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Complaints and Feedback Policy



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1. Purpose

From time to time, the people we serve at ICAS may wish to provide feedback about their experience in dealing with us. Such feedback may cover a wide range of issues, including:

- The level of service provided by ICAS.
- The process followed by ICAS in taking a decision.
- The actions or behaviour of an ICAS employee.

The purpose of this policy is to set out how ICAS will deal with such feedback, including feedback which is treated by ICAS as a complaint (as defined below).

2. Scope

The policy sets out the processes which ICAS will follow when feedback is received. It is designed to cover everyone employed by ICAS (included the Chief Executive and other members of our Executive Team). It also applies to our Office Bearers, as well as members of our Council, boards, committees and panels.

While it is expected that this policy will mostly be used in response to feedback provided by the people we serve in ICAS, it could, in certain circumstances, apply to feedback from ICAS employees, or members of our Council, boards, committees and panels.

This policy also applies to ICAS students and apprentices.

It is important to understand that this is a separate process from the one that is in place for handling complaints made against ICAS Members under our Rules and Regulations. The process set out in this policy applies where a complaint is made against ICAS or an individual acting for or on behalf of ICAS.

In addition, concerns raised by members of staff about malpractice, impropriety or wrongdoing within ICAS, should follow the process set out in the Whistleblowing Policy.

3. Our commitments and principles

As ICAS is committed to offering the highest possible level of service to all of our customers, irrespective of whether or not they are Members, we will always welcome feedback in case improvements can be made.

If someone believes that the level of service has fallen below the standards our customers would reasonably expect, we will ensure that their feedback is considered and addressed in a manner which best secures the following principles, subject to any overriding legal requirements, such as confidentiality:

- Transparency
- Independency
- Proportionality
- Fairness to all parties
- Efficiency

4. How to submit feedback

Feedback may be provided to ICAS in person, by telephone, by email, or in writing – whichever method is best for the person providing the feedback. However, where more serious issues are being raised, we will need full details to be provided, together with such supporting evidence as may be available.

4.1 Apprenticeships

Graduate Apprenticeship students may contact ICAS using the methods outline above or contact their university directly.

ESFA funded Apprenticeship students (Level 7 Accountancy/Taxation Professional) may contact ICAS as outlined above, or alternatively contact the ESFA Apprenticeship Service Support Line on 08000 150 600, or email helpdesk@manage-apprenticeships.service.gov.uk.

5. Types of feedback

It is important that ICAS deals with feedback in a proportionate manner. We will aim to deal with less serious issues more quickly and effectively, whilst serious issues are given the time and attention they deserve.

On that basis, this policy refers to three different types of feedback:

- Queries
- Concerns
- Complaints

When feedback is received, we will decide which category it falls into, and will deal with it according to the processes set out below (always taking into account the five key principles set out above).

5.1 Queries

We consider a query to be a request for further information that needs to be actioned by ICAS. A query will not normally indicate any concerns over our service, and can normally be dealt with quickly by ICAS, through contacting the person with the relevant knowledge.

5.2 Concerns

We consider a concern to be an expression of dissatisfaction, where the person raising the concern does not expect a formal response to the issue they have raised.

When a concern is raised, we will do our best to deal with it relatively quickly and informally – for example:

- By providing a full explanation of what happened.
- Through a discussion with a more senior member of staff.
- By making an apology.

The member of staff who receives the concern must ensure that it is passed on to someone who can take action, if necessary, i.e. someone who understands the subject and who can either address it themselves or escalate it to a manager who can.

5.3 Complaints

We consider a complaint to be an expression of dissatisfaction about a more serious issue which requires to be investigated before a response can be provided. It is important that ICAS undertakes an investigation of every complaint.

6. Complaints Handling Process

A complaint which is received by ICAS should be passed to the owner of the relevant process, who is likely to be a line manager or director. That person will take ownership and aim to resolve it as quickly as possible if it does not need to be escalated.

However, where a complaint makes an allegation against any member of staff (including an Executive Director or the Chief Executive), or against an Office Bearer or member of Council, which if substantiated, carries a serious risk of damage to ICAS, either financially or reputationally, the Serious Complaints procedure (below) must be followed.

On receipt of a complaint, an acknowledgement should be issued to the complainer as soon as possible.

An initial response shall be issued within three working days advising the complainer that their complaint is being investigated and either a full response will be provided within two weeks, failing which, the complainer will be provided with an update and a revised timescale, with regular contact maintained thereafter.

6.1 Recording a complaint

Full details of all complaints received by ICAS must be recorded in Q-Pulse and should include the following information:

- Name of complainer
- Name of complaint owner (the member of staff dealing with the complaint)
- Date & contact type (i.e. telephone, email, etc)
- Category of issue (i.e. website, customer service, payment, etc)
- Full summary of complaint
- Date of completion of investigation
- Outcome (e.g. upheld, rejected, follow-up steps etc)

6.2 Investigating a complaint

All complaints must be investigated. For complaints against individuals ('Serious Complaints'), the process set out at section 6.3 must be followed. The purpose of the investigation is to establish the facts and assess whether ICAS was at fault. When the investigation has been completed, the conclusion and proposed response must be signed off by the complaint owner's line manager (in most cases, an Executive Director).

6.3 Serious complaints

Where a serious allegation, such as an accusation of behaviour which would fall within the definition of gross misconduct in the ICAS Disciplinary Policy and Procedure (if substantiated), is raised against a member of staff, the serious complaint process must be followed.

Given the level of resource required, and the impact on the individual who is subject to the process, we will only use this process where it is appropriate to do so, having regard to the seriousness of the allegations, and the reasons / evidence submitted to ICAS.

6.3.1 Serious complaint process

All serious complaints must be passed to the ICAS Secretary immediately. The ICAS Secretary will acknowledge the complaint within three working days of receipt, and ensure that it is dealt with in accordance with the following process:

- i. The Secretary shall notify the persons responsible for investigation and determination as per the table below within as soon as possible following receipt of the complaint.
- ii. The appropriate person (or persons) will be appointed to investigate the complaint ("the Investigator").
- iii. The Investigator will carry out such work as they deem necessary to allow for an assessment of the complaint.
- iv. Unless there are valid reasons to proceed otherwise, the Investigator will bring the complaint to the attention of the person complained about at the earliest opportunity and will ensure that he or she is provided with a reasonable opportunity to respond.
- v. While the Investigator will use discretion in deciding what investigation work is necessary, it is likely that they will seek to interview the subjects of the complaint and possibly the complainer (ensuring that full minutes of such interviews are prepared).
- vi. On conclusion of the investigation, the Investigator shall prepare a written report setting out the circumstances giving rise to the complaint, their findings, and their conclusions and/or recommendations for determination.
- vii. The Investigator shall use all reasonable endeavours to complete the investigation and issue the report as a matter of priority and shall liaise with the Secretary as to timescales. The Secretary shall keep the complainant informed as to progress on a fortnightly basis.
- viii. The Investigator's report will be passed to the Decision-maker, as set out below.
- ix. The Decision-maker will consider the Investigator's report and decide the outcome (based on the "Outcomes" below), aiming to do so within seven days of receipt of the report).
 - x. If the complaint is upheld, the Decision-maker will make such directions or recommendations as he or she deems appropriate in respect of follow-up action in consultation with the Chief Executive and HR Director.
- x. The Decision-maker will notify the complainant of the outcome of the investigation in writing within seven days of receipt of the report.

It may be appropriate for ICAS to vary this process on a case-by-case basis. In doing so, we will always take account of the five underlying principles set out above.

All ICAS employees, as well as people serving ICAS on its Council, boards, committees, and panels, will be

expected to comply fully and promptly with any requests received from an Investigator.

Our commitment to 'fairness to all parties' includes any ICAS employees who may be referred to in any feedback we receive. We will ensure that we meet our responsibilities as a conscientious employer, by making sure our employees are appropriately supported throughout any processes which are undertaken.

6.4 Responsibility for investigation and determination

The individuals who will be appointed as Investigators and Decision-makers will vary according to the identity of the individual(s) who are the subject of the complaint. Whilst the process may be varied on a case-by-case basis, as appropriate, the following table sets out the parties who are likely to be appointed as Investigators and Decision-makers:

Subject of complaint	Investigator	Decision-maker
Employee (not Director)	Line Manager or Director	Executive Director
Employee (Director)	Executive Director	Executive Director
Executive Director	The Chief Executive and an Executive Director	Chief Executive
Chief Executive	Two Council members (CA and Public Interest Member)	Office Bearers
Office Bearer	Two Council members (CA and Public Interest Member)	Council
Council member	Two Council members (CA and Public Interest Member)	Office Bearers
Member of ICAS board, committee, or panel	Two Council members (CA and Public Interest Member)	Chair of the relevant board, committee or panel

The same person will not act as Investigator and Decision-maker for the same complaint. ICAS will ensure that the people appointed to act as Investigators and Decision-makers understand the terms of this policy and are sufficiently competent to fulfil their role. They will be supported in an administrative capacity by the ICAS Secretary.

6.5 Outcomes

If a complaint is upheld, the Decision-maker will make such directions or recommendations as they deem appropriate in respect of follow-up action.

Where a complaint against an ICAS employee is upheld, it may be appropriate for matters to be dealt with in accordance with ICAS' internal disciplinary procedures. In such instances, a complainant shall only be entitled to know that the complaint has been upheld and that it will be dealt with under ICAS' internal disciplinary procedures.

Where a complaint against an individual who serves ICAS on its Council, board, committee or panel is upheld, consideration may be given to the individual's ongoing appointment to such body.

What ICAS expects from people making complaints

We expect people to always behave appropriately when making complaints, avoiding any behaviour which is not constructive.

We recognise that a complaint may follow an experience that a person found frustrating, concerning or upsetting. Whilst every person is entitled to have their complaint heard and considered by ICAS, we operate a zero-tolerance policy for abusive or aggressive behaviour towards our staff. We will take appropriate action in response to any person who is engaging in threatening, abusive or repetitive correspondence or making unreasonable demands on our staff, including terminating or limiting contact with the person.

If an ICAS Member or Student Member behaves in such a way, we will consider whether a disciplinary investigation is required under the ICAS Rules and Regulations.

6.6 Vexatious complaints

ICAS will reject any complaint which we consider to be vexatious. This would be where we consider that the complaint has been made with the attention of causing annoyance, worry or trouble to the person who is the subject of the complaint, or a complaint which is otherwise manifestly unreasonable.

6.7 Process review

A concern may be raised where a person does not think that we correctly followed our processes when making a decision. In these instances, we are likely to undertake an administrative review in response, to assess whether the correct process was followed, leading to two possible outcomes:

- If the correct process was not followed, we will take appropriate steps to ensure that the position is addressed.
- If the correct process was followed, we will do our best to explain this to you, with no further action taken.

It is important to emphasise that some decisions taken by ICAS have distinct processes which provide for oversight and may have distinct rights of challenge. It will not be appropriate for concerns against such decisions to be assessed in accordance with the processes set out in this policy.

For example:

- A decision of Council to increase the Member subscriptions.
- A mark awarded to a CA Student for an exam.
- A decision of the Investigation Committee to dismiss a complaint made against a CA Firm.





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