

COMPLAINT POLICY

APPROVAL CONTROL

ROLE	NAME	DATE
Chief of Staff	Sara Robinson	

VERSION CONTROL

VERSION	AUTHOR NAME	VERSION CHANGES	DATE
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OBJECTIVE

Huntswood has a positive attitude towards complaints. The future of the company depends on the ability to attract and retain employees, associates and clients and ensure their continued satisfaction. A complaint represents an opportunity to continuously improve the level of service that Huntswood provides.

The objectives of this policy are:

- to define the term complaint for Huntswood
- to ensure that complaints are handled appropriately and consistently across the business
- to define how complaints must be tracked and reported
- to drive continuous improvement with the successful implementation of root cause analysis.

APPLICABILITY

This policy applies to all Huntswood Representatives (see Table of Definitions)

POLICY PRINCIPLES

1. A complaint is any expression of dissatisfaction whether verbal or written raised by a valid complainant.
2. Dissatisfaction for the purposes of this policy refers to any matter raised in either their dealings with Huntswood (direct complaint), or as a result of reading / hearing something via a third party (indirect complaint) which is about the way that Huntswood (or its representatives) has conducted itself.
3. A valid complainant must be one of the following where they are also impacted by the subject of the complaint:
 - Existing or prospective employee
 - Existing or prospective client
 - Existing or prospective associate
 - Existing Third Party Supplier
4. A complaint cannot be made on behalf of someone else, unless the complainant is incapacitated
5. Day to day operational issues on live engagements are out of scope and do not require central resolution or logging, unless the complainant feels their issue is not being dealt with, at which point their concerns can be escalated in line with this policy
6. Examples of complaints in scope (to be logged centrally) include:
 - 6.1. From employees
 - Health and safety issues
 - Allegations of bullying, harassment or discrimination
 - Terms and conditions of employment

- Working conditions
- Conduct or behaviour of a fellow Huntswood Representative

6.2. From clients:

- Conduct or behaviour of a Huntswood Representative
- Failure of Huntswood (or its representatives) to comply with the clients stated policies
- Material contractual breaches
- Allegations of malpractices (e.g. fraud, unauthorised engagement of third parties)

6.3. From associates

- Misrepresentation of the role
- Contractual breaches
- Health and safety issues
- Allegations of bullying, harassment or discrimination
- Conduct or behaviour of a fellow Huntswood Representative

6.4. From third party suppliers

- Contractual breaches
- Health and safety issues
- Conduct or behaviour of Huntswood Representatives
- Delayed invoice fulfilment

7. Out of scope of this policy is any matter concerning the wider conduct of Huntswood business which leads to the belief that malpractice is occurring. This is covered in the Whistleblowing Policy (see Reference Materials).

RAISING A COMPLAINT

Employees

Please follow the process outlined in the [Grievance Policy](#), which can be found on the Vault.

Associates, Clients and Suppliers

Should you wish to raise a complaint directly with Huntswood, please email your concerns to tellus@huntswood.com. This email should cover the following:

- some personal details including your name and contact information
- details of the complaint subject and how you how you suggest things could be put right

HANDLING A COMPLAINT

1. Receiving a complaint

The complaint recipient is responsible for forwarding the complaint or details of the incident to the HR Director and the Head of Resourcing for logging and allocation of an owner if different from the person receiving the complaint.

2. Managing the complaints process

The Head of Resourcing shall maintain the log of complaints and incidents and provide support to the owner to ensure swift resolution they are responsible for the following:

- Updating Huntswood Complaints/Incident Log
- Set up complaint/incident file
- Allocate owner & pass on file
- File soft copy file in resourcing folder

The complaint owner shall investigate the complaint in full to establish all of the facts relevant to the points raised and provide a full, objective and proportionate response that represents Huntswood's definitive position. Responsibilities include:

- Co-ordination of internal activity
- Communication to all parties
- Acknowledgement (within 24 hours)
- Investigation of complaint/incident
- Resolution and response (examples provided in folder)
- Root cause analysis
- Engagement of process owners
- Updating of internal systems

3. Reporting

The HR Director shall maintain management information and report regularly to the Risk and Audit Committee, Board and the Executive Board in relation to:

- Complaint volumes and timeliness of response
- Complaints that relate to issues that have been identified as serious or high risk/high profile
- Trends

ROLES AND RESPONSIBILITIES

WHO	WHAT
Executive Board	<p>Accountable for determining the risk appetite of the business</p> <p>Accountable ultimately for managing the key risks of the business</p>
Chief of Staff	<p>Accountable for maintaining the framework as fit for purpose, oversight of actions across the business to embed the framework and monitoring Huntswood wide compliance</p>
Chief Technology and Risk Officer	<p>Accountable for governance of risk management, monitor and challenge the company's management of risk and adherence to the framework with respect to Client complaints</p> <p>Responsible for ensuring that Huntswood policies and processes are updated to reflect continuous improvement.</p>
Chief Operating Officer	<p>Responsible for the day to day activities to embed the framework and promote Huntswood wide compliance</p> <p>Responsible for governance of risk management, monitor and challenge the company's management of risk and adherence to the framework with respect to Client complaints</p>
Head of Resourcing	<p>Responsible for the day to day activities to embed the framework and promote Huntswood wide compliance</p> <p>Responsible for governance of risk management, monitor and challenge the company's management of risk and adherence to the framework with respect to Associate complaints</p>
Head of HR	<p>Responsible for the day to day activities to embed the framework and promote Huntswood wide compliance</p> <p>Responsible for governance of risk management, monitor and challenge the company's management of risk and adherence to the framework with respect to Employee complaints</p>
Business Unit Heads	<p>Accountable for ensuring their business unit carries out the appropriate level of risk management activity</p> <p>Responsible for ensuring that their teams have an appropriate understanding of the relevant aspects of the Risk Management Framework and that both individual and team objectives are appropriately aligned to risk management principles</p> <p>Responsible for governance of risk management, monitor and challenge the company's management of risk and adherence to the framework with respect to Supplier complaints</p>

WHO	WHAT
All management roles (permanent and associate)	Responsible for risk management within their business unit (i.e. board of directors, operational departmental, client engagement, programme or project for which they have been allocated management responsibility either on a permanent or temporary basis)
All Huntswood representatives	Responsible for identification and escalation of risks pertinent to their individual roles or functions, or others which may be identified

TABLE OF DEFINITIONS

The table of definitions provides definitions of terms used within the policy document

TERM	DEFINITION
Huntswood Representative	Anyone who works for or on behalf of Huntswood.
Complainant	Anyone making a complaint
Complaint	Any expression of dissatisfaction whether verbal or written raised by a valid complainant

POLICY RESPONSIBILITIES

The following table defines the business roles and their responsibilities in regard of the policy document.

RESPONSIBILITY	ROLE	DEFINITION
Owner	Chief of Staff	The Owner ensures the policy is reviewed and maintained on a regular basis
Reviewer	Head of HR Head of Legal Head of Infrastructure	The Reviewer ensures the policy document aligns with relevant legislation and company requirements
Author	Head of Risk and Audit	Shall update the policy document in a succinct time frame on receiving updates from the reviewer and in accordance with company policy writing guidelines

RESPONSIBILITY	ROLE	DEFINITION
Policy Audience	Huntswood Representative	Must apply the business policy to the business they undertake on behalf of Huntswood

REFERENCE MATERIALS

- [Whistleblowing Policy](#)
- [Grievance Policy](#)