

# Better Cotton Initiative Complaints Policy and Procedures

Policy: Complaints Policy and Procedures	Version: 2.0
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# Section 1: Complaints Policy

## Objective and Policy Statement

Better Cotton Initiative (BCI) recognises that anyone who engages with BCI activities, people or programmes, has the right to raise a complaint. BCI will take seriously any complaint received and will assess and respond to it promptly, with the aim of seeking a resolution as quickly as possible. Information received as part of the complaint will be treated confidentially and with respect for sensitive information. The BCI Complaints Policy and Procedures has been developed in accordance with Article 13 of the Statutes of the Association and provides clear guidance on how to raise a complaint, how complaints are handled and what to do if a complaint is not satisfactorily resolved.

## Definition

A complaint is any expression of dissatisfaction by individual(s) or organisation(s), whether justified or not. Individual(s) or organisation(s) may make a complaint if they consider that BCI and/or associated third parties:

- Failed to deliver activities of an acceptable standard or made a mistake in the way an activity was conducted
- Failed to act in a proper way
- Failed to meet its obligations

## Scope of Policy

Complaints can relate to any aspect of BCI and its activities, including third parties with a direct relationship with BCI. The Complaints Policy and Procedures are publicly accessible and can be used by any person or organisation that engages with BCI.

This includes, but is not limited to:

- Members of the Association
- Members of the public
- Programme partners
- Consultants carrying out work on behalf of BCI or its affiliates
- Farmers
- Farm workers
- Producer staff

- Cotton supply chain actors (e.g. ginner, spinners, traders, fabric makers, mills, end product manufacturers, sourcing agents)
- BCI staff

## Limitations of the Policy

The BCI Complaints Policy does not cover:

- Complaints around activities not associated with BCI or BCI activities
- Complaints against BCI members not related to their BCI membership.
- Complaints covered by the BCI Safeguarding Policy such as incidents of sexual abuse, exploitation or harassment.
- Complaints covered under the BCI Whistleblowing policy such as incidents reported by BCI staff pertaining to wrong-doing of public interest.
- Licensing decision appeals and Certification appeals
- Chain of custody and supply chain appeals, referenced in the Chain of Custody Guidelines.

## Partner Organisations and Service Providers

Partner organisations and service providers are required to have their own mechanisms in place to manage complaints relating to their own organisation. If BCI receives a complaint that would ordinarily be dealt with by a partner organisation's own processes, the person making the complaint will be informed that it is outside of BCI's scope and, with their permission, the complaint will be forwarded to the partner organisation to be dealt with appropriately.

If a complaint refers to a matter which, if verified, would constitute a breach of a partnership/service-level agreement, or a safety concern, BCI will investigate the complaint and take action according to BCI's internal processes. The original complaint will not be forwarded to the partner organisation/service provider unless as part of the evidence presented during the investigation. This is in order to ensure the protection of the person making the complaint.

## Confidentiality

Confidentiality will be maintained at all times. This means that the identity of the person making the complaint will only be made known to those who need to know about it in order to review, make a decision on appropriate actions or implement corrective actions.

Complaints received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

## Data Management and Protection

To process a complaint BCI will hold personally identifiable data about the person making a complaint and others involved. Data will be held securely in line with the BCI Data Privacy Policy and only used to address the complaint.

## Section 2: Complaints Procedure

### Raising a Complaint

Complaints can be raised by:

1. Sending an email to [complaints@bettercotton.org](mailto:complaints@bettercotton.org)
2. Completing the online form on the BCI website, [bettercotton.org/complaints](https://bettercotton.org/complaints)
3. Talking to a member of staff directly

The person raising a complaint should provide the following information:

- Name(s) of person(s) making the report (optional) and contact details
- Name(s) of person(s) involved in complaint if appropriate
- Description of complaint
- Date(s), time(s) and location(s)

### Receiving a Complaint

Any staff member who is approached with a complaint relating to BCI, its people, activities or programmes must forward this complaint within 72 hours to the [complaints@bettercotton.org](mailto:complaints@bettercotton.org) inbox.

### Complaints Monitoring Team

The complaints inbox is reviewed by a Complaints Monitoring Team comprised of a maximum of five BCI staff members.

The monitoring team are responsible for:

- Monitoring the complaints inbox
- Reviewing complaints received, validating their admissibility, and creating a case code for the complaint
- If applicable, requesting any missing or additional information from the person making a complaint in order to assess admissibility

- Triaging admissible complaints to the relevant BCI Complaints Resolution Focal Point who will inform the person making the complaint of next steps.

## **Complaints Resolution Focal Points**

Complaints Resolution Focal Points are representatives from each function at BCI who are responsible for taking forward any complaint related to their function and ensuring it is managed following the appropriate internal processes. There are usually at least two focal points per function to avoid a single point of failure.

Once a complaint has been received, the Complaints Resolution Focal Points will conduct initial enquiries into the complaint to determine whether an investigation will be required.

## **Investigations**

If it is considered that the information raised will require an investigation, the person making a complaint will be informed of this and the investigation process will be started within 21 days of the person being informed, with the intention of reaching a resolution as fast as possible.

If an investigation is required, the Complaints Resolution Focal Points will inform the BCI management team and appoint an investigation team. Depending on the severity and circumstances of the complaint, investigations may be carried out internally or with the support of third-party experts.

Investigations may include conducting interviews with those involved and collecting and reviewing evidence. At the conclusion of an investigation, an investigation report will be produced with recommendations for actions based on the appropriate complaints management procedure relating to the case.

## **Decision-Making Group**

The investigation report will be presented to a decision-making group comprising members of the Executive Group and other staff as relevant to the case. The Decision-Making Group will review the investigation report and, based on the information presented to them, decide whether to follow the recommendations of the investigation team or to pursue a different course of action.

This decision, and any relevant resulting actions, will be communicated to those involved, including the person who made the complaint. Confidentiality will be maintained throughout the process meaning that details of the decision may not be disclosed to all involved.

## **Escalation to Council**

In some instances, the involvement of some, or all, of the BCI Council may be required in order to appropriately address a complaint. This will only occur in instances where the complaint is of

sufficient severity that the Council's involvement would be appropriate. A risk based approach will be used to determine which cases are escalated.

The following are examples of when the BCI Council would ordinarily be involved:

- Complaints relating to members of the BCI Executive Group
- Complaints relating to a Council Member
- Criminal proceedings
- Significant financial misconduct
- Any complaint representing a substantial risk to the organisation, including financially, reputationally, ethically, etc.

When a complaint requires the involvement of the Council it will be escalated by the CEO to the Council Executive Committee, who will review the complaint and decide on next steps. If the complaint relates to the CEO, it will be escalated to the Executive Committee by the Council Chair.

## Closing a Complaint

Upon resolution of the complaint, the BCI Focal Point will advise those involved of the final outcome and any solution proposed to address the concern raised. All information related to the complaint will be kept for record purposes in strict compliance with the BCI Data Privacy Policy (see Data Management and Protection above).

## Appeals

If the person making a complaint is not satisfied that the organisation is appropriately addressing their complaint, they have a right to an appeal.

In order to make an appeal the person must:

- Send an email to [complaints@bettercotton.org](mailto:complaints@bettercotton.org)
- Write Appeal: [insert case code] in the email subject line
- Clearly state the grounds for the appeal in the body of the email

Appeals will be reviewed by an Appeals Decision-Making group comprising different people than those who initially reviewed the complaint, including at least one member of the Executive Group. Where possible, appeal reviews will be conducted within 30 days of an appeal being lodged. The appeal may be adjourned if BCI needs to carry out further investigations in light of any new points raised at the appeal review. Appeals can be escalated to Council by the Appeals Decision-Making Group in consultation with the CEO.

## Learning

After a complaint is raised and resolved, BCI will implement lessons learned and any required improvement processes in order to avoid similar occurrences in the future. BCI will conduct an annual review of agreed remediation and preventative measures taken.

## **Reporting**

The BCI Council, management team, and any donors or other bodies that BCI is required to report to will be provided with a high-level summary of the complaints received.

These will include the number and types of complaints received, and the countries where the complaints originated. This information will also be included in BCI's annual reports.

No identifying information will be shared, and the aggregation of complaints data will only be used to improve BCI's processes and ensure transparency with stakeholders.

## **Policy Review**

This policy will be subject to review by the BCI Executive Group every three years.