

Complaints Policy

1. Introduction

CoST, the Infrastructure Transparency Initiative, is a registered charity with the Charity Commission for England and Wales. As such, CoST has a responsibility to ensure compliance with the UK regulations, including safeguarding and other related matters. This document is part of CoST's safeguarding framework. The other documents in this framework are:

- Code of conduct
- Safeguarding policy
- Safeguarding procedure
- Whistleblowing policy and
- Anti-trafficking policy and plan

2. Policy statement

Receiving feedback and responding to complaints are important parts of improving CoST's accountability. Ensuring our stakeholders can hold us to account will improve the quality of our work in all areas.

3. Scope

This policy applies to all CoST Board Members and all CoST International Secretariat staff, contractors (associated personnel) and sub-grantees (delivery partners).

A complaint can be made by any supporter, partner organisation, community or individual with whom we work, or any member of the public, whether an individual, company or other entity, in the UK or anywhere else in the world.

In addition, it is expected that all CoST Members, specifically the host organisation staff and contractors, and Multi-Stakeholder Group Members, consider this policy and its relationship to any national and institutional regulations, policies, and requirements as part of their CoST programme.

4. Definitions

A complaint is an expression of dissatisfaction with the standards of service, actions, or lack of action by its associated personnel or delivery partner. It is a criticism that expects a reply and would like things to be changed. Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery.
- Concern from a member of the public or supporter about a particular fundraising approach or campaign action.
- Concern about the behaviour of associated personnel.

A complaint must be about an action for which CoST is responsible or within our sphere of influence.

A complaint is **not**:

- A general inquiry about CoST's work
- A request for information
- A contractual dispute
- A request to amend records, e.g. to correct an address, cancel a donation
- A request to unsubscribe from a CoST service, e.g. a newsletter, email, or social media.

The complaints procedures do not apply to complaints that are currently under investigation by any regulatory body or other legal or official authorities in the UK or other countries in which we operate. Such issues will be dealt with by the relevant regulatory body.

5. Procedures for making a complaint

It is hoped that most complaints or concerns about CoST's work or behaviour can and will be dealt with informally by associated personnel or the delivery partner at the level where the issue arises (i.e., Board, Member, International Secretariat). However, it is recognised that not all issues can be resolved in this way, and that a formal complaints mechanism is required for occasions when an individual or organisation wishes to make their complaint a matter of record and receive a formal response.

6. How to make a complaint

All formal complaints should be made in writing, either directly by the individual or organisation making the complaint, or by someone acting on their behalf. See below for details about to whom to address a [complaint](#).

7. Who can make a complaint?

This policy is global in application. A complaint can be made by:

- Any supporter
- Partner organisation
- Community or individual with whom we work
- Any member of the public, whether an individual, company or other entity, worldwide.

8. Who is not covered by this policy?

Complaints by associated personnel are governed by CoST's handbook on workplace problems. Complaints relating to serious incidents, such as fraud, corruption, or safeguarding concerns, will be dealt with in accordance with the relevant policies and procedures.

9. How to make a complaint

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This Policy will be reviewed every five years by the Board.

| Approval date | Changes made | Review date |
|---------------|--|---------------------------|
| 24/11/2025 | Adapting the content using recommended good practice | 07/05/2025 and 10/11/2025 |

Annex: Glossary of Terms

Safeguarding

In the UK, safeguarding means protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect.¹

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults, from that harm; and to respond appropriately when harm does occur.

Code of conduct

Sets out the conduct expected of CoST staff, contractors, suppliers and associated partners. Associated partners include, but are not limited to, the following: CoST Member host organisation staff, partners, MSG Members, volunteers, and programme visitors, including academics, journalists, and public officials.

Whistleblowing policy

This policy outlines CoST's commitment to non-retaliation against staff members who report malpractice and the procedures for investigating such reports.

Complaints policy

This policy sets out CoST's commitment to receive and respond to complaints. It governs the procedures to respond to complaints.

Procedures for response to safeguarding concerns

This is a set of procedures outlining how to handle reports of breaches of the CoST safeguarding policy.

¹ NHS 'What is Safeguarding? Easy Read' 2011