

Women's Aid Federation England Membership Complaints Policy

For use by: Any member of the public or stakeholder organisation

For complaints against: Full Members of Women's Aid Federation England (WAFE)

How to make a complaint

If you want to complain about a Women's Aid member service, please read the below information and then complete the Women's Aid complaints form.

The rest of this document outlines Women's Aid's complaints process and lists the values and terms of reference Women's Aid members should adhere to.

If you need any support making a complaint, email feedback@womensaid.org.uk

Please note:

- Women's Aid Federation of England is a separate organisation from its member services, so you need to complain to the service directly first
- In the first instance, if you have a safeguarding concern, please contact the local authority's safeguarding team. To report a crime, please contact the police on 999 or 101 (non-emergency).

Introduction

At Women's Aid we welcome feedback about our members, as this helps us and our members to ensure that survivors of domestic abuse receive services of the highest quality when they need them.

Women's Aid is a national federation of organisations (members) that provide vital services to women and their children experiencing domestic violence. Our members are all independent organisations registered in their own right. As separate bodies, they all have their own complaints policies and procedures that operate independently of Women's Aid.

If you make a complaint to Women's Aid we will always ask if you have made a complaint directly to our member already, and if so, what the outcome was.

When organisations apply to become members of Women's Aid, they are required to sign up to Women's Aid's values and expectations¹, and they are asked to reaffirm their commitment annually. Women's Aid reserves the right to revoke membership where there is evidence of a breach of Women's Aid's values and/or Quality Standards if members are unwilling or unable to implement improvements, as detailed below.

Who can make a complaint? Any member of the public or a stakeholder organisation who has a concern about a current member of Women's Aid Federation England, and who has either raised that complaint with the member or has difficulty in doing so.

How will your complaint be dealt with?

1. In all circumstances a complainant should try to follow the complaints procedure of the member organisation first. Women's Aid acknowledges that this may not always be possible, in which case it may be possible for the complainant to lodge a complaint directly with Women's Aid.
2. If the complainant wishes to tell Women's Aid they are using a local member's complaints process, they are welcome to do so.
 - a) We encourage member services to make Women's Aid aware of any ongoing serious complaints which have the potential to cause reputational damage², or which are at the final stage of the complaints procedure.
 - b) If a complainant is a survivor distressed by the nature of the complaint, we expect members to provide additional support to the survivor through internal or external means.
 - c) We encourage members to make complainants aware of Women's Aid's complaints policy as an additional resource, should the complainant be dissatisfied with the outcome of the member's investigation.
 - e) If the complainant is not satisfied with the process or outcome of the organisation's investigation, they may complain to Women's Aid; ordinarily

¹ [Women's Aid Terms of Reference and Statement of Support](#)

² [Process for supporting members who disclose internal complaints to WAFE](#)

once the internal complaints process has been completed. If the complainant has difficulty making a complaint to a member or is concerned that the member organisation is not adhering to its timescales, they may complain to Women's Aid ahead of the conclusion of the member's process, and in that event Women's Aid will explore the concern with the member.

- f) A complaint can only be dealt with if it involves a breach by the member organisation of the terms of its Women's Aid membership or National Quality Standards, if the member organisation is a standards holder.
3. Anyone who wishes to make a complaint to Women's Aid may email feedback@womensaid.org.uk to raise the issue. It is expected complainants may contact Women's Aid either because they have difficulty in making a complaint direct to the member, or because they feel that a complaint they have made to a Women's Aid member organisation has not been dealt with adequately and that the member may have breached their terms of membership of Women's Aid, or the National Quality Standards.
 4. We recognise that there may be reluctance for survivors of domestic abuse to raise a complaint about a service they are still using, for fear of repercussions or enduring further trauma. For this reason, Women's Aid will protect survivors' anonymity as far as possible within the confines of the law and safeguarding practice where that is preferred by the complainant.
 5. Women's Aid will consider any safety or safeguarding issues that may arise, take appropriate action and endeavour to minimise any potential risks.
 6. The complainant may be accompanied by a friend, representative or other supporter during all contact with Women's Aid.
 7. Women's Aid will maintain a confidential record of all complaints and serious concerns and the outcomes of any investigations, subsequent decisions, and appeals, and will treat all information in accordance with GDPR and safeguarding principles.
 8. Complaints raised anonymously which fall within scope for consideration will be investigated as far as is reasonably practicable.

9. Women's Aid will approach complaints objectively and expects members will fully cooperate and engage in accordance with the expectations of members which are set out at Appendix 2.
10. When Women's Aid receive a written complaint about a member, we will:
 - a) Establish whether it is within scope of this procedure.
 - b) Acknowledge receipt of the complaint and confirm in writing whether the complaint falls within the scope of this procedure.
 - c) If the complaint does fall within this procedure, Women's Aid will contact the member organisation concerned within two weeks of receipt of the complaint, to inform the member of the complaint made against them.
 - d) Request details from the organisation of the internal complaints process followed and the outcome reached. Women's Aid expects to receive this information within three weeks of the request being made.
11. Women's Aid will investigate or oversee the investigation of a complaint which is within scope in accordance with its framework for investigation and subsequent decision making (Appendix 3). This includes:
 - a) Appointing an independent investigator in the case of very serious allegations such as of: racism, systemic diversity and inclusion issues, an organisational level culture of lack of safeguarding practice, or organisational corruption
 - b) Contacting the person making the complaint to clarify the detail of the complaint and ask for any evidence required
 - c) Contacting the member organisation to gather information about the alleged breach of the conditions of membership or Quality Standards.
 - d) Undertaking a fair and proportionate fact-finding process, which will include: taking the perspectives of both the complainant and the organisation complained of, and reviewing any documentation presented, to assess whether on the evidence reviewed it is possible to confirm whether or not any breach has occurred. Where further investigation is required to draw a conclusion, scoping and conducting the investigation.

- e) Ensuring that the complaint process and any subsequent decision-making process is objective, impartial, and free from bias or conflict of interest. No trustees for whom a conflict of interest exists in relation to the complaint will be involved in Women's Aid's handling of the complaint or decision making in respect of it. Any trustees whose organisations are subject of a complaint to Women's Aid, or who are themselves the subject of a complaint to Women's Aid, will step down from the Women's Aid Board until the complaints process is exhausted. Any subsequent decisions on their reinstatement to the Board will have regard to the outcome of the complaint as well as the usual considerations for Board appointments.
12. The investigator will draw conclusions from the investigation in relation to whether or not there is evidence of a breach of membership terms of reference or National Quality Standards and will make recommendations.
13. If the potential breach relates to the membership terms of reference, the investigator's report will ordinarily be reviewed by the Head of Membership. If the proposed outcome is to suspend or remove the membership status, this must be escalated by the Head of Membership to and discussed with the CEO of Women's Aid. The investigation will be reviewed by a panel comprising Women's Aid directors and trustees in the case of very serious allegations.
14. If the potential breach relates to the Quality Standards, the investigator's report will be reviewed by the Quality Assessment Panel. If the proposed outcome is to suspend or remove the Quality Mark, this must be escalated to and agreed with the CEO of Women's Aid.
15. The following outcomes may arise from investigation:
- a. The member organisation is not found in breach of the Quality Standards or terms of membership and no further action is required, or
 - b. The member organisation is found to be in breach of aspects of the Quality Standards or terms of membership but displays understanding of the issues and potential to learn from the process. An improvement plan is put in place, with support from Women's Aid, to be completed within six months; if the plan is assessed to have been successfully implemented the organisation will retain its membership/Quality Standards, or

- c. The member is found to be in serious breach of the Quality Standards or terms of membership and does not show understanding of the issues or potential to learn from the process, and membership is withdrawn.

Withdrawal of suspension of an organisation's membership may also result in suspension or removal of an organisation's listings on Routes to Support.

16. The complainant and the member organisation will ordinarily be notified of the outcome of the investigation within three months of Women's Aid receiving the complaint. Women's Aid will do its utmost to achieve this. If more time is justifiably required to enable fair, proportionate, and thorough process, Women's Aid will discuss with the parties and ensure the process is concluded as thoroughly and swiftly as possible. Decisions will be confirmed in writing to all parties.

Historic complaints

Women's Aid does not impose a time limit on when complaints can be lodged. For complaints about incidents which happened many years ago, it may be difficult to find a resolution, however we are committed to supporting survivors to have their voices heard wherever possible.

Occasionally, a complaint is made against an organisation which is no longer operational. In that instance, there are unfortunately no steps that can be taken to find a resolution. Nevertheless, we can offer survivors an opportunity to meet with a member of Women's Aid staff to hear their experiences, which will help inform our work with member services and support for survivors.

Multiple Complaints

Women's Aid may receive multiple complaints regarding a member. Multiple complaints against one member service may indicate potential concerns. Women's Aid would approach such instances as follows:

Scenario A)

2-3 informal complaints or concerns against a member service are brought to Women's Aid's attention through survivors, forums, staff, member services, Quality Assessments or other means, in a five-year period:

Membership Complaints Policy

Authorised: Philippa Thomas, Interim Director of Services, December 2021

Next review: December 2022

Women's Aid would raise concerns with the member service through a supportive and collaborative discussion, to determine the underlying reasons and agree next best steps, which may include:

- i) Those with concerns being encouraged to raise them formally for investigation
- ii) The member undertaking and sharing with Women's Aid an exploration of the issues of concern
- iii) Women's Aid supporting the member through a mutually agreed improvement plan
- iv) Women's Aid suspending or withdrawing membership/ Quality Standards if the member service is unwilling to work with Women's Aid on an improvement plan

Scenario B)

2-3 formal complaints logged by Women's Aid over a five-year period have been investigated through both the service's internal investigation process and Women's Aid's investigation process. Breaches of terms of membership or of the National Quality Standards have been found on investigation by Women's Aid, and upheld following any appeal:

Women's Aid would raise concerns with the member service through a supportive and collaborative discussion, to determine the underlying reasons and agree next best steps, which may include:

- a) Work through an improvement plan with the Member Service
- b) Suspend membership/Quality Standards whilst the investigation is in progress
- c) Withdraw membership/Quality Standards if the member service is unwilling to work with Women's Aid

Contact

If or you would like further information about this complaints procedure, or have any queries, please email feedback@womensaid.org.uk. Alternatively you can email membership@womensaid.org.uk or write to the Membership Team, Women's Aid, PO Box 3245, Bristol BS2 2EH

Statement of Support for Women's Aid's mission and values,

Please read the following, tick the boxes at the end, sign, and return to us

Our values are:

Feminist, Survivor-Centred, Inclusive, Empowering, Resilient

Our vision is:

A world where every woman's right to equality and freedom from violence is unquestioned.

Our purpose is to:

User our expertise, knowledge and influence to raise the status of women to a level where violence against them is no longer legitimised or tolerated.

We are aiming for the following impacts:

- Women are believed, know it is not their fault, their experiences have been understood and responded to and they feel safer and better able to make their own choices
- Gender based intimate partner violence is understood and is seen as unacceptable and actively opposed at all levels
- More women and their children receive support when they need it

Women's Aid Definition of Domestic Violence:

Women's Aid defines domestic abuse as an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, by a partner or ex-partner. It is very common. In the vast majority of cases it is experienced by women and is perpetrated by men.

Domestic abuse can include, but is not limited to, the following:

- Coercive control (a pattern of intimidation, degradation, isolation and control with the use or threat of physical or sexual violence)
- Psychological and/or emotional abuse
- Physical abuse
- Sexual abuse
- Financial abuse
- Harassment

- Stalking
- Online or digital abuse

Domestic abuse is a gendered crime which is deeply rooted in the societal inequality between women and men. It takes place 'because she is a woman and happens disproportionately to women.' Women are more likely than men to experience multiple incidents of abuse, different types of domestic abuse (intimate partner violence, sexual assault and stalking) and in particular sexual violence. Any woman can experience domestic abuse regardless of race, ethnic or religious group, sexuality, class, or disabled status, but some women who experience other forms of oppression and discrimination may face further barriers to disclosing abuse and finding help.

Domestic abuse exists as part of violence against women and girls; which also includes different forms of family violence such as forced marriage, female genital mutilation and so called "honour crimes" that are perpetrated primarily by family members, often with multiple perpetrators.

Terms of reference for Women's Aid Membership

Women's Aid Full Members are dedicated to supporting women and child survivors of domestic violence and working in partnership with other dedicated providers of services to women and child survivors, including Women's Aid Federation of England (Women's Aid), fostering feminist leadership and advocating for collaboration and solidarity. All members will:

1. Provide high-quality support to the survivors of domestic abuse which reflects their needs and helps them to feel safe, respected, and empowered. This means enabling women to define their own needs and priorities and to be involved in all decisions that impact on them and their children, if they have any.
2. Ensure that our work and practice reflect the voices of survivors.
3. Promote an understanding of domestic violence as a gendered form of violence rooted in women's inequality and characterised by patterns of coercive control. This means that members' governing documents and publicity materials must reflect this
4. Have a commitment to provision led by and for women. This means that members must only employ women to provide support to female survivors and their governance should be all female in order to deliver feminist leadership.
5. Recognise the multiple and intersecting inequalities faced by women with protected characteristics under the Equality Act 2010 and have a commitment to promoting anti-oppressive approaches in our own organisations and other agencies. This means actively ensuring that your organisation welcomes all female survivors and their children, has a staff team and trustees that reflects their protected characteristics, are highly trained and skilled in meeting those needs and advocating for their human rights

6. Work in partnership with integrity, and engage on equal terms, with other dedicated specialist women's organisations and Women's Aid, valuing and supporting each other's specialisms and offering integrated local pathways between our complementary services. This means working with integrity with other members, particularly small specialist and BME members, and respecting their unique contribution to the sector. It also means not competing against them or undermining their independence.
7. Recognise children and young people as service users in their own right and give them dedicated support and a voice in service planning. This means treating children and young people as survivors too.
8. Support campaigns to end violence against women and girls and ensure they focus on survivor-identified priorities
9. Promote positive and diverse gender roles, challenging the sexualisation of girls and oppressive norms of gender identity
10. Value and protect women-only spaces as supportive of women's journeys to stability, resilience and autonomy. This means that survivors should always be supported by a female member of staff.
11. Recognise that the experiences and needs of male victims differ from those of female victims and should be met in specialist men's services located separately from services for women.

*In a spirit of promoting improving practice for the benefit of survivors of abuse, Women's Aid will work with organisations found to have breached the terms of membership to address the concerns around practice. Women's Aid also reserves the right to refuse or cancel the membership of any member where there is evidence of non-compliance with the requirements of membership.

Appendix 2:

Women's Aid Federation: Expectations of Members in Relation to Investigations

Women's Aid expects that members will fully engage with Women's Aid in relation to investigations of serious concerns, whether conducted by the member or initiated by Women's Aid.

Full engagement in this context includes providing a commitment to, and demonstrating throughout:

- participation in the process of investigation,
 - taking on board learning,
 - respecting and adhering to any follow up action as may be required by Women's Aid.
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- Providing a senior key point of contact with appropriate authority to represent the organisation in the process. Generally, this would be the CEO or a member of the executive team.
 - Responding in a reasonable timeframe to all requests in connection with the investigation and any subsequent processes. Thus, it is expected that the member will respond to routine requests within 48 hours, and will acknowledge more complex requests within the same period and agree a timeframe for full response, which should then be adhered to. It is expected that members who have previously investigated the issues themselves internally would share the process and findings of their investigation within a maximum of three weeks from request.
 - Prioritising cooperation and input throughout, actively supporting the timely progress of the investigation and any subsequent process.
 - Not doing anything to frustrate or delay the progress of the investigation, whether or not wilfully. This includes refraining from cancelling or rescheduling meetings or interviews and rescheduling agreed timeframes for the production of information. It is recognised that in an extreme situation (e.g. the sickness absence of an individual on a key date), if it is impossible for a colleague to represent them, it may be necessary to reschedule: however this should be done only once, and to the soonest date possible.
 - Sharing with Women's Aid (and where relevant, any investigators identified by Women's Aid, and any relevant bodies as may be identified and agreed), full information relevant to the issue being investigated.
 - Providing information in accordance with all legal obligations in relation to information sharing and confidentiality.

- Maintaining full confidentiality regarding Women's Aid and any other parties involved in the investigation or subsequent processes.
- Ensuring no harm is caused or permitted to survivors or any others who have raised or are involved in the investigation of concerns.
- Willingness to ensure there is appropriate support for those who may be involved, who may be distressed by the concerns, and to agree with Women's Aid the practicalities of achieving that in relation to the particular concern.

Women's Aid will offer members reasonable opportunities to participate in investigations and subsequent processes. If members are unable to provide full participation within the appropriate timescales to enable investigations, and any subsequent process to progress, that will be noted (with the member's reasons and the attempts made to enable their participation), and will be taken into account in decision making. A lack of full participation, including within the appropriate timescales, will not impede the progress of either the investigation or subsequent actions.

Women's Aid encourages member services to make it aware of any ongoing serious complaints which have the potential to cause reputational damage.

If a survivor is distressed by the nature of a complaint or concern, Women's Aid expects members to provide additional support through internal or external means.

Women's Aid encourages members to make complainants aware of Women's Aid's complaints policy as an additional resource should a complainant be dissatisfied with the outcome of a member's investigation of their complaint.

Appendix 3:

Women's Aid internal framework for investigation and subsequent decision making in relation to complaints and serious concerns about member services

Women's Aid expects members to provide high quality services in accordance with the membership terms and, in the case of organisations which hold the Women's Aid Quality Mark, the National Quality Standards.

Women's Aid aims to enable members to continuously improve quality and will work with them to explore concerns and address potential or perceived breaches of terms of membership and / or National Quality Standards. Women's Aid will therefore work to understand concerns and assess whether there is evidence of breaches of terms of membership or of National Quality Standards if complaints regarding members and/or Quality Mark holders are received by Women's Aid, or if serious allegations or concerns arise through other means. Non-exhaustively, it may be that serious allegations or concerns arise through Women's Aid's review of patterns in complaints it has received, or by issues being raised either by members seeking assistance from Women's Aid, or by issues in the public domain coming to the attention of Women's Aid. Women's Aid will approach the exploration of concerns objectively.

We encourage member services to make Women's Aid aware of any ongoing serious complaints which have the potential to cause reputational damage.

If a survivor is distressed by the nature of the complaint or concern, we expect members to provide additional support through internal or external means.

We encourage members to make complainants aware of Women's Aid's complaints policy as an additional resource should a complainant be dissatisfied with the outcome of a member's investigation of their complaint.

Summary of internal process: receipt of concerns, investigation, and report:



Possible outcomes following investigation:

- b. The member organisation is not found in breach of the Quality Standards or terms of membership and no further action is required, or
- c. The member organisation is found to be in breach of aspects of the Quality Standards or terms of membership, but displays understanding of the issues and potential to learn from the process. An improvement plan is put in place, with support from Women's Aid, to be completed within six months; if the plan is assessed to have been successfully implemented the organisation will retain its membership/Quality Standards, or
- d. The member is found to be in serious breach of the Quality Standards or terms of membership, and does not show understanding of the issues or potential to learn from the process, and membership is withdrawn for one year, after which period the member may re-apply for membership.

If the potential breach relates to the Quality Standards, the investigator's report will be reviewed by the Quality Assessment Panel. The Quality Assessment Panel will comprise of member CEOs; at least 50% will be from a Black and minoritised background to ensure that the intersectional needs of the survivor/complainant will be acknowledged and met. If the proposed outcome is to suspend or remove the Quality Mark, this must be escalated to and agreed with the CEO of Women's Aid.

If the potential breach relates to the membership terms of reference, the investigator's report will ordinarily be reviewed by the Head of Membership. If the proposed outcome is to suspend or remove the membership status, this must be escalated by the Head of Membership to and discussed with the CEO of Women's Aid. The investigation will be reviewed by a panel comprising Women's Aid directors and trustees in the case of very serious allegations, as outlined below. No trustees for whom a conflict of interest exists in relation to the complaint will be involved in Women's Aid's handling of the complaint or decision making in respect of it. Indeed, any trustees whose organisations are subject of a complaint to Women's Aid, or who are themselves the subject of a complaint to Women's Aid, will step down from the Women's Aid Board until the complaints process is exhausted. Any subsequent decisions on their reinstatement to the Board will have regard to the outcome of the complaint as well as the usual considerations for Board appointments.

In all cases, decisions on complaints will be confirmed in writing.

If any party is dissatisfied with the outcome of the investigation, they can appeal to the Chair of the Women's Aid Board within one calendar month of the decision. After consideration of an appeal, the decision of the Chair of the Board will be final; there will be no further recourse to appeal within Women's Aid. For clarity, if there is any conflict of interest in regards to the Chair hearing the appeal, the appeal will be considered and decided on by another Board member in respect of whom there is no conflict of interest.

In the case of very serious allegations, such as of racism, systemic diversity and inclusion issues, an organisational level culture of lack of safeguarding practice, or organisational corruption, the following will apply:

Women's Aid internal process to assess findings of independent investigations into very serious allegations such as of racism, systemic diversity and inclusion issues, an organisational level culture of lack of safeguarding practice, or organisational corruption:

1. Where there are allegations of racism or very serious other issues within the membership, Women's Aid will commission an independent investigator to investigate the matter with the member(s) organisation.
2. The terms of reference are set out for the investigation reflecting the complaint/allegations against the membership principles and/or National Quality Standards.
3. An independent investigator is appointed by Women's Aid.
4. An initial meeting is arranged with the member outlining the terms of reference.
5. A Women's Aid panel meet within 10 working days of receipt of a finalised independent report to assess the findings in the context of the principles of membership. It will make recommendations to the Services Sub Committee of the Board in relation to potential action in relation to the status of the member and, if relevant, their accreditation under the National Quality Standards.

The panel will comprise:

- Chief Executive Officer, Women's Aid
- Director of Services, Women's Aid/Director of People and Culture, Women's Aid;
- Two independent trustees of Women's Aid, one of whom will be from the Services Directorate, and one of whom will be from the wider Board.

6. Women's Aid will do its utmost to ensure an anonymised summary will be shared with the member and complainant(s), recognising there may be limitations on this intention due to the anonymised nature of complainant(s).

7. The process recognises there may be a need for sensitive public communications which will be shared with the member and the complainant(s) in advance of any publication.

Multiple instances of concerns or complaints in relation to members/ standard holders:

Through Women's Aid's complaint log, we are able to monitor the frequency, severity and nature of complaints raised against Women's Aid member services. Multiple complaints against one member service may indicate potential concerns. Women's Aid would approach such instances as follows:

Scenario A)

2-3 informal complaints or concerns against a member service are brought to Women's Aid's attention through survivors, forums, staff, member services, Quality Assessments or other means, in a five year period:

Women's Aid would raise concerns with the member service through a supportive and collaborative discussion, to determine the underlying reasons and agree next best steps; which may include:

- i) Those with concerns being encouraged to raise them formally for investigation
- ii) The member undertaking and sharing with Women's Aid an exploration of the issues of concern
- iii) Women's Aid supporting the member through a mutually agreed improvement plan
- iv) Women's Aid suspending or withdrawing membership/ Quality Standards if the member service is unwilling to work with Women's Aid on an improvement plan

Scenario B)

2-3 formal complaints logged by Women's Aid over a five year period have been investigated through both the service's internal investigation process and Women's Aid's investigation process. Breaches of terms of membership or of the National Quality Standards have been found on investigation by Women's Aid, and upheld following any appeal:

Women's Aid would raise concerns with the member service through a supportive and collaborative discussion, to determine the underlying reasons and agree next best steps; which may include:

- a) Work through an improvement plan with the Member Service
- b) Suspend membership/Quality Standards whilst the investigation is in progress
- c) Withdraw membership/Quality Standards if the member service is unwilling to work with Women's Aid on an improvement plan, or if the complaints (individually or collectively) are deemed so serious and the commitment of the member to address the underlying issue(s) so insufficient as to present an untenable risk.

In the case of suspension/withdrawal of membership and/or Quality Standards, reinstatement would depend on both the level of cooperation from the member service and the frequency and severity of the issue(s) raised.

To reinstate membership and/or Quality Standards, Women's Aid would work with the member service and support them to look at the areas of concern. A quality improvement plan would be agreed between Women's Aid and the member service and progress reviewed from the time of suspension/withdrawal to the time of re-application. This would be included as part of the member's effort to be seen as compliant with good practice measures.

Confidentiality

Women's Aid will maintain a confidential record of all complaints and serious concerns and the outcomes of any investigations, subsequent decisions, and appeals, and will treat all information in accordance with GDPR and safeguarding principles.