



1. IMPACD CIC will always apply the following principles:

- 1.1 Complaints will be treated seriously
- 1.2 We will respond promptly
- 1.3 We will treat people fairly and listen to both sides of the story
- 1.4 We will stay neutral, or when there is a conflict of interest, we will engage an impartial arbiter or panel
- 1.5 We will keep parties to the complaint informed in a timely manner
- 1.6 We will take all possible steps to keep matters confidential
- 1.7 We will be vigilant against victimisation
- 1.8 We will keep accurate records
- 1.9 We will make sure information is gathered and assessed in a proper manner
- 1.10 We will test decisions for bias or personal views
- 1.11 All actions, including disciplinary action, will be relative to the breach

2. Complaint options and steps

2.1 IMPACD CIC's actions are guided by its Ethos, Aims and Code of Conduct, its Equality, Diversity and Inclusion Policy, its Safeguarding Policies, its Bullying & Harassment Policy and its Disciplinary/ Grievance Policies. If the complaint includes any of these issues, this Complaints Procedure should be considered alongside the relevant policy, in order to inform options/ procedures for dealing with complaints.

2.2 Attempts will be made to deal with less serious complaints informally at the level they occur when that is appropriate.

2.3 When the circumstances of a complaint require a more formal process, the Complaints Assessment Procedure should be utilised by the relevant director, which will include consideration of whether there is a conflict of interest.

2.4 In the case of a very serious complaint, such as suspicion of harm against a vulnerable person, the complaint will be escalated to consideration by an appropriate external agency.



3. Escalating a complaint

3.1 Escalating a complaint to an external agency is appropriate when:

3.1.1 There is a possible conflict of interest (or close relationship) between the people on the management committee and any of the parties to the complaint

3.1.2 It is beyond the skills of the committee and specific expertise or experience may be required to manage the complaint

3.1.3 The complaint has not been able to be resolved informally and the Complaints Assessment Procedure states an impartial arbiter/ panel should be instructed

3.1.4 It becomes clear that the issue is more serious than initially thought

3.1.5 The person complaining contacts an external authority (e.g. an anti-discrimination agency) at any stage in a complaint process

4. Complaint Handling Process

4.1 Minor complaints can be handled informally between the person making the complaint and:

4.1.1 the supervising employee/ agent at the time a verbal complaint is made;

4.1.2 the project director or the governance director, whether directly contacted by the complainant or having the matter referred to them by the supervising employee/ agent

4.2 More serious complaints will be referred to an impartial arbiter/ panel by management to help find a resolution

4.3 All complaints, whether managed informally or formally must be referred to the governance director to record the complaints and to carry out an Evaluation of Learning Opportunity

4.4 The governance director is responsible for providing/ facilitating support for the person making the complaint, giving information on the process and offering solutions

4.5 The governance director will investigate the complaint when there is no conflict of interest or will refer the matter to an impartial arbiter/ panel if there is a risk of conflict of interest or it becomes clear that the matter is serious



5. Initial management of complaint

5.1 If an initial complaint is made to a project worker they should refer that complaint to the supervising employee/ agent on-hand at the time at the end of the session or when there is a safe and opportune moment to do so

5.2 The supervising employee/ agent to whom the complaint has been referred, or to whom a complaint is made directly by the complainant, has authority to agree a course of action if:

5.2.1 the course of action is agreeable to the complainant;

5.2.2 no third party is detrimented by the course of action;

5.2.3 it does not attribute blame or hold IMPACD CIC responsible for reparations to be made

5.3 A referral must be made to the project director or governance director either by the supervising employee/ agent or the complainant directly if the complainant's expressed desired course of action involves:

5.3.1 potential detriment to a third party;

5.3.2 an attribution of blame or reparations to be made by IMPACD CIC;

5.3.3 no expression of a course of action that is agreeable to them;

5.3.4 their expressed desire for the complaint to be further considered.

5.4 Upon the need for a referral to be made directly to the project director or governance director by the complainant, the complainant shall be referred to the relevant link on the website or supported in making the referral by way of that link by any available project worker or by the supervising employee/ agent if the complaint relates to the project worker on hand, depending on the wishes of the complainant.

5.5 If the complainant is a vulnerable person, the project worker or supervising employee/ agent shall make contact with the project director or governance director by direct telephone call or WhatsApp group available for emergencies to bring their swift attention to the complaint.

5.6 If the complaint relates to the project worker or the supervising employee/ agent the opposite number shall ensure the complainant is referred to the project director or governance director by the appropriate link in the website.

5.7 The project worker or supervising employee/ agent in listening to a complaint should take every step to be impartial and not take sides in the complaint process, whether for or against the complainant. This can be easier said than done and they should be aware of the language used and making statements that can be interpreted as taking sides. Should it become apparent that impartiality is too difficult to achieve, the complainant must be referred to the project director or governance director by the appropriate link in the website.

5.8 if the Complaint is dealt with without the need to refer it to the project director/ governance director, the supervising employee/ agent, should complete a Concluded Informal Complaint Summary and send it by email to the project director.



6. Meeting with the parties

6.1 Whether the complaint is dealt with informally or more formally in-house or by escalating a complaint to an impartial arbiter/ panel, IMPACD CIC will also apply the following principles:

6.1.1 All parties in a dispute will be treated with respect.

6.1.2 By understanding that listening, not talking, skills are the most important.

6.1.3 By understanding calmness, neutrality and respect are key attributes when managing complaints.

6.2 Upon receiving a complaint by the appropriate link on the website, the relevant director will:

6.2.1 make contact with the complainant by the communications method provided within two working days (Monday to Friday);

6.2.2 discuss the complainant's desired outcome;

6.2.3 discuss and offer resolution if appropriate to do so;

6.2.4 explain the complaints procedure and what to expect from it if resolution is not agreed;

6.2.5 discuss potential support that the complainant might need going forward;

6.2.6 arrange for a further discussion at a future agreed date, allowing for their initial assessment of the matter, either in-person or by Zoom/ Teams or WhatsApp video call

6.3 The relevant director will then apply the company's Complaints Assessment Procedure to the facts already ascertained

6.3 The complainant will have the right to have a person attend the Further Discussion meeting, whether in-person or remotely

6.4 The relevant director will provide, in writing, a summary of the complaint, the resolution or the ongoing process after the Further Discussion, whether the matter has been resolved, will be assessed further in-house or will be referred to an impartial arbiter/ panel

7. Third party advisors/ representatives

7.1 Nothing in this Complaints Procedure prevents the complainant from contacting an external authority (e.g. an anti-discrimination agency) for advice or representation at any stage in this complaints process and all steps will be taken by IMPACD CIC to accommodate communications with such a nominated third party advisor/ representative upon being informed by the complainant of their involvement