



## COMPLAINTS PROTOCOL FOR CCRIF SPC

June 18, 2020

CCRIF SPC recognizes the need for transparency, accountability and fairness in its operations. This document sets out and establishes a Protocol to be followed when a complaint is received. A “complaint” refers to an expression of dissatisfaction with CCRIF, specifically as it relates to the Board or Directors, Management, staff or service providers or operations. *CCRIF has a separate Protocol for Complaints for policyholders related to Payouts and Claims administration.*

This Complaints Protocol provides a process for receiving, recording, tracking and addressing complaints which may arise if CCRIF has been deemed to have acted unfairly as it relates to:

- i. mistakes or lack of care
- ii. unreasonable delays in providing services
- iii. unprofessional behaviour
- iv. perceived bias or unethical behaviour
- v. perceived lack of integrity

Complaints received verbally would be classified as a query until received in writing via the online complaints submission located on the CCRIF website.

Using the online complaints form, all complaints would require/be mandatory for the affected party making the complaint to be identified (the person/party writing must have a direct interest or be instructed by a person/party who has a direct interest in the subject matter of the complaint).

The online form will be so structured to allow the complainant to provide relevant particulars on the substance of the matter, together with relevant documents. CCRIF will seek to resolve complaints as soon as reasonably possible.

The Complaints Protocol provides CCRIF an opportunity to remedy shortcomings identified or resolve potential disputes.

### CCRIF Complaints Policy Statement

(1) CCRIF’s Complaints Policy is developed to respond in a timely manner to complaints received by the Facility and to do so fairly, efficiently, effectively and consistently where a response is expected or legally required.

(2) As an organization dedicated to the public good and benefit, and which operates according to international best practices including a focus on continuous improvement, CCRIF therefore views complaints as one mechanism to inform its business practices as it relates to the services it provides, consistent with its vision and mission.

## Procedure

- 1 The CCRIF website will include a section on *How to Make a Complaint*. Complaints will be completed using an online submission form located on the CCRIF website; and upon submission would be automatically forwarded to the CCRIF CEO's email address and any other address designated by the CEO
- 2 An email address [complaints@ccrif.org](mailto:complaints@ccrif.org) already exists and is the mechanism through which the CEO will communicate with complainants
- 3 The complainant will receive an immediate acknowledgement that his/her complaint has been received via an automated response upon completion of the submission. As part of the automated response the complainant will be advised that a complaint on an alleged matter is received or being investigated, and does not constitute admission of any fault, wrongdoing or legal liability by CCRIF.
- 4 The online form for complaints will include information such as name, country, subject of complaint, type of complaint, and details. There will be drop boxes to include this information. The complaint must be written with reasonable detail regarding the facts giving rise to the complaint together with any time or other details of the incident that would help CCRIF investigate and address the complaint.
- 5 The Complaints automated system will assign an identification number to the complaint and record details such as receipt date, information about the sender of the complaint (country, organization etc), type of complaint, issues to be addressed and status.
- 6 CCRIF may contact the complainant for clarification and inform them of the process that will be undertaken to investigate and formulate a response and action plan, if required, to address the complaint.
- 7 The CCRIF CEO will approve all responses which include the approved response document and any supporting documents. The online system will be used for responding and allowing the complainant to track progress. The response for complaints will be issued by the CCRIF CEO within 10 days. However, if a substantive response cannot be furnished within that period of time, the complainant will be advised of the reason for the delay and how soon a final response is expected.

If the complaint relates to the CEO, the automated system will automatically issue an email to the Chairman who will review and approve all responses. Further, for complaints about a particular individual working in or with CCRIF, the Facility will ensure that the person handling the complaint is different from the person about whom

the complaint is made. A person against whom a complaint is directed should be given a reasonable opportunity to respond to such a complaint.

- 8 If a complaint is deemed to be well-founded, the response would advise the complainant in writing of what CCRIF proposes to do to remedy the matter, subject to its responsibilities and obligations as well as the governing law. If CCRIF concludes that a complaint is not well-founded, the response will explain the reasons in writing.
- 9 The complainant should confirm receipt of each response from CCRIF by email sent to [complaints@ccrif.org](mailto:complaints@ccrif.org) and indicate if there are further issues or if all matters have been addressed.
- 10 An online complaints log will be maintained to record incoming complaints and track the client requests. It will include the
  - Date of complaint
  - Source of complaint (name and contact information of member country representative)
  - Nature of the complaint,
  - Specific details of the complaint,
  - How and when the complaint was resolved,
  - Any changes implemented as a result of the complaint and procedures to implement the changes required

The complaints log will be continually updated until all matters are resolved and signed off by the CCRIF CEO.

- 11 On a quarterly basis, the CEO would report to the CCRIF Board on complaints received and the results of the findings. The report may include information on trends in complaints, lessons learned or any prospective legal action from complainants.

### **CCRIF's Pledge**

CCRIF pledges to:

- (1) Treat all people with respect, including those who make complaints.
- (2) Comply with this policy and its procedures.
- (3) Keep informed about best practice in complaint handling.
- (4) Provide feedback to its Board regarding issues arising from complaints.
- (5) Implement applicable changes arising from complaints, if necessary, to properly address the matter giving rise to the complaint in future.

(6) CCRIF operates consistently with good international practices regarding individual privacy; its complaint's procedures are subject to privacy and confidentiality considerations and to legal consideration as may be advised by CCRIF legal counsel.

### **General Provisions**

- This Policy pertains to the public and its interactions with CCRIF as a public-service institution. Any staff grievances are dealt with through separate mechanisms.
- CCRIF distinguishes “complaints” from general feedback that may be sent to CCRIF including opinions, comments or expressions of interest about CCRIF’s programs and services where a response is not reasonably expected or legally required.
- CCRIF will take reasonable steps to ensure that the complainant is not adversely affected because a complaint has been made by or on their behalf.
- CCRIF is committed to improving its management systems and for that reason will periodically review its processes for answering and resolving complaints and implement changes as required to help CCRIF deliver its on its mission.