Canada Standards Program, the leading accreditation for charitable and not-for-profit organizations in Canada, building organizational credibility and donor confidence. This policy also supports the requirements of Accountable Now's 11th Accountability Commitment on responsive decision-making. Members of ChildFund Alliance are encouraged to meet Accountability Now Commitments.

### II. POLICY OBJECTIVE

This policy aims to ensure all stakeholders have safe avenues to communicate with Children Believe to register a concern or complaint and that complaints from stakeholders are heard, recorded and resolved effectively and professionally. The policy sets out the principles and minimum standards for addressing stakeholder complaints.

### III. POLICY SCOPE

This policy applies to:

- All persons working for Children Believe, including but not limited to employees, volunteers, Board members, interns and consultants;
- Partner organizations and their representatives who are responsible for implementing programs or projects on behalf of Children Believe.

This policy applies to **any types of complaints** from **stakeholders, relating to an action for which CB is responsible or is within its sphere of influence**. This includes complaints about sensitive matters

(sexual exploitation and abuse, child safeguarding, etc.) and non-sensitive matters (programs, communications, fundraising, sponsorship programs, operations, services, staff, volunteers and partner organizations, etc.); complaints about direct actions of Children Believe or indirect actions through organizational partners or third-party providers working on behalf of CB.

The principles and minimum standards apply to all complaints, whether from internal or external stakeholders. The complaints channels and processes for internal stakeholders – employees, volunteers or Board members about the actions of other staff or volunteers – are addressed in the Complaints and Conflict Resolution Policy for workplace-related grievances and the Whistleblower Policy.

#### IV. POLICY DETAILS

This policy outlines the principles and minimum standards for stakeholder complaints irrespective of the nature of the complaint. Other organizational policies and procedures that have reporting / complaints management requirements must adhere to these principles and meet the minimum standards herein.

##### 1. Definitions

1.1. A **complaint** is an expression of dissatisfaction about the service, actions, or lack of action by CB as an organization, or by a staff or volunteer acting on behalf of the organization.

Complaints may come from anyone who interacts with CB, be it the general public, donors, sponsors, program beneficiaries, partners, funders or others. It is a criticism that implicitly or explicitly expects a response or that is legally required.

1.2. Complaints can be about any of the following issues (not an exhaustive list):

- Exploitation or abuse of children, vulnerable adults or any other person.
- Misuse of funds or fraud (including terrorism financing).
- Misconduct (including sexual exploitation, abuse and harassment) by an individual involved in the work of Children Believe, including employees, volunteers and contractors of CB, partner organizations or other stakeholders, or by an individual unrelated to CB's work.
- Concern from someone with whom we work about the quality of program delivery.
- Concern from a member of the public or supporter about a particular fundraising approach or campaign.
- Concern about CB's failure to protect the privacy of individuals and the confidentiality of their information.

1.3. A complaint is **not**:

- A general query or feedback about CB'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 a CB's 'service' e.g. a newsletter or email

- 1.4. A “**Complainant**” is the person or entity who has made a complaint or requested someone else to make a complaint on their behalf. A Complainant can be any supporter, partner organization, community or individual with whom we work or any member of the public whether an individual, company or other entity in countries where we work.

## 2. Principles

- 2.1. **Accountability.** CB holds itself fully accountable for all actions, programs and staff behaviour related to our organization. We are committed to providing safe channels for stakeholders who feel we may have failed in upholding the high standards we hold ourselves accountable to as an organization. We value the opportunity to be able to restore confidence in us and for us to learn from mistakes. CB will clarify the scope of issues CB is able to address and those that it is not able to address.
- 2.2. **Accessibility.** CB commits to making this policy easily accessible to the public, our staff and representatives, our partners and in communities where we work. We will ensure the communities we serve are aware of the complaints mechanisms established for their use. Complainants should be able to make a complaint through various channels suitable to their circumstances, as we are committed to making communication with us as easy as possible. We will consult with communities and people we serve on the design and implementation of complaints processes.
- 2.3. **Responsiveness.** CB commits to acknowledge and resolve complaints within a reasonable timeframe. In the event that a complaint cannot be resolved within the timeframe indicated in the acknowledgement of the complaint, the complainant will be informed about the progress made to date and when they can expect the complaint to be resolved. We will assess and prioritize complaints in accordance with the urgency and /or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security, the response will be immediate and escalated appropriately.
- 2.4. **Confidentiality.** We will protect the identity of people making complaints where this is practical and appropriate. We respect the needs of complainants who wish to remain anonymous. Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws and any relevant confidentiality obligations. Confidentiality also applies to any sensitive verbal or written information recorded in the course of the complaint handling process. Survivors of sexual exploitation and abuse (SEA) have the right to be de-identified in our records of the complaint.
- 2.5. **People-centered approach:** The interests of participants/beneficiaries, partners and other stakeholders are foremost in our approach to complaints handling. We are committed to ensuring that the most disadvantaged and vulnerable people can exercise their right to file a complaint. We will take into account cultural and gender sensitivities to ensure complaints are handled appropriately.
- 2.6. **Child and survivor-centered approach:** We commit to a complaints mechanism which is accessible to children and survivors of SEA by ensuring all complaints are handled confidentially and by responding sensitively to the needs and wishes of the survivors. CB also commits to providing any survivor of SEA with appropriate referral to local organizations

equipped to handle the immediate and longer-term needs of the survivors, regardless of whether the complaint falls within the scope of this policy. All such complaints will be handled by trained, designated staff in accordance with our *Child Safeguarding and Prevention of Sexual Exploitation and Abuse* policies.

- 2.7. **Mutual respect:** We are committed to being accessible and responsive to all people who approach us with complaints. At the same time, our success depends on our ability to do our work and perform our functions in the most effective and efficient way possible, the health, safety and security of our staff and our ability to allocate our resources fairly across any complaints we receive.

Vexatious or frivolous complaints can detract our resources and may significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

- 2.8. **Objectivity:** We will address each complaint with integrity and in an equitable, objective and unbiased manner. We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being implicated. Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision-maker.

- 2.9. **No retaliation:** Under no circumstances shall any member of CB discriminate or retaliate against any persons filing a complaint under the provisions of this policy.

### 3. Working with partner organizations

- 3.1. Partner organizations that do not have their own complaints policy fall under the scope of CB's complaints policy.
- 3.2. Partner organizations that have their own complaints policy are required to ensure the principles and commitments in this policy are applied in any management of complaints which may be related to CB. Any complaint that falls within the scope of this policy can be made to CB directly, regardless of the scope of our partners' policies.
- 3.3. Partners are required to ensure all stakeholders can make complaints related to CB-funded programs in a safe and confidential manner, suitable for the community they live in, and that complaints are handled in line with this and other related policies.
- 3.4. CB ensures this policy and related procedures are shared and discussed with partners at the time of establishing a partnership, during the inception phase of a project and regularly throughout the duration of the partnership. It is the responsibility of CB offices to ensure that the information is clear and easily accessible to partners.
- 3.5. Partners are an integral part in the implementation of this policy and related procedures in communities where they work, and it is the responsibility of partners to ensure awareness of existing complaints mechanisms in those communities.
- 3.6. Where a complaint involves multiple organizations, we will work with the other organization/s where possible, to ensure that communication with the complainant and/or their representative

is clear and coordinated. Subject to the seriousness of the complaint, as well as privacy and confidentiality considerations, communication and information sharing between the parties will also be organized in a sensitive manner to facilitate a timely response to the complaint.

#### 4. Where and how complaints from external stakeholders can be made

- 4.1. Complaints can be made verbally in person, by telephone or in writing by post, email, via a Suggestions & Complaints Box or on our website or other any other safe and confidential channels established by our offices in the communities we work. Complaints may be made by a friend or advocate of the complainant on their behalf.
- 4.2. Where the above complaints mechanisms cannot be accessed or do not meet the needs of the communities we work with, CB will work with those communities to identify and establish mechanisms and processes that are accessible, effective, confidential and safe.
- 4.3. CB's complaints channels include:

Website: <https://childrenbelieve.ca/speak-up/>

Email: [speakup@childrenbelieve.ca](mailto:speakup@childrenbelieve.ca)

Mail: 1200 Denison St., Markham ON

Phone: 1-800-263-5437

In person: If the complaint cannot be made by phone, email, post or online, it may be made directly to a CB staff member.

Outside Canada: In countries where CB implements programs, complaints can be made through various channels, including, but not limited to:

- In person to the Country Directors.
- Via our website at <https://childrenbelieve.ca/speak-up/>
- Verbally by phone to the country office.
- Submitted by mail to the country office.
- In writing via a Suggestions & Complaints box available at the country office.
- Any other such channels established by the country office to meet the needs of their communities.

- 4.4. The process and channels for complaints from internal stakeholders (staff, volunteers, contractors, interns) are outlined in the *Complaints and Conflict Resolution HR Policy* and the *Whistleblower Policy*.

#### 5. Complaints management

##### 5.1. Receipt & acknowledgement

- CB will appoint designated person(s) to triage and monitor the status of all complaints received through its complaint channels.
- Complaints should be acknowledged within a maximum five (5) working days from their receipt, wherever possible.

- Complaint handling will be assigned to the department or individual best positioned to resolve that complaint, usually the person who has the primary relationship with the complainant and has the specific knowledge that is needed to resolve the complaint.
- Complainants will be notified of the person assigned to manage their complaint.

### **5.2. Assess and investigate**

- Subject to their nature, each complaint will be handled in accordance with the provisions of this policy and any other relevant policies listed in Section VIII herein as well as any local laws and regulations. Complaints related to specific issues that are addressed in other policies (such as child safeguarding, sexual exploitation and abuse, fraud, terrorism, privacy, ethical fundraising, harassment) will be handled by designated and trained staff.
- CB will work to resolve the complaint in a timely fashion.
- Complainants will be kept informed of the status of their complaint and the timeframe for action.
- Where a complaint cannot be easily resolved, it will be escalated to the next line of supervision.
- CB will handle all complaint information sensitively, telling only those who need to know and following any relevant privacy, confidentiality and data protection requirements.

### **5.3. Resolution and appeal**

- Once a complaint is considered resolved, the complainant shall be informed accordingly.
- Complainants will be provided clear and understandable reasons for decisions related to their complaints.
- If a complaint isn't addressed satisfactorily to the complainant or cannot be resolved for whatever reason, the complainant will be advised of their options to escalate their concern to a more senior staff person.

### **5.4. Record retention**

- All complaints received must be recorded and retained in accordance with our Records Retention policy. Information about the complaint must include at a minimum the date and description of the complaint, who handled it, what was done to resolve the complaint, the timeframe for resolving the complaint and a description of the resolution.

### **5.5. Reporting requirements**

- The CB Executive Leadership Team (ELT) will receive timely reports about unresolved or significant issues and complaints received.
- On an annual basis, the Executive Champion of this policy must submit a complaints report to the Board of Directors. The report shall include – at a minimum – the number of complaints in the reporting period, the type and nature of the complaints received and the status of the complaints.

## **6. Exemptions to this policy**

### **6.1. There may be rare occasions when the CB may not respond to a complaint. These include:**

- When a complaint is about something CB has no direct connection to or something we are responsible for.

- When someone unreasonably pursues a complaint that we have already responded to. They will be given escalation points, but we may choose not to reply again and will always inform them of our decision to do this.
- When a complainant is being obviously abusive, prejudiced or offensive in their manner.
- When a complainant is harassing a staff member.
- When a complaint is illegible.
- When a complaint has clearly been sent to us and numerous other organizations as part of a bulk mailing or email.
- CB will not respond to complaints made anonymously. However, we will investigate the concern and use the information to improve in any way that we can.

## V. POLICY AUTHORITY AND OFFICERS

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|---------------------------------------|----------------------------------|
| a. Authority to approve this policy:  | <b>Board of Directors</b>        |
| b. Executive champion of this policy: | <b>Chief Executive Officer</b>   |
| c. Authority to develop procedures:   | <b>Chief Executive Officer</b>   |
| d. Authority to approve procedures:   | <b>Executive Leadership Team</b> |

## VI. IMPLEMENTATION, MONITORING, COMPLIANCE AND REPORTING

The Executive Champion is responsible for the implementation of this policy including its publication, communication, training and change management, development and implementation of the related policy procedures, forms and guidelines as well as cascading the policy to Country Offices (where applicable).

The Approval Authority identified in Section V(a) is ultimately responsible for compliance with this policy.

The Executive Champion will report on compliance with this policy to the policy Approval Authority on a quarterly basis.

## VII. POLICY REVIEW

This policy and related procedures must undergo an in-depth review every **5 (five) years** from the approval date, but it may be reviewed at any time as needed.

The Executive Champion will initiate and lead the policy or procedure review process and will provide updates to the Approval Authority on the progress and key dates.

## VIII. RELATED DOCUMENTS

The following documents support the application of this policy:

- Anti-fraud and corruption policy
- Anti-terrorism, money laundering and political partisan activity policy
- Child safeguarding policy
- Complaints and Conflict Resolution HR policy
- Ethical fundraising and donor accountability policy
- Prevention of sexual exploitation and abuse policy

## Stakeholder Complaints Policy

- Privacy policy
- Records retention policy
- Whistleblower policy
- Workplace anti-violence, harassment and sexual harassment policy

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### DEFINITIONS

**Executive Leadership Team (ELT):** The most senior level of staff leadership within Children Believe comprised of the Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Marketing and Development Officer (CMDO), Chief International Programs Officer (CIPO) and Vice-President, People & Culture (VP-P&C). The CEO may alter the composition of the ELT as required from time to time. One person may hold more than one position.

**Executive Champion:** A member of the ELT with overall responsibility for an assigned policy, including: drafting, carrying out appropriate consultations / assessment, evaluating implications of the policy, including risks and costs and seeking legal advice where necessary, developing and carrying out the communication, change management and implementation plan, writing any related procedures, standards or guidelines, monitoring compliance through regular reviews of the policy as well providing oversight to cascading the policy to Country Offices.

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### POLICY HISTORY

Date	Type of review	Comments
March 2, 2016	Policy development and approval: Donor and General Public Complaint Policy	Approved by the ELT. Author Hilda Wood. Effective Date March 2, 2016.
Dec 6, 2021	Major review with significant revisions	Changes to policy's purpose, scope and details. The policy has been deemed a governance policy and was approved by the Board of Directors.