

Humanists UK Humanist Ceremonies™ Network Complaints Policy

This policy, and its procedures, aims to promote and protect the professionalism, high quality and integrity of the Humanist Ceremonies™ network, in terms of both the network as a whole and its individual celebrant members. It does this by:

- Building and maintaining relationships with clients and potential clients.
- Demonstrating a commitment to providing the best possible service.
- Trying to repair situations when they go wrong and reducing the risk of repeat.

The Humanists UK and Humanist Ceremonies™ network

This policy relates to complaints made about a Humanist Ceremonies™ network celebrant. It does not cover complaints made about Humanists UK staff, volunteers, or consultants (including Quality Assurance Committee (QAC) and Marketing Advisory Committee (MAC) members), or Ceremonies Board members.

Humanist Ceremonies™ network celebrants are self-employed individuals trained and accredited by Humanists UK and eligible to practise under Humanists UK trademark. Accreditation requires Humanist Ceremonies™ network celebrants to commit to all rights and responsibilities in Humanists UK Celebrants Handbook, including the Code of Conduct, Standards of Practice and Complaints Policy and Procedure.

This policy covers complaints received from:

- Celebrant colleagues.
- Funeral directors or fellow professionals.
- Clients, family members or attendees at a ceremony.
- Humanists UK staff.
- Members of the public.

Principles of Humanists UK Complaints Policy

The policy is a public document accessible to any member of the public or celebrant. It provides everyone in Humanists UK staff team, Ceremonies Board, QAC and Humanists UK Board with a consistent and clear reference point for responding to complaints, and clarity as to who is responsible for administering responses.

All complaints will be handled within the timeframe described at the end of the procedures unless there is a clearly expressed reason not to.

All complaints, other than major breaches or failures, will be considered under the informal stage in the first instance.

All complaints will be handled seriously and:

- As swiftly as possible to avoid or minimise damage to the reputation, integrity

and self-esteem of individuals concerned, of the Humanist Ceremonies™ network, and of Humanists UK.

- In line with the Code of Conduct and Standards of Practice required of all celebrants.
- All complaints are subject to confidential investigations and all parties are required to respect and uphold confidentiality throughout every stage of the process. A full account of the investigation will be strictly limited to those who need to know and in accordance with relevant data protection requirements.
- Fairly and with equality at the core.
- Within procedures that are easy to use and understand.
- Observing moral and ethical codes based on humanist principles, as in the Code of Conduct.
- Using the civil standard of proof to determine facts underlying allegations, i.e. on the balance of probabilities (of whether it is more likely than not that a certain event occurred).
- With the aim of resolving all complaints and repairing relationships where possible.

Complaints will inform the improvement of services and quality standards, including the training of new and existing celebrants.

Responsible person

The Administrator of this Complaints Procedure is the Head of Ceremonies. However, if the complaint involves the Head of Ceremonies, or in other exceptional circumstances, the Director of Community Services may appoint another staff member as Administrator of the Complaints Procedure.

The Administrator will be assisted in the individual case by the QAC Duty Officer, according to the rota of duty officers agreed at the QAC meetings. Any current Duty Officer will only assist with one complaint at a time. In the event of two concurrent complaints, the next QAC Duty Officer on rota will assist.

The QAC's role in the Complaints Procedure

The QAC comprises practising celebrants and its responsibilities include:

- Ensuring the Complaints Policy and Procedure are regularly reviewed and updated in line with best practice and appropriateness to Humanists UK and Humanist Ceremonies™ network.
- Overseeing ongoing implementation and administration of the Complaints Policy and Procedure.
- Hearing and judging complaints and deciding on remedial actions.
- Receiving reports on the number and types of complaints annually, and making recommendations that relate to quality standards to the Ceremonies Board as appropriate.

The QAC's possible courses of action if a complaint is upheld

If the panel upholds a complaint, then action may include requiring the celebrant to:

- Reimburse all fees to the client(s) involved.*
- Make a formal apology to the client(s).
- Undertake training in a specific area of weakness.
- Seek professional healthcare advice.
- Undergo an occupational health report before being permitted to continue to practise.
- Practise for a period of time under the guidance of a mentor appointed by the QAC.
- Be observed during a number of ceremonies and/or home visits.
- Be de-accredited for a period of time or permanently.

**Sometimes the reputation of Humanists UK is at stake if a client is dissatisfied with the service they have received. The QAC can therefore request that Humanists UK reimburse a fee to a client who has made a complaint as a gesture of goodwill before the complaint has been investigated or upheld. The decision to do so will be at the discretion of the Chief Executive. If the complaint is upheld, the QAC can require the celebrant to then reimburse Humanists UK.*

When a category 3 complaint is upheld then the celebrant will be responsible for any expenses (excluding staff and QAC members time) generated by remedial action.

Note – any celebrant requested to attend a hearing about a complaint against them, will pay for any expenses they incur as a result of attending the hearing e.g. travel

Conflict of interest

It is the responsibility of members of the QAC to declare any actual or potential conflict of interest when made aware of a complaint. Such conflicts may be financial, or involve personal or professional relationships. Any declaration should be made as soon as possible to the Complaints Administrator and the Chair of the QAC.

Where an interest has been declared, the Chair of the QAC, in consultation with other members of the Committee, will decide whether a member of the Committee has a conflict of interest. In UK law, the legal test for bias derived from case law is: 'whether the fair-minded observer, having considered the facts, would conclude that there was a real possibility that the tribunal was biased'. Therefore, it follows that a perception of impaired judgement or undue influence can be equally as detrimental as any of them actually occurring.

If the Chair of the QAC decides that there is a conflict of interest, it will not be permissible for the individual to participate in any discussion of the complaint or related Hearing.

Humanists UK Humanist Ceremonies™ Network Complaints Procedure

This policy relates to complaints made about a Humanist Ceremonies™ network celebrant. It does not cover complaints made about Humanists UK staff or Board members. It *must* be read in conjunction with Humanists UK Humanist Ceremonies™ Network Complaints Policy, and all principles in that policy adhered to.

Contents

- Introduction
- Stage 1: Informal
- Stage 2: A complaint is received in writing
- Stage 3: The complaint is classified
- Stage 4: The complaint is processed
- Procedure in absence

Introduction

All complaints will be overseen by the Quality Assurance Committee (QAC), who will appoint a Duty Officer to consider all complaints, and a complaints panel if required.

Having established the facts, the panel will use its judgement and experience to determine whether there has been a breach of the Celebrant Handbook Code of Conduct or Standards of Practice, and the seriousness of any breach. If a breach is/ breaches are found, the panel will decide what action should be taken. In making this decision, the panel will take into account any relevant corrective measures taken by the celebrant.

Responsible person

The Administrator of this Complaints Procedure is the Head of Ceremonies. However if, in their role as a celebrant, the complaint involves the Head of Ceremonies, or in other exceptional circumstances, the Director of Community Services may appoint another staff member as Administrator of the Complaints Procedure.

The Administrator will be assisted in the individual case by the QAC Duty Officer, according to the rota of duty officers agreed at the QAC meetings. Any current Duty Officer will only assist with one complaint at a time. In the event of two concurrent complaints, the next QAC Duty Officer on rota will assist.

Source of the complaint

Complaints against a celebrant may be received from:

- Celebrant colleagues.
- Funeral directors or fellow professionals.
- Clients, family members or attendees at a ceremony.
- Humanists UK staff.

- Members of the public.

A complaint from within the network

A complaint will be administered in the same way, whether the complaint is from within the network (i.e. from another celebrant or Humanists UK staff member) or from an external source. However, for complaints received from *within the network*, the following two things will be carried out before progressing:

1. Encourage the parties to address the situation less formally with the support of the Head of Ceremonies or a member of the QAC, as described in Stage 1.
2. Ensure that the Administrator and the celebrants on the QAC panel are not compromised by their 'friendship' or close working relationship with the complainant or celebrant being complained about.

Possible courses of action if a complaint is upheld

If the panel upholds a complaint, then action may include requiring the celebrant to:

- Reimburse all fees to the client(s) involved.
- Make a formal apology to the client(s).
- Undertake training in a specific area of weakness.
- Seek professional healthcare advice.
- Undergo an occupational health report before being permitted to continue to practise.
- Practise for a period of time under the guidance of a mentor appointed by the QAC.
- Be observed during a number of ceremonies and/or home visits.
- Be de-accredited for a period of time or permanently.

Where timescales are described, a working day means Monday to Friday unless otherwise stated.

Stage 1: Informal

This stage is primarily, but not exclusively, for complaints that come from within the network. For complaints that come from external sources, this stage will be offered in the first instance. For all internal complaints, they are encouraged to follow the logical route of Stage 1 before proceeding onto Stage 2, which is the start of the formal process.

This recognises that the collaborative nature of the Humanist Ceremonies™ network can sometimes make it difficult to report perceived unacceptable behaviour or the poor performance of another celebrant. This might be behaviour or performance that a celebrant believes breaks the Code of Conduct and Standards of Practice.

Humanists UK recommend either a one-to-one conversation, or a discussion with the CNSC in the first instance, If this does not resolve the issue celebrants are asked to use

the informal stage part of this procedure in order to receive the support of Humanists UK. It is hoped that this might minimise the tension and conflict that can arise either from engaging with the formal Complaints Procedure, or choosing not to engage with it at all and allowing the problem to continue.

1. In the informal stage, complainants are encouraged to discuss issues with the Head of Ceremonies, who is the Complaints Administrator (unless s/he is involved in the complaint). Concerns and complaints may initially be made by telephone to the Head of Ceremonies, recognising that phone calls and un-minuted conversations cannot be regarded as evidence in any future investigation. The telephone conversation is quite simply an alternative way of considering the problem in order that the concerned celebrant may decide what course of action to take.
2. Having communicated, in brief, the outline of the concern to the Head of Ceremonies, the person with the concern will be invited to agree a mutually convenient time for the concern to be discussed in more depth with her/him, either in person or on the phone. The Head of Ceremonies will clarify that their role is simply to listen and explore possible ways forward for the person with the concern, in order to resolve it without recourse to the formal Complaints Procedure.

The Head of Ceremonies will explore and discuss ways that the celebrant can raise the matter themselves, in an open and honest way, with the colleague with whom there may be an issue. A conversation held in the spirit of constructive feedback can often be far easier than imagined and can often preempt later difficulties.

Other possibilities might be for the celebrant to:

- a. Speak to their Local Celebrant Group Organiser or the Celebrant Network Support Coordinator. The purpose of this conversation would be to alert them to the concern and to find out if there are any current circumstances or challenges for the celebrant at that time.
 - b. Speak to the Celebrant Network Support Coordinator and suggest that continuing professional development on the specific issue is arranged for a local group by a member of the training and development team.
 - c. Offer both parties the opportunity to come into the office to talk about the concern with Head of Ceremonies or with the QAC Duty Officer present to facilitate.
3. It is hoped that this will result in a satisfactory resolution to the issue. If a satisfactory resolution cannot be achieved through informal means, a formal complaint may be made in writing to the Complaints Administrator. If this is the case, the guiding procedure for investigating the formal written complaint will be the same as for any other written complaint.

The procedure for informal complaints can be varied according to the nature of the grievance expressed. In all cases, the Complaints Administrator will maintain a record of the actions and decisions taken.

The number of informal complaints and their outcomes will be reported to the QAC, ensuring anonymity of the complainant and the celebrant involved.

Stage 2: A complaint is received in writing

For the formal Complaints Procedure to be activated, the complaint must be expressed formally, in full, and in writing to the Head of Ceremonies.

The written complaint, which will be summarised for the celebrant being complained about, must include:

- Full details and relevant facts;
- All names, dates, times and places, wherever possible;
- The complainant's telephone number and email address for future contact.

The date of receipt will be formally recorded by the Head of Ceremonies as the Complaints Administrator.

Stage 3: The complaint is classified

1. Within five working days, the designated Administrator will acknowledge the receipt of the complaint to the complainant in writing, providing a copy of the current Complaints Procedure and the timeframe within which the complainant will be notified of its outcome.
2. During the next 10 working days, the Administrator will review the complaint with the QAC Duty Officer and will ask for additional information from the complainant, if required. The complaint will be provisionally classified based on the information received, in line with the following classifications.

Category 0: Complaint doesn't reach the threshold to be defined as a complaint.

For instance, it may not be a complaint about a celebrant who is a member of the Humanists UK Network.

Category 1: Minor mistakes or misunderstandings, which may be explained to the complainant's satisfaction.

Category 2: Apparent breaches of this Handbook, including the Code of Conduct, that have caused distress to clients or compromised other celebrants or fellow professionals, and that can be attributed to inaction or neglect on the part of the celebrant, such as lateness, inaccuracies in scripts, or poor presentation.

Category 3: Apparent major breach or failure. This can be either a single, serious mistake (such as failing to attend a ceremony without good reason) or a series of failings or mistakes over a period of time that have accumulated, potentially resulting in:

- Serious loss of confidence.
- A sense of being seriously compromised.
- Material loss.
- Damage to the reputation of Humanists UK.

Stage 4: The complaint is processed

For all categories, within 15 working days of receipt of the complaint the Administrator will write to the celebrant, summarising its substance, clarifying which parts of the Standards of Practice have been potentially transgressed, and stating which category the complaint has been provisionally classified against. The celebrant will be encouraged to respond with a full account of their own perspective within seven working days (including the weekend). On receipt, they will be asked to confirm that their response has been expressed fully, or will be asked for additional information.

At the end of the seven working days, the Administrator and QAC Duty Officer will review the classification of the complaint and inform the celebrant if this has changed.

Category 1

This category does not require a QAC meeting to be convened.

1. On receipt of the response from the celebrant (or if no response has been received, even after a reminder has been given before the end of the seven days), within five working days the Administrator and QAC Duty Officer will decide what action, if any, is necessary – e.g. a written apology from the celebrant to the client. A note will be made on the celebrant's records and copied to the celebrant. If no further complaints are made, this note will be deleted after two years.
2. Where a complaint is found to be unsubstantiated or unfounded, this will be formally notified to the celebrant concerned. In this case, no note will be recorded.

If the complaint is considered to be more serious than a Category 1 complaint at this stage, it will be referred to the QAC as a Category 2 complaint.

3. The Administrator will write to the complainant with the outcome of the investigation within 30 days of the receipt of the complaint.

Appeal: The celebrant and complainant may appeal in writing to the full QAC via the Complaints Administrator within 14 working days of receiving confirmation of the outcome of the complaint.

Category 2

This category is likely to lead to a meeting between the Complaints Administrator, QAC Duty Officer and the celebrant.

1. On receipt of the response from the celebrant (or if no response has been received, even after a reminder has been given before the end of the seven days), within five working days the Administrator and QAC Duty Officer will decide what action, if any, is necessary. If necessary, the Administrator may seek information, guidance, opinion and advice from the ceremonies training staff, a trainer, mentor, or other, as appropriate.
2. If it is decided that there is a case to answer, the Administrator will invite the celebrant to a meeting with the Administrator, QAC Duty Officer, and any other person considered relevant by the QAC Duty Officer, to discuss the complaint.
3. The meeting should be held within 15 working days of the decision to hold it being made. The celebrant may be accompanied at this meeting by a colleague or friend.
4. Immediately following this meeting, the Administrator and the QAC Duty Officer will decide:
 - a. Whether to uphold the complaint;
 - b. What action, if any, is needed.
5. Within two working days, the decision will be communicated clearly in writing and a phone call made to the celebrant concerned. The celebrant must comply with any recommended actions and assistance offered, and, where requested, report back. Failure to do so may lead to this being treated as a Category 3 complaint.
6. A note of the actions will be recorded. If no further complaints are received within two years, this note will be deleted. Where a complaint is not upheld, no note will be recorded.
7. The Administrator will write to the complainant with the outcome of the investigation within 40 days of the receipt of the complaint.
8. If a complaint has been upheld, this must be reported to the QAC at its next meeting.

Appeal: The celebrant or complainant may appeal to the full QAC within 14 days of the decision being communicated to them.

Category 3

This category is likely to lead to a Hearing of the complaint by a QAC panel.

1. On receipt of the response from the celebrant (or if no response has been received, even after a reminder has been given before the end of the seven days), within two working days the Administrator and QAC Duty Officer will confirm that a Hearing is required.

In exceptional circumstances, it may be felt that a Hearing is unnecessary and the complaint can be dealt with as a Category 2 complaint – e.g. if a celebrant decides they will immediately retire from the network as a result of receiving the complaint. This alternative must be agreed by the QAC, either by phone or email.

2. The Administrator will write to the celebrant detailing the complaint, explaining its seriousness and providing a summary of its nature. The Administrator will invite and urge the person who has been complained about to attend a Hearing by a panel comprising the Administrator and three members of the QAC to consider the complaint. This will be known as the QAC Panel. The person being complained about is invited to add to their original response in writing beforehand if they wish to do so.

The Chair of the Ceremonies Board and the Director of Community Services will be informed at this stage that a Category 3 complaint is being heard, but will not be informed of any of the detail in case they are required to receive an appeal at a later stage.

3. The Hearing will, if possible, be held within 15 working days of the letter. Everyone involved in the Hearing will receive all papers three working days in advance, including the original written complaint and the celebrant's full response. The celebrant will be informed that they may be accompanied by a colleague or friend.

The celebrant will be asked to leave the Hearing once they have had an opportunity to hear the complaint against them, offer their response and be asked questions by the Panel. The Panel will then discuss the complaint and, after deciding whether there is a case to be answered, decide on what action to take. If necessary, the Panel may seek information, guidance and advice from the ceremonies training staff, a trainer, mentor, or other, as appropriate, before making a decision.

4. Immediately following the Hearing, the celebrant will be notified of the decision by the Administrator, both in writing and with a phone call. The complainant will be informed in writing of the decision within five days of the Hearing.

Where a complaint is not upheld, no note of events will be recorded.

5. Following remedial action, the celebrant must report to the Administrator within the timescale set by the Panel, who will consider this at their next meeting (or sooner if they have previously agreed to do so).

Failure of the celebrant to report to the Administrator may lead to further remedial action being taken. Should it be decided that it is necessary to remove accreditation, the appropriate colleagues in the Humanist Ceremonies™ network and other appropriate professionals will be advised accordingly in the form of a simple statement.

Appeal: The celebrant or complainant may make an appeal to the Complaints Administrator within 14 days of being informed of the decision taken by the Panel at the Hearing. Any appeal will be heard by the Chair of the Ceremonies Board and the Director of Community Services.

Procedure in absence

The QAC is given the authority to proceed with a Hearing in the absence of the celebrant, subject to the QAC clearly recognising:

- That it is the QAC's duty to ensure public protection and to recognise that expeditious resolution of the complaint is in the public interest;
- That the celebrant has a right to attend and present their case at the Hearing.

In order to proceed in absence, the QAC must be satisfied that all reasonable steps have been taken to facilitate the attendance of the celebrant at the Hearing. Evidence of this must be presented to the QAC by the Complaints Administrator. Evidence could include notes on telephone conversations, letters and email correspondence.

The celebrant does not have the authority to decide whether to proceed with the Hearing; this decision will be made by the QAC Panel and does not require the consent of the celebrant. The reason for a decision to proceed in absence will be included in the decision sent to the celebrant.