

Island Coastal Community Futures

POLICY NAME: "Independent Client Service Review

INTRODUCTION:

This Policy sets out the Island Coastal Community Futures Group approach to resolving a complaint or request through recommendations for change and/or redress.

Community Futures organizations are founded on the principles of local decision-making, locally autonomous and overseen by independent boards. On occasion a client that has applied for a loan may request a decision be reviewed. For this reason offices have established a Loans Committee separate from the Board of Directors to adjudicate loan submissions; enabling the board to perform the review function of its Loans Committee if and when necessary. At this level the board will review process and may overturn the decision of the Loans Committee.

As per policy, all loans over \$150,000 must be approved by the Board of Directors. When a loan is declined by the Board of Directors, and an applicant is not satisfied the due process and consideration has been given by that Board, an independent redress can be formally requested. It is important to note that the "Independent Client Service Review" Committee has the authority to review and ensure that process has been followed and that the client's application has been given fair consideration. As each office operates independently they do not have the authority to overturn a Board of Directors decision.

In a situation where a complainant requests further review the applicant in writing shall make a formal request to the CF Board Chair of the organization using the "Independent Client Service Review" Form. The CF Board Chair will forward the request to the Independent Client Service Review Committee Chair (Chair). The Chair's role is to create and chair an Independent Client Service Review Committee (Committee) comprised of at least three (3) experienced volunteer members and one (1) business analyst. The committee will generally be drawn from within the Island Coastal Community Futures Group.

These seven independent Community Futures organizations in the ICCF:

- 1) Cowichan
- 2) Central Island
- 3) Alberni Clayoquot
- 4) Mount Waddington
- 5) Powell River
- 6) Sunshine Coast
- 7) Howe Sound

gives the Chair the authority, in defined circumstances, to investigate a complaint or request. It is for the Chair to decide whether to initiate, continue or discontinue an investigation, and that the Chair may take such action in connection with the complaint or request as the Chair thinks may be of

assistance in reaching any such decision which may include action with a view to resolving the complaint or request.

The function, then, of the Committee is to resolve complaints. That literally means to find a solution or settle a problem or controversy. While the needs and wishes of the complainant and the views of the authority under investigation are taken into account, resolution of the complaint is to the satisfaction of the Committee. As part of the resolution of a complaint, the Committee may make proposals for action by the body. This Policy outlines the basis on which the Committee makes such recommendations.

INDEPENDENT CLIENT SERVICE REVIEW PROCESS

1. If a party is not satisfied with an outcome from the respective Community Futures office, the decision may be appealed through the "Independent Client Service Review" Committee. The party must complete the "Independent Client Service Review Form" and submit the form to the Chairperson of the CF Board of Directors in question. The Chair of the respective Community Futures office will within 3 working days submit the "Independent Client Service Review" Form to the Independent Client Service Review Committee Chair.
2. In the situation of an appeal by a syndicated loan client, the Independent Client Service Review Policy approved for implementation by the Lead CF Syndicator will be used.
3. The Chair and their Committee shall consider whether or not due process was followed. This may not necessarily change the decision or final outcome.
4. The Chair will make recommendation to the respective Community Futures office or may choose to designate of the committee to complete this work.
5. The Chair will inform the complainant of the Independent Client Service Review Committee's recommendation(s)

GUIDELINES FOR IMPLEMENTATION

1. Confidentiality shall be respected at all times.
2. The initial response to a complaint shall occur as soon as possible and not longer than one week from the Chair receiving the complaint.
3. Every effort shall be made to review and respond to a complaint within 30 days.
4. The respective Community Futures office shall ensure that all information is accessible.
5. Accommodations shall be provided for effective communication.
6. Documentation concerning the complaint shall be kept in a file separate from the individual's regular file.
7. The "Independent Client Service Review Form" and progress notes shall remain in the possession of the Committee Chair.
8. The "Independent Client Service Review Form" shall be copied to the appropriate Executive Director or Manager.
9. It is the responsibility of all boards and their staff to have a working knowledge of the complaint resolution process and to co-operate with the processing of complaints.

10. It is the responsibility of the Board and the Executive Director to track and respond to any trends identified through the complaint resolution process.

RECOMMENDATIONS FOR CHANGE:

This means action by the Committee to ensure that complaints are used to drive improvement and ensure, as far as possible, that when something has gone wrong the same thing does not happen to someone else. They may include:

- changes to procedures
- changes to policy
- staff guidance and training
- clear feedback to demonstrate that changes have been made

RECOMMENDATIONS FOR REDRESS:

Redress is setting right what is wrong. The general principle is that, wherever possible and practicable, someone detrimentally affected when something has gone wrong should be returned to the position they would have been in if the failure had not occurred. It is essential from the outset that complainants are given realistic expectations about what the Committee can achieve. Redress should be proportional to the degree and nature of the failure and hardship or injustice suffered.

Redress for the complainant may include some or all of the following:

- an apology
- an explanation
- practical action to mitigate any detriment
- other appropriate action suggested by the complainant or the organization

Redress should:

- be fair and reasonable
- take into account the wishes and needs of the complainant
- be procedurally sound
- be provided in a timely manner
- provide, as far as possible, a comprehensive resolution of the issue remembering that it may apply not only to the complainant but others who have suffered as a result of the same failure.

Redress may be limited by:

- the time elapsed since the problem occurred
- the degree to which the complainant had a contributory responsibility for the failure and the detriment suffered
- the capability of the organization to comply

COMPLIANCE:

When the Committee Chair and the Committee has said it will take action or when they have made recommendations for change or asked for redress, they we will follow up to make sure that it has

happened. If it appears to the Committee that the injustice or hardship has not been remedied then the Committee Chair may lay before the Group a Special Report on the case.

RECOMMENDING ACTION:

In handling a complaint the Committee first consider whether the complaint is one they can investigate and whether or not it has come to them too early. During consideration at this stage, they can propose action that may inform their decision whether or not to initiate an investigation and which may resolve the complaint. After investigation they may uphold, partially uphold or not uphold the complaint. In any of these circumstances they may make recommendations for change.

Additionally, if the complaint is upheld in full or in part, they may conclude that the failure has caused injustice or hardship and recommend appropriate redress.

CONSISTENCY:

When making recommendations it is essential that, as far as possible, consistency is maintained.

Created and recommended by the Island Coastal Community Futures Group:

Approved by the Board:

Reviewed: