

Better Cotton

Complaints Policy and Procedures

Policy:	Complaints Policy and Procedures	Version:	2.0
Owner:	Lena Staafgard	Review Date:	07/02/23
Approver:	Alan McClay (for Better Cotton Secretariat)	Approval Date:	07/02/23
		Effective Date:	07/02/2023
Audience:	Internal and external		

Contents

Section 1: Complaints Policy	page 2
Objective and Policy Statement	page 2
Complaints Definition	page 2
Scope of Policy	page 2
Limitations of the Policy	page 3
Partner Organisations	page 3
Confidentiality	page 3
Data Management and Protection	page 3
Section 2: Complaints Procedure	page 4
Raising a complaint	page 4
Receiving a complaint	page 4
Investigations	page 5
Escalation to Council	page 5
Appeals	page 6
Learning	page 6
Reporting	page 6
Policy Review	page 7
Appendix	page 8

Section 1: Complaints Policy

Objective and Policy Statement

Better Cotton recognises that anyone who engages with Better Cotton activities, people or programmes, has the right to raise a complaint.

Better Cotton will take seriously any complaint received and will assess and respond to it promptly, with the aim of seeking a resolution as quickly as possible. Information received as part of the complaint will be treated confidentially and with respect for sensitive information.

The Better Cotton Complaints Policy and Procedures has been developed in accordance with Article 13 of the Statutes of the Association" and provides clear guidance on how to raise a complaint, how complaints are handled and what to do if a complaint is not satisfactorily resolved.

Definition

A complaint is any expression of dissatisfaction by individual(s) or organisation(s), whether justified or not. Individual(s) or organisation(s) may make a complaint if they consider that Better Cotton and/or associated third parties:

- Failed to deliver activities of an acceptable standard or made a mistake in the way an activity was conducted
- Failed to act in a proper way
- Failed to meet its obligations

Scope of Policy

Complaints can relate to any aspect of Better Cotton and its activities, including third parties with a direct relationship with Better Cotton. The Complaints Policy and Procedures are publicly accessible and can be used by any person or organisation that engages with Better Cotton.

This includes, but is not limited to:

- Members of the Association
- Members of the public
- Programme partners
- Consultants carrying out work on behalf of Better Cotton or its affiliates
- Farmers
- Farm workers
- Producers' staff

- Cotton supply chain actors (e.g. ginner, spinners, traders, fabric makers, mills, end-product manufacturers, sourcing agents)

Limitations of the Policy

The Better Cotton Complaints Policy does not cover:

- Complaints around activities not associated with Better Cotton or Better Cotton activities
- Complaints against Better Cotton members not related to their Better Cotton membership.
- Complaints covered by the Better Cotton Safeguarding Policy such as incidents of sexual abuse, exploitation or harassment or bullying and intimidation.
- Complaints covered under the Better Cotton Whistleblowing policy such as incidents reported by Better Cotton staff pertaining to wrong-doing of public interest.
- Licensing decisions appeals
- [Chain of custody](#) and supply chain appeals, referenced in the [Chain of Custody Guidelines](#).

Better Cotton staff, contractors, and consultants are encouraged to use internal HR processes instead of the external complaints procedure to raise any concerns.

Partner Organisations and Service Providers

Partner organisations and service providers are required to have their own mechanisms in place to manage complaints relating to their own organisation. If Better Cotton receives a complaint that would ordinarily be dealt with by a partner organisation's own processes, the person making the complaint will be informed that it is outside of Better Cotton's scope and, with their permission, the complaint will be forwarded to the partner organisation to be dealt with appropriately.

If a complaint refers to a matter which, if verified, would constitute a breach of a partnership/service-level agreement, or a safety concern, Better Cotton will investigate the complaint and take action according to Better Cotton's internal processes. The original complaint will not be forwarded to the partner organisation/service provider unless as part of the evidence presented during the investigation. This is in order to ensure the protection of the person making the complaint.

Confidentiality

Confidentiality will be maintained at all times. This means that the identity of the person making the complaint will only be made known to those who need to know about it in order to review, make a decision on appropriate actions or implement corrective actions.

Complaints received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

Data Management and Protection

To process a complaint Better Cotton will hold personally identifiable data about the person making a complaint and others involved. Data will be held securely in line with the Better Cotton Data Privacy Policy and only used to address the complaint.

Section 2: Complaints Procedure

Raising a Complaint

Complaints can be raised by:

1. Sending an email to complaints@bettercotton.org
2. Completing the online form on the Better Cotton website, bettercotton.org/complaints.
3. Talking to a member of staff directly

The person raising a complaint should provide the following information:

- Name(s) of person(s) making the report (optional) and contact details
- Name(s) of person(s) involved in complaint if appropriate
- Description of complaint-
- Date(s), time(s) and location(s)

Receiving a Complaint

Any staff member who is approached with a complaint relating to Better Cotton, its people, activities or programmes must forward this complaint within 72 hours to the complaints@bettercotton.org inbox.

Complaints Monitoring Team

The complaints inbox is reviewed by a Complaints Monitoring Team comprised of a maximum of five Better Cotton staff members.

The monitoring team are responsible for:

- Monitoring the complaints inbox
- Reviewing complaints received, validating their admissibility, and creating a case code for the complaint
- If applicable, requesting any missing or additional information from the person making a complaint in order to assess admissibility
- Triaging admissible complaints to the relevant Better Cotton Complaints Resolution Focal Point who will inform the person making the complaint of next steps.

Complaints Resolution Focal Points

Complaints Resolution Focal Points are representatives from each function at Better Cotton who are responsible for taking forward any complaint related to their function and ensuring it is

managed following the appropriate internal processes. There are usually at least two focal points per function to avoid a single point of failure. These comprise of a member of the Leadership Team as well as one other staff member.

Once a complaint has been received, the Complaints Resolution Focal Points will conduct initial enquiries into the complaint to determine whether an investigation will be required.

Investigations

If it is considered that the information raised will require an investigation, the person making a complaint will be informed of this and the investigation process will be started within 21 days of the person being informed, with the intention of reaching a resolution as fast as possible.

If an investigation is required, the Complaints Resolution Focal Points will inform the Better Cotton management team and appoint an investigation team. Depending on the severity and circumstances of the complaint, investigations may be carried out internally or with the support of third-party experts.

Investigations may include conducting interviews with those involved and collecting and reviewing evidence. At the conclusion of an investigation, an investigation report will be produced with recommendations for actions based on the appropriate complaints management procedure relating to the case.

Decision-Making Group

The investigation report will be presented to a decision-making group comprising members of the Executive Group and other staff as relevant to the case. The Decision-Making Group will review the investigation report and, based on the information presented to them, decide whether to follow the recommendations of the investigation team or to pursue a different course of action.

This decision, and any relevant resulting actions, will be communicated to those involved, including the person who made the complaint. Confidentiality will be maintained throughout the process meaning that details of the decision may not be disclosed to all involved.

Escalation to Council

In some instances, the involvement of some, or all, of the Better Cotton Council may be required in order to appropriately address a complaint. This will only occur in instances where the complaint is of sufficient severity that the Council's involvement would be appropriate.

The following are examples of when the Better Cotton Council would ordinarily be involved:

- Complaints relating to members of the Better Cotton Executive Group
- Complaints relating to a Council Member
- Criminal proceedings
- Significant financial misconduct
- Any complaint representing a substantial risk to the organisation, including financially, reputationally, ethically, etc.

When a complaint requires the involvement of the Council it will be escalated by the CEO to the Council Executive Committee, who will review the complaint and decide on next steps. If the complaint relates to the CEO, it will be escalated to the Executive Committee by the Council Chair.

Closing a Complaint

Upon resolution of the complaint, the Better Cotton Focal Point will advise those involved of the final outcome and any solution proposed to address the concern raised. All information related to the complaint will be kept for record purposes in strict compliance with the Better Cotton Data Privacy Policy (see Data Management and Protection above).

Appeals

If the person making a complaint is not satisfied that the organisation is appropriately addressing their complaint, they have a right to an appeal.

In order to make an appeal the person must:

- Send an email to complaints@bettercotton.org
- Write Appeal: [insert case code] in the email subject line
- Clearly state the grounds for the appeal in the body of the email

Appeals will be reviewed by an Appeals Decision-Making group comprising different people than those who initially reviewed the complaint, including at least one member of the Executive Group. Where possible, appeal reviews will be conducted within 30 days of an appeal being lodged. The appeal may be adjourned if Better Cotton needs to carry out further investigations in light of any new points raised at the appeal review. Appeals can be escalated to Council by the Appeals Decision-Making Group in consultation with the CEO.

The person making an appeal will be notified of the outcome of their appeal in writing as soon as practicable, normally within 10 working days of the date of the appeal hearing. The decision on the appeal will be final, with no right to further appeal.

Learning

After a complaint is raised and resolved, Better Cotton will implement lessons learned and any required improvement processes in order to avoid similar occurrences in the future. Better Cotton will conduct an annual review of agreed remediation and preventative measures taken.

Reporting

The Better Cotton Council, management team, and any donors or other bodies that Better Cotton is required to report to will be provided with a high-level summary of the complaints received.

These will include the number and types of complaints received, and the countries where the complaints originated. This information will also be included in Better Cotton's annual reports.

No identifying information will be shared, and the aggregation of complaints data will only be used to improve Better Cotton's processes and ensure transparency with stakeholders.

Policy Review

This policy will be subject to annual review by the Better Cotton Executive Group.