



COMHLÁMH

CODE OF CONDUCT

FOR

**STAFF, MEMBERS AND BOARD OF
COMHLÁMH**

February 2022

Policy owner: CEO of Comhlámh

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Contents

Introduction and purpose	4
1 Comhlámh's vision, mission statement and values	4
1.1 Vision	4
1.2 Mission	4
1.3 Values	4
2 Scope of the Code of Conduct	4
3 Sector standards and national laws	4
4 Code of Conduct vision	2
5 Code of Conduct principles	2
6 Our Behaviours and Comhlámh actions in support of the Code of Conduct principles	3
6.1 Address power and privilege	4
6.2 Disrupt oppressive power	4
6.3 Respect survivors' voices	5
6.4 Listen carefully	5
6.5 Speak out	5
6.6 Care for others	6
6.7 Take personal responsibility	6
6.8 Collaborate and co-create	7
6.9 Learn and innovate	7
7 Our Accountability	8
8 Reporting and support	8
9 Confidentiality statement	11
10 Commitment statement and signature	11
11 Annex 1- Definitions	12

Introduction and purpose

Comhlámh's ability to deliver the mission, vision and strategy depends on the ability of its staff, board, members, and others associated with the association to promote the highest standards of behaviour and professional conduct. Comhlámh is committed to preventing and responding to all forms of discrimination, abuse, exploitation, and harassment against people who come into contact with the association. Our Code of Conduct recognises that these forms of harm are violations of fundamental human rights and result from unequal power relations.

Comhlámh's Code of Conduct outlines the principles, personal behaviours, and associational actions that Comhlámh staff, members and board shall uphold to safeguard the required standards of conduct and support a nurturing and empowering culture.

The Code of Conduct informs all Comhlámh policies.

1 Comhlámh's vision, mission statement and values

1.1 Vision

PEOPLE TOGETHER IMAGINING AND ACTIVATING NEW POSSIBILITIES FOR A WORLD BEYOND INJUSTICE

1.2 Mission

TO NURTURE AND SUPPORT THE WORK FOR JUSTICE LOCALLY AND GLOBALLY

1.3 Values

Respect: openness and flexibility in the way we think and act. It involves compassion, empathy, humility, having a reflective and critical awareness of ourselves and others and of structures and systems.

Integrity: honesty, fairness, transparency, and accountability in everything we do.

Solidarity: taking longer-term action in mutually supportive relationships on issues identified by those most affected. It is premised on interconnectedness and interdependence, and involves a critical voice, a recognition of power differentials and acting together for positive change.

Ecological sustainability: understanding ourselves as integrated with and impacting on the environment whilst recognising and acting on our individual and collective responsibility in this regard.

2 Scope of the Code of Conduct

The Code describes the expected behaviours for all Comhlámh staff, members, member groups, associates, and board. In line with best practice across the development sector, both professional and personal conduct should be consistent with the principles described in the Code. The Code is integral to conditions of employment, membership and other forms of engagement and is therefore included in recruitment and induction processes and as an appendix to staff contracts and must be accepted as a condition of membership of Comhlámh and of the Board.

In addition, this Code applies to those associated with Comhlámh such as volunteers, students, and consultants for the duration of their engagement. Those using the Comhlámh premises must also commit to the code whilst using the premises.

3 Sector standards and national laws

The Code is informed by and aligned with national laws and international conventions and standards, namely Universal Declaration of Human Rights (1948), the UN Convention on the Rights of the Child, 1989 (and its optional protocols); Minimum Age Convention (1973), Convention to End Discrimination Against Women (1979), the Convention on the Rights of Persons with Disabilities (2006), the Eliminating Violence in the World of Work Convention 190 (2019) and the UN Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (2003); the national safeguarding legislation of Ireland; Charities Governance Code and international good practice.

4 Code of Conduct vision

We envision an association where:

- There is a safe, nurturing, and welcoming culture
- There is a community of solidarity, inclusiveness, and respect of all people, where everyone knows, lives and breathes the values of Comhlámh
- We are all heard and valued
- We create safe and brave spaces for all to speak out, reflect and dialogue with others
- We bring energy to the learning process, and learning spaces are facilitated so everyone can participate in mutual learning to strengthen safeguarding practises
- We do no harm

5 Code of Conduct principles

The following principles inform the Comhlámh Code of Conduct and subsequent behaviours and actions.

Figure 1- The principles underpinning Comhlámh Code of Conduct



Address power and privilege- We are aware of the power and privileges we hold and seek to address power imbalances to develop and maintain safe organisational cultures.



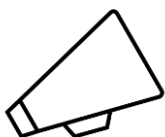
Disrupt oppressive power- We seek to interrogate the root causes of our unequal world. We dig deep to understand and will act with others to address structural inequalities and disrupt oppressive power.



Respect survivors' voices- We respect survivors' voices and provide a survivor-centred response in the pursuit of justice.



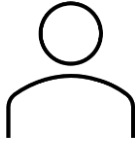
Listen carefully- We listen to others to understand what is needed to create welcoming and safe spaces where everyone can speak out. We listen to all voices as every conversation matters.



Speak out- We speak out and act upon injustice.



Care for others- We act in fairness and respect for the human rights and dignity of all.



Take personal responsibility- We will uphold the principles of the code of conduct and safeguard all those we work with and those who Comhlámh comes into contact with.



Collaborate and co-create- We facilitate opportunities to work together and for supportive, kind, and open collaboration.



Learn and innovate- We encourage learning and innovation. We are understanding when things go wrong and seek to reflect and understand how to do better.

6 Our Behaviours and Comhlámh actions in support of the Code of Conduct principles

We are committed to role modelling behaviours which demonstrate that we are implementing the Code of Conduct principles and promote organisational actions to create a safe, nurturing, and welcoming culture.

6.1 Address power and privilege



We are aware of the power and privileges we hold and will address power imbalances to develop and support safe organisational cultures

Applying this principle to our behaviours

- Comhlámh welcomes people from diverse cultures, communities, and identities in all our interactions and work.
- We work to address unequal distributions of power, promote equality, diversity, and inclusion, and end all forms of discrimination¹.
- We critically reflect on the power and privileges we hold relative to others. We use this reflection to challenge our personal biases and inform our actions.
- We are open to learn, be challenged, and change through open and honest conversations so we use our power and privileges responsibly.

¹ See graphic 2

Applying this principle to the work of Comhlámh

- Promote more diverse and inclusive working environments and create safe spaces for everyone to learn and share insights on power, safeguarding and human rights. This may include, but is not limited to, holding anti-racist training, and providing opportunities to consider power dynamics in workshops.
- The requirement to respect the Code of Conduct and promote equality, diversity and inclusion is in job descriptions, and conditions of membership groups.
- Power and privilege are agenda items on board, staff, and members' meetings at least once a year.
- A staff representative at board meetings is provided within Comhlámh's governance and the board is elected by the membership at AGMs.

6.2 Disrupt oppressive power



We seek to interrogate the root causes of our unequal world. We dig deep to understand and will act with others to address structural inequalities and disrupt oppressive power

Applying this principle to our behaviours

- We commit to zero tolerance of discrimination, bullying or harassment, including sexual harassment, sexual exploitation, and sexual abuse. Unacceptable behaviours and language are challenged.
- We actively seek diverse views to broaden our understanding of power in order to address social injustice.

Applying this principle to the work of Comhlámh

- Reach out and attract people from diverse communities and networks to join Comhlámh as staff, members, and board members.
- Safe spaces may be established by and for those with diverse identities. These spaces provide opportunities to contribute to decision-making.
- Ensure that diverse voices amongst the board, staff and members are heard and included in decision-making across the association.
- Promote human rights, including the rights of children and the diverse communities that Comhlámh is committed to working with.
- Commit to ensuring that there are no forms of discrimination² in our programmes.

6.3 Listen carefully



We listen to others to understand what is needed to create welcoming and safe spaces where everyone can speak out. We listen to all voices as every conversation matters

Applying this principle to our behaviours

- We actively seek out, and listen to, diverse voices.
- We take time to understand, without judgement, cultures, customs, and traditions which are different from our own.

Applying this principle to the work of Comhlámh

² See graphic 2

- Create opportunities for all staff, members, and board to contribute to the development, review, and monitoring of the Code of Conduct.
- Training will be provided for those who receive reports of concerns, so they can provide person-centred, thorough and prompt responses.

6.4 Respect survivors' voices



We respect survivors' voices and provide a survivor-centred response in the pursuit of justice

Applying this principle to our behaviours

- We demonstrate kindness to, and belief and trust in, survivors.
- We take the survivor's wishes into account ensuring that all actions are taken in accordance with their wishes.

Applying this principle to the work of Comhlámh

- A survivor and person-centred, safe reporting and response mechanism is in place. This provides survivors and others who report breaches of the code with a confidential and timely response. Investigations are thorough, impartial, and uphold Comhlámh's legal requirements. The survivor and reporter are informed at each step of the process and is told the result of the investigation.
- The well-being of the survivor is a priority, risks are assessed to do no harm and ensure the well-being of all and specifically the best interests of the child.
- Breaches of the Code of Conduct will be managed by the disciplinary processes outlined in the Staff Handbook, Comhlámh's Governance Manual, and Constitution.

6.5 Speak out



We speak out and act upon injustice

Applying this principle to our behaviours

- We enable people to be their whole/authentic selves at Comhlámh. We meet others where they are at and build trusting and credible relationships.
- We speak out in solidarity with others.
- We respect confidentiality as needed.

Applying this principle to the work of Comhlámh

- Social justice and activism are organisational values.
- Inclusive language is used in all internal and external communications.
- A robust survivor-centred reporting and response process is in place (section 8 below). This is known and understood enabling everyone to speak out against breaches of the Code of Conduct, the Equality and Child Safeguarding Policies.

6.6 Care for others



We act in fairness and respect for the human rights and dignity of all

Applying this principle to our behaviours

- We promote and respect all human rights, including the rights to be protected from all forms of harm, abuse, sexual abuse, sexual and commercial exploitation.
- We uphold the Comhlámh Child Safeguarding Policy and our duty to protect the rights of children.
- We will not engage in any form of abuse - emotional, verbal, physical or sexual - and undertake not to abuse the power and influence we have.
- We will not engage in sexual activity with a person under the age of 18 years regardless of the legal age of consent.
- We will not exchange sex for money, employment, goods, or services.
- We will not discriminate against any person, group or organisation based on the grounds described in *figure 2*.

Applying this principle to the work of Comhlámh

- Sexual and commercial exploitation is prohibited, as is sexual activity with a person under the age of 18 years regardless of the legal age of consent.
- A whole organisational approach to implementing the Comhlámh Code of Conduct is in place which integrates the Code within all policies, procedures, and programmes.
- The Code of Conduct is applied throughout the employee life cycle (recruitment, selection, performance management, capacity development, and exit).
- All internal and external communications reflect the Code of Conduct.
- The Code of Conduct, Child Safeguarding Policy and other related policies and procedures are visible and accessible to external (website and events) and internal audiences.

6.7 Collaborate and co-create



We facilitate opportunities to work together and for supportive, kind, and open collaboration.

Applying this principle to our behaviours

- We learn with and from others. We act as mentors, and seek mentors, to share knowledge, skills and expertise and work to co-create for mutual benefit.
- We provide guidance and supportive challenge to strengthen positive professional relationships.

Applying this principle to the work of Comhlámh

- Create opportunities for diverse groups of staff, members, and board to inform the development and review of organisational policies which support the Code of Conduct.
- Identify and work together with leaders in safeguarding, professional conduct and safe organisational cultures to inform Comhlámh's development.

6.8 Learn and innovate



We encourage learning and innovation. We are understanding when things go wrong and seek to reflect and understand how to do better

Applying this principle to our behaviours

- We value all knowledge and learning wherever it is gained.
- Research and best practises inform our work.
- We share learning and insights from things that go wrong so that we can do better the next time.
- We motivate and engage others to try new things.

Applying this principle to the work of Comhlámh

- Provide engaging opportunities for all staff, members, and board to understand the Code of Conduct, Child Safeguarding, and associated policies.
- Building on 6.7 we conduct and share research to build sector knowledge, understanding and strengthen safe programmes.
- The board carries out an annual review of its performance and uses the learning from this to strengthen governance practises

6.9 Take personal responsibility



We will uphold the principles of the code of conduct and safeguard all those we work with and who Comhlámh comes into contact with

Applying this principle to our behaviours

- We maintain high levels of professionalism; we work with skill, competence, ethics, courtesy, and respect.
- We uphold the Code of Conduct and promptly report concerns.
- We uphold the national laws in all the places where we work and are respectful of local customs and traditions.
- We behave with integrity: we do not act in our own personal interests; we protect the interests of Comhlámh when a financial or reputational conflict of interest arises. We are accountable and transparent to those who work with us³.
- It is our responsibility to be aware of local laws and customs regarding substance use including alcohol, and we will not put ourselves in a situation where our ability to uphold the Code of Conduct is compromised.
- We will not work under the influence of alcohol or illegal substances.

Applying this principle to the work of Comhlámh

- Board members and staff declare conflicts of interest.
- The board has in-camera meetings without the CEO of Comhlámh.
- Relevant programmatic, financial, governance and HR policies and procedures are known and understood by board, staff, and member groups.

³ Adapted from Governance manual, Principle 2

Figure 2- Ending discrimination.



7 Comhlámh's Accountability

Comhlamh will be accountable to the Code of Conduct in the following ways:

- Make sure all staff, members and board indicate agreement with the Code of Conduct commitment statement.
- Hold a learning review after any reports of breaches of the Code of Conduct. We will learn from breaches of the Code of Conduct, the Equality and Child Safeguarding Policies and share and act upon this learning across the association.
- Maintain a record of the ways we are upholding the Code of Conduct and share these in creative ways, e.g., stories or images in the Annual General Meeting and other opportunities as they arise.
- We will review this Code and associated policies at a minimum every three years to ensure we continue to learn from, and reflect on, best practises across the sector.

8 Reporting and support

This section includes information on whom to contact and how for support and to report a violation of the code provisions.

What to report?

- Report all concerns regarding breaches of the Code of Conduct. Even where you are not sure a breach has taken place you can contact the CEO of Comhlámh or the Chair to discuss your concerns.
- Concerns or allegations of child exploitation and abuse and Child Safeguarding Policy non-compliance should be reported in accordance with the Child Safeguarding Policy reporting procedure.

Who can report?

- Everyone including staff, members, member groups, board, interns, students, programme participants and all those associated with Comhlámh are responsible to contribute to a safe, nurturing, and welcoming culture: this includes being responsible to report concerns.
- Everyone has the right to report concerns and is welcome to do so.

Who to report to?

- You can report concerns of breaches of this policy to the CEO of Comhlámh or the Chair.
 - The CEO of Comhlámh- caroline@comhlamh.org
 - The Chair- chair@comhlamh.org
- If the Chair of the Board is connected to the concern, then you can report to the Vice-chair of the Board member.
- In addition, staff can report concerns to their line manager. Where the concern relates to their line manager, reports can be made to the line manager's manager, up to and including the CEO of Comhlámh.
- Staff can also use the Whistle-blowing procedures in the Staff Handbook.
- The CEO and Chair on receiving reports may seek the advice of Peninsula⁴ on employment law matters.

How to report

- Reports can be made verbally or in writing/email to:
 - The CEO of Comhlámh- caroline@comhlamh.org
 - The Chair- chair@comhlamh.org

When to report

- Ideally, reports should be made as soon as possible after you become aware of the breach of the Code of Conduct.
- It's never too late to report, so follow up whenever you feel ready.
- Don't assume someone else will report it.

⁴ Company offering HR support to small companies- <https://www.peninsulagrouplimited.com/ie/>

Response

- Responses to all concerns will be treated sensitively in a person-centred way. Persons affected will be supported to access services they may need.
- Every concern will be responded to on a case-by-case basis. Concerns raised may be resolved through dialogue rather than a formal investigation where this is the wish of the complainant. All other suspected breaches of the Code of Conduct will be investigated in line with the appropriate policy. The response will be appropriate to the risk presented.
- Where it is found that there has been a breach of the Code of Conduct there will be a review process to decide what happens next.
- Outcomes may vary from providing training, counselling, increased supervision or transfer to other duties, mediation, restorative justice, and up to and including dismissal/expulsion.
- Reports will be made to regulatory or statutory bodies where required by law.

Protection for complainants

- The Comhlámh Whistleblowing Policy protects staff who make reports in good faith. Deliberately false or malicious allegations will be taken seriously, and appropriate disciplinary action taken.
- The principles outlined in this Code will protect all others who make reports in good faith.
- We will act in the best interest of the complainant respecting any fears they may have throughout the complaints process. We will do our utmost to protect complainants from discrimination or retaliation.
- The Charities Regulator can be approached if a complainant so wishes.

Investigation

- Training will be provided for those who receive reports and conduct investigations.
- Investigation process:
 1. Conduct a risk assessment to understand the potential risks associated with the concern and to identify and implement actions to minimise those risks.
 2. Develop an investigation plan to inform the investigation process. This may include, but not be limited to, conducting interviews, and gathering evidence.
 3. Analyse findings and decide about whether the Code of Conduct was breached on the balance of probability.
 4. Decide the outcome for the person who breached the Code of Conduct, known as the subject of concern.
 5. Provide feedback to the complainant and subject of concern.
 6. Hold a learning review to reflect on the concern and the investigation to learn and improve practises.
- Principles of natural justice will be applied to the investigation:
 1. No person can act as judge in a case in which they have an interest. In practice, this means an independent person should carry out the investigation and disciplinary processes into any alleged misconduct. The more serious the incident, the more independent the investigation team needs to be.
 2. There must be a fair hearing at which all sides have an opportunity to respond to any evidence produced against them.

9 Confidentiality statement

Comhlámh is committed to maintaining the confidentiality of complainants, witnesses, and subjects of concern.

It is essential that confidentiality is maintained at all stages of the process when dealing with Code of Conduct concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only. All personal and sensitive personal data will be treated with equal care by Comhlámh in line with the Data Protection Policy.

10 Commitment statement and signature

I confirm that I have read and understood the Code of Conduct and I agree to uphold this.

I understand that any breaches of the above Code will be reported to the Head of Comhlámh (caroline@comhhlamh.org) or the Chair (chair@comhhlamh.org) and appropriate action will be taken in accordance with the policies and procedures in place.

Name

Date

Signature

11 Annex 1- Definitions

Bullying (From Staff Handbook)

Bullying at work is defined as “repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual’s right to dignity at work”. A once off incident of bullying behaviour may be an affront to an individual(s) dignity at work but is not considered bullying.

A pattern of the following behaviours are examples of types of bullying:

- Exclusion with negative consequences
- Verbal abuse/insults
- Physical abuse
- Being treated less favourably than colleagues
- Intrusion – pestering, spying or stalking
- Menacing behaviour
- Intimidation
- Aggression
- Undermining behaviour
- Excessive monitoring of work
- Humiliation
- Withholding work-related information
- Repeatedly manipulating a person’s job content and targets
- Blame for things beyond the person’s control

This list is not exhaustive.

Child (From UNCRC and Child Safeguarding Policy)

Any human being under 18 years

Equality (From Equality Policy)

From Equality Policy We believe that all are equal but require differing supports to ensure effective participation in all aspects of society.

Inclusion and Diversity

Adapted from: <https://www.cipd.co.uk/knowledge/fundamentals/relations/diversity/factsheet#gref>

Inclusion and diversity often go hand in hand but are different from one another. This means that organisations need to consider both in their people management practises and strategies.

Inclusion is where people’s differences are valued and used to enable everyone to thrive at work. An inclusive organisation is one in which everyone feels that they belong without having to conform, that their contribution matters and they are able to perform to their full potential, no matter their background, identity, or circumstances. An inclusive organisation has fair policies and practises in place and enables a diverse range of people to work together effectively. Diversity is about recognising

and valuing difference. It's acknowledging the benefit of having a range of perspectives in decision-making and the organisation being representative of the organisation's community.

Harassment (From Equality Policy)

Is conduct which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person

Sexual abuse (From Secretary General's Bulletin, 2003)

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation (From Secretary General's Bulletin, 2003)

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (From Staff Handbook)

"Any form of discrimination on the gender ground in relation to the conditions of employment" and includes:

- Any act of physical intimacy
- Requests for sexual favours
- Other act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material that is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating".

The following is list of examples of behaviour that constitute sexual harassment:

- Physical conduct of a sexual nature – this may include unwanted physical conduct such as unnecessary touching, patting, or pinching or brushing against another employee's body, assault and coercive sexual intercourse.
- Verbal conduct of a sexual nature – this includes unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments.
- Non-verbal conduct of a sexual nature – this may include the display of pornographic or sexually suggestive pictures, objects, written materials, emails, text messages, or faxes. It may also include leering, whistling, or making sexually suggestive gestures.
- Sex-based conduct – this would include conduct that denigrates or ridicules or is intimidating or physically abusive of an employee because of his/her sex such as derogatory or degrading abuse or insults which are gender-related.

Social justice (From Equality Policy)

We strongly believe that the current economic model is unjust, oppressive, and exclusionary and needs radical change. We commit ourselves to work for social justice where there is greater fairness in terms of outcomes in society, with a genuine respect for diversity and greater popular participation in decision-making.

Unwelcome Conduct (From Staff Handbook)

To constitute harassment or sexual harassment the behaviour complained of must firstly be unwelcome. It is up to each employee to decide what behaviour is unwelcome, irrespective of the attitude of others to the matter and from whom, if anybody, such behaviour is welcome or unwelcome, irrespective of the attitude of others to the matter.

The fact that an individual has previously agreed to the behaviour does not stop him/her from deciding it has now become unwelcome. It is the unwanted nature of the conduct which distinguishes sexual harassment and harassment from friendly behaviour which is welcome and mutual.

Adults experiencing vulnerability *Adapted from the UK NHS definition and the remainder was developed Lucy Heaven-Taylor. [LinkedIn profile](#)*

Individuals 18 years and above who are, or may be, unable to take care of themselves and/or are unable to defend themselves against significant harm or exploitation. This vulnerability could be both temporary or permanently experienced. It may result from: a mental health illness; a learning or physical disability; a sensory impairment; an imbalance of power from a dependent or unequal relationship; the influence of alcohol or drugs, the effects of trauma or for any other reason.

Adults may experience vulnerability either temporarily or permanently, due to:

- Reduced capacity to understand information, process information, or communicate opinions or decisions. This capacity may be task-specific and may fluctuate, as changes in a person's condition can impair their ability to understand, retain, weigh up information and communicate their decisions.
- Their lack of freedom or ability to engage voluntarily. This could be a consequence of coercion or undue influence by means of force; threats; retribution; manipulation (including emotion-laden appeals); persuasion and inducements; or the undue influence of a partner; guardian; employer; or government authority.
- Their dependent and/or unequal relationships which can occur with either a partner, guardian, employer or government or local authority amongst others. These relations can put them at increased risk of being unable, or unwilling, to express their independent views. Their dependence or lack of status can also put them at real or perceived risk of suffering consequences should they not agree.
- Their circumstances can put individuals in a situation which incurs risk of significant harm, exploitation, or abuse by people around them. The risk could be inflicted upon individuals by family members, friends, health providers, and other persons within a position of authority.

ANNEX – Public Complaints Policy

Comhlámh views complaints as an opportunity to learn and improve for the future, as well as a chance to put things right for the person or organisation that has made the complaint. Our policy is:

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint.
- To publicise the existence of our complaints procedure so that people know how to contact us to make a complaint.
- To ensure everyone at Comhlámh knows what to do if a complaint is received.
- To ensure all complaints are investigated promptly and fairly.
- To ensure that complaints are, wherever possible, resolved and that relationships are repaired.

What is a Complaint?

- A complaint is any expression of dissatisfaction about any aspect of Comhlámh. Complaints may come from any individual or organisation who has a legitimate interest in Comhlámh.
- A complaint can be received verbally, by phone, by email, via social media or in writing.
- All complaint information will be handled sensitively, telling only those who need to be involved and following any relevant data protection requirements.
- This policy covers complaints about: how you or others have been treated by Comhlámh; the behaviour of Comhlámh staff, board, and its members; any concerns about Comhlámh policies and legal obligations.
- Concerns raised by Comhlámh employees are dealt with under our Whistleblowing Policy.
- It may be the case that we receive correspondence that in our view does not fall under our definition of a complaint or does not raise any issue that calls for in depth investigation. This may apply, for instance, to objections to certain steps, recommendations, or decisions we have taken in compliance with a legal requirement; disapproval of Comhlámh's refusal to act in a matter where we have no legal power to act; malicious, repetitive, or vexatious claims such as harassment of staff or repeated submissions of a complaint to which a response under section three of our complaint procedure has been provided.
- We will not reply to rude or abusive emails, calls, or letters. In all other cases we will give brief reasons for our views but having done so once will not normally engage in further correspondence on the merits of the position we have taken.

We will treat any expression of dissatisfaction about our conduct as a complaint. However, we ask you to contact us in writing as set out in the next section, so that we can consider the matter properly.

Making a Complaint

- Comhlámh's contact details are available on our website.

- A complaint may be emailed to elena@comhlámh.org or sent by post to: Head of HR, Comhlámh, 12 Parliament St, Dublin 2
- A telephone complaint can be received at +353 (01) 4783490
- It will help us to deal quickly and fully with your complaint if you can state that you are making a complaint, set out your concern in writing as clearly as possible, and provide your contact details.

Responding to Your Complaint

- If you have supplied your contact details, we will send an acknowledgment of your complaint within five working days. Your complaint will then be passed to our complaints committee.
- We will aim to respond as soon as possible, and in any event within 21 working days. We may need to contact you to ask for more information or clarity before making a final response.
- When we provide you with a final response, we will clearly set out the steps we took in investigating the complaint along with our views and reasons for this. Where we identify mistakes in our approach we will acknowledge those mistakes, set out details of remedial steps or changes we think are appropriate in the circumstances, and explain what we will do to prevent the problem from reoccurring. We will also indicate your right to request a review of your complaint if you are not satisfied with our response.

Receiving a Complaint – Guidance for Staff

- Complaints received by telephone or in person need to be recorded.
- The person who receives a phone or in person complaint should:
 - Write down the facts of the complaint.
 - Take the complainant's name, address, telephone number and email address.
 - Note the relationship of the complainant to Comhlámh.
 - Inform the complainant that we have a complaints procedure.
 - Inform the complainant what will happen next and how long it will take.
 - Where appropriate, ask the complainant to send a written account by post or by email so that the complaint is recorded in the complainant's own words.

You should:

 - Remain calm and respectful throughout the conversation.
 - Listen - allow the person to talk about the complaint in their own words.
 - Don't debate the facts in the first instance, especially if the person is upset/angry.
 - Show an interest in what is being said.
 - Ask for clarification wherever necessary.
 - Show that you have understood the complaint by reflecting back what you have noted down.

- Acknowledge the person's feelings (even if you feel that they are being unreasonable) - you can do this without making a comment on the complaint itself or making any admission of fault on behalf of the organisation e.g. "I understand that this situation is frustrating for you".
- Be clear about what you can do, how long it will take and what it will involve.
- Make sure you double check the person's contact details before ending the conversation.

Handling a Complaint – Guidance for Complaints Committee

- On receiving the complaint, the complaints committee should record it in the complaints log located on the Share-Drive (accessible only to the complaints committee).
- Complaints should be acknowledged in writing within five working days. The acknowledgement should say who is dealing with the complaint and when the person complaining can expect a reply. A copy of the complaint procedure should be attached.
- Ideally complainants should receive a definitive reply within 21 days. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.
- Whether the complaint is justified or not, the reply to the complainant should describe the action taken to investigate the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.
- If the complainant feels that the problem has not been satisfactorily resolved, they can request that the complaint is reviewed at CEO and Board level. This request should be acknowledged within five working days of receiving it. The acknowledgement should say who will deal with the case review and when the complainant can expect a reply.
- The CEO and Board should then review the complaint and keep the complaints committee informed so the Complaint Log is updated accordingly.
- Ideally complainants should receive a definitive reply within five working days. If this is not possible because for example, an investigation has not been fully completed, a progress report should be sent with an indication of when a full reply will be given.
- Whether the complaint is upheld or not, the reply to the complainant should describe the action taken to review the complaint, the conclusions from the investigation, and any action taken as a result of the complaint.
- The decision taken at this stage is final.

