

OXFAM GB (OGB): ANNUAL LEARNING REVIEW FROM COMPLAINTS AND FEEDBACK (1 April 2017-31 March 2018)

Introduction

This report is Oxfam GB's 7th Annual Complaints Learning Review and provides an overview of Oxfam GB complaints activity and any related actions and learnings during 2017-2018. It also reports back on progress on the actions for 2017-2018 to which we committed last year.

The Review has seven sections: this Introduction, then a Synopsis, followed by separate sections on each of; the Complaints Group, Trading, Supporter Relations (including Campaigning and Policy), Programmes and Whistleblowing. The Review also has two appendices: (1) a report against 2017-2018 action plan and (2) a 2018-2019 action plan.

Ensuring that our stakeholders can hold us to account will improve the quality of our work. Oxfam strives to be excellent in all it does but recognises that this cannot always be the case. When we make a mistake, we want and need to be informed. We will use that information to endeavour to put things right and to help us become more effective.

This has been a challenging year. The very public criticisms in February 2018 of Oxfam's failure to prevent and then investigate sufficiently the use of prostitutes by its staff in Haiti led to a steep rise in complaints towards the end of the year under review in this Report. To enable a like for like comparison with previous years, we have provided a separate table of Haiti related complaints on page 7. The revelations have led to a profound sense of shame in Oxfam, and to a concerted programme of reforms, set out in our Ten Point Plan ([link](#)). We will continue to review the complaints received; and in particular, the complaints through our whistle-blowing helpline, and will report further in next year's report.

In March 2018, the UK Charity Commission and Department for International Development co-hosted a Safeguarding Summit, at which Oxfam and other charities participated, and we, alongside the Commission, DfID and other charities agreed to five commitments¹, of which the fourth was "we will ensure full accountability through rigorous reporting and complaints mechanisms, for any misconduct that occurs under the banner of our organisations, including by sub-contractors and partners". While this report covers the year 1 April 2017 to end March 2018, it forms part of our accountability and complaints mechanisms, which we are reviewing further in the light of the Summit commitments.

1. Synopsis

- **Complaints Group:** the Group met twice during the year to review complaints communications and activity and to share learning.
- **Trading:** Complaints about Trading Division activity decreased in the past year. From April 2017 to March 2018 there were 355 complaints, a 9% fall on the 388 received in 2016-2017 and less than the number in 2015-2016, our previous lowest year so far. This is just 1% below the Trading KPI for this activity. A breakdown of the figures is provided at pages 2-5.

¹ Link at: <https://www.gov.uk/government/publications/joint-statement-safeguarding-summit-5-march-2018>

- **Supporter Relations (including campaigning and policy):** In comparison with 2016-17 figures the overall volume of recorded complaints has increased significantly – up from 1534 to 2572. In previous years, we had a downward trend in overall complaints year on year since 2013; however, complaints have increased in our ‘Oxfam the Organisation’ category, mainly due to the Haiti-related crisis. A breakdown of the figures is provided at pages 5-9.
- **Programme:** Responsibility for collating Programme-related complaints shifted from the Oxfam GB Programme team to Oxfam International in 2017. However, we still report below on the Oxfam GB dimension.
- **Whistle-blowing:** Oxfam GB now makes available a new externally run hotline, ‘Speak Up’, which went live on 13 March 2018. This tool is based on the EthicsPoint software. The aim is for anyone in a country where Oxfam GB is the lead delivery partner of Oxfam International (27 countries) to be able to make a whistle-blowing report.

2. Complaints Group

The Complaints Group is convened by the Director of Finance (as owner of Oxfam GB’s Complaints Policy), and meets twice each year. Its membership includes the managers responsible for shop support and supporter relations, along with the Company Secretary & General Counsel and the Head of Governance.

The Group has two aims: firstly, to receive information about – and conduct a thorough peer review on- feedback/complaints figures and trends from throughout the organisation², as part of a learning and continuous improvement process; and secondly, to report to Oxfam GB’s Trustees and publicly (by way of this Review), as evidence of our commitment to accountability and to show how processes are being improved.

The Complaints Policy and associated processes are easily accessible on the Oxfam GB website (just two clicks from the home page), with clear contact information (by email, post and telephone).

The current Complaints Policy was developed in 2012, and was therefore due for review in 2017. In the light of the March 2018 summit, and the learnings from the safeguarding investigations, this will now be further reviewed and will be completed by March 2019.

The Group’s remit includes the review of any appeals heard in the year under the Appeals Process. There was one Appeal this year, and the Complaints Group handled it as set out in Section 6 below.

3. Trading³

About our Complaints Handling Process

The Trading Division’s complaints handling process is set out in annexe 2 to the Complaints Policy and can be summarised as follows:

² Other than (i) staff and volunteer grievances, which are managed and monitored by the People Team; and (ii) safeguarding and other whistleblowing-type complaints, which are reported to the Leadership Team and Council on an annual basis.

³ Excluding online shop and website, which are reported within the Supporter Relations category.

- Trading Division complaints in this context refers to all complaints that are reported to Shop Support and then logged and managed as complaints under the formal process. It is recognised that a significant volume of issues are resolved locally and informally by our shop teams.
- Where the complaint is such that the customer wishes it to be raised formally or the Shop Manager recognises that this is necessary, the customer is provided with Shop Support contact details. They can raise the complaint by telephone, email or letter as appropriate. Contact details are also available on the Oxfam GB website should the complainant wish to raise a complaint subsequent to a shop visit or where it may not relate directly to a shop (e.g. it relates to policy).
- Upon receipt, Shop Support summarise, log and acknowledge within 24 hours, providing details of the complaints process with the acknowledgement. Shop Support as complaint facilitator then refer the complaint to the most appropriate member of staff to investigate and respond.

A breakdown of complaints made by donors, customers and volunteers about Oxfam’s Trading activity, 2017-18



(i) Actions and progress in 2017-2018

Complaints about Trading Division activity decreased in the past year. From April 2017 to March 2018 there were 355 complaints, a 9% fall on the 388 received in 2016-2017 and less than the number in 2015-2016, our previous lowest year so far. This is also 1% below the Trading Key Performance Indicator for this activity.

(ii) Trends & figures in 2017-2018

Complaints by category from volunteers, donors and supporters about Oxfam's Trading activity, 2013-18.

Trading Complaints	2013-14	2014-15	2015-16	2016-17	2017-18	'17 vs '18
Customer Service	227	187	223	263	245	-7%
Other Complaints	79	67	42	26	18	-30%
Policy/Quality	98	56	32	29	39	+34%
Refund/Exchange	46	45	28	35	25	-29%
Donation	34	26	22	19	10	-47%
Pricing	29	25	18	16	18	+13%
TOTAL	513	406	365	388	355	-9%

One of our key indicators is to handle complaints within 14 days of initially receiving them. Last year 38% of complaints took longer than the allotted 14 days to resolve. This year the number taking more than 14 days reduced to 32%, which is better even than the most recent comparable achievement of 33% in 2014-2015.

The average time to resolve a complaint was just under 12 days this year. This compares well with last year when the average was 16 days to resolve (however the figures were skewed by 3 complaints that took more than 200 days to resolve, taking these out the average would have been 14 days). It was also less than 2015-2016 when it took an average of 13 days.

Fewer than half of our shops – 250 – received one or more complaints. Around 380 did not receive any complaints at all. This was similar to our experience in previous years.

Customer service is, as in all previous years, the main category of complaints. The number of complaints declined by 7%, but is still higher than in 2016-17.

All other categories of complaints recorded very low numbers, and have all shown corresponding falls, apart from pricing, which registered a small increase, and Oxfam policy. The significant increase in complaints about Oxfam Policy was caused by the closure of one particular shop, which led to us receiving 10 complaints about the decision to close it.

(iii) Learning and actions for 2017-2018

Processes initiated by Shop Support to proactively pursue responses and updates from the Retail Line (Shops, Area Managers) have had a very positive effect in reducing complaints with response-times outside the 14-day threshold, and also reducing the average response time. This is very encouraging, and suggests it may be premature to review the 14-day threshold.

A plan to manage centrally (by Shop Support) complaints relating solely to policy (following dialogue with Operations Teams), was deferred due to the crisis of early 2018, and is to be revisited later in Financial Year 2018/19, all preparations having been done. Although this is not expected to involve large numbers of complaints, it will contribute to reducing both the average resolution time and the number that take over 14 days to resolve.

During 2017-18, several retail skills training modules were delivered, and while there was not a specific module rolled-out for customer service, this subject was covered as a part of each of those that were.

[One significant piece of work undertaken⁴ has been to initiate an attempt at benchmarking ourselves against peer charities while also interviewing our own Shop Teams for feedback relating to the existing policy and their understanding of the process.

We approached those peer charities with a reasonably similar retail presence on the High Street, unfortunately the response was limited with only two engaging. This work was planned before the safeguarding revelations in February but not initiated until afterwards, it is therefore possible that the timing had an impact. The high-level findings from this small sample can be summarised as follows:

- *Oxfam has evolved a complaints management process which from the limited comparison is in most instances equivalent to or more rigorous than the others.*
- *Based on the limited sample complaint resolution time target may be worthy of review in the future to see if it can be made shorter (balanced by any cost implications of doing so).*
- *We may wish to reconsider categorising anonymous complaints as such rather than “feedback” as we do currently and adapt/amend our policy/processes to accommodate this.*

Given the limited response, future activity needs to be carefully considered and this will be kept under review.]

From Shop Feedback:

- Feedback from our own shops suggests that we may wish to consider periodic complaint refresher training to ensure shops receiving few complaints remain conversant with the correct processes. To be referred to Trading Leadership for consideration.

Actions for 2018-19:

- Revisit 2016-17 policy related complaints work and subject to confirmation by Trading Leadership agree a date to initiate the changes already identified.
- Consult with Trading Leadership about development of a complaint training module for Shop Teams and take forward as directed.

4. Supporter Relations (including Campaigning and Policy)

In comparison with 2016-17 figures, the overall volume of recorded complaints has increased significantly in 2017-18 – up from 1534 to 2572. In previous years, we had a downward trend in overall complaints year on year since 2013; however, complaints have increased in our ‘Oxfam the Organisation’ category, mainly due to the Haiti-related crisis.

About our Complaints Handling Process

The Supporter Relations complaints handling process is set out in annexe 1 to the Complaints Policy and can be summarised as follows:

- Supporter Relations receive all OGB complaints that do not fall within Programme or Trading (other than staff grievances or whistleblowing issues).
- They log, investigate and respond within 14 days of receipt.

⁴ The text in italics and square brackets is for the internal copy of this report ONLY. This is to honour an express commitment requested by, and given to, those two charities which did consent to engage.

- Reporting on learning takes place monthly, and will inform all appropriate stakeholders. For Fundraising complaints, this is also included in a quarterly report to the Fundraising Committee on behalf of Council.

Actions and Progress

99.9% of complaints were handled within 14 days of receipt, which is in line with the departmental standard. The overall average response time was two working days, with most of the complaints requiring standard or fairly straight-forward responses. Just 0.6% of complaints required more than 4 days to deal with, and the longest complaint took 24 days. This was due to us awaiting further information from the supporter to be able to complete the investigation.

Non-fundraising complaints (website issues and policy complaints) historically produced quite significant volumes of complaints and year on year have been reducing, but this year the number of complaints has increased in one of these areas: “Oxfam General Policy” increased from 50 to 1698; whilst Website-related complaints overall decreased from 158 to 122.

The increase for ‘general policy’ complaints is directly attributable to February’s very public examination of Oxfam GB’s handling of allegations of sexual misconduct in Haiti. Figures relating to this are identified separately later in this report.

On Fundraising complaints, we continue to see an overall reduction from 846 to 468, however we have seen very slight increases in the following fundraising channels: TV Advertising, Private Site Fundraising and the Oxfam mobile application. However, in other areas we have seen significant reductions in complaints, with Mail, Telemarketing and Street Fundraising all lower than previously. Other areas of improvement include significant reductions in email-Marketing, Legacy and Events fundraising complaints.

In 2017-18, we reviewed our feedback & complaints process with our Online Shop customer service supplier, to ensure they are capturing and reporting all feedback for us to action. As a result, we will see a significant increase in our shopping feedback & complaints. This “re-basing” of this category will be included in next years’ report, enabling a comparison of two years of data. This year’s report uses the same definition as previous years.

Learnings 2017-18

During 2016-17 we decided that the Oxfam street team should be managed by Oxfam employees – this change has given us more direct engagement with the activities and ensured more prompt and clear follow-up on any requested changes in activities and behaviours. All this has contributed towards a reduction, year on year in public complaints (2016/17 139 v 2017/18 75).

A new feature last year (from January 2017) has seen Supporter Relations logging complaints and adding an upheld/not upheld flag. This recognises the outcome of further investigation to identify those complaints that absolutely required action, or were warranted due to error or similar by Oxfam, rather than those that (for example) were views on our approach or policy.

The results for the year 2017/18 have shown that 2572 complaints have been logged, and 2010 (78%) of those complaints were “upheld”. Previously, only 34% of complaints, recorded by Supporter Relations were upheld. This significant spike can be specifically attributed to the Haiti Crisis. As noted in the introduction, we acknowledge that mistakes were made and have implemented measures to improve our practice, including the 10-point plan announced in February 2018.

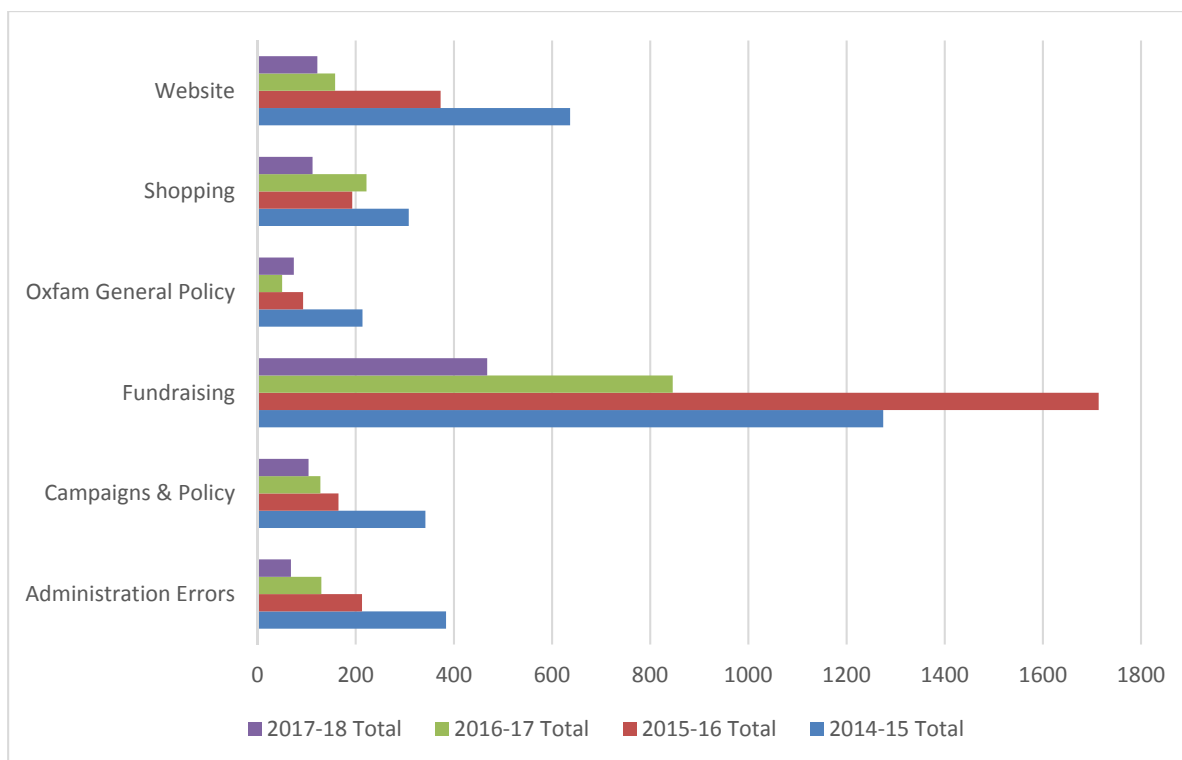
April 2017 - March 2018			
No. Complaints Upheld/Not Upheld (excluding Haiti)	No	Yes	2017-18 Total
Administration Errors	48	20	68
Campaigns & Policy	53	51	104
Fundraising	316	152	468
Oxfam General Policy	57	17	74
Shopping	59	53	112
Website	29	93	122
Grand Total	562	386	948
February 2018 - March 2018			
No. Complaints Upheld/Not Upheld	No	Yes	2016-17 Total
Oxfam General Policy (Haiti specific)		1624	1624

Overall Trends and Figures

We have removed complaints relating to Haiti so that underlying trends may be clearly identified.

Complaints by category received by Oxfam GB's Supporter Relations Team, April 2014 – March 2018.

Complaint Category	2014-15 Total	2015-16 Total	2016-17 Total	2017-18 Total
Administration Errors	384	213	130	68
Campaigns & Policy	342	165	128	104
Fundraising	1275	1714	846	468
Oxfam General Policy	214	93	50	74
Shopping	308	193	222	112
Website	637	373	158	122
Grand Total	3160	2751	1534	948



Complaints received from Regulatory bodies

Calendar Year	Number of TPS Complaints	Number of MPS Complaints	Fundraising Regulator	ICO
2015	8	0	N/A	0
2016	4	1	1	0
2017	1	0	0	1

Included within the “Fundraising” complaint category, we received a small number of complaints directly from the Telephone/Mail Preference Service the Fundraising Regulator and the Information Commissioner’s Office during 2017. As can be seen from the table above, this has continued to decline significantly over the last three years for TPS complaints. Neither of the complaints was upheld by Oxfam.

Fundraising Complaint Rates

Our annual return to the Fundraising Regulator (previously the Fundraising Standards Board) enables us to monitor complaint rates for each of the key fundraising methods. We have provided our top 5 Fundraising complaint categories by volume, as can be seen in the table below.

Oxfam has seen an increase in the 2017 complaint rate for Supporter Mail category, compared to the Fundraising Regulator 2016 Complaint Rate. This will be an area we will continue to monitor.

Regulator Reported Complaints	2016 Fundraising Regulator Complaint Rate	2017 Oxfam GB Complaint Rate
Email Marketing	0.001%	0.001%
SMS	0.001%	0.001%
Supporter Mail	0.004%	0.007%
TV	0.000%	0.000%
Web Marketing	0.000%	0.000%

More information on the Fundraising Regulator's 2016 complaint report may be found here: <https://www.fundraisingregulator.org.uk/sites/default/files/2018-07/Report-on-complaints-received-by-charities-about-fundraising-2016.pdf>

Actions for 2018-19

Actions from last year's report have been carried out and completed, which include:

Carry out training and refresher training for Supporter Relations staff on the complaints and vulnerable people process.

Investigate further the "Upheld / Not Upheld" area, identify and implement opportunities to learn from this to reduce instances of "not upheld" issues arising.

Complete the transition and rebasing of online shop feedback and complaints data to enable next year's report to present an improved and complete picture of this area, to include historic data.

Define and complete the migration of appropriate historic complaint data into our new CRM system.

5. Programme

As noted above, since 2017, responsibility for collecting programme-related complaints now rests with Oxfam International (OI), of which Oxfam GB is one of 19 members. Altogether the data is collected from 65 countries. It is important to note that of these countries, Oxfam GB has the lead responsibility for processes and systems in 27. In future Reports, we would like to disaggregate the data that is from Oxfam GB programmes, and if practical to restate the figures here by reference to the Oxfam GB programmes (but we are not as yet sure that OI will be in a position to provide the disaggregated data we need).

The source of the largest category of such data is our whistleblowing mechanisms (see section 6 below on Whistleblowing). There could be some overlap between the figures here, and the complaints referred to elsewhere in this Report, and at this point we have not yet been able to de-duplicate. The other categories are written and oral. The quality of the available data varies, and it is reasonable to assume that there is significant under-reporting of complaints. We expect this to improve as our complaints and feedback mechanisms, and the data capture about them, at country level become more robust.

Programme Complaints Reporting

This table incorporates complaints which relate either to countries where Oxfam GB is the member of Oxfam International responsible for day to day support to Oxfam programmes (27 countries), and countries where Oxfam GB is either not operational (38 countries), or where it funds other members of Oxfam International (8 countries). As the data is collected by Oxfam International and has not yet been disaggregated, it is not possible to identify how many of these complaints relate to Oxfam GB, but if the presence in countries is used as a measuring stick, then that would amount to approximately half. We aim to produce disaggregated statistics in 2018-19.

Global Summary		No. of complaints			
		Written	Whistleblower mechanism	Verbal	Other
1.Complaints by individuals directly affected by your programmes	Responded and resolved	198	1985	387	3276
	Responded but not yet resolved	0	0	0	132
	[Not responded ⁵	0	0	61	14]
2.Complaints against your Office by partner organizations	Responded and resolved	27	0	5	1
	Responded but not yet resolved	24	2	0	0
	Not responded	0	0	0	0
3.Complaints against a partner organization	Responded and resolved	2	0	2	2
	Responded but not yet resolved	1	0	1	0
	Not responded	0	0	0	0
4.Complaints against your Office by staff, volunteers or interns (incl. Grievances)	Responded and resolved	15	2	8	0
	Responded but not yet resolved	2	0	0	0
	Not responded	0	0	0	0
5.Complaints against your Office by the general public	Responded and resolved	2	0	3	0
	Responded but not yet resolved	2	0	0	0
	Not responded	28	0	0	0

This table presents summary aggregate data for ALL countries where any Affiliate member of Oxfam International works.

About our Complaints Handling Processes for Programmes

As noted, since 2017, significant complaints (“serious complaints about programmes/partners”) are now reported to Oxfam international in each country’s Quarterly Management Reports (QMRs). The information in the QMRs is seen as being mainly operational in nature

⁵ This data are currently being checked with OI in order to ascertain reasons why it appears that some complaints have not received a response, (e.g. if some complaints were anonymous). This will be clarified in the final (public) version of this Report.

and for Country Director/OI Regional Director use, and it has therefore not been collated for the purposes of this Review.

We do note that some countries recorded a 'nil return' in reporting Complaints to Oxfam International. However, it is very unlikely that any country had no actual Complaints; the 'nil return' is more likely to reflect under-reporting. This assumed under-reporting may skew the aggregate data.

Our website encourages anyone who has a complaint about a programme or activity in our International Programme to contact the Country Office concerned. We also provide an email address which is currently monitored by Oxfam GB's Supporter Relations team – who pass on comments and queries to the relevant Country Director. As in previous years, significant complaints ("serious complaints about programmes/ partners") are reported to us in each country's Quarterly Management Reports (QMRs).

Under Oxfam's confederation structure, complaints in countries and regions are channelled mainly through the Executing Affiliate systems. Country Directors also inform the rest of Partner Affiliates and the Country Governance Group about complaints and reflect them in the Quarterly Risk Register.

There is a specific protocol for humanitarian responses supervised by Oxfam's Global Humanitarian Team. In each response, the country team sets up a complaints channel available to communities and partners.

Oxfam GB has created a new position of Strategic and Programme Lead - Accountability and Partnerships, reporting to the International Programmes Director is, is intended to help ensure better accountability and better partnerships, and improve our ability to deliver safer and more impactful programmes.

Actions for 2018-19

As noted on page 9 above, we would like to provide disaggregated data for Oxfam GB programmes if we are able to do so.

6. Whistle-blowing

In this report, we also focus on Whistle-blowing. Oxfam previously had an internally-run whistleblowing hotline, but recognised that an independently-run hotline would better enable external complaints.

Oxfam GB now makes available a new externally run hotline, 'Speak Up', which went live on 13 March 2018. This tool is based on the EthicsPoint software provided by Navex Global, a US-owned company which is the largest technology and services organization in the ethics and compliance arena, working with 95 of the Fortune 100 companies.

'Speak Up' links Oxfam with an independent third-party call centre contactable through Freephone numbers and an on-line form for whistle-blowing. The call centres can converse in over 150 different languages. Reporters may remain anonymous if they wish, and the system permits Oxfam to converse with anonymous reporters after the initial conversation through 'Speak Up'.

The aim is for anyone in a country where Oxfam GB is the lead delivery partner of Oxfam International (27 countries) to be able to make a whistle-blowing report. In sixty percent of these 27 countries, a free phonenumber is available, and in 26 of the 27 countries, it is possible

to make an on-line report (Syria is the only current exception, owing to US sanctions, so Oxfam will introduce an alternative operating procedure there).

Oxfam's Complaints procedures ensure that if there is a complaint against a member of the Leadership Team (Chief Executive and her/his direct reports), this is handled by the Trustees in order to ensure independence from management. In the year under report, a single complaint was received, relating to actions by two members of the Leadership Team. It was investigated in line with Oxfam GB policy; the Vice-Chair decided not to uphold the complaint; the complainant appealed, and the Chair decided not to uphold it. As an ancillary matter, several recommendations for improvements to systems and procedures were made, and these have been, or are in the process of being, implemented. They were also communicated to the complainant.

These process recommendations concerned improvements to: performance management processes, documentation of cases in the light of GDPR, sign off processes for internal and external communications, guidance for complaints handling, handling of confidential issues, balancing confidentiality and transparency, management of case documentation, and the creation of a process Protocol for trustee reviews. Together these seven recommendations are being fed into reviews to be completed before the end of this financial year, 2018/19.

Annex 1: Progress Report on Complaints Action Plan 2017-18

Action		Timescale	Update
Complaints			
1.	Improve complaints communications by ensuring Oxfam GB website and intranet include all annexes to the Complaints Policy, 2015-16 and 2016-17 Annual Learning Reviews and 2014-15 OI Accountability Report.	July 2017	Completed December 2017.
2.	Review Complaints Policy and annexes and recommend any changes to Council (unless we are informed that the cross-federation Policy will be developed during the year).	December 2017	Review commenced but not yet completed.
Programme			
3.	International Programme Team, at conclusion of current change process, to identify staff member to be responsible for complaints oversight in future.	October 2017	Not yet confirmed, but see page 4 for new role.
4.	The Complaints Group to consider later this year the complaints information in the Oxfam Operational Report and other available information (eg complaints about Oxfam GB's fulfilment of its Executive Affiliate or Partner Affiliate Role or from donors) and to recommend next steps to Leadership Team and/or Council.	November 2017	This year's report includes Oxfam Operational Report data for the first time.
Trading			
5.	Review complaint resolution timescales in Trading's complaints handling procedures.	September 2017	Improvements achieved in handling of complaints outside 14-day threshold.
6.	Organise and deliver retail skills training (including customer service) for shop teams.	End of F/Y 2017-18	Several retail skills training modules were delivered; customer relations formed part of the modules.
7.	Explore whether Shop Support can manage (rather than facilitate) any specific categories of complaint, such as those relating to matters of policy, to where possible improve speed of resolution and implement any recommended changes.	August 2017	Deferred owing to the crisis, due to be addressed later in 2018-19.
8.	We will also explore whether any benchmarking data is available from the Charities Retail Association with a view to comparing our performance with peer charities and, where appropriate, entering into a dialogue with them. This benchmarking, if feasible will then comprise part of Trading's annual review summary.	March 2018	Trading staff undertook bench-marking project on how a few other charities manage complaints. Initial findings await analysis.
Supporter Relations			
9.	Supporter Relations to continue training for all Supporter Relations staff on Complaints and Vulnerable People	Ongoing	Done (quarterly)

Action	Timescale	Update
Complaints		
	processes, with training to be run at least twice a year and each staff member to attend at least once.	
10.	Use the training team and the new quality management process to check on a regular basis (at least quarterly) feedback logged and actions taken.	Ongoing Done (ongoing)
11.	Continue to produce monthly reports for Fundraising Leadership Team and Compliance, and feed into post fundraising campaign wash up sessions.	Ongoing monthly Done (ongoing)
12.	Working closely with Marketing Operations, provide our Agency Relationship Lead a monthly breakdown of Fundraising Agency complaints, so that this can be used in Supplier reviews and action plans.	Ongoing monthly Done (ongoing)
13.	Create a separate category in our system for Legacy and Gift Aid/Tag Your Bag to report on those areas in more detail.	July 2017 Not yet done, owing to complexity of changes in fulfilment systems.
14.	Continue to monitor complaints upheld & not upheld and report on these trends within the existing reporting.	Quarterly Done (ongoing)
15.	Review format of complaints responses to include clear link to Complaints Policy and associated appeals process.	July 2017 Done
16.	Review representative selection of complaints responses to give better understanding of quality of responses.	June 2017 and then quarterly Done (ongoing)

Annex 2: Complaints Action Plan 2018-19

Action		Timescale
Complaints		
1.	Review Complaints Policy and annexes and recommend any changes to Council (unless we are informed that the cross-federation Policy will be developed during the year).	March 2019
Programme		
2.	If practicable, disaggregate the data that is from Oxfam GB programmes from OI data, and restate the figures by reference to the Oxfam GB programmes.	March 2019
3.	International Programme Team to confirm staff member to be responsible for complaints oversight in future.	March 2019
Trading		
4.	Revisit 2016-17 policy related complaints work and subject to confirmation by Trading Leadership agree a date to initiate the changes already identified.	Approved by TLT 19/9/18. Changes to be initiated during October 2018.
5.	Consult with Trading Leadership about development of a complaint training module for Shop Teams and take forward as directed.	31/12/2018.
Supporter Relations		
6.	Investigate further the "Upheld / Not Upheld" area, identify and implement opportunities to learn from this to reduce instances of "not upheld" issues arising	Quarterly
7.	Complete the transition and rebasing of online shop feedback and complaints data to enable next year's report to present an improved and complete picture of this area, to include historic data	July 2019
8.	Define and complete the migration of appropriate historic complaint data into our new CRM system	April 2019
Whistle-blowing		
9.	Monitor and report on functioning of new external 'Speak Up' hotline: access to, and performance of, complaints processing and resolution.	April 2019

Complaints Group:

Paul Mullins [Head of Supporter Services & Operations]
 Judeth Neville [Head of Governance]
 Joss Saunders [Company Secretary & General Counsel]
 Roy Seaward [Customer and Shop Support Manager]
 Joe West [Supporter Relations Team Manager]

Report compiled by Alexandra Jones, Interim Governance Adviser (for Judeth Neville)

On behalf of: Alison Hopkinson, Director of Finance

25 September 2018