



ISEAL Complaints Procedure

Version 3 – December, 2013

Purpose

This procedure outlines the process required to file a complaint against the 'ISEAL Alliance' (the Secretariat, Committees of the Board, ISEAL members and ISEAL subscribers) and the steps taken by the ISEAL Secretariat, and Board of Directors where warranted, to respond to and resolve complaints.

Scope

A complaint is a formal expression of dissatisfaction by a third party, including ISEAL members, subscribers and external stakeholders. This procedure covers complaints related to compliance by an ISEAL member or subscriber with the ISEAL membership requirements (including alignment with the ISEAL Code of Ethics), or to the operation or decisions of the ISEAL Board, Secretariat, or committees in supporting member or subscriber fulfilment of these obligations.

Complaints by an ISEAL member relating to decisions about their own compliance with ISEAL membership requirements are not included within the scope of this procedure. Please see www.iseal.org/compliance for more information.

General Provisions

1. The ISEAL Secretariat aims to investigate a complaint in a fair and balanced manner and to resolve the issues efficiently and effectively.
2. A key tenet underlying this procedure is to seek to resolve complaints at the lowest and least formal levels, with submission of a formal complaint being the option of last resort.
3. Thus, the complaints resolution process may include bilateral discussions, or the optional use of mediation to discuss and attempt to resolve issues before lodging a formal complaint, where this is agreed by both parties.

Pre-condition of a complaint against an ISEAL member

1. If the complaint is against an ISEAL Member, the complainant must raise the complaint directly with the ISEAL Member in the first instance.
2. If the complainant is not satisfied with the response from the ISEAL Member, they may raise a complaint with ISEAL regarding the Member.

Complaint Submission Process

1. If bilateral attempts to resolve the issues have not been successful, a complaint may be filed with the ISEAL Secretariat.

2. Complaints can be filed with the ISEAL Secretariat by any party that is not satisfied with:
 - a. the operation or decisions of the ISEAL Board, Secretariat, or Committees, in relation to supporting members or subscribers to fulfil ISEAL membership requirements;
 - b. the compliance of an ISEAL Member with ISEAL membership requirements (including alignment with the ISEAL Code of Ethics);
 - c. any ISEAL subscribers whose operations or decisions run counter to the ISEAL Code of Ethics
3. All complaints shall be submitted in writing to the ISEAL Secretariat using the *ISEAL Complaints Submission Form*, explaining the nature of the complaint, who or what the complaint is against, and including all documented evidence to support the claim. The ISEAL Complaints Submission Form is available at www.iseal.org/complaints and can be submitted by email (secretariat@isealalliance.org) or mail: ISEAL Alliance, Wenlock Centre, 50-52 Wharf Road, London, N1 7EU.
4. The Secretariat shall acknowledge receipt of the complaint by notifying the complainant in writing within one week. The Secretariat shall assess the complaint submission for completeness and shall have the option to contact the complainant for additional information or clarification, where necessary.

Complaint Resolution Process

Mediation

1. In the case of a complaint against an ISEAL member or subscriber, the ISEAL Secretariat can offer in the first instance to provide mediation between the complainant and the member or subscriber, to endeavour to resolve the issue before a formal complaint is taken forward. Note the pre-condition to making a complaint against an ISEAL member using this procedure is that a complaint has been made directly to the member in advance.
2. Upon receipt of a complaint, the ISEAL Secretariat shall communicate with the complainant to assess openness to mediation. Where this is an option, the Secretariat shall reach out to the subject of the complaint, provide information about the complaint, and establish whether bilateral or mediated dialogue between the parties is feasible.
3. Mediation shall be time limited and shall have the objective of resolving the complaint. If the complainant is not satisfied with the results of mediation efforts, they can ask that the complaint be taken forward through the formal complaints resolution process.

Complaints relating to ISEAL member and subscriber requirements

1. In cases where the complaint relates to a member or subscriber, the ISEAL Secretariat shall forward the complaint and all supporting materials to the ISEAL Membership Committee within one week. Within one week, the Secretariat shall also inform the affected member or subscriber that a complaint has been brought against them and the nature of the complaint. The affected member or subscriber may provide a response if they wish, but is not required to before the Membership Committee determines that the complaint has merit. They will also have an additional opportunity to provide information during a formal investigation of the complaint.

2. The Membership Committee shall undertake an assessment of the submitted information within three weeks to determine whether the complaint has merit. This determination shall be based on whether the complaint raises legitimate and substantiated issues about contravention with current member or subscriber obligations by the subject of the complaint.
3. During this time, the Membership Committee may approach the complainant for clarification or additional information. The Membership Committee shall also approach the member or subscriber against whom the complaint is lodged for similar clarification or additional information.
4. If the Membership Committee determines the **complaint has merit**, the Committee shall communicate this information to the ISEAL Secretariat.
5. The party against whom the complaint was brought shall develop a corrective action plan and timeframe for implementing the corrective actions within three weeks.
6. The Secretariat shall forward the proposed corrective action plan to the Membership Committee for their review and comment within one week. The Membership Committee shall approve the corrective action plan if it is likely to lead to satisfactory resolution of the complaint, or shall request changes within three weeks.
7. The Secretariat shall notify the party against whom the complaint was brought of the decision of the Membership Committee. Where necessary, the party against whom the complaint was brought shall amend their corrective action plan.
8. The Secretariat shall then contact the complainant to inform them of the decision and the corrective action plan (CAP).
9. Completion of the CAP will be verified by the Secretariat after the allotted time to address the issues has passed.
10. If the Membership Committee determines that the complaint **does not have merit**, the Committee shall note the justification in a written report and shall communicate this to the ISEAL Secretariat. The Secretariat shall contact the complainant and subject of the complaint within one week to inform them of the decision and justification.
11. Decisions by the Membership Committee are final.

Complaints against the ISEAL Secretariat, Board or Committees

1. In cases where the complaint relates to the ISEAL Secretariat, Board or Committees, the ISEAL Secretariat shall forward the complaint and all supporting materials within one week to the Board of Directors Executive Committee, except in the case where the complaint is against the Executive Committee, in which case the material shall be forwarded to the full ISEAL Board.
2. The Executive Committee (or Board as appropriate) shall undertake an assessment of the submitted information within three weeks to determine whether the complaint has merit. This determination shall be based on whether the complaint raises legitimate and substantiated issues about the subject of the complaint.
3. During this time, the Executive Committee (or Board as appropriate) may approach the complainant for clarification or additional information. The Committee may also approach the parties within ISEAL Secretariat against whom the complaint is lodged for similar clarification or information.

4. If the Executive Committee determines the **complaint has merit**, the Committee shall communicate this information to the ISEAL Secretariat (and Board or Committee if complaint applies to them) by the end of the three week period.
5. The body against which the complaint was brought (Secretariat, one of the Committees or the Board) shall develop a corrective action plan and timeframe for implementing the corrective actions, and submit it to the Executive Committee (or Board as appropriate).
6. The Executive Committee (or Board as appropriate) shall approve the corrective action plan if it is likely to lead to satisfactory resolution of the complaint, or shall request changes within three weeks.
7. The Executive Committee (or Board as appropriate) shall then contact the complainant to inform them of the decision and the corrective action plan.
8. Completion of the CAP will be verified by the Executive Committee after the allotted time to address the issues has passed.
9. If the Executive Committee (or Board as appropriate) determines that the **complaint does not have merit**, the Committee shall note the justification in a written report and shall communicate this to the ISEAL Secretariat. The Executive Committee (or Board as appropriate) shall contact the complainant within one week to inform them of the decision and justification.
10. Decisions by the Executive Committee are final.

Disagreement with the findings

1. Complainants retain the right to submit a complaint against the Complaint Resolution process.

Records

1. The Secretariat shall maintain a record of each complaint received by the Secretariat, including all correspondence and related evidence, from initiation through to final outcome.