



Equity, Diversity, and Inclusion (EDI) Complaint Reporting, and Management Procedure

British Oncology Pharmacy Association

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1 Introduction

This document describes how BOPA deals with violations to the BOPA EDI principles and provides recommendations as to how these can be managed to ensure BOPA meets its obligations. This will be achieved by providing a framework for reporting and monitoring EDI complaints.

As an inclusive organisation, BOPA recognises the importance of its duties under the Equality Act 2010. To demonstrate compliance, BOPA has produced its EDI Policy Statement [<here>](#) and developed this procedure to capture and address all EDI-related complaints.

This document sets out how BOPA aims to ensure that all its members can be held to the standards set out in BOPA EDI policy statement and EDI Code of Conduct. This is achieved by implementing robust reporting, investigation, and resolution mechanisms, as well as providing management information (MI) of all EDI incidents within the BOPA organisation.

If you have any concerns regarding this procedure, please contact BOPA EDI subcommittee via email EDI@bopa.org.uk.

1.1 Purpose

The procedure described within this document, in addition to the EDI Policy Statement and Code of Conduct, is designed:

- To promote inclusivity in training, education, and engagement
- To promote diversity amongst staff communities, and an inclusive staff experience
- To promote an inclusive healthcare environment, which promotes equality of respect and opportunity for all members, non-members, and patients.
- To develop our pharmacists so they are best placed to share learning about inclusion
- To set high standards around inclusion within BOPA when recruiting committee members, and expecting the same from healthcare organisations
- To promote greater transparency and accountability of Executive Committee, Subcommittees, and Working Groups
- To regularly monitor and report our Diversity and Inclusion Objectives, evaluate how we are doing, and respond accordingly
- To ensure that inclusion and diversity are embedded within organisations and are sustained long-term

1.2 Scope

This procedure relates to all BOPA members and covers all activities within the BOPA organisation.

This procedure applies to any partnership, organisation, or individuals that enter into work with BOPA.

BOPA is committed to learning from all incidents and ensuring a fair organisation for its members.

This procedure is in place to support BOPA members in reporting complaints without any fear of retribution.

This procedure covers aspects based on breaches on the following categories: age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, sex and sexual orientation.

This covers all complaint(s) against any BOPA procedures, policies, events, Committee members, Subcommittee members, member(s) at a BOPA event or communication.

1.3 Out of Scope

This procedure does not cover EDI complaints originating from outside of the BOPA organisation (e.g. BOPA members' workplace). In such circumstances, members are advised to follow their employment grievance or complaint procedure. Other organisations that members may contact for support are UNISON, PDA, or RPS.

2 Reporting and Investigation of Complaints

The reporting of complaints is an important means of providing information that allows BOPA to investigate such occurrences promptly and effectively and, where possible, to quickly apply control measures. This will help with the process of identifying the causes of such incidents, from which lessons can be learned and measures put in place to reduce the risk of recurrence.

The EDI investigation process has 4 steps:

1. The individual completes an online EDI complaint form and receives an automated response.

This form is accessed [here](#)

2. The complaint is investigated by a panel of three EDI subcommittee members, on a randomised allocation. Please check information of the EDI members on BOPA EDI website for details. Should there be a conflict of interest with any Panel member(s), an alternative EDI member will participate.
3. Findings reported to and discussed within the EDI Panel. Minor infractions (Level 0 or 1) can be dealt with by the Panel and the closed case be reported to the EDI subcommittee. More complex or serious cases (Level 2 or 3) are to be raised and discussed with the EDI subcommittee as open cases.
4. EDI subcommittee discusses all closed and open cases. If a complaint is about the EDI subcommittee or any of its members, then this will be referred to the BOPA Executive Committee as an open case for them to decide. All decisions made by the EDI Panel or subcommittee are presented to the executive in a closed case report.

2.1 Resolution of Complaints

The resolution of complaints has three levels:

Level 0 Complaint not upheld	Close Case. Complainant and Respondent will receive the outcome via email from EDI Complaint Panel
Level 1 Minor Infraction	Educate. Typically education aimed to advise the Respondent that their behaviour did not comply with the BOPA EDI policy and Code of Conduct and to provide guidance to prevent further occurrence

	The respondent will provide a written response to the Complainant (if applicable).
Level 2 Complex/ serious	<p>Warning.</p> <p>The Respondent will be informed that their behaviour is unacceptable. EDI will issue a formal notice to the Respondent to adhere to our Code of Conduct and Policy. The Respondent will provide a written response to the Complainant (if applicable).</p> <p>A further breach of BOPA EDI standards will result in the termination of their membership and involvement with BOPA.</p> <p>Future reapplication of membership may be affected.</p>
Level 3 Gross misconduct	<p>Termination of BOPA membership*</p> <p>To comply with BOPA legal and regulatory duties and obligations. The BOPA committee will discuss if there are reasonable grounds to inform the member's employer and /or the regulator e.g. If the nature of the complaint meets the General Pharmaceutical Council guidance for reporting concerns, which is the complaint means there are 'serious concerns about pharmacists, pharmacy technicians or pharmacies, where there may be a risk to patient safety or the public confidence in pharmacy could be affected.' See https://www.pharmacyregulation.org/reporting-concerns/report-concern</p>

There may be occasions when the EDI Panel or Executive Committee does not uphold the complaint. In these circumstances, the lead investigator will provide reasons to the Complainant.

*In circumstances where the offence is found to be serious or gross misconduct, this may result in immediate termination of membership.

2.2 Appeal process

- If any parties to the complaint feel that the action taken against them is wrong or unjust, they should appeal in writing, stating their full grounds of appeal, to the BOPA Executive Committee within one week of the date on which they were informed of the decision.
- BOPA will give either party written notice of the date, time, and place of the appeal meeting. This will normally be seven days after the written notice has been sent to them.
- The appeal meeting may be a complete re-hearing of the matter, or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at the discretion of BOPA Executive Committee depending on the circumstances of the case.

- (d) The appeal meeting will be conducted impartially by a Member of the Executive team who has not been previously involved in the case. The Respondent may bring a friend or colleague for support but they are not allowed to participate in the proceeding. It is the Respondent's responsibility to arrange this and to advise the task force of any such attendee.
- (e) Following the appeal meeting, the BOPA Executive Chair may:
- (i) confirm the original decision;
 - (ii) revoke the original decision; or
 - (iii) substitute a different penalty.

The EDI lead investigator will inform the party in writing of the final decision as soon as possible, usually within one week of the appeal meeting. Where possible this will also be explained to them in person. There will be no further right of appeal.

2.3 Complaint and Handling Process: Timeline and Feedback

Complaint handling process

Working Day(s)	Task	Activity
0	Complaint received	Complainant completed the online form here
0	Complaint acknowledged	System generated reply of acknowledgment to Complainant
0	Automated email to EDI taskforce	System generated message to notify all members within the taskforce
0 - 5	EDI subcommittee members allocated on the EDI Panel rota reviewed complaint	<p>Ensure the complaint reviewed</p> <p>Change of Panel member should there be conflict of interest</p> <p>Panel arranged meeting with Complainant</p> <p>Panel arranged meeting Respondent</p> <p>If appropriate/ necessary Panel would arrange meeting with Complaint and *Respondent via email and letter</p>
6- 20	Complaint investigated	Corroboration – evidence gathering. This will take into account the severity of the EDI complaint

21-23	Complaint summarised and syndicated	Lead investigator documents salient points of their investigations and proposed outcome to the EDI Panel
24+	Complaint decision	Severity of the complaint confirmed (see resolution of complaints section above). Complaint(s) may be escalated to either EDI subcommittee or Executive committee depending on severity. The timescale for a complaint decision is dependent on the severity of the case
25+	Decision communicated to all parties	Summary provided to Individual via email Where the decision is made by EDI Panel or EDI subcommittee this will be within one month. If the decision is by the Executive committee, timescale will extend up to two months
26+	Record management and closure	Complainant and Respondent contacted within 2 months of decision to confirm recommended action is complete

* If Respondent fail to engage with meeting request or attend meetings arranged on two occasions, the Panel will make a decision based on evidence presented by Complainant.

3 Management Information (MI)

3.1 Why?

Management information (MI) is a cyclical process for identifying and reporting EDI complaints, followed by analysis, resolution, and learning to mitigate the risk of recurrence. The reporting of all complaints, no matter how trivial they may appear, will enable the EDI subcommittee group to build a profile of risks to BOPA.

3.2 How?

All EDI complaints will be logged on a database and only accessible by members of the EDI Panel.

This will include all the complaints and the outcomes approved by BOPA.

For each complaint received, consideration will be documented as to any lessons to be learned and guidance that can be provided. This will also include categorisation of the type of EDI-related incidents to identify any themes.

The monthly EDI subcommittee meeting will review all EDI complaints, resolutions, and lessons learned.

EDI subcommittee is responsible for producing a quarterly summary report of complaints to the BOPA exec team and newsletter. This will also be used as a Quality Improvement tool to inform the EDI subcommittee of any areas for improvement to EDI policies and tools.

EDI subcommittee will also produce a yearly report for presentation at BOPA /AGM conference focusing on themes, lessons learned, and changes made due to this.

3.3 Data Protection

Any information relating to an identified individual recorded as a consequence of this procedure will be processed in accordance with our privacy policy.

3.4 Monitoring and Review

This procedure will be reviewed every 2 years or considering reported incidents, lessons learned, or at such other times as may become necessary.

3.5 Who to contact about this procedure?

A task force within the EDI subcommittee group of BOPA is responsible for this procedure. The taskforce can be contacted via the following email EDI@bopa.org.uk

At the closure of any complaint, the documentation will be compiled for any reflective practices on what happened and why, including lessons learned to ensure actions are identified to prevent a recurrence. The documentation will be retained and embedded.

4 Definition of Key Terms

Term	Meaning
Complaint	A complaint raised formally to BOPA by an individual about the alleged treatment they have experienced/witnessed within BOPA. This complaint can either be against another BOPA member, staff contracted by/ working with BOPA, or BOPA's guests. The complaint can originate from any of BOPA activities, such as BOPA committee meetings or BOPA events.
Complainant	The person who is raising the complaint
Respondent	The person(s) against whom the individual is raising a complaint against
Resolution	An outcome that provides the complainant with satisfaction that their concern has been given due consideration and appropriate action has been taken to address the underlying complaint
Mediation	An exchange of views that provides a basis for the resolution of the concerns that have been raised. Facilitated by a third party, both parties enter into an agreement and commitment to supporting a mutually agreeable outcome
EDI subcommittee	The BOPA subcommittee that is responsible for all aspects of EDI
EDI Panel	<p>This task force is a small group within the EDI subcommittee that is responsible for the completion of the investigation and advising on the most appropriate method of resolution. This taskforce is led by the chair of the EDI subcommittee who is also a member of the BOPA Executive Committee.</p> <p>EDI Panel and committee members are volunteers typically performing this role in addition to their regular employment</p>

5 References

BOPA Equity, Diversity, and Inclusion Policy Statement 2022 (Internal policy)

BOPA EDI Code of Conduct 2022 (Internal policy)

Equality Act 2010 (Applicable Legislation)

Key Principle of the Data Protection Act 2018 (Applicable Legislation)

Public Sector Equality Duty Guidance (External policy for reference)

6 Acknowledgements

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7 Document control

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