



Complaints and Whistleblowing Policy

The BIAZA complaints and whistleblowing policy outlines the process by which complaints made against BIAZA members (of any membership category), are managed

This policy endeavours to:

- provide a transparent and effective process to deal with complaints against BIAZA members;
- be timely, accessible and effective;
- ensure that each complaint is dealt with objectively on its merits, and to identify those which are malicious, mischievous, or trivial; and
- provide a mechanism which will allow BIAZA to take appropriate action if a member is in breach of its obligations.

Policy

All complaints will be recorded. All complaints made against BIAZA Members will be recorded and reported to the Membership & Licensing Committee (MLC)

Anonymous complaints will be considered invalid.

The procedures below will be followed, but BIAZA reserves the right to bypass these procedures for animal welfare reasons where it is deemed that immediate action is necessary.

When assessing complaints BIAZA will consider all Governing Documents and Policies.

Complaints about joint members will be shared with EAZA in accordance with the Pathways of Communication and action between EAZA and National Associations regarding Complaints of joint members.

All travel expenses for inspections as a result of complaints will be covered by BIAZA.

All inspections will be carried out by at least two people. When deciding who to appoint as inspector BIAZA will refer to the Conflict of Interest Policy.

Where an investigation includes sensitive or confidential information this will be restricted to essential BIAZA office staff, inspectors, and MLC, and to BIAZA Council if sanctions are recommended.

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BIAZA strives to operate in an ethos of openness; however, it is recognized that certain cases will have to proceed on a confidential basis to ensure that concerns can be raised without fear of victimisation, discrimination or disadvantage. In these cases, BIAZA Office will put the complaint to the member rather than the complainant doing so, and follow the complaints procedure as detailed below.

Compliance with the BIAZA Complaints Procedure and other policies does not indicate compliance with existing legislation which takes precedence in all cases. On an individual case-by-case basis, BIAZA may refer complaints to the appropriate legislative authorities where a situation, once fully investigated and considered, warrants assessment or enforcement under national legislation.

Procedures

For members of the public or staff from a non-BIAZA zoo:

The complainant is asked, if they have not already done so, to put details of the complaint in writing to the zoo/aquarium about which they are complaining. The collection is asked to reply to the complainant and to the BIAZA Office.

In the event of the reply being deemed to be unsatisfactory by the BIAZA Office, MLC will discuss and consider further action.

Where a satisfactory response has been received, MLC will note the member's written response to the complainant, which will remain on file. In the event of repetition of the same or similar complaints, procedures under serious complaints should be invoked.

Serious complaints are those which may, if proven, constitute a *prima facie* breach of the BIAZA Requirements for Membership. MLC have the option:

1. if the complaint has been addressed and there are no outstanding concerns, to support the written response of the zoo/aquarium to the complainant; or
2. if there are outstanding concerns, to investigate the complaint by further written enquiries and/or by an inspection visit to the premises in question. Where appropriate, the investigation would include reference to the relevant licence and attached conditions and other information not included in the complaint.

The report of the inspection team will be submitted to MLC who have the option to:

1. if the complaint has been found not to have merit, or has been addressed and there are no outstanding concerns, close the complaint and report findings to the complainant; or
2. if there are outstanding concerns, make appropriate recommendations for remedial action by the member in question, setting a time limit within which the problem must be resolved and following-up on implementation. MLC may choose to recommend to BIAZA Council that sanctions be imposed, in accordance with the Sanctions Policy, when the complaint is upheld and/or on failure to resolve the problem within the time limit set. The outcome will be reported to the complainant.

For BIAZA members, staff (and ex-staff) of a BIAZA member, individual members of BIAZA and BIAZA staff:

Staff of BIAZA members who have a concern about their own organization should first undertake to resolve the issue through their organization's internal processes, raising concerns with their own line manager where possible.

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We would encourage concerns about other organizations to be discussed between the members, if appropriate, without recourse to BIAZA complaints and whistleblowing procedures.

Where internal processes or discussion between members are unsuccessful in resolving the issue, or inappropriate for the circumstances, concerns should be raised with the BIAZA Office, preferably in writing or by e-mail with as much detail as possible.

Additional information and supporting material may be requested from the complainant.

An anonymised complaint will be reported to the Membership & Licensing Committee (MLC) complaints group, who have the option to:

1. request further information and supporting evidence from the complainant; or
2. request a written response from the zoo/aquarium to the complaint.

On receipt of this response the complaints group have the option to:

1. if the complaint has been addressed and there are no outstanding concerns, support the written response of the zoo/aquarium, close the complaint and report findings to the complainant; or
2. if there are outstanding concerns, investigate the complaint by further written enquiries and/or by an inspection visit to the premises in question. Where appropriate the investigation would include reference to the relevant licence and attached conditions and other information not included in the complaint.

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Where evidence of a breach of BIAZA Requirements for Membership is received without a formal complaint BIAZA reserves the right to investigate following the whistleblowing procedure.