



PROCESS FOR RESPONDING TO COMPLAINTS ABOUT ACTIVISTS' CONDUCT

It is preferable that problems are addressed informally. However, this is not always possible.

We would normally expect any complaint to be made shortly after an incident has occurred. However, in some circumstances this may not be possible, including where concerns arise from accumulation of events.

When a complaint is made about the conduct of an activist, it should be drawn to the attention of the head of the CORE team, or the Director of Supporter Campaigning and Communications or the Director of the Chief Executive's Office (who are senior staff at AIUK).

The following flowchart outlines the process for responding to complaints. The document below explains this in more detail:

a) Informal process

Senior staff may arrive at a view that a complaint about activist conduct can be resolved informally. This is normally the preferred course of action.

Informal action will usually involve a conversation with the activist concerned describing the complaint and listening to their version of events. If the grounds for complaint seem reasonable, recommendations may be provided in writing.

If, during discussion, it appears that informal action will not satisfactorily address the complaint, the formal procedure may be used.

b) Formal process

i) Investigation

A formal process will be used where a complaint or allegation is serious, or where repeated concerns about behaviour have arisen. In such circumstances, the head of the CORE team, the Director of Supporter Campaigning and Communications or the Director of the Chief Executive's Office will need to satisfy themselves that there are grounds to proceed. A decision to investigate does not indicate support for a complaint, merely that further enquiry is necessary.

After determining that grounds for an investigation are merited, the activist will be notified in writing, and will be provided with the name of the staff member who will undertake the investigation.

The activist may wish to seek support from another activist during the process, including attendance at any meetings together. If the activist whose behaviour is being investigated does not know who to approach, they can contact the head of the CORE team, or the chair of a representative activist body. Every effort will be made to identify someone willing and able to provide support.

AIUK aims to complete any investigation within 20 working days, although this may not always be possible. The purpose is to establish whether there are reasonable grounds for believing that a breach of the Code of Conduct has occurred. If none are found the activist will be notified and the matter closed.

If reasonable grounds do exist, the activist will be notified in writing and requested to attend a Code of Conduct meeting, which will normally be convened within 15 working days. The assessment arising from the investigation and any relevant supporting evidence will be provided to the activist concerned as well as the person(s) responsible for conducting a Code of Conduct meeting.

ii) Code of Conduct meeting and outcomes

- **Activist role-holders:** The Code of Conduct meeting for activist role-holders will comprise three members of the Activism Sub-Committee (known as 'the panel') to be determined by the chair of that committee. They will determine whether to uphold the complaint and determine a course of action. The activist will be informed in writing of the results of the meeting, including the reasons for any decision, within seven working days of it taking place and he or she will have 15 working days to request a review.
- **Other activists:** The Code of Conduct meeting for activists not holding specific roles will normally be conducted by the head of the CORE team sitting with one other person ('the panel'). Composition of the panel will be determined by the Director of Supporter Campaigning and Communications and it will determine whether to uphold the complaint and determine a course of action. The activist will be informed in writing of the results, including the reasons for any decision, within seven working days and they will have 15 working days to request a review.

iii) Use of witnesses

The panel may draw on advice from AIUK's Human Resources Team and will always involve a note-taker. In some circumstances, the meeting may wish to hear from witnesses who can provide additional information. Both the complainant and the person who is the subject of the complaint may request witnesses but the panel is under no obligation to agree to such requests.

When a witness is invited to attend, they may meet the panel alone or accompanied by someone who is willing and able to provide support. Any new information arising from this discussion will be put to the person who is the subject of the complaint.

In exceptional circumstances, a witness may provide information anonymously. However, anonymous information will be summarised for the Code of Conduct meeting and the person being complained about. This will be in a format that does not compromise the individual supplying the evidence. If this is not possible, the information will not be used.

iv) What happens if the complaint is not upheld?

The complainant will be informed that their complaint has not been upheld. While they may appeal under the terms of AIUK's feedback mechanism, it is unlikely that an investigation into behaviour would be renewed.

The subject of the complaint would also be informed and we hope that their involvement with AIUK's work would continue unaffected.

v) What happens if the complaint is upheld?

If the complaint is felt to be justified and an activist has fallen short of the standards expected in the Code, then the panel will determine any remedial action required.

This may involve a determination that AIUK should no longer allow an activist to undertake a particular set of responsibilities. This would happen if the allegations were particularly serious or where a repeated pattern of conduct had been identified.

In other cases, the remedy is likely to involve recommendations to prevent a recurrence. Such recommendations will be specific to the case and could involve additional training or support, a request to change a particular form of behaviour, or a suggestion that a different role be pursued. As well as making recommendations to the activist concerned, the panel might make them to AIUK as an organisation.

The panel cannot terminate an individual's membership of AIUK. However, it can recommend this to AIUK's board. Should this occur, the provisions of AIUK's constitution (available on our website) will be observed.

vi) Review of the decision

The person who is the subject of a complaint may request a review of the outcome of the Code of Conduct meeting. This should be made within 15 working days of the formal notification of the meeting outcome and the reasons for requesting the review must be set out in writing.

The review will be conducted by two or three members of the Activism Sub-Committee, appointed by its chair. They are known as the review panel. Membership of the review panel will be entirely different to that of the original panel.

The review panel will decide whether a meeting is necessary or whether to proceed based on the paperwork provided. The person requesting the review will be consulted before a decision is taken.

There is only one stage of review and its outcome is final.

vii) Confidentiality

Confidentiality is of the utmost importance. An allegation and any subsequent information will only be disclosed in the interests of an effective investigation, ensuring a fair Code of Conduct meeting (or review) and to the extent required for the implementation of recommendations or instructions.

