

CPET Complaints procedure

1. Background

ProForest is currently operating Phase 2 of the Central point for Expertise on Timber procurement (CPET). There is the potential that either real or perceived conflicts of interest may arise with respect to ProForest's role as an independent consultant and their work on the UK Government's CPET project.

If such a case were to arise where there was a real or perceived conflict of interest, a concerned party would be able to raise the particular issue with CPET and their contracting authority, the Department for Environment, Food and Rural Affairs (Defra). The procedures for this are outlined below.

2. Definitions

Conflict of interest - a situation when a ProForest employee, their family member, close friend, or other associate is in a position to gain or lose personally, professionally or financially from an action that might be taken, as a result of the ProForest employee's role with respect to the CPET project. It also applies to a situation where ProForest as a company is in a position to gain or lose professionally or financially from an action that might be taken, as a result of their role as the CPET service provider.

Resolution - A conflict of interest issue will be considered to be resolved when the information provided indicates there is no real conflict of interest or the information provided demonstrates there are adequate safeguards in place to prevent an employee or the company from acting in a manner where their interests are conflicted, with respect to the CPET project.

3. Procedures

3.1 An individual or organisation wishing to raise an issue of conflict of interest must do so in writing.

3.2 Written submissions should be addressed to CPET, and can be sent by letter, fax or email.

3.3 A ProForest project manager will be assigned to oversee the complaint process for each case. They will be identified within 1 working day of the receipt of the complaint, based on a discussion with two or more ProForest associate directors or directors and the CPET project manager. Issues relating to conflict of interest between personnel and complainant will be taken in to account as part of the nomination of the responsible project manager.

3.4 A written response to the allegation of a conflict of interest will be drafted by ProForest within 14 days.

3.5 The response, along with the original written submission will be sent to Oversight Committee at or before the end of the 14 day period.

3.6 Oversight Committee members will provide feedback within a 14 day period.

3.7 If the issue has been resolved to the satisfaction of the Oversight Committee, a summary of the issue and resolution will be provided to Defra, and the complainant where appropriate.

3.8 If the issue has not been resolved to the satisfaction of the Oversight Committee, they must communicate this directly to Defra, in writing.

3.9 If Defra is satisfied that the issue has been resolved, they will provide confirmation of this in writing.

3.10 If Defra is not satisfied that the issue has been resolved, they will enter in to discussion with ProForest to resolve any such outstanding issues.

3.11 In the case of 3.10, resolution of outstanding issues should occur within 90 days of the original submission.

3.12 If resolution is not achieved within the 90 day period, then ProForest and Defra will move to arbitration proceedings.

4. Documentation

4.1 All records of communication with reference to conflict of interest issues will be kept in the Oversight Committee folder, both electronically and in hard copy.

4.2 Information relating to conflict of interest will not automatically be put in the public domain.

4.3 In certain situations, it may be appropriate for information and correspondence related to conflict of interest discussions to be put in the public domain. In these cases, the decision to do so will be made by Defra.