



**THE SUSTAINABLE
FIBRE ALLIANCE**

Complaints and Disputes Resolution Procedure

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1. INTRODUCTION AND OBJECTIVE

The SFA defines a complaint as any expression of dissatisfaction, whether justified or not, that relates to the SFA and requires a formal response.

A complaint can be made about any aspect of the SFA's work, internationally, including the work of our projects, project partners, staff members, contractors or volunteers.

Complaints may come from any individual, volunteer or organisation that has a legitimate interest in the SFA, including the general public if something is perceived to be improper.

This policy does not typically cover complaints by SFA staff regarding issues at work, who should instead refer to the SFA's disciplinary and grievance policies.

It should be kept in mind that, whilst this policy provides guidance, it is not meant to supplement good judgment.

1.1 Purpose

All those who work for and represent the SFA in any capacity must adhere to the SFA's Code of Conduct and Good Practice and we are committed to providing an honest and quality service.

The SFA works in an open and accountable way that builds the trust and respect of all of our stakeholders.

In the unfortunate situation that an individual or organisation feels that the SFA has not met the high standards we set for ourselves or your expectations, this policy is publicly in place to help guide in making a complaint and outlines how the SFA will handle this and respond.

This policy also intends to ensure that any complaints made are handled fairly, consistently, in a timely manner and, where possible, resolved to the satisfaction of the complainant, with good relationships being maintained and/or repaired.

The SFA values and takes all complaints seriously.

1.2 Monitoring and learning from complaints

As well as a chance to resolve and put things right, the SFA views any complaints made as an opportunity to learn and improve our systems for the future.

The SFA will internally review logged complaints annually to identify any trends that may indicate a need to take further action.

2. THE SFA'S APPROACH TO RESOLVING COMPLAINTS

The SFA encourages feedback and seeks to investigate complaints in a fair (without bias or discrimination) and balanced manner, resolving concerns efficiently and effectively.

A key principle of this procedure is to work with all parties to resolve complaints at the lowest and least formal levels, with the escalation to formal complaint investigation by the SFA being the option of last resort.

Complaints specifically regarding a member of the SFA

Stakeholders with concerns about a member's adherence to the SFA's requirements (e.g. a cashmere processor, etc.) should contact the member and seek to resolve the matter with them directly either through dialogue or by making use of the member's own complaints mechanisms before contacting the SFA.

Where complaints cannot be resolved directly with the member, stakeholders are encouraged to contact the SFA's Standards & Compliance Manager in the first instance to highlight their concern. This should be done by email – info@sustainablefibre.org.

The Standards & Compliance Manager will treat such approaches in the strictest of confidence and will seek to understand the nature of the complaint and outline the options available to seek resolution.

Informal complaint

The SFA recognises that many concerns will be raised informally and dealt with swiftly and suitably.

In the first instance, if appropriate, the complainant should make their informal complaint directly to the SFA staff member, contractor, project partner, member or representative that they have been dealing with. This is so that they have a chance to put things right personally and hopefully the situation will be informally resolved, agreeably.

2.1 Procedure: Stage 1

Formal complaint

An informal approach is appropriate and effective when it can be achieved. However, if concerns cannot be satisfactorily resolved informally, then the formal complaints procedure should be followed.

To submit a formal complaint, the complainant must make their complaint in writing, via email. Any complaints made verbally to any of our staff or representatives will need to be recorded in writing so that they can be formally investigated.

Written complaints should be emailed to the SFA's Standards & Compliance Manager at info@sustainablefibre.org.

In their submission, the complainant should include:

- In their own words, their reason for making the complaint, providing a clear description of their experience with all documented evidence available to support the complaint
- What outcome they would like to see
- The individual(s) their complaint relates to
- If this is their first complaint regarding this matter or if it relates to a previous case
- Their own relationship with the SFA and their appropriate contact details

The complainant can expect for their submission to be acknowledged within 5 working days of receipt.

The complaint information should be recorded in the complaints logbook and passed on to the Chief Executive Officer, who will take on the investigation of the complaint themselves, or delegate an appropriate individual to investigate and to take appropriate action.

If a complaint relates to a specific person they should be informed, where possible, and given a fair opportunity to respond.

An update should be sent to the complainant by the individual chosen to handle the complaint within 5 working days of being delegated the task. The update should identify who is dealing with the complaint and when the complainant should expect a reply. A copy of this complaints policy should be attached.

Complaints will be investigated thoroughly and fairly by the SFA to establish the facts of the case. This includes reviewing all relevant evidence and might include speaking to any individuals complained about as well as the complainant and any third parties involved. The appropriate individual chosen to investigate should also determine the admissibility of the complaint.

The SFA will seek to respond to complainants with a definitive reply of the investigation within 30 days of their initial submission of a formal complaint.

If this is not reasonably possible (because, for example, an investigation has not been fully completed at that date) a progress report should be sent to the complainant, stating how the complaint is being addressed, and should include an indication of when a full response will be given.

Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation and any action taken or improvements made to the SFA's systems as a result of the complaint.

2.2 Procedure: Stage 2

Where a complainant feels that a problem has not been satisfactorily resolved with the outcome of the investigation into their complaint, they may lodge a formal request to appeal to the SFA's Board.

The SFA's Board is responsible for hearing and deciding on appeals and their decision is final.

Appeal process and timings

1) Appeals must be submitted to the SFA's Board Chair within 60 days of receipt of the notification of the respective decision. Submissions should clearly refer to the previous case and state that a formal appeal is being lodged, explain the nature of the appeal and include all documented evidence to support the appeal.

2) The Board Chair will acknowledge receipt of the appeal within 10 working days.

3) The Board Chair will notify the SFA's Board and forward to the Board members all information received from the complainant within 14 working days of acknowledging receipt.

4) The SFA's Board will undertake the assessment of the submitted information within 30 working days of receipt. They may investigate the facts of the case themselves or delegate a suitably senior person to do so. This may involve reviewing the paperwork of the case and, where possible, speaking with the individual who dealt with the original complaint at Stage 1.

Where possible, the person who dealt with the original complaint at Stage 1 should be kept informed of what's happening. As a result of the Board's investigation, they shall determine whether to uphold or overturn the decision and will inform the Board Chair.

5) Upon receipt of the final decision, the Board Chair will contact the complainant within 14 working days to inform them of this decision.

External appeal

The SFA is a UK registered charity. Therefore, if the complainant is still not happy with the decision once all of the SFA's procedures have been exhausted, then they may escalate as appropriate to the UK's Charity Commission.

Variation of the complaints procedure

The Board may choose to vary the procedure if they are able to agree and provide a good and considered reason for doing so. This may be necessary to avoid a conflict of interest.

3. DATA PROTECTION AND PROVISIONS

All complaint information will be handled sensitively, and confidentially where required, and will be processed in accordance with data protection principles as set out in the Data Protection Act 2018.

3.1 Responsibility

Overall responsibility for this policy and its implementation lies with the SFA's trustees, who empower and expect the Senior Management Team (SMT) internally and in working with those externally to implement the policy and report back to the SFA's trustees on any emerging issues.

3.2 Confidentiality

Although it is helpful and encouraged in order to better facilitate proper handling and investigation, a complainant raising a concern is not required to disclose their identity if they wish to remain anonymous and they may use a code name to facilitate further communications.

Where complainants raising a confidential concern identify themselves, their identity will not be further disclosed to persons assessing the concern without the complainant's consent.

While it should generally be possible for the SFA to undertake a preliminary assessment of the admissibility of a confidential concern, the assessment of the merit of the concern under the formal complaints resolution process is likely to be hindered or incomplete if it's raised in this way.

If concerns are raised confidentially, the SFA will make every effort to keep the identity of those raising the concerns confidential, and will only proceed to investigate the concern as a formal complaint under the SFA's complaints policy procedure if the person raising the concern agrees to the matter being disclosed. This doesn't apply if the SFA believes there is a legal or regulatory obligation to disclose the concern.

Where possible, members of staff or representatives should be informed if a complaint has been made about them or actions for which they were responsible; organisations have a duty of care to staff complained about as well as to complainants. The SFA should ensure members of staff have an opportunity to respond to the allegations made.

3.3 Timings

The SFA aim to resolve all complaints as quickly as possible. However, inevitably some issues will be more complex and therefore may require longer to be fully and properly investigated. Consequently, all timescales outlined in this document regarding handling and responding to complaints are

indicative. If a matter requires a more detailed investigation, an interim response will be sent to the complainant, describing what is being done to deal with the complaint and when a full response can be expected.

3.4 Review and availability

The SFA will ensure that this complaints policy is made publicly available and the SFA's Board will annually review the complaints policy and procedure. Additionally, this policy may be updated to reflect any identified need for change that arises through its operation.