

CIFFA Guidelines for Handling Complaints

Policy

CIFFA takes complaints against Member firms seriously and has a mechanism to handle complaints.

Complaints, however they are received, are recorded. Complaints which have been filed on the appropriate form are investigated by the Secretariat and when warranted are forwarded to the Chair of the Ethics Committee of the National Board of Directors. At the discretion of the Chair of the Ethics Committee, complaints may be reviewed by the National Board of Directors and further action taken.

The association does not investigate or take action on commercial disputes. If a Member is found to have breached the Code of Ethics, the only sanction that the association can implement is to cancel the Membership of the company.

Procedure

- Complaints are received via the on-line complaint form found on the CIFFA website and forwarded to the Secretary-Manager via admin@ciffa.com.
- The Secretary-Manger records and forwards the complaint to the Executive Director.
- The Executive Director conducts a preliminary investigation, determining if the complaint is in breach of the CIFFA Code of Ethics, particularly with regard to *honesty, integrity, standard of competence, conscientiousness, diligence and efficiency*. The first two items on the CIFFA Code of Ethics are open to interpretation/definition.
 - The CIFFA Regular Member must discharge its duties with honesty and integrity.
 - The CIFFA Regular Member pledges a standard of competence to its client, to perform in a conscientious, diligent and efficient manner, services undertaken on the client's behalf.
- If the complaint is not considered to be in breach of the Code of Ethics, the Executive Director communicates to the Regular Member firm and to the person filing the complaint that the complaint has been reviewed and no further action will be taken.
- If the complaint appears to be in breach of the Code of Ethics, the Executive Director advises the Chair of the Ethics Committee.
- In consultation, the Chair of the Ethics Committee and the Executive Director agree on the next steps to be taken.

- Next steps may include:
 - Formal notification to the Member firm of the complaint with a request for response.
 - Formal notification back to the complainant on decision.
 - Following review that response and review of previous complaints against the Member firm.
 - If the matter is before the courts, defer action until after a determination has been made by the courts.
 - Notification to the Member that they appear to have acted unethically with a detailed review and that the complaint will be presented to the National Board of Directors.
 - Formal letter to Member firm with the decision of the Board of Directors, which may be:
 - Letter outlining why the Member appears to be in breach of the Code of Ethics and advising that action must be taken to prevent such a breach in the future.
 - In this event, the Executive Director follows up with the Member firm to ensure preventive action plan has been introduced.
 - Notification that the membership in CIFFA has been cancelled, with immediate loss of benefit and without refund.