

EUROPEAN ENVIRONMENTAL BUREAU COMPLAINTS POLICY

As adopted by the EEB Board in Edinburgh, 5 November 2017

The European Environmental Bureau (EEB) is committed to upholding the principles of transparency and accountability which are at the core of good governance. Within this context, ensuring that stakeholders can hold the organisation to account through an effective process for recording and responding to complaints is essential to improving the quality of work in all areas of operation. This document sets out the procedures that the EEB will follow in the handling of complaints.

When does the policy apply?

The complaints policy is intended to be used by supporters, partners, member organisations and members of the public (individual, company or other entity). The complaints procedure may be suspended in relation to complaints that are subject to current investigation by any regulatory body or other legal or official authorities in Belgium or in other countries where EEB activities are being implemented. Such issues will be dealt with under the relevant regulatory regime.

Definition of a complaint

The EEB defines a complaint as an expression of dissatisfaction made to the organisation, related to its activity or lack of activity, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected. The following are examples of complaints (this list is not exhaustive):

- Concern about the quality of the EEB's programme delivery;
- Concern from a supporter about a particular fundraising approach;
- Concern about a lack of action regarding a request made to the EEB;
- Concern about the behaviour of EEB staff.

A complaint has to be about an action for which the EEB is responsible or is within our sphere of influence.

A complaint is **not**:

- A general query about the EEB's work;
- A request for information;
- A contractual dispute;
- A request to amend records e.g. to correct an address;
- A request to unsubscribe from an EEB 'service' e.g. a campaign newsletter or email.

Principles of complaint handling

In handling complaints, the EEB will uphold the following principles:

- a) Respect for the person's right to complain – the EEB will take all complaints seriously and will treat all complainants with respect.
- b) Timely - Complaints will be investigated and responded to in a timely manner. The EEB will keep complainants informed of the progress of their complaint if the response cannot be provided within the specified timeframe.

- c) Open and transparent – the EEB will provide clear information regarding the process for making and handling complaints and will clearly communicate the decision reached to the communicant.
- d) Fair - Each complaint is addressed in an equitable, objective and unbiased manner through the complaints handling process.
- e) Confidentiality – Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. However in some instances we might judge that the complainant will be better served if others are involved in the resolution of a complaint. The EEB will always limit the circulation of the specific details of the complaint to those who need to know in order for the EEB to respond effectively. If adherence to a confidentiality request prevents the effective handling of a complaint, the EEB will consult with the complainant to see if a solution can be found that protects the interests of the complainant while enabling the complaint to be handled effectively.
- f) Responsive - Where EEB investigation shows that actions are required on the part of the EEB as a result of complaints, these will be implemented.
- g) Feedback –Complainants will be given the opportunity to provide feedback on the EEB’s response to the complaint.

Procedures for complaint handling

How to make a complaint

Complaints can be made to the EEB verbally or in writing. Verbal complaints can be made using the telephone or in person and will be addressed as expediently as possible through a verbal or written response. If a person making a verbal complaint is not satisfied with the response, he or she may follow up with a written complaint. Only written complaints will require a written response and trigger the process described in the following paragraphs. Written complaints can be submitted by post or email. Complainants should identify themselves within their complaint, stating their full name, organisation if applicable and in which context they have had to deal with the EEB. The EEB will treat a complaint as confidential if requested but will not respond to anonymous complaints.

Who should a complaint be addressed to?

Complaints sent by email should generally be addressed to complaints@eeb.org.

Complaints sent by post should generally be addressed to “EEB Complaints” at the Secretariat using the postal address that may be found on the [EEB website](#).

Where a complaint alleges corrupt or illegal conduct by the Secretary General, it should be sent to the EEB President at president@eeb.org. This address goes directly, and only to the EEB President.

Only written complaints sent to these addresses (e-mail or postal) will be considered to be written complaints in the sense of this complaints procedure.

What information should a complaint include?

Every complaint should include the name and contact details of the person making it. Full details should be provided of the issue being complained about along with any documentation or correspondence which is required to understand the complaint being made. Suggestions about how the problem which is the subject of the complaint might have been avoided or proposals on resolving the issue may also be included.

What happens after a complaint is made

Complaints other than those addressed to the President will be processed by a staff member designated by the Secretary General to have responsibility for the initial handling of complaints, who will pass the complaint to the relevant staff member with responsibility for the area being complained about, with the Secretary General in copy. The relevant staff member will investigate the circumstances surrounding the issue being complained about and provide a response to it. In the specific case of complaints alleging corrupt or illegal conduct by the Secretary General, the EEB President will bring the matter to the attention of the Management Committee which will decide upon the appropriate action to take. The EEB will in general endeavour to acknowledge all complaints within 14 days of receipt and to inform the complainant of the outcome of its investigation within 30 days of receiving the complaint. In the event that an investigation cannot be completed within this timeframe the complainant will be informed, in writing, about when they can expect a full response.

What should the complainant do if I he/she is unhappy with the EEB's response?

In the event of a complainant being dissatisfied with the response from the EEB to their complaint they may appeal in writing using the same addresses. Where the original complaint does not allege corrupt or illegal conduct by the Secretary General, the appeal will be forwarded to the EEB Secretary General and copied to a designated member of the Management Committee. The Secretary General will in consultation with the Management Committee member consider what action should be taken if any and will inform the complainant accordingly. If the complainant remains dissatisfied, he or she may convey this directly to the EEB President at president@eeb.org who will decide whether or not to take any further action. Where the complaint alleges corrupt or illegal conduct by the Secretary General, the appeal should again be addressed to the EEB President who shall bring the matter to the attention of the Executive Committee which shall decide upon the appeal.

EEB member organisations also have additional possibilities to bring matters to the attention of the Board and/or to submit a resolution to the Annual General Meeting.

When will the EEB not respond to a complaint?

Everyone who makes a complaint to the EEB will be treated with courtesy and respect. In return, the EEB expects people who make a complaint to make their concerns fairly and appropriately. Where complainants harass staff, behave abusively, or unreasonably pursue complaints, the EEB reserves the right to derogate from the above outlined complaints process.

Any complaint must be made as soon as possible, when the events causing the complaint are still fresh, and at the latest within three months of the relevant incident. In exceptional circumstances, the EEB may be able to respond to a complaint that is older, although the passage of time may make it harder to resolve the complaint satisfactorily.

Review of the policy and findings

The EEB will review the policy every three years to ensure that it remains fit for purpose. The EEB will log and monitor all written complaints and the results of such complaints and this information will be brought periodically to the attention of appropriate senior managers in order that we learn from what we do and how we do it. This information will not necessarily be available to the public.

Publicising this policy

This policy will be made available to all stakeholders via the EEB's website at www.eeb.org

International non-profit association - Association internationale sans but lucratif (AISBL)