

ERC | General Complaints Policy

1. Introduction

The European Resuscitation Council (“ERC”) is committed to providing high-quality services, products, education, and support to its staff, volunteers, course participants, faculty, partners, and other stakeholders.

The ERC recognises that concerns and complaints may arise from time to time and views complaints as an important source of feedback, accountability, and organisational learning.

This policy sets out a clear, fair, and proportionate process for receiving, handling, investigating, and resolving complaints relating to the activities of the ERC.

2. Purpose

The purpose of this policy is to outline the procedures for lodging, handling, and resolving complaints from all stakeholders of the ERC

It aims to:

- provide a clear route for raising complaints;
- ensure complaints are handled fairly, consistently, and in a timely manner;
- clarify how different categories of complaint will be managed;
- support appropriate escalation and appeal where necessary; and
- enable organisational learning through monitoring and review of complaints.

3. Scope

3.1 Application

This policy applies to complaints relating to the ERC’s activities, staff, volunteers, or other aspects of its operations.

This policy does not replace or override any separate procedure that applies to:

- safeguarding or protection concerns
- employment grievances or internal HR processes
- whistleblowing disclosures
- legal or regulatory proceedings.

Where a complaint falls more appropriately under another ERC policy or procedure, the ERC may redirect the matter accordingly and will inform the complainant of the appropriate route.

3.2 Complaints concerning allegations of bullying or harassment

Everyone is responsible for promoting a culture of respect for each other, reporting any incidents of bullying or harassment they witness or experience.

The ERC will address and investigate complaints promptly and with due care and take appropriate action when needed.

Definitions -

- **Bullying:** repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety. It includes verbal abuse, social exclusion, spreading rumours, or physical intimidation.
- **Harassment:** improper or unwanted conduct that might reasonably be perceived as causing offence or humiliation to another person. Harassment may involve any conduct of a verbal, non-verbal or physical nature, including written and electronic communication.
- **Sexual Harassment:** unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature.

3.3 Reporting and investigation

Complaints or concerns will be treated seriously, investigated promptly and dealt with in confidence, in accordance with the procedure set out in this document.

Clear misuses of the complaint procedure, such as false or vexatious complaints, will not be supported. Disciplinary actions may be taken against the individuals misusing the complaint procedure.

3.4 Consequences

Individuals who have been found to violate the Code of Conduct, including bullying or harassment, may face disciplinary action

3.5 Support

Support will be made available to those affected by violations of the Code of Conduct, including bullying or harassment. The support offered will be guided by discussions with the individual concerned.

4. Categories of Complaints

4.1 Course related complaints

Complaints about course fees, or issues concerning course or course centre organisation should be directed to the relevant course centre and course director. These complaints should be dealt with locally. If no resolution can be found, the complainant or course centre may refer the matter to the ERC office for review, but the ERC cannot overturn decisions made locally as to course fees.

4.2 Instructor based complaints

Complaints concerning the conduct or expertise of an Instructor should be directed to the Course centre and Course Director and wherever possible dealt with locally. If no resolution can be found, the complaint may be referred to the ERC office for review. In this case, the matter would usually be dealt with by the Director of Education. Where a matter of serious misconduct is raised, the relevant professional body may be informed.

4.3 Complaints regarding volunteer colleagues

Where an ERC volunteer lodges a complaint against a fellow ERC volunteer, the complaint may be dealt with using the process within the ERC Code of Conduct.

4.4 Complaints regarding members of staff

Complaints concerning the conduct, actions, or decisions of ERC staff members will normally be handled by the relevant senior manager who is independent from the matters complained of, with HR input where appropriate. Where the complaint concerns a senior staff member, presents a conflict of interest, or raises serious allegations, the matter may be referred to a more senior authority, an appropriate committee chair, or an external investigator, as determined by the ERC.

4.5 ERC's activities complaints

Where a complaint concerns the delivery, quality, accessibility, or administration of an ERC activity, or operational process, the complaint will be reviewed and handled by the relevant director, supported by an appropriate staff member.

Where the complaint is particularly serious, complex, or sensitive, or where independence is required, the ERC may appoint an external or independent investigator. Where appropriate, the ERC may seek advice from its legal advisers regarding the appointment and scope of such an investigator.

5. Definitions

- **Complaint:** Any expression of dissatisfaction by a customer, employee, or stakeholder regarding the ERC's products/services or operations.
- **Complainant:** The person or organisation lodging the complaint.
- **Complaint Handler:** The person or department responsible for receiving, investigating, and resolving complaints.
- **Appeal:** A request for review of a complaint outcome on one or more specified grounds under clause xx of this policy.

6. Lodging a Complaint

Customers, employees, or stakeholders can lodge a complaint through the following channels:

- By email at [Email Address]
- Through our website [URL] (if applicable)
- By telephone to the ERC office, followed by written confirmation where requested.

7. Complaint Handling Process

Complaints and reports shall be filed and investigated using the following procedure. Any complaint will be treated with respect and investigated. If the complaint is upheld, appropriate and timely action will be taken. A complaint shall be submitted as per article 6, within twelve (12) months of the date of the incident or of the date on which the complainant became aware, or reasonably ought to have become aware, of the incident.

The process for investigation will include:

- Acknowledgement of receipt of the complaint shall be sent within five (5) working days.
- A complaint will be considered by the Chair of the Governance Committee along with the Chief Executive Officer (CEO), and a decision will be made within fourteen (14) working days to either continue the investigation or to dismiss the complaint. The complainant will be notified of the outcome and reasons for the decision.
- If the complaint is to be investigated further:
 - A complaints team, comprising 1-3 individuals, will be appointed by the Chair of the Governance Committee along with the Chief Executive Officer (CEO) to investigate.
 - A timeline will be decided and communicated to the complainant.
 - Evidence will be collected and considered.
 - If appropriate, and with the consent of the parties involved, the complaints team may initiate a mediation procedure. This can result in verbal or written resolutions.
 - If appropriate, the complaints team may decide to order any of the sanctions, up to and including:
 - informal discussions and verbal agreements
 - formal discussions with written action plans,
 - formal written warnings,
 - mandatory training sessions,
 - dismissal or exclusion, in accordance with applicable Belgian law and in compliance with the ERC's Articles of Association and Internal Rules, and subject to the relevant procedural safeguards.
 - In making a decision, the complaints team will consider the severity of the breach, the impact it has on others, the intent behind the action(s), and the existence of previous violations.
 - If the investigation is more complex, all relevant parties will be informed of any applicable delay.
 - Consequences will be communicated to all relevant parties.

- There will be a right to appeal the outcome and consequences. The decision to appeal must be communicated within seven (7) working days of receiving the response and will be reviewed and decided by the ERC President.
- All complaints will be summarised, and presented for audit purposes via the Governance Committee report to the Board and/or GA as appropriate.

8. Confidentiality

All complaints will be handled with the utmost confidentiality, and information related to the complaint will only be shared with individuals directly involved in the investigation and resolution process or where disclosure is otherwise required for legal, regulatory, safeguarding, or governance reasons.

Records of complaints will be processed and retained in accordance with applicable data protection and record-retention requirements.

9. Feedback and Continuous Improvement

We welcome feedback on our complaints handling process and are committed to continuously improving our procedures based on the lessons learned from complaints.

10. Review and Revision

This policy will be reviewed every three years, or more frequently if required, to ensure its effectiveness and compliance with relevant legislation. Any necessary revisions will be made in consultation with relevant stakeholders.

11. Contact Information

For any inquiries or further information regarding our complaints policy and process, please contact: ERC Secretariat, mailto: secretariat@erc.edu.

Version 1.0

Approved by the ERC Board on 10th June 2026