

COMOS POLICY FOR REDRESSAL OF GRIEVANCE

Version:/...../2018

Proposed by:

Approved by:

1. PURPOSE:

COMOS believes that having a well-managed mechanism for handling internal/external complaints can improve the quality of its work, enhance the trust and confidence of members/stakeholders, identify areas of work that need to be improved, and ensure that COMOS learns from the feedback provided through this process. COMOS therefore welcomes feedback and will react constructively to complaints from the people it works with: its supporters, donors, the general public, official bodies and its partners.

The Complaints Handling Policy links to the principles of ICOMOS and will ensure feedback, transparency and learning which will strengthen COMOS accountability as an organisation. This Complaints Handling Policy complies with COMOS International's Complaints and Response Mechanism Framework Policy and Procedure with appropriate tailoring to meet local Indian needs.

2. APPLICABILITY & SCOPE:

- This policy applies to everyone in the company regardless of position or status.
- This policy also applies to contractors, and consultants; office-based volunteers, interns and partner organisations.
- A complaint may be made by a person to whom COMOS delivers programs or support including a partner, a local organisation with which we work, a national government or other NGOs, as well as members , supporters, donors, the government, and trusts and foundations.
- COMOS will receive and respond to all complaints irrespective of who makes them or the nature or subject of the complaint. Some complaints are of a more minor nature, can be more easily and promptly resolved and pose minimal risk to COMOS, India. Minor complaints that are readily resolved will not follow all the procedures outlined in the Complaints Handling Procedures of this Policy as to do so would be unnecessarily cumbersome, bureaucratic and compromise their timely resolution. More minor complaints might include a telephone complaint that can be responded to in an initial call, a written complaint that proceeds on the basis of a misconception that can readily be corrected.

- Complaints of a more complex and significant nature that require acknowledgement, initial assessment and investigation and may require remedial action (e.g. a change to the way in which we operate, train, counsel or discipline staff or volunteers or even the involvement of regulatory/enforcement authorities) will be undertaken in line with the Complaints Handling Procedures of this Policy. Serious complaints – those that pose significant operational, safety, financial or reputational risk to COMOS, India will be immediately escalated to Secretary and by the Secretary, depending on the seriousness of the complaint, to the President and potentially the Ex Com. If it is established that a complaint has been made maliciously, in bad faith or without serious intent then a response will be made to the complainant explaining why their complaint is not being taken further.

3. DEFINITIONS:

For the purpose of this Policy, COMOS defines a complaint as:

“an external grievance made against COMOS or against one or more of its members, employees, consultants, suppliers, partners or anyone else acting on its behalf, where the organisation has allegedly failed to meet a requirement. That commitment might be related to use of resources, mission and values, member(s) /staff conduct or behaviour, or a legal requirement.”

4. PRINCIPLES:

The following principles will guide COMOS in the handling of complaints and ensure that as a signatory to the ICOMOS Code of Conduct we comply with the standards relating to complaints handling as follows:

1. We recognize the importance and value of listening and responding to concerns and complaints.
2. The feedback and complaints handling process is as effective, safe, confidential and accessible to all members/stakeholders as possible, irrespective of their gender, status or background and without prejudice to their future participation.
3. **Visibility:** Information about the process for making a complaint will be clear and well publicized to members, supporters, rights holders participating in programs, and other stakeholders.

4. **Accessibility:** The complaints handling process is easily accessible to all members/ stakeholders. There is readily accessible information about the process of making and resolving complaints so that no complainants are disadvantaged. COMOS will ensure that flexibility is provided to complainants to call, write and e-mail complaints and/or to raise concerns in person.
5. **Objectivity:** All complaints are addressed in a fair and equitable, objective and unbiased manner throughout the complaints handling process. Issues of conflict of interest will be identified to ensure objectivity.
6. **Confidentiality:** Confidentiality relating to the complaint will be safeguarded so far as reasonably practicable including the person(s) to whom the complaint is addressed.
7. **People-centred approach:** COMOS has a people-centred approach and actively welcomes feedback including complaints and has a commitment to acting to resolve all complaints •
8. **Responsiveness:** All complaints and constructive feedback will be taken seriously and handled as swiftly as practicable. All complainants will be treated courteously and kept updated on the progress of their complaint through the complaints-handling process.
9. **Accountability:** Accountability for handling complaints and reporting on the actions and decisions of COMOS with respect to complaints handling will be clearly established. All complaints will be recorded through one central point before action is taken. Complaints will be addressed as locally as possible using the agreed complaints procedure and only escalated to management if they are of a serious nature.
10. **Continuous improvement:** COMOS is committed to the continual improvement of the complaints handling process and the quality of COMOS work. This commitment is practically supported by: the collection and classification of complaints trends; analysis and reporting of complaints trends; monitoring of complaints handling processes; and auditing/management reviews of the complaints handling process and refining of complaints handling in light of those reviews.
11. **Organisational commitment to this policy:** COMOS will ensure that sufficient resources and expertise are provided to handle complaints. Staff will be briefed on

the nature and purpose of the policy and senior managers dealing with the complaints will be given coaching in handling complaints. Complaints will be handled in accordance with COMOS policies and procedures and in accordance with Indian laws and regulations. .

5. Standards COMOS handling of complaints will meet the following minimum standards:

1. All complaints will be acknowledged as soon as possible and ideally within five working days by the recipient. All complainants will have access to the policy on the COMOS website.
2. All complainants will receive a response giving the outcome of their complaint as soon as possible and ideally within thirty working days of receipt. If the matter is more complex a further acknowledgement will be sent explaining what further investigation is required to resolve the complaint and the likely timeframe.
3. All complaints should be recorded on a Complaints Record Form (Appendix 1).
4. All complainants will be treated respectfully, whether it is felt the complaint is justified or not.

6. Complaints Handling Procedures:

This Policy will be implemented using the following procedures:

- 1. Raising Complaints with COMOS:** All COMOS' members/stakeholders must be clear that COMOS India welcomes complaints and constructive feedback and need to know how to raise a complaint with the organisation. COMOS Complaints Handling Policy, specifically highlighting the following central points for all complaints, is publicized on COMOS website.
 - Complaints about any aspect of COMOS and its work should be sent to the e-mail address: info@icomosindia.com;
 - Postal complaints can also be sent to the Secretary or President or the members of Ex Com. at COMOS official address: 623A, Somdutt Chamber 2, Bhikaji Cama Place, New Delhi 110066

COMOS President in consultation with other Ex. Com members has delegated responsibility to initiate and coordinate the complaint response to the Secretary. This person in his/her capacity as the Focal Point for all complaints made against COMOS or its members will maintain appropriate confidentiality and ensure that only the parties relevant to solving the complaint are involved. The person handling the complaint will ensure that the central contact for all complaints is informed and that the Complaint Record Form (Appendix 1) is completed.

2. **Receiving Verbal and Written Complaints:** The complainant must be treated with respect at all times. It is important that the person receiving a complaint face to-face clarifies the issues underlying the complaint, listens to what the complainant has to say and makes a brief and accurate written summary of the complaint. Where necessary, language interpreters may be required to help establish the nature of the complaint. If the complaint is in writing it might be appropriate to write or speak to the complainant to clarify the facts of the case.
3. **Acknowledging Complaints:** Complainants, who are not anonymous, will receive an acknowledgement of their complaint to confirm that it has been received and an outline of the next steps.
4. **Registering Complaints:** All complaints, whether verbal or written, are recorded on the Complaints Record Form at **Appendix 1**.

Each complaint will also be recorded on the log form at **Appendix 2** which will form the basis for review at the end of each year. All complaints will be recorded and logged. These records will be used to ensure complaints are dealt with efficiently and effectively and to monitor any trends. It will provide information on the number and types of complaints COMOS is receiving.

5. **Resolving Complaints (Investigation and Action):** Each complaint will be investigated. The person handling the complaint will:
 - establish the facts and gather the relevant information; and
 - if necessary and/or practicable, interview those involved.

If, as a result of the investigation it is felt that there is a case to answer by the member then the matter would be referred to the President for the appropriate disciplinary and other organizational policies and procedures will be followed. Any relevant applicable laws of land should also be followed and taken into account.

6. Responding to the Complainant:

Complainants, who are not anonymous, will receive a response outlining the outcome of the complaint or, if it is a complex matter, when it will be investigated further and how long it is likely to take. COMOS will let the complainant know the outcome which may include:

- corrective action which has been taken;
- timeline for implementation; and/or
- the person/role addressing the issue.

Wherever possible COMOS will invite the complainant to outline suggestions for actions the organization can take to ensure similar complaints do not arise in future.

7. Appeals Process:

If a complainant is unhappy about the response received from COMOS or if they believe the corrective action has not been adequately implemented they may appeal to the next level.

For example:

- if the complaint is unresolved by Secretary then the complainant may appeal to the President;
- if the complaint is about COMOS governance, then the complainant may appeal to the Ex-Com. members.

If the complainant continues to be dissatisfied with the outcome, after all avenues have been explored to resolve the complaint, a letter will be sent to the complainant explaining the steps/actions that have been taken, outlining any changes that have been put in place as a result of the complaint and bringing the matter to a close.

The Role of the Ex-Com in COMOS complaints and response mechanism needs to be transparent and independent. COMOS Ex Com. has an important role to play in overseeing the number and nature of complaints received by COMOS and ensuring that they have been handled satisfactorily, that appropriate corrective action has been implemented and that trends are identified and addressed. The Secretary, in consultation with the President or other Ex-Com. members, will complete the Complaints Handling Log and any supporting analysis for submission to the governing body of COMOS.

8. Monitoring and Review of Policy and Procedure:

The Secretary is primarily accountable to the President and Ex- Com for managing and maintaining this policy. All members of the Ex- Com are accountable for ensuring that members/staff understand and adhere to this policy in their day-today work. Where compliance issues are surfaced, Ex-Com members will work to address these issues promptly. Any updates/revisions to the policy must be endorsed by the Secretary and President before being submitted to the Ex-Com_ for its approval. As part of the annual participatory review and reflection process COMOS members will reflect on the learning from the complaints process.

Appendix 1

COMPLAINTS RECORD FORM

All complaints about COMOS or any of its people from an external individual or organisation, whether verbal or written, are to be recorded on this form. COMOS Ex-Com has delegated responsibility to initiate and coordinate the complaint response to the Secretary. This information will then be logged in so that all complaints and follow-up actions can be accurately tracked and reported.

Date: <i>(Date complaint is received)</i>	
Personal Details: <i>(name, contact details, if appropriate)</i>	
Nature of Complaint: <i>(Brief outline of the complaint)</i>	
Detail of Complaint: <i>(A detailed description of the complaint the person has made)</i>	
Dealing Official: <i>(Name of person who is or has responded to the complaint)</i>	
Action initiated: <i>(Action taken to handle the complaint)</i>	
Outcome: <i>(Outline of what has happened as a result of the complaint)</i>	
Follow up required: <i>(Any action required as a result of the complaint. This may include a change to COMOS procedures and policies)</i>	

Appendix 2

COMPLAINTS HANDLING LOG

The Head of Fundraising will extract complaints logged, summarizing those documented on Complaints Record Forms for the period. This Log will be provided to the President and then to the members of Ex-Com as part of the Management Report. This completed log will be accompanied by any analysis that may highlight a need to review/improve/change organisational processes or practices.

The log should indicate, at a minimum:

- Date the complaint was received ;
- Nature and detail of complaint;
- Who responded to complaint;
- How the complaint was resolved/dealt with;
- Outcome ;
- Any follow-up required, such as escalation or change to program or policy