

## IWFM Complaints & Disciplinary Policy

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**Approved By:** IWFM Board

**Version:** Final

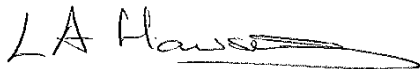
### Leadership Statement

At IWFM, trust is the foundation of everything we do. This revised Complaints and Disciplinary Policy reflects our commitment to creating an environment where concerns can be raised openly, without fear of retaliation, and where every voice is heard with respect.

Speaking up is not just welcomed at IWFM, it is valued. Whether you are raising a concern about our services, questioning a decision, or highlighting conduct that falls short of our standards, you are helping us live our values and strengthen our community.

We are committed to ethical conduct at every level. This means responding to concerns with fairness, transparency, and integrity. It means protecting those who come forward in good faith. And it means taking meaningful action when needed, always balancing accountability with the possibility of learning and restoration.

No one who raises a genuine concern will face retaliation. This is my personal commitment to you. Our goal is to build and maintain the trusted relationships that allow our profession to thrive.



Linda Hausmanis

Chief Executive Officer, IWFM

### Executive Summary

This revised IWFM Complaints and Disciplinary Policy (*hereafter known as the policy*) aligns with the recommendations of the IWFM commissioned Professional Code of Conduct Review 2025, transitioning IWFM's approach from a rule-based to a values-led framework. The policy affirms IWFM's commitment to integrity, professionalism, respect, transparency, and inclusiveness. It emphasises constructive dialogue, restorative accountability, and continuous improvement rather than purely punitive measures. By embedding these values into every stage of the complaints and disciplinary process, IWFM ensures that concerns are addressed fairly, reflectively, and transparently strengthening trust across its membership and beyond.

# IWFM Complaints & Disciplinary Policy

## 1. Introduction

IWFM recognises the importance of accountability and transparency in all its interactions. We affirm the right of members, stakeholders, and the wider public to raise concerns when services, behaviours, or decisions fall short of expected standards. Constructive complaints and feedback are welcomed as part of a continuous improvement cycle that promotes learning and excellence.

This policy is rooted in the core values of IWFM: integrity, respect, professionalism, transparency, and inclusivity. These values guide how we serve our members and the public, how we respond to concerns, and how we hold ourselves accountable.

Rather than enforcing rules in isolation, this procedure promotes a shared commitment to high standards and ethical behaviour across all roles including staff, volunteers, and members. We view the complaints and disciplinary process not just as a compliance mechanism, but as an opportunity for reflection, dialogue, development, and restoring trust when it has been broken.

This policy covers complaints about:

- Services or conduct of IWFM staff (paid or volunteer).
- IWFM members in their professional or voluntary capacities.
- IWFM itself and its internal processes.

Complaints by non-members about members will initially be handled by the Company Secretary and referred to the Audit & Risk Committee Chair where necessary, with risk and reputational considerations in mind.

All parties are encouraged to uphold our values and engage in respectful, open communication throughout the complaints and disciplinary process.

IWFM views the flow of complaints and feedback as an important element of its quality control framework. By learning from constructive complaints, we aim to continuously improve our internal procedures, services, and member experience.

## 2. Accessibility Statement

IWFM is committed to ensuring that everyone can access and understand this policy, regardless of background, ability, or circumstance.

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If you require this policy in an alternative format (such as large print, audio, or a different language), please contact us at [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk) or call the IWFM office for support. We will make every reasonable effort to accommodate accessibility needs promptly and respectfully. If you require assistance in making a complaint including help with reading, writing, or digital access our team will provide guidance or refer you to a trusted support resource. This commitment reflects our values of inclusivity, respect, and equal access to all who interact with IWFM.

### 3. Purpose and Scope

This policy sets out how IWFM manages concerns or complaints raised by members, stakeholders, or members of the public about any aspect of our work. These may relate to:

- The quality, accessibility, or reliability of IWFM services.
- The behaviour or performance of IWFM staff, volunteers, or representatives.
- The conduct of IWFM members in their professional or voluntary roles.
- Concerns about how IWFM makes decisions or applies internal policies and governance processes.

IWFM is committed to a values-led approach to complaints, grounded in integrity, respect, accountability, and continuous improvement. We view complaints not as threats but as opportunities to strengthen trust, improve our services, and uphold high standards across our organisation.

#### 3.1 Distinguishing Between Issues and Complaints

IWFM recognises that not every concern raised is a formal complaint. In many cases, individuals may wish to flag a problem, suggest an improvement, or express dissatisfaction without invoking a formal process.

- An **issue** may involve a one-off service error, communication breakdown, or unmet expectation. These should be raised informally in the first instance with the relevant team or department.
- A **complaint** refers to a more serious or persistent concern, particularly where informal resolution has not succeeded, or the issue involves a significant breach of IWFM's values, policy, or conduct standards.

Wherever possible, IWFM encourages early dialogue and informal resolution. Only if the issue remains unresolved or is of a serious nature should it proceed through the formal complaints process. This approach supports proportionate, constructive handling of concerns and helps preserve trust and collaboration at all levels.

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This policy applies to all individuals and groups who interact with IWFM, including members, non-members, staff, volunteers, and partners. It provides a clear, fair, and consistent framework for:

- Raising and responding to complaints.
- Ensuring appropriate action is taken.
- Learning from concerns raised to improve future performance.

Complaints about the conduct of members will be managed in conjunction with the IWFM Code of Professional Conduct. Complaints about staff, services, volunteers, or internal decision-making will be addressed with equivalent seriousness and fairness, through appropriate channels detailed in this policy.

### 4. What This Policy Does Not Cover

This policy is intended to guide the handling of complaints about IWFM services, staff, volunteers, and members. However, certain issues are more appropriately addressed under other specific IWFM policies and procedures.

If your concern involves one of the areas below, please refer to the appropriate alternative route:

- **Serious wrongdoing, unethical behaviour, fraud, or illegal activity**  
→ Refer to the IWFM Whistleblowing Policy.
- **Employment-related grievances or performance concerns involving IWFM staff**  
→ Refer to the Staff Grievance Procedure or Dismissal and Disciplinary Policy (as set out in the Staff Handbook).
- **Bribery or corruption risks**  
→ Refer to the IWFM Policy on the Bribery Act 2010.
- **Constitutional issues, board responsibilities, or structural governance queries**  
→ Refer to the IWFM Articles of Association, Board Regulations, or Bylaws.
- **Appeals or grievances relating to assessment or qualification decisions** (e.g., exam outcomes, marking, professional recognition)  
→ These are not covered by this Complaints Policy. Such concerns should be directed to the relevant assessment or education appeals process, which is designed to ensure fair academic review and procedural integrity.

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This policy complements, but does not replace, these existing frameworks. If you are unsure which policy or route applies to your concern, please contact the IWFM Company Secretary at [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk) for advice.

### 5. Complaints Concerning IWFM Services, Staff, Volunteers, or Internal Processes

IWFM is committed to delivering high-quality, professional services that reflect our values of transparency, respect, and integrity. We acknowledge the right of members, stakeholders, and the public to raise concerns about our services, staff (including volunteers), or internal decision-making processes.

This section outlines how such complaints will be addressed:

#### 5.1 Service Concerns and Complaints

If a service does not meet expected standards of quality, professionalism, or responsiveness, complainants are encouraged to contact the relevant department directly or email: [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk).

Complaints will be acknowledged within 5 working days and investigated by a designated staff member or manager. A full response will usually be provided within 20 working days. Where the issue is complex, updates will be provided regularly.

IWFM sees such feedback as a vital part of service improvement and will aim to resolve the concern through dialogue, explanation, and if needed, process review or service correction.

#### 5.2 Complaints About Staff or Volunteers

IWFM recognises the importance of professional conduct by all individuals representing the Institute. Complaints may arise regarding the behaviour of IWFM employees or volunteers acting in an official capacity.

**Complaints About Staff (Employees):** Concerns about the conduct, communication, or professionalism of paid IWFM staff will be investigated by a relevant senior staff member or manager. Where appropriate, matters may be escalated to the Company Secretary or CEO for review. Investigations will follow principles of fairness, confidentiality, and values-led accountability. Outcomes may include additional training, supervision, or formal HR action as outlined in internal employment procedures.

**Complaints About Volunteers:** Volunteers, while not contractually employed by IWFM, are considered official representatives of the Institute and are equally expected to uphold

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our values of integrity, professionalism, and respect. Complaints involving volunteers will be assessed fairly and independently, taking into account the nature of their role and responsibilities. Outcomes may include feedback, retraining, role reassignment, or, where appropriate, removal from a volunteer position.

While the handling of complaints will respect the different legal statuses of staff and volunteers, IWFM will maintain a consistent standard of expected behaviour and a shared commitment to respectful engagement.

### **5.3 Complaints About IWFM Internal Processes or Governance**

If a concern relates to how IWFM makes decisions, manages policies, or exercises authority, it may be escalated to the Company Secretary and, where appropriate, the Chair of the Audit and Risk Committee.

These complaints will be handled with independence and impartiality and may lead to process audits or governance review if concerns are substantiated. IWFM is committed to continuous improvement and welcomes constructive scrutiny that helps enhance trust and operational integrity.

## **6. Values and the Code of Professional Conduct**

The IWFM Code of Professional Conduct serves as a values-based framework that underpins expected behaviour rather than acting solely as a list of enforceable rules. It emphasises trust, accountability, professionalism, and respect for others. This policy uses those values as guiding principles when evaluating allegations and recommending responses. Ethical judgement, proportionality, and impact are considered alongside technical adherence.

## **7. Complaints and Disciplinary Procedures**

The complaints and disciplinary procedures will follow a staged process, including:

- Validation of submissions and appropriate early action (informal resolution, mediation).
- Investigation by an impartial officer.
- Proportionate disciplinary or developmental outcomes.
- Opportunities for appeal and reinstatement.

## **8. Detailed Procedures**

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### 8.1 Stage 1: Validation of Submission

Upon receiving a complaint, the Company Secretary (or their delegate) will first determine whether the matter falls within the scope of this policy. This stage ensures fairness, confidentiality, and early clarity.

A values-based approach here ensures the individual raising the concern is respected, informed, and assured that the matter will be managed with integrity. The member or party involved will be given an opportunity to understand the nature of the concern and respond transparently.

As part of the resolution process, IWFM may provide explanations to the complainant about why certain procedures are followed or why internal processes cannot be changed. This aims to promote transparency and to help manage expectations around the services IWFM provides.

### 8.2 Stage 2: Investigation

If the concern is validated, an impartial Investigating Officer will be appointed to gather facts and consider the behaviour in the context of IWFM's values. The appointment will be the Company Secretary; with the Investigating Officer submitting their report and recommendations to them. Witnesses may be interviewed, documents reviewed, and both the complainant and respondent consulted.

Investigations are not about proving fault but understanding actions, intent, and impact. The focus is on learning, accountability, and fairness, enabling those involved to reflect and, where needed, correct behaviour.

### 8.3 Stage 3: Decision on How to Proceed

Once the investigation is complete, the Investigating Officer will decide on next steps:

- No further action if no breach is identified.
- Referral to mediation if the matter can be constructively resolved.
- Proceed to disciplinary proceedings if values or standards were compromised.

All decisions are guided by proportionality and a desire to restore trust and integrity.

### 8.4 Stage 4: Disciplinary Proceedings

If formal proceedings are warranted, a Disciplinary Committee, comprised of impartial and experienced members, will be convened. The individual involved will have full



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opportunity to respond and be accompanied if they wish. The Chair of the Disciplinary Committee will be either the Chair of the Audit & Risk Committee or a Board Member.

The process respects dignity, clarity, and fairness, and aims to support ethical development, not merely apply punishment.

### 8.5 Stage 5: Hearings

Hearings will be conducted respectfully, with all parties invited to present evidence and respond to questions. The emphasis is on fair hearing, compassionate engagement, and mutual respect, reflecting IWFM's commitment to transparency and ethical standards.

### 8.6 Stage 6: Sanctions

Sanctions will reflect the severity and impact of the breach and the opportunity for learning or restorative action. These may include:

- Letters of advice or reprimand.
- Mediation and monitored behavioural commitments.
- Temporary or permanent suspension from roles.
- Expulsion in cases of serious or repeated breaches.

Sanctions aim to uphold standards while fostering the possibility of ethical restoration and re-engagement.

## 9. Appeals and Reinstatement

Members have the right to appeal against any findings or sanctions. Appeals will be considered by the Constitution and Ethics Committee, with full transparency and fairness. The appeal process honours the principles of openness, second chances, and consistency.

Reinstatement, where permitted, is possible after a reflective period, and may include evidence of development or change. Expelled members cannot reapply, in keeping with IWFM's responsibility to the profession and the public.

## 10. Records of Complaints and Disciplinary Actions

Transparency and accountability are core IWFM values. Accurate records are essential to ensure fairness, track patterns, and promote institutional learning.



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Records of complaints, investigations, outcomes, and any sanctions will be maintained securely and confidentially. These records will help inform better practices and foster a culture of reflection and improvement. Decisions about record retention (e.g., 7–10 years) are made with sensitivity to privacy, reputational impact, and safeguarding needs.

A summary of disciplinary matters will be reported to the IWFM Board to maintain oversight and foster a culture of shared accountability.

### 11. Confidentiality and Anonymity

All matters raised under this policy are handled with the utmost care and confidentiality. IWFM respects the privacy of everyone involved and is committed to protecting sensitive information.

While anonymous complaints are not normally accepted due to fairness requirements, IWFM ensures that identities are protected where possible. Any information shared will be handled with discretion and only shared with those directly involved in managing the case.

Everyone involved, staff, investigators, committee members, complainants, and respondents, are expected to uphold these confidentiality principles as a sign of respect, professionalism, and ethical responsibility.

### 12. Resignation of Membership

Resignation from IWFM will not halt an ongoing investigation or disciplinary process. Members are expected to engage in the process with integrity, even if they no longer wish to remain affiliated with IWFM.

This ensures accountability, allows IWFM to maintain accurate records, and prevents reputational avoidance. Resignation will only be recognised after the conclusion of any live complaints or proceedings.

### 13. Mediation

Mediation offers a values-aligned alternative to formal proceedings when concerns can be resolved through respectful dialogue. It reflects our belief in restoration, understanding, and shared learning.

Mediation may be considered when:

- The concern is not severe (e.g., no discrimination, violence, or financial harm).
- Both parties agree to participate in good faith.
- It offers a chance to bring behaviour back in line with IWFM's values.

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Where successful, mediation helps rebuild trust and align behaviour with shared expectations. It will be facilitated by a trained, impartial party and monitored to ensure the agreed outcomes are followed. If mediation fails or is no longer suitable, the formal process may resume.

### 14. Summary of Timescales

This table summarises the timescales associated with each stage of the complaints and disciplinary process, reflecting IWFM's commitment to transparency, clarity, and timely resolution.

Stage	Action	Timeframe
<b>Stage 1: Validation of Submission</b>	Acknowledgement and initial review by Company Secretary	Within 5 working days
	Full validation, including any evidence requests	Within 20 working days
<b>Stage 2: Member Response</b>	Respondent to reply to allegation	Within 30 calendar days
<b>Stage 2: Investigation</b>	Completion of investigation and report	Within 90 days from response
<b>Stage 3: Decision on How to Proceed</b>	Investigating Officer decision on next steps	Within 15 working days of report
<b>Stage 4: Notification</b>	Company Secretary informs complainant and member of decision	Within 10 working days
<b>Stage 5: Disciplinary Hearing</b>	Convening of Disciplinary Committee (if applicable)	Within 30 days of decision to proceed
<b>Post-Hearing Report</b>	Written outcome from Disciplinary Committee Chair	Within 15 working days of hearing
<b>Final Notification</b>	Disciplinary decision shared with parties	Within 25 working days of hearing

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Stage	Action	Timeframe
<b>Appeal (if applicable)</b>	Member must submit appeal	Within 25 working days of decision
<b>Appeal Hearing</b>	Constitution & Ethics Committee convenes	Within 21 working days of appeal
<b>Sanction Compliance</b>	Member must comply with sanction (if applicable)	Within 3 months or as specified

### 15. Quick Reference Guide – How to Raise a Concern

What are you concerned about?	Who should you contact?	Initial Response Time
Poor experience with an IWFM service	Relevant department or email <a href="mailto:governance@iwfm.org.uk">governance@iwfm.org.uk</a>	5 working days
Behaviour of IWFM staff or volunteer	Their manager or the Company Secretary	5 working days
Misconduct by an IWFM member (e.g., ethics breach)	Company Secretary (formal complaint in writing)	5 working days
Concerns about how IWFM is governed or decisions made	Company Secretary or Chair of Audit & Risk Committee	5 working days
Unsafe, unethical, or illegal behaviour within IWFM	Report under the Whistleblowing Policy (published on IWFM website)	Prompt acknowledgement

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What are you concerned about?	Who should you contact?	Initial Response Time
Need for informal resolution or mediation	Request mediation through Company Secretary or Investigating Officer	Based on eligibility

### How to Submit Your Complaint:

All formal complaints should be marked '**Confidential**'.

- **Email:** [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk)
- **Post:** The Company Secretary, IWFM, Thremhall Park, Start Hill, Bishop's Stortford, Hertfordshire, CM22 7WE.