



Complaints Management Procedure

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PRO048 - Complaints Management Procedure

I. Key principles

HQAI welcomes all complaints that are within the scope of its complaints policy and procedure. The principles that underpin the complaints system of HQAI and what these mean for HQAI is described below.

1. **Transparency:** communication between parties to a complaint shall be open and honest, unless information must be limited for confidentiality, privacy, safety or other reasons.
2. **Impartiality:** any person handling a complaint shall treat the complaint on its merits and any actual or perceived conflicts of interest must be declared. They shall make decisions based on objectivity rather than bias or prejudice. The complaints handling process and governance should be able to demonstrate that it is independent from the parties involved in the complaint.
3. **Confidentiality:** identifying information relating to the complaint should only be made available to people who need to know, and those people should be cognizant of any risks related to the sharing of information. Systems shall be in place to ensure all privacy requirements when collecting and using information.
4. **Fairness:** proceedings shall be fair to all parties to the complaint. In particular, cost considerations shall not be a deterrent for founded complaints.
5. **Safety and Well-being:** ensuring the safety and well-being of parties involved in the complaint shall be a priority and this will guide how HQAI deals with the complaint.
6. **Timeliness:** HQAI will endeavour to resolve complaints within a reasonable timeframe and will communicate promptly with those involved in the complaint about timeframes and progress.
7. **Accessibility:** information about HQAI's complaints policy and procedure, how to file complaints shall be made available to stakeholders, as far as possible, taking into account cultural attributes and language requirements.
8. **Efficiency and Proportionality:** whilst ensuring these principles are upheld, HQAI will efficiently apply methods that are appropriate to the complexity and sensitivity of each complaint.
9. **Appeals:** it is possible to appeal against decisions made relating to a complaint to an independent body which has not been involved in the original decision.

II. References

ISO/IEC 17065 - Conformity Assessment Requirements for bodies certifying products, processes and services (2012)
HQAI GOV001 - Articles of Association
HQAI PRO114 - Third-party quality assurance procedure
HQAI POL048 - Complaint management policy
HQAI PRO050 - Advisory and complaint board

III. Scope

This procedure applies to all complaints that are lodged with HQAI. To be within the scope of this procedure, complaints must be filed by external stakeholders about the behaviour or conduct of HQAI staff, contracted personnel (including auditors), interns, volunteers and members of HQAI governance bodies. The procedure includes how HQAI deals with complaints that it receives that are out of scope, including internal grievances and Third-party Observations of Interest (TPOI) (see chapter 3).

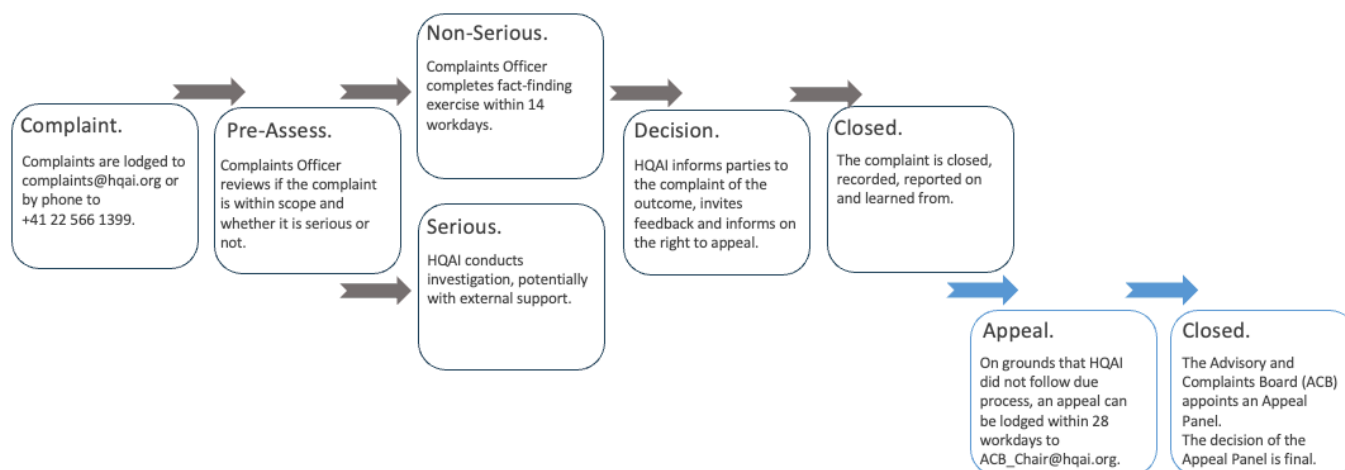
IV. Definitions

For the purpose of this procedure the following definitions of key terms will apply.

- Complaint:** A report about a perceived or real issue raised by an individual, group, organisation or community. A complaint is negative inasmuch as it reports a level of dissatisfaction, discontent or concern with the conduct or behaviour of HQAI staff, contracted personnel (including auditors), interns, volunteers and members of HQAI governance bodies.
- Complainant:** The individual, group, organisation or community lodging the complaint.
- Complaints Officer/Handler:** The staff member of HQAI appointed to manage the complaint. This could be a HQAI staff member with duties related to managing complaints within their Job Description.
- Subject of Complaint:** The individual/s who the complainant alleges has behaved in a way that the complainant feels is unsatisfactory. There could be multiple subjects of a complaint.
- Appellant:** An individual, group, organisation or community who lodges an appeal of the complaint decision.
- Feedback:** A report to HQAI from an individual, group, organisation or community that is complimentary, positive, neutral or negative about the organisation, its people or processes but the source of the feedback has not formalised the feedback as a complaint.
- Stakeholders:** In the context of this procedure, stakeholders include any individual, group, organisation or community that HQAI has directly or indirectly engaged with.
- Serious Complaint:** A complaint about the conduct or behaviour of HQAI staff, contracted personnel (including auditors), interns, volunteers and members of HQAI governance bodies that represents a significant deviation from the expectations of HQAI. As a guide, serious complaints would include conduct or behaviour involving alleged or actual 'Acts of Misconduct' as described in the HQAI Code of Conduct. HQAI can apply its discretion to treat other misconduct as a serious complaint.
- Non-serious Complaint:** A complaint about the conduct or behaviour of HQAI staff, contracted personnel (including auditors), interns, volunteers and members of HQAI governance bodies that is not defined as a serious complaint.
- Third Party Observation of Interest (TPOI):**
A complaint from an individual, group, organisation or community about the work of an organisation audited by HQAI or personnel of the organisation. It is of interest to HQAI because it might be deemed sufficiently relevant to be considered indirectly as part of the audit process.

Flowchart

The following chart summarises the complaint process described in detail in this procedure. The flowchart is simplified, hence incomplete, and serves to illustrate the overall process.



1. Accessibility to the Complaints Mechanism

In order to ensure that the complaints mechanism is known and as accessible as possible to all stakeholders, the Complaints Officer will:

- Provide training on the complaints policy and procedure for all new staff, contractors, interns, volunteers and governance bodies of HQAI and provide regular refresher trainings.
- Provide staff, contractors, interns and volunteers of HQAI with the tools they need to inform stakeholders of the complaints procedure of HQAI. These could include cards in multiple languages, QR codes, guidance for meetings etc.
- Have in place measures to check whether HQAI staff and auditors are informing stakeholders about the complaints process of HQAI.
- Ensure that the ability of HQAI to receive confidential complaints through the HQAI website, email and other mechanisms (such as WhatsApp platform) remain functional. Functional channels include *a minima* the following:
 - By E-mail to complaints@hqai.org
 - By E-mail for appeals to complaint decisions to ACB_Chair@hqai.org
 - By phone to +41 22 566 1399
 - Access to policies and procedures on www.hqai.org
- Ensure that at least one complaints channel allows for complainants to remain anonymous.
- Establish and maintain relationships with collective complaints handling processes through which complaints about HQAI can be confidentially channelled.

HQAI management is responsible for ensuring that there are processes in place which help to promote stakeholder confidence in the complaints management process. These measures include:

- Regularly reviewing, seeking feedback about, reporting on and improving the complaints system.
- Ensuring there are processes in place to make information about the complaints management system available to stakeholders, their concerns with the system are addressed, and publicly reporting on complaints received by HQAI.
- Supporting and holding to account personnel who have a role to play in the application or administration of the complaints management system.

2. Receiving Complaints

a) Role of Complaints Officer

The Complaints Officer will be the first point of contact for complaints and will usually be the designated Complaint Handler. If the Complaints Officer is unavailable, a party to the complaint or a conflict of interest exists, the Executive Director should designate an alternative Complaint Handler (also see section 13.).

In order for the Complaints Handler to be able to receive complaints that could involve sexual exploitation, abuse and harassment, HQAI must ensure that they are trained (including refresher training) and demonstrably competent to appropriately handle serious complaints. This includes having skills in, and understanding of:

- The principles of confidentiality and safety of complainants/survivors,
- How HQAI manages serious complaints
- How to receive in-person complaints, including how to be sensitive to complainants, how to handle any distress the complainants may be experiencing
- Where to refer complainants for appropriate services
- How to properly document, and gather evidence about, the complaint so that their actions do not interfere with a subsequent appeal and/or a criminal case
- Child-friendly communication techniques
- Laws and regulations relating to child protection¹

For each complaint which is within scope, the Complaints Officer shall create a record of the complaint and assign a unique identifier. To ensure consistency, the Complaints Officer shall ensure that the complainant understands their responsibility to provide the following information. This information will be used to create the complaints record within the HQAI Management Information System which will be added to through the fact-finding process, learning and closure stages. Initial information to be recorded includes:

- Source of complaint (e.g., email, phone etc.)
- Name of complainant and contact details or whether complaint is anonymous
- Preferred mode of communication of complainant
- Name and contact details of person making the complaint on behalf of the complainant (if applicable)
- Name (or other information about) of person(s) the complaint is about (subject of complaint)
- Details about the complaint or concern (including what happened, where and when, who was involved)
- The outcome(s) the complainant is seeking
- Any relevant support documentation as attachments.

b) Acknowledging Complaints

The Complaints Officer will ensure that the complainant receives an acknowledgement from HQAI indicating that their complaint has been received and the next steps within 24 hours of HQAI receiving the complaint or as soon as is practicable. The acknowledgement can be an automated generic response.

c) First Response to a Complaint

The Complaints Officer will triage each complaint and determine whether the complaint is:

- Within scope.
- Serious or non-serious.

¹ Adapted from *Guidelines Inter-Agency Community-Based Complaints Mechanisms Protection against Sexual Exploitation and Abuse*. International Organisation for Migration, April 2016, p. 56-58.

- A Third-Party Observation of Interest (TPOI) (and thus out of scope)
- An internal grievance (and thus out of scope)
- Of another nature.

d) Receiving Anonymous Complaints

Whilst accepting anonymous complaints, HQAI recognises that there are limitations to the extent to which HQAI can respond to and investigate an anonymous complaint including providing feedback to the complainant

3. Responding to Out-of-Scope Complaints

Out of scope complaints will fall into one of the following three categories:

- Third Party Observations of Interest (TPOI)
- Internal Grievances
- Other out of scope complaints

Out of scope complaints shall not be dealt with under the complaints management policy and procedure. For details of how HQAI deals with Third-Party Observations of Interest (TPOI) and Internal Grievances refer to the respective processes.

In acknowledging the 'complaint', the Complaints Officer is responsible to make stakeholders lodging an out-of-scope complaint aware that their concern will be dealt with as per either the TPOI process or the internal grievance process and not as a complaint.

If the Complaints Officer deems that a complaint is neither a TPOI nor an internal grievance and is out of scope of the complaints management process of HQAI, they shall, as far as possible, advise the complainant of appropriate agencies that they can direct their complaint to. The Complaints Officer will record the referral outcome in the Complaints Summary Record and close the complaint.

4. Frivolous, Malicious and Vexatious Complaints

HQAI is not obliged to consider complaints that it has assessed as frivolous, malicious or vexatious.

Frivolous complaint: a complaint about a minor or trivial matter than can more appropriately be dealt with through another channel such as a discussion. It includes complaints about matters that have already been resolved.

Malicious complaint: a complaint that is motivated by dishonest intent or with the intent to cause harm to another person. These include complaints that convey threats or intimidation.

Vexatious complaint: a complaint that is intended to disrupt or has the effect of disrupting or clogging up the complaints handling process. These include complaints that are unreasonably escalated (e.g., appealed without presentation of new information) or are lodged multiple times through the same or related systems.

The Complaints Officer is responsible for determining if a complaint is frivolous, malicious or vexatious, recording evidence of this determination and advising the complainant of the determination. Note that the Complaints Officer can seek support from the Executive Director and make this determination at any time in the complaints handling process and this may not be evident when the complaint is first received.

Complainants do not have a right to appeal to HQAI about a determination that the complaint is frivolous, malicious or vexatious.

HQAI reserves the right to pursue legal action or seek payment reflecting actual costs incurred by HQAI from individuals or organisations found to have lodged a frivolous, malicious or vexatious complaint.

5. Fact-Finding Process for Non-Serious Complaints

The following procedure shall apply if:

- The complaint has been determined as non-serious by the Complaints Officer
- The Complaints Officer or Executive Director are not a party to the complaint and have not declared a conflict of interest relating to the complaint (see Clause 7 below)

The fact-finding process will be led by the Complaints Officer who will seek, analyse and record information using the Fact-Finding and Investigation Process template (ADM072) that helps HQAI determine:

- Expectations of the parties to the complaint
- Whether the complaint is justified
- Appropriate measures to resolve the complaint
- Actions for learning and improvement.

As well as collecting information, the Complaints Officer needs to provide certain information to the parties to the complaint. The process might also include corroborating evidence and information provided by both or either party.

a) Sharing Information

The Complaints Officer shall inform the parties to the complaint about the HQAI complaints management process (including the complaints appeal process) and provide HQAI's complaints policy and procedure to the parties to the complaint.

The Complaints Officer will respect privacy and confidentiality and will only share information that is required with people on a need-to-know basis. To help determine what information others need to know, the Complaints Officer will consider:

- Their role in the organisation and how the complaint impacts on their ability to do their job
- The safety and well-being of the complainant
- The ramifications for the subject of the complaint (including considering the complaint could be unfounded)

b) Information gathering

If necessary and as part of information gathering the Complaints Officer will meet with the complainant(s) and subject(s) of complaint separately. The purpose of the meetings is to help the Complaints Officer:

- Understand the type of outcome that the parties to the complaint expect as a result of the complaints process
- Preferred modes and language of communication of the parties to the complaint
- Understand what happened and how this impacted on the complainant
- Identify points of agreement and disagreement between the parties to the complaint
- Identify who was involved and present during the times that relevant events took place

c) Corroborating Information

If there are discrepancies in the accounts of the parties to the complaint, whenever feasible, the Complaints Officer should seek ways to broaden and substantiate information that they have received. This can include

consulting with witnesses, reading documents, watching or listening to recordings etc. The Complaints Officer will be mindful that the absence of a means to corroborate pieces of information does not mean the event didn't happen.

d) Supporting the Parties to the Complaint

Recognising that making a complaint and being the subject of a complaint can be an emotional and stressful experience, the Complaints Officer should:

- Encourage the parties to the complaint to access support and counselling if they need it
- Make clear that their role is not to provide supports or counselling to either party
- Communicate with the parties to the complaint in ways that are empathic, non-judgemental and cognizant of the stress that they may be experiencing.

e) Timeframes

The Complaints Officer should complete the fact-finding process within 14 workdays of the complaint being received by HQAI, or within an appropriate timeframe commensurate with the nature and complexity of the complaint. For complex cases or if there are delays in gathering information (due to availability of people, technical problems etc) it might not be possible to complete the process within these timeframes. In these instances, the Complaints Officer should keep the parties to the complaint and the Executive Director informed of revised timeframes.

The decision of HQAI should be communicated to the complainant and subject of complaint as soon as possible after the decision is approved.

f) Recording and Reporting Findings

The Complaints Officer is required to record their findings within the complaints record for each complaint according to the complaint Fact-Finding and Investigation Process template (ADM072). The Complaints Officer could also complete the Complaints Process Checklist (ADM073) as a means of ensuring that the procedure has been correctly followed. They should submit the complaints fact-finding record with the necessary information and supporting documents to the Executive Director for review and approval or otherwise.

6. Investigating Serious Complaints

The process for investigating serious complaints is identical to the process described above for non-serious complaints apart from the following.

The Complaints Officer shall advise the Executive Director immediately of a complaint that includes or implies an allegation of, or actual case of, a serious nature. The Executive Director is responsible for appointing an investigator to undertake the investigation of the serious complaint. The investigator could be from within HQAI or external to HQAI but must be able to demonstrate that they are appropriately qualified and experienced.

a) Timeframes

The Complaints Officer should establish the timeframes for completion of the investigation with the investigator, keeping in mind the need to gather the information needed to make informed determinations as well as not allowing the process to stretch on unnecessarily. The Complaints Officer should advise the parties to the complaint of the timeframes and keep them, and the Executive Director, informed of revised timeframes.

b) Recording and Reporting Investigation Findings

The Complaints Officer is required to ensure that the investigator is aware of and follows the reporting requirements of HQAI. At a minimum the report of the investigator should provide sufficient information to the Complaints Officer to record findings within the complaints record for each complaint according to the Complaint Fact-Finding and Investigation Process template (ADM072).

7. If the Complainant is a Child

HQAI recognises that children (that is, people under the age of 18) can make a complaint to HQAI and that dealing with complaints from children requires a modified approach. When receiving and dealing with a complaint from a child the Complaints Officer will consider engaging experts to support complex cases involving children as complainants.

8. If the Complaints Officer or Executive Director are parties to the Complaint

There could be instances when the Complaints Officer and/or the Executive Director are parties to the complaint, or a conflict of interest has been identified. If the Complaints Officer or the Executive Director are a party to the complaint, they cannot fulfil their role as described in these procedures. If the Complaints Officer is a party to the complaint, the Executive Director is responsible for appointing an alternative Complaints Handler to manage the complaint. If the Executive Director is a party to the complaint, the Chair of the Advisory and Complaints Board (ACB) is responsible for appointing a suitable alternative HQAI staff member or member of the ACB to fulfil the oversight and approval role described in these procedures that the Executive Director would usually perform.

The Complaints Officer and Executive Director are required to declare any conflicts of interest relating to any complaint received by HQAI. The conflict of interest could be actual or perceived that would impact on their capacity to act without bias (or be seen to be able to act without bias) in relation to their role in the complaint management procedure. If a conflict of interest is declared, it is the responsibility of the Executive Director to appoint an alternative person to fulfil the function as described in these procedures. The alternative person could be external to HQAI but can be a member of the ACB (but not the Chair of the ACB).

If the alternative person appointed is a member of the ACB, they cannot also be part of the Complaints Appeals Panel that is convened if parties to the complaint lodge an appeal.

9. Outcome of Complaints Process

Each complaint could have one of the following outcomes:

- Complaint processed, appropriate actions taken and communicated - Closed nil further action
- Complaint processed, appropriate actions taken and communicated - Pending appeal to ACB
- Withdrawn

The Complaints Officer will submit their findings and recommendation to the Executive Director for review and approval. After the investigation and outcome has been approved and documented, the Complaints Officer will:

- inform the complainant and subject of complaint, including the basis for the decision, and they will explain the process for appealing the decision

- seek feedback about how satisfied the parties to the complaint with how the complaint was handled and the outcome
- follow-up and consult with the complainant/s about any concerns

a) Withdrawal of the Complaint

The complainant could choose to withdraw their complaint prior to the completion of the investigation. This decision must be conveyed to HQAI in writing by the complainant(s). In the event that the complaint is withdrawn, the Complaints Officer shall:

- Seek to understand why the complaint is being withdrawn
- Explain to the complainant that the investigation will cease and that HQAI will not consider the complaint again
- Cease the investigation
- Advise the subject of the complaint of the decision of the complainant and that the case has been closed
- Advise the Executive Director of the decision of the complainant to withdraw the complaint.

b) Closure of the Complaint

The Executive Director is responsible for closing complaints within the HQAI complaints system. They will formally close a complaint after they are satisfied that the following tasks have been satisfactorily completed:

- The record of the complaint is complete and accurate in the complaint record and Complaints Summary Record.
- Learning and relevant improvement actions associated with the complaint in terms of how the complaint was handled and appropriate changes to other systems or processes have been identified and documented.
- All parties have been notified of the outcome of the complaint and their right to appeal.

10. Appealing a Complaints Decision

An intention to appeal a complaints decision must be received from the complainant(s) and/or subject(s) of complaint by HQAI Complaints Officer within 14 work days of the complaint decision being conveyed in writing to them.

a) Role of HQAI in Considering Appeals of Complaints Decisions

The Complaints Officer is responsible for informing complainants and subjects of complaint of their right to appeal and the process of appeal when a complaint is received and when they are informed of the determination of HQAI in regard to the complaint.

Parties to the complaint should advise HQAI about their intent to appeal the decision, usually through the Complaints Officer or Executive Director. In response, HQAI will advise the appellant that:

- They must submit their appeal to the Chair of the ACB within 28 workdays of the complaint decision being conveyed in writing to the appellant. The appellant of the Complaints Decision shall use the dedicated address ACB_Chair@hqai.org.
- The appeal must make clear the grounds for appeal, that is, how the process followed by HQAI in considering the complaint did not align with HQAI's Complaints Management policy and/or procedure.

The Executive Director is responsible for informing the Chair of the ACB about the intent of a party to a complaint to lodge an appeal as soon as they are made aware of that likelihood. Once the Chair of the ACB has received an appeal they shall request information pertaining to the complaint from the Executive Director which must include all relevant documented information and could also include a verbal briefing. The Executive Director shall provide information relating to the original determination of the complaint to the Chair of ACB within seven (7) workdays of receiving the request.

b) Role of ACB in Considering Appeals

The Chair of the ACB shall constitute a Complaint Appeal Panel consisting of a minimum of two and a maximum of three people. The panel members could be drawn from the ACB membership or outside of the ACB. No panel members shall have been involved in the consideration of the original complaint and panel members must declare any conflicts of interest. The conflict of interest could be any actual or perceived relationships that would impact on their capacity to act without bias (or be seen to be able to act without bias) in relation to their role in considering the appeal. In addition, Complaint Appeal Panel members must:

- Have participated in an induction process or briefing about the role of the ACB and HQAI
- Understand the HQAI Complaints Management Policy and Procedure.

The Complaint Appeal Panel should use the fact-finding/investigation procedures described above as guidance in as far as it applies to their role in determining whether HQAI followed the policies and procedures in considering the original complaint. In order to reach an evidence-informed decision the Complaint Appeal Panel can:

- Request HQAI, the appellant or other sources to provide more information
- Consult with witnesses or other informants who may or may not have been consulted as part of the original investigation

The Complaint Appeal Panel should make a final decision within 45 workdays of receipt of the appeal. For complex cases or if there are delays in gathering information (due to availability of people, technical problems etc) it might not be possible to complete the process within these timeframes. In these instances, the Complaint Appeal Panel should keep the parties to the complaint and the Executive Director informed of revised timeframes.

The Complaint Appeal Panel should compile an internal report of their findings which includes the following information:

- HQAI complaint reference number
- Name of appellant
- Date appeal was received and determined
- Summary of the complaint
- Summary of the stated grounds of appeal
- Summary of evidence considered
- Findings substantiating the outcome
- Outcome of appeal.

The documented outcome of the appeal should reflect whether the complaint appeal is upheld or rejected as well as any recommended improvement actions that the Complaints Appeal Panel feel would assist HQAI to improve their processes. The Panel should advise the appellant in writing of the outcome of the appeal as soon as possible after their decision is made.

11. Record Keeping

HQAI shall maintain and store confidential and complete records of each complaint it receives in a secure location with restricted access. Access shall be restricted to the Complaints Officer and the Executive Director, and the Complaints Appeal Panel in case of an appeal. Anyone accessing the complaints records of HQAI are required to have signed HQAI's Confidentiality Agreement and Code of Conduct and follow HQAI's data protection protocols and procedures. Unless compelled by law or other extenuating circumstances, they are not permitted to reveal any confidential information:

- Download, copy, or remove any file or information to another device
- Allow an unauthorised third party to access information or files.

The Complaints Officer is responsible for maintaining the Complaints Summary Record and ensuring it only includes de-identified information.

12. Reporting of Complaints

On a bi-annual basis the Executive Director shall report to the ACB Chair the status of all complaints as well as evidence of learning and continuous improvement related to analysis of complaints. The report shall contain de-identified information only. The purpose of the report is to provide the ACB with the information it needs so that it can:

- Be confident that HQAI is following its Complaints Management policy and procedures
- Identify any shortcomings and good practices relating to complaints handling
- Understand what learning is being generated as a result of complaints received
- Understand how systems and processes are being improved based on learning identified through review of complaints

The Executive Director shall ensure that an annual report of complaints received by HQAI and a summary of how they were dealt with using de-identified information is made publicly available on an annual basis.

13. Accountability, Learning and Improvement

HQAI recognises that complaints are a source of information that can assist the organisation to become aware of shortcomings and identify and implement actions that improve the quality of the services it delivers.

The Executive Director shall facilitate the review of the status of complaints in management review meetings to ensure that:

- Shortcomings and improvement actions in relation to how HQAI manages complaints are identified and implemented.
- Shortcomings and improvement actions in relation to other systems and processes based on analysis of complaints are identified and implemented.

Role of Complaints Officer

HQAI will develop a Terms of Reference describing the role of the Complaints Officer. The Complaints Officer role will sit within the existing role of another existing position within HQAI. HQAI shall ensure that the Complaints Officer role is adequately resourced, and the role is appropriately prioritised in terms of time allocation. The Complaints Officer will be responsible to the Executive Director in relation to their duties relating to the role of Complaints Officer which will constitute a portion of their overall responsibilities. They will report to their usual line manager in relation to their other duties.

There may be occasions when the Executive Director appoints a person other than the Complaints Officer to manage a complaint (including as backup function). In these circumstances the references to Complaints Officer shall apply to the complaints handler who need to be trained appropriately. For the purposes of this policy, the role of Complaints Officer is used to describe the role of the complaints handler.

