

**Review history**

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**Policy Lead:** Chief Marketing Officer

# UNICEF UK COMPLAINTS POLICY

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**11. WHAT TO REPORT – CHARITY COMMISSION GUIDANCE.....15****1. DOCUMENT DATE AND REVIEW SCHEDULE**

- 1.1 This policy was approved by the Board of Trustees in November 2019.
- 1.2 This policy will be reviewed every three years by the Board of Trustees at the next available meeting.
- 1.3 This policy will be reviewed between review dates and considered by the Audit and Risk Committee, with approval for any necessary changes sought from the Board of Trustees following:
- A relevant event or incident which highlights an issue or shortfall in our policy.
  - If revised guidance from the Charity Commission or the Fundraising Regulator is issued.

**2. RESPONSIBILITIES**

- 2.1 The responsibility for preparing, updating and securing approval of this policy from the Trustees is assigned to the Head of Supporter Care.
- 2.2 Operational compliance with this policy is the responsibility of all UNICEF UK employees.
- 2.3 Third-party fundraising agencies and partners are expected to adhere to this policy.
- 2.3 Any UNICEF UK employee informed of a complaint shall immediately inform the Supporter Care Team by emailing [complaints@unicef.org.uk](mailto:complaints@unicef.org.uk). The responsibility for the coordination of all Complaints, as well as the resolution of general fundraising Complaints rests with the Supporter Care Team, and the Head of Supporter Care. This policy does not include Safeguarding or UNICEF UK employee related complaints, which are to be dealt with via UNICEF UK's Child Safeguarding Policy, Adult Safeguarding Policy and/or relevant internal People Policy.
- 2.6 The responsibility for the coordination of Complaints notified by the Fundraising Regulator rests with the Head of Supporter Care and in cases where this is escalated, upheld, or identifies a breach of the Fundraising Code, the approval of any response rests with the Head of the appropriate team and the Chief Marketing Officer.
- 2.7 The responsibility for the resolution of non-fundraising Complaints often will be handled by Supporter Care, however in certain instances, complaint resolution will rest with the Director of the appropriate team, with support from Head of Supporter Care. Safeguarding concerns will be dealt with using the Child Safeguarding Policy or Adult Safeguarding Policy and UNICEF UK's employees with the relevant internal People Policy.
- 2.8 The responsibility for the assessment of whether a Complaint constitutes a safeguarding concern rests with the Safeguarding Team, with the support of Head of Supporter Care. All and any complaints that may constitute a safeguarding concern should be escalated to the safeguarding team as per our safeguarding escalation process and safeguarding case management system.

- 2.9 The responsibility for the resolution about a UNICEF UK employee complaint will be directed to the Director of People for assessment. If deemed required the Supporter Care Team may aid the resolution of this directly with the member of the public, if advised to do so.
- 2.10 The final responsibility for reporting 'serious incidents' resulting from Complaints to the Charity Commission rests with UNICEF UK's Board of Trustees in line with the Reporting Serious Incidents Policy. The operational responsibility for this rests with the Chief of Staff.

### 3. PURPOSE OF THIS DOCUMENT

- 3.1 This policy sets out UNICEF UK's position when receiving and responding to any complaint received, in relation to any aspect of UNICEF UK's public facing work or fundraising, with the exception of safeguarding complaints and issues, which fall under a separate process and policy.
- 3.2 This policy applies to ALL employees, agency worker, casual worker, contractor, trustee, volunteer and others contracted by and working on behalf of UNICEF UK.
- 3.3 This policy is not applicable for Complaints raised from individuals within UNICEF UK that relate to an internal aspect of UNICEF UK or its operations. In these instances, the relevant internal policy should be followed and found in the UNICEF Policy and Procedures Library<sup>1</sup>. UNICEF UK employees should refer to the Raising Concerns Map for ease of navigation.
- 3.5 Where the Complaint is subject to a serious incident, the Serious Incident Policy should be followed and reported to [seriousincidentgroup@unicef.org.uk](mailto:seriousincidentgroup@unicef.org.uk).
- 3.4 Where the Complaint is subject to an individual that is in a potentially vulnerable circumstance, the Complaint shall be viewed in connection with the guidance set out in the Vulnerable Circumstances Policy.
- 3.5 In the instance of a safeguarding concern, the Child or Adult Safeguarding Policy will take priority and all subsequent actions / decisions will be undertaken as per guidance set out in the Safeguarding Policies, not the Complaints Policy.

### 4. GUIDANCE AND REGULATORY CONTEXT

- 4.1 This Policy has been developed with due regard to the following guidance;
- 4.1.1 UK Charity Commission Guidance Complaints about charities<sup>2</sup>
- 4.1.2 UK Fundraising Regulator Code of Fundraising Practice<sup>3</sup>
- 4.1.3 UK Fundraising Regulator Complaints Process<sup>3</sup>
- 4.1.4 UK Fundraising Regulator Complaints Handling Guidance for Charities and Third Party Fundraising Organisations<sup>4</sup>

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<sup>1</sup> Unicef Policy and Procedures Library:

<https://unicefuk.sharepoint.com/sites/UUKGovernance/Policies%20%20Procedures/Forms/AllItems.aspx>

<sup>2</sup> <https://www.gov.uk/government/publications/complaints-about-charities/complaints-about-charities>

<sup>3</sup> <https://www.fundraisingregulator.org.uk/more-from-us/resources/complaints-process>

<sup>4</sup> <https://www.fundraisingregulator.org.uk/sites/default/files/2018-07/Complaints-handling-guidance.pdf>

## 5. DEFINITIONS

5.1 What is a Complaint? In line with guidance provided by the Fundraising Regulator, a Complaint may be generally defined as:

*“an expression of dissatisfaction, however **made**, about actions taken or a lack of action.”*

5.2 As this definition is broad, to ensure consistency in our handling of Complaints the Supporter Care Team will make an assessment, following the guidelines within this Complaints Policy, as to whether an inbound communication is to be handled as a Complaint or as feedback.

5.3 We define the individual who raises a Complaint at the ‘Complainant’

5.4 We define our Salesforce supporter relationship management database using the acronym ‘SRM’.

## 6. POLICY STATEMENTS

6.1 UNICEF UK is happy to receive Complaints from any source, and publishes information on how Complaints can easily be made on our website, <https://www.unicef.org.uk/legal/contact-supporter-care/> and within our Fundraising Promise, and other ‘contact us’ pages.

6.2 Where a Complaint is received directly to the Supporter Care Team, the Complaint must immediately be logged on SRM.

6.3 Where it is unclear whether a communication is feedback or a Complaint, the Supporter Care Team will make an assessment. This will assess the impact upon the Complainant, the impact on UNICEF, and any requests made by the Complainant. This assessment will determine whether the communication is treated as a Complaint or as feedback. In cases where it is not clear, it is generally best to err on the side of caution and treat it as a Complaint.

6.4 Where a Complaint is received by a team or function outside Supporter Care, then it must be directed to the Supporter Care Team, to [complaints@unicef.org.uk](mailto:complaints@unicef.org.uk) within 1 working day.

6.6 Where a Complaint relates to an aspect of fundraising within Public Engagement, Supporter Care take the lead on resolving that Complaint. To reach a resolution this may require discussion and support from appropriate colleagues in the relevant department.

6.7 Where a Complaint relates to an aspect of fundraising that falls outside the remit of the Public Engagement department, or relates to a UK Programme, Partnerships and Philanthropy or other aspect of Unicef UK’s work; the Complaint will be escalated to the appropriate point to provide a resolution, with oversight in Supporter Care.

6.8 Where a Complaint has been escalated to another team the Supporter Care Team retains responsibility for liaison with the Complainant and would normally communicate the resolution with the Complainant, with the exception of safeguarding concerns, for which the Safeguarding Team will communicate directly with the individual.

6.9 Where a Complaint relates to a UNICEF UK employee, this will be escalated to the Director of People, who will advise depending on the nature of the complaint whether the resolution will be handled by the People or the Supporter Care Team.

- 6.10 Where a Complaint resolution includes a telephone discussion with the Complainant, it is recommended that this call is made via the call centre software within the Supporter Care Team, so that a recording of the conversation at the permission of the individual can be retained. The Supporter Care Team can facilitate this, and permission to record the call must be requested at the start of the call

## 7. COMPLAINT TIMESCALES

- 7.1 All Complaints must be acknowledged to the complainant within one working day.
- 7.2 Where possible, Complaints should be fully resolved within five working days.
- 7.3 For complex Complaints where the full resolution will take longer than five working days, the Complainant should be informed, with an update on progress on resolution at regular intervals, until the complaint has been resolved.
- 7.4 For Complaints notified by the Fundraising Regulator or Charity Commission, resolution must be prioritised, with the aim of resolving within five working days.

## 8. ESCALATION PROCESS

- 8.1 Where the Complainant remains unhappy with the initial resolution response, the Complaint is to be escalated internally to the Head of Supporter Care, SLT or Executive team member for review and further resolution.
- 8.2 In cases of escalation, the Head of Supporter Care will coordinate the complaint, unless the Complaint is of a confidential nature that prevents this.
- 8.3 In all cases of escalation, the Complainant will also be provided with the contact details of the Fundraising Regulator and the Charity Commission should they wish to further escalate their concern outside of UNICEF UK.

## 9. THIRD PARTY AGENCIES

- 9.1 UNICEF UK requires agencies working on our behalf to uphold our Complaints policy, and this should be included as a contractual term.
- 9.2 Third party agencies will often have their own pre-existing Complaints policy. During the procurement for a new agency, their Complaints policy should be examined as part of the due diligence process, and steps taken to ensure that this is commensurate with Unicef UK's policy.
- 9.3 If the agency's policy is not commensurate with UNICEF UK's policy, or they do not have a policy, then the principles of UNICEF UK's policy should be included in any contract and terms of reference.
- 9.4 Before an agency or third party represents UNICEF UK, their approach to training supporter facing staff on Complaints handling and escalation should be reviewed by the staff member accountable for that contract, for adherence to this policy.
- 9.5 For Complaints received that relate to the actions of third party the Complaints the Supporter Care Team will take the lead on resolving that Complaint, with the support of appropriate colleagues in the relevant team.

## 10. COMPLAINTS VIA THE FUNDRAISING REGULATOR

10.1 There are two types of notifications from the Fundraising Regulator:

- Where the Complainant has approached the Fundraising Regulator directly and UNICEF UK has no prior knowledge of the Complaint – this is referred to as a ‘notification’. UNICEF UK will have the opportunity at this stage to respond to the Complainant directly.
- Where the Complainant is unhappy with the resolution of a Complaint by Unicef UK and 30 days has passed since it was first raised, at this point the Complainant can refer this onto the Fundraising Regulator for further action – this is referred to as an ‘escalation’. In these cases, the Fundraising Regulator is likely to open an initial investigation into the Complaint and follows their escalation process. If an investigation is conducted the full details of which will become publicly available on their website.

10.2 Any Complaint notification or escalation from the Fundraising Regulator should be acknowledged by the Supporter Care Team within one working day, either by phone or email.

10.3 When a Complaint notification is received from the Fundraising Regulator, the normal Complaints procedure should be followed, but with an additional step of notifying the Fundraising Regulator of the resolution details. The Head of Fundraising Quality and Compliance, and the Chief Marketing Officer should be notified.

10.4 When a Complaint escalation is received from the Fundraising Regulator, this should immediately be alerted to the Chief Marketing Officer, the Head of Media, the Head of Supporter Care, the Head of Fundraising Quality and Compliance, and members of the Senior Leadership Team and the Executive teams as appropriate.

10.5 During or subsequent to the efforts to resolve any Complaint involving the Fundraising Regulator, the Executive team will make appropriate decisions regarding the notification of the Complaint to the Audit and Risk Committee and the Board of Trustees. They will also evaluate whether the Complaint constitutes a Serious Incident that should be reported to the Charity Commission via the Chief of Staff.

10.6 The resolution of a Complaint escalated from the Fundraising Regulator should involve any relevant senior colleagues from across UNICEF UK and should be prioritised.

## **11. COMPLAINTS VIA THE CHARITY COMMISSION**

11.1 Should a Complaint be escalated via the Charity Commission, this should immediately be alerted to the Chief Marketing Officer and the Serious Incident Group ([seriousincidentgroup@unicef.org.uk](mailto:seriousincidentgroup@unicef.org.uk)), the Head of Media, the Head of Supporter Care and members of the Senior Leadership Team and the Executive teams as appropriate. During or subsequent to the efforts to resolve the Complaint, the Executive team will notify the Audit and Risk Committee and the Board of Trustees as appropriate.

11.2 The resolution of a Complaint escalated from the Charity Commission should involve relevant senior colleagues from across UNICEF UK and should be prioritised.

# APPENDIX 1 – APPLICATION OF POLICY

The UNICEF UK Complaints policy and procedure seeks to provide a clear framework as to how we respond to Complaints, to ensure that all Complaints received are:

- resolved quickly, efficiently and fairly.
- recorded consistently and submitted to the Fundraising Regulator in line with our regulatory commitment.

By resolving Complaints to a very high standard, we can address the concerns raised by the Complainant. We can demonstrate how highly we value their decision to be involved in our work, and hopefully retain their support for the long term. As well as addressing individual issues, we can identify potential improvements to our services and ensure the highest quality experience of UNICEF UK.

Each year the Fundraising Regulator will require UNICEF UK to submit a summary of all fundraising Complaints in an annual return. The Fundraising Regulator requests this to monitor the total level of fundraising Complaints across the charity sector and to highlight the common issues behind those Complaints. This helps to shape fundraising standards and best practice guidance.

## 1. DEFINITION OF A COMPLAINT

At UNICEF UK, we define a Complaint as:

***“an expression of dissatisfaction, however made, about actions taken or a lack of action”***

We define the person making the Complaint as the ‘Complainant’.

## 2. COMPLAINT MANAGEMENT

The Supporter Care Team at UNICEF UK centrally manages all Complaints in terms of recording, responding and reporting. It is therefore vital that all Complaints received are reported immediately to the Supporter Care Team. Supporter Care will coordinate the response to all Complaints and ensure that appropriate records are kept on SRM. Safeguarding concerns are an exception; the Safeguarding Team will coordinate the response and ensure appropriate records are securely maintained on SRM.

General Complaints about UNICEF UK and complaints relating to fundraising are resolved by Supporter Care. Complaints relating to any other department should be escalated to the relevant team of Head of team. The team should provide a resolution Supporter Care who will then share this resolution back with the Complainant (unless otherwise agreed). The relevant team and Supporter Care remains accountable for the resolution of the complaint within the timescales set out in the Complaints Policy.

This maintains Supporter Care as the point of contact for the Complainant in the future. If the Complaint is confidential, the details of the Complaint and resolution must be stored on Sharepoint with appropriate access permissions, and a link to the documentation saved on SRM.

The Head of Supporter Care has the primary responsibility to oversee UNICEF UK's Complaint management process, act as the initial contact with the Fundraising Regulator, and coordinates the Fundraising Regulator's annual Complaints return.

High profile and Fundraising Regulator notified Complaints are immediately escalated to the relevant colleagues in the Media, Senior Leadership, and Executive teams to ensure appropriate adherence to regulations and sign off for compliance purposes.

### 3. COMPLAINTS PROCEDURE

Our Complaints process exists to ensure that we will respond promptly to all Complaints and to provide a satisfactory resolution. This requires the Supporter Care Team to carry out an assessment of the severity of the Complaint to ascertain the level of involvement to compile the response. If a supporter remains dissatisfied with the response they receive, they have the option to take their Complaint further.

When receiving a Complaint, the following steps should be taken:

- 1.** If not directly received by them, the Complaint should be forwarded to the Supporter Care team via email to [complaints@unicef.org.uk](mailto:complaints@unicef.org.uk).
- 2.** The Complaint should be logged as a case on SRM, with the date received, the relevant type, subtype, and team.
- 3.** If the Complaint cannot be resolved straight away, an acknowledgement of the Complaint should be sent to the Complainant within 1 working day.
- 4.** The Supporter Care Team will investigate and aim to provide a resolution within five working days. Depending on the severity of the Complaint, colleagues will be involved in the resolution as appropriate (see table below)
- 5.** If the Complaint needs to be escalated to another team for resolution, that team should provide a resolution within five working days. The Supporter Care Team will share that resolution with the Complainant.
- 6.** If the Complaint resolution cannot be provided within five working days, the Supporter Care Team will update the Complainant at regular intervals until the resolution can be provided.
- 7.** Details of the resolution, and any updates to the Complainant should be logged on SRM. If the details of the investigation and resolution are sensitive or confidential, then appropriate records should be kept in the relevant secure location on Sharepoint, with a reference link added to SRM.



At the start of each month, the Complaints report will be run and shared with relevant stakeholders. This report summarises the previous months Complaints.

## 4. SEVERITY OF COMPLAINTS

UNICEF UK categorises Complaints according to their severity, based on an assessment of the Complaint, the risk it could present to the Complainant, and the risk this complaint could present to UNICEF. The severity of the Complaint will indicate the level of further escalation appropriate;

<b>Level</b>	<b>Scenario</b>	<b>Escalation</b>
Low	General expression of dissatisfaction in; <ul style="list-style-type: none"> <li>- A fundraising activity</li> <li>- A communication received</li> <li>- In relation to UNICEFs work</li> <li>- Inadvertent contact (permissions)</li> </ul>	Supporter Care Manager
Medium	A complaint that is; <ul style="list-style-type: none"> <li>- A notification from the Fundraising Regulator</li> <li>- Breach of GDPR</li> <li>- Negative Media/Social Coverage</li> <li>- A vulnerable circumstance complaint</li> <li>- A request for refund</li> <li>- Fraud</li> </ul>	Head of Supporter Care Head of Fundraising Compliance and Data Protection Officer Head of Media/Head of Organic Social Director of Finance for refunds over 5K
High	A complaint that has a risk of <ul style="list-style-type: none"> <li>- Negative media/social coverage</li> <li>- Will have a significant effect on the complainant</li> <li>- Alleges criminal behaviour</li> <li>- Breach of the Fundraising Code</li> <li>- An escalations complaint from the Fundraising Regulator or other regulatory body</li> <li>- Safeguarding risk to children/adults or employee, Trustee or Ambassador/High-Profile Supporter.</li> <li>- A serious Incident that would require reporting to the Charity Commission</li> <li>- A breach of Contract</li> </ul>	Head of Supporter Care Head of Media / Head of Organic Social / Director of Communications Finance Director /CFO Head of Fundraising Complaint Director of Safeguarding, or delegated representative in Safeguarding Team Serious Incident Group

	<ul style="list-style-type: none"> <li>- Misconduct by an employee of UNICEF UK, associate, Board of Trustees, High profile supporter or senior volunteer</li> </ul>	<p>Legal Director</p> <p>People Director</p>
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## 5. RECORD KEEPING AND REPORTING

Details of the original Complaint, each communication with the Complainant and details of the Complaint resolution should be logged on SRM.

- 1 Where possible, contact details for the Complainant should be requested, along with consent to store these for the purpose of responding to the Complaint. These details should be added to SRM as a contact, following standard process.
- 2 Where a complaint is received via an email or similar, the initial response should include a link to the UNICEF UK Privacy Policy to inform the Complainant how we will store and use the data they have provided.
- 3 Where a Complaint is received anonymously, or there are insufficient details of the Complainant, it is enough to record the Complaint in a case record, without a linked contact record.
- 4 For complex or confidential Complaints where it is not appropriate to log extensive detail on SRM, links must be provided to relevant locations on Sharepoint where this information can be found. Sharepoint links should be stored in the 'Complaint Summary' field on the case record in SRM. Appropriate security permissions should be assigned to these links.
- 5 Complaints data from SRM will be used to track the volume and nature of Complaints received by Unicef UK, as well as the time taken to resolve Complaints.
- 6 Complaints data from SRM will be shared in summary form with key stakeholders across Unicef UK on a regular basis in the Complaints Dashboard.
- 7 Complaints data from SRM will be used to populate the Fundraising Regulator annual Complaints return.

## 6. IF THE COMPLAINANT IS UNHAPPY - 2<sup>nd</sup> STAGE ESCALATION

If the Complainant is unhappy with the initial resolution, the Complaint should be escalated for review and the following steps should be taken:

2. If not directly received by them, the Complaint escalation should be forwarded to the Supporter Care team by emailing [complaints@unicef.org.uk](mailto:complaints@unicef.org.uk)
3. The Complaint escalation should be logged as a new case on SRM, with the date received, the relevant type, subtype, team and agency.
4. An acknowledgement of the escalation should be sent to the Complainant within one working day.

5. The Head of Supporter Care should review the Complaint and the initial resolution and escalate to the relevant senior managers to investigate and agree a resolution.
6. The resolution of the escalated Complaint should be shared with the Complainant within five working days.
7. If the Complaint resolution cannot be provided within five working days, the Complaints Coordinator will update the Complainant at regular intervals until the Complaint is resolved.
8. Details of the second resolution, and any updates to the Complainant should be logged on SRM. If the details of the investigation and resolution are sensitive or confidential, then appropriate records should be kept in the relevant secure location on SharePoint, with a reference link added to SRM.

## 7. IF THE COMPLAINANT REMAINS UNHAPPY - 3<sup>rd</sup> and Final Internal Stage

If the Complainant remains unhappy with the second resolution, the Complaint should be escalated for further review. This would normally be coordinated by the Head of Supporter Care, with support from the Head of Media, the Chief Marketing Officer, and senior colleagues from other teams as appropriate.

The Complainant should be advised that if they remain unhappy with the resolution, then they can escalate their concern to the Fundraising Regulator or Charity Commission.

Details of the final resolution, and any updates to the Complainant should be logged on SRM. If the details of the investigation and resolution are sensitive or confidential, then appropriate records should be kept in the relevant secure location on SharePoint

## 8. FUNDRAISING REGULATOR COMPLAINTS

If Unicef UK receive notification from the **Fundraising Regulator** in relation to a Complaint, this must immediately be referred to the Head of Supporter Care and the relevant Head of team. This will be further escalated to the appropriate member of the Senior Leadership Team, alongside the Chief Marketing officer, who will if appropriate notify relevant members of the Board of Trustees as appropriate.

The fundraising Regulator Complaints management process can be found at <https://www.fundraisingregulator.org.uk/more-from-us/resources/complaints-process>

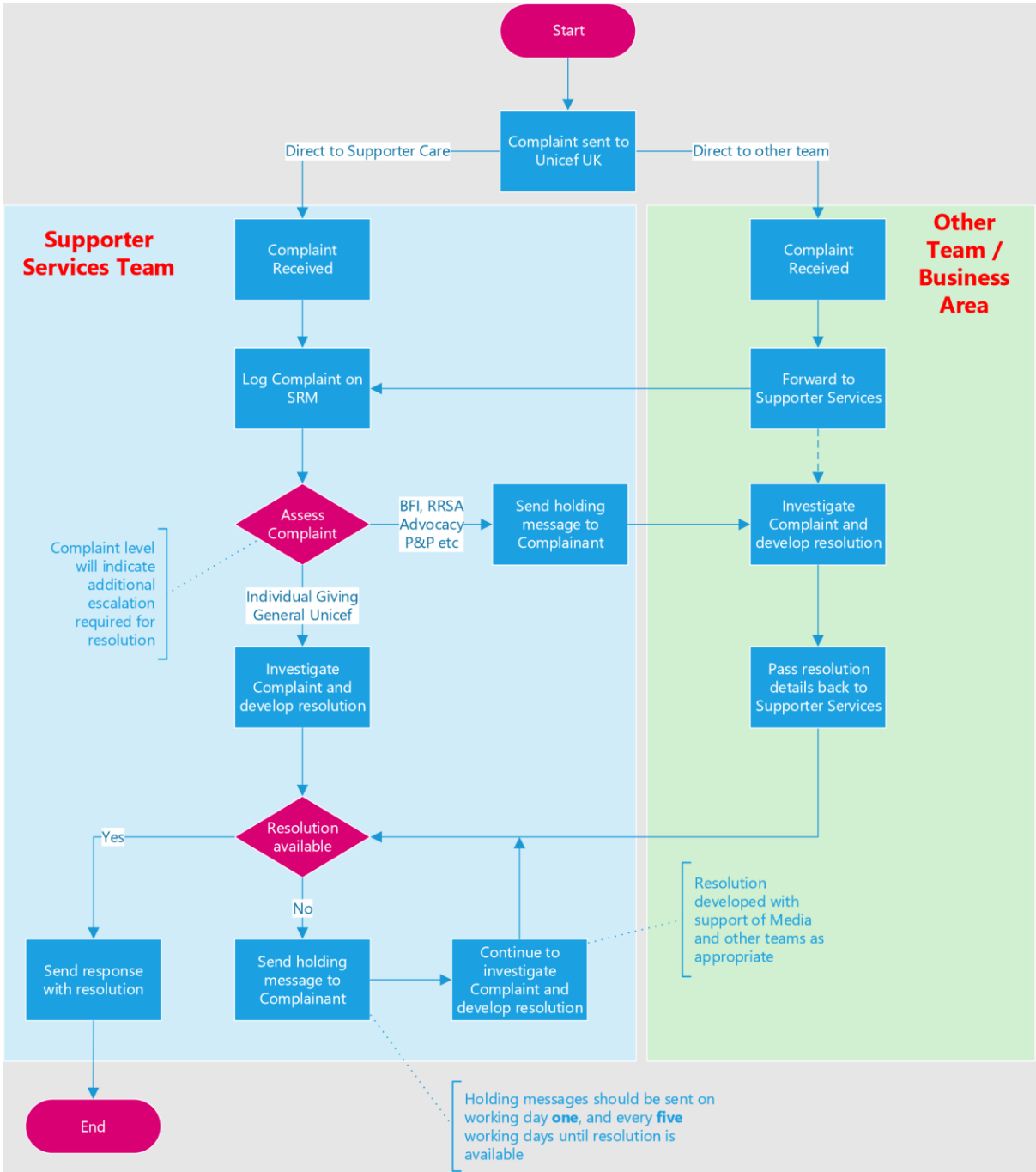
The Complaint will be recorded on SRM as a Fundraising Regulator Complaint, following the procedure outlined above.

The resolution will be led by the Head of Supporter Care and the relevant Head of team. A full Complaint case report will be compiled and stored on SRM for auditing purposes. Approval of responses will be required by Head of Supporter Care, Head of Media, The

Chief Marketing Officer, and other Executive Team members as appropriate, with a reference link added to SRM.

### 9. COMPLAINTS PROCESS – SUMMARY FLOW CHART

This diagram summarises the main process flow for the resolution of Complaints at UNICEF UK. During the assessment of a Complaint, the Complaints Coordinator will establish the level of escalation, and the appropriate colleagues to be involved in developing a resolution to the Complaint.



# APPENDIX 2 – REGULATORY REPORTING REQUIREMENTS

At UNICEF UK all Complaints are recorded as cases on SRM, using the Complaint coding structure. This enables the analysis and monitoring of Complaints in real time through SRM dashboards and reports.

A Complaints dashboard is circulated by the Head of Supporter Care, which identifies ongoing trends for changes to our fundraising practices. This is shared with a wide group of stakeholders across fundraising, as well as the executive team.

1. As part of a cycle of continuous improvement, UNICEF UK aims to learn from our Complaints and aim to improve our supporter experiences, this may lend itself to a change to a system or process, especially in the cases of a Safeguarding concern or Serious Incident.
2. Should an investigation into a Complaint highlight an area of Unicef UK operations, policy or procedure that requires more substantial change, development or improvement, then the relevant Head of team for that area is responsible for leading on the implementation of these changes.
3. Where Complaints have led to a change in process, policy or procedure, this Complaints policy may need to be reviewed in response to that change.

## 10. REGULATORY COMPLAINTS RETURN.

The Fundraising Regulator requires charities to submit an annual Complaints return, using a data collection template. The UNICEF UK Annual Complaints report follows a similar template to allow ease of analysis. This data is tracked and compared to that of previous years and circulated to a wide group of stakeholders across fundraising, as well as the Executive team.

The annual Complaints return is collated by the Head of Supporter Care with support from appropriate colleagues across UNICEF UK. The Head of Supporter Care submits the report to the Fundraising Regulator after approval by the Chief Marketing Officer.

The Fundraising Regulator has been reviewing the process for the annual submission of Complaints data from charities. UNICEF UK feeds back on the submission and categorisation of this complaints data annual Complaints reporting structure has been determined to comply with the reporting requirements of the Fundraising Regulator.

The Head of Fundraising Compliance is responsible for reviewing any revised guidance published, to ensure that this policy document reflects and changes to the Fundraising Code or Complaint Reporting.

## **11. WHAT TO REPORT – CHARITY COMMISSION GUIDANCE**

Generally, we would not be required to report on the details of Complaints received by UNICEF UK to the Charity Commission.

We would report the details of a Complaint to the Charity Commission if the impact of the Complaint meets the criteria to be considered a reportable incident, in which case we would follow both the Complaints process outlined above in association with the process outlined in the Reporting Serious Incidents Policy.