



External Stakeholder Complaints and Grievances Policy

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1. Purpose

- 1.1 The purpose of this policy is to provide a clear, transparent, and fair procedure for external stakeholders to raise grievances and have them addressed promptly and effectively. This policy also outlines the safeguards in place to protect stakeholders from retaliation. Time scales have been fixed to ensure that grievances are dealt with quickly. However, these may be extended if it is agreed upon by both parties.

2. Scope

- 2.1 This policy applies to all external stakeholders, including but not limited to: Clients or Customers, Partners and Suppliers, Community Members, Civil Society Organisations, Regulators or Government Entities. It covers grievances related to the organisation's conduct, services, employees, or operations. This procedure is not intended to deal with employee grievances, disciplinary matters, dismissal matters, recruitment-related complaints, contractual disputes that are subject to separate dispute resolution provisions, or matters that are already the subject of legal proceedings or regulatory investigation. Such matters will be managed under the appropriate policy, procedure, or legal process.

3. Grounds for Accepting a Grievance

- 3.1 A grievance may be accepted if it relates to any of the following: breach of contract or agreement, failure to meet service or product expectations, unethical, discriminatory, harassing, victimising, or otherwise inappropriate behaviour, including conduct prohibited under the Equality Act 2010, environmental, social, or community harm caused by the organisation's actions, lack of transparency or access to information, violation of legal, regulatory, or compliance obligations, inappropriate or unfair treatment by a representative of the organisation.
- 3.2 Anonymous grievances may also be reviewed if sufficient detail is provided for investigation. However, anonymity may limit the organisation's ability to investigate the matter fully or provide updates regarding the outcome.

4. Grievance Management Procedure

Submission: Stakeholders may submit grievances by contacting the Adelphi Group of Companies using the contact details below. Complaints may be submitted in writing, by email, or by telephone.

Required information: complainant's name and contact details, relationship to the organisation, detailed description of the issue, any supporting evidence or documents, desired resolution (optional).

Acknowledgment (normally within 5 business days of receipt): The organisation will confirm receipt in writing, including: the name and contact of the grievance handler, an outline of the next steps and estimated resolution timeframe.

Preliminary Assessment (normally within 10 business days of receipt): The grievance will be reviewed to determine: whether it meets the grounds for acceptance, whether it contains sufficient detail for investigation, any immediate actions required (e.g. risk mitigation).

If the grievance is outside the organisation's scope or lacks necessary detail, the complainant will be informed with reasons and guidance, if appropriate.

Investigation (normally completed within 30 business days): The organisation will determine the nature and extent of the investigation based on the circumstances of the grievance and the information available.

For accepted grievances: a fact-based investigation will be conducted by the grievance handler, interviews or clarification may be sought from the complainant and relevant parties, all findings will be documented, stakeholders may be updated if timelines are adjusted.

Where a grievance concerns the conduct of an employee, matters may also be managed under the organisation's internal disciplinary, grievance, or other relevant procedures where appropriate.

The organisation reserves the right to refer matters to regulators, law enforcement agencies, insurers, auditors, or other appropriate authorities where required by law or where it considers such referral appropriate.

Resolution and Response (normally within 5 business days of an investigation concluding): A written resolution will be provided, including: findings from the investigation, decisions made and rationale, corrective actions or remedies.

Possible resolutions may include: apology or explanation, remedial action (e.g. refund, service correction), process or policy changes.

Review Request: If the complainant is dissatisfied with the outcome of the grievance, they may submit a written request for review within 20 business days of receiving the decision.

Where reasonably practicable, the review will be conducted by an individual not previously involved in the matter.

The outcome of the review will be communicated in writing and will represent the organisation's final position.

5. Protection Against Retaliation

- 5.1 The organisation strictly prohibits any form of retaliation, harassment, or disadvantage directed at individuals who submit a grievance in good faith, participate in an investigation, or provide evidence.
- 5.2 Controls in place include: disciplinary actions for any employee found retaliating, and regular monitoring and reporting of grievance cases to Senior Leadership.
- 5.3 The organisation will seek to maintain confidentiality of complainant identity and grievance information as far as reasonably practicable. However, information may need to be disclosed where required for a fair investigation, safeguarding reasons, legal proceedings, regulatory requirements, or other legal obligations.
- 5.4 Any stakeholder who feels they are experiencing retaliation should report it immediately via the grievance channel.

6. Data Protection and Confidentiality

- 6.1 Any personal data collected as part of a grievance or complaint will be processed in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the organisation's Privacy Policy.
- 6.2 Information provided during the grievance process will only be used for the purposes of assessing, investigating, resolving, and monitoring complaints and grievances, or where otherwise required by law.
- 6.3 Information may be shared with employees, advisers, regulators, insurers, legal representatives, or other third parties where necessary to investigate and resolve the grievance or to comply with legal obligations.
- 6.4 Records relating to grievances will be retained in accordance with the organisation's document retention procedures.

7. Contact Information

- 6.1 You may contact the Adelphi Group of Companies at any time if you would like to make a complaint or grievance.

Postal address: Adelphi Group of Companies, Olympus House, Mill Green Road, Haywards Heath, West Sussex, RH16 1XQ

Email: policy@adelphi.uk.com

Telephone number: +44 (0)1444 472300