

CLIENT COMPLAINT POLICY and PROCEDURE

GENERAL POLICY: Persons served by World Links Association, Inc. ("World Links") may, from time to time, have a complaint, grievance, or a question concerning World Links services, activities or staff. It is the general policy of World Links to treat every grievance or complaint seriously and to attempt to resolve every grievance or complaint promptly. Persons served by World Links can initiate the complaint procedure for any grievance, complaint, or concern that has not been resolved to the complainant's satisfaction at any time during their adoption process.

World Links does not take any action to discourage a client or prospective client from, or retaliate against a client or prospective client for: making a complaint; expressing a grievance; providing information in writing or interviews to an accrediting entity on the agency's performance; or questioning the conduct of or expressing an opinion about the performance of the agency.

World Links provides to the accrediting entity and the Secretary, on a semi-annual basis, a summary of all complaints received from any birth parent, prospective adoptive parent or adoptive parent, or adoptee during the preceding six months, including the number of complaints received and how each complaint was resolved, and an assessment of any discernible patterns in complaints against the agency received from any birth parent, prospective adoptive parent or adoptive parent, or adoptee along with information about what systemic changes, if any, were made or are planned by the agency in response to such patterns.

The agency or person provides any information about complaints received from any birth parent, prospective adoptive parent or adoptive parent, or adoptee as may be requested by the accrediting entity or the Secretary.

World Links has a quality improvement program through which it makes systematic efforts to improve its adoption services as needed. The agency uses quality improvement methods such as reviewing complaint data, using client satisfaction surveys, or comparing the agency's practices and performance against the data contained in the Secretary's annual reports to Congress on intercountry adoptions.

World Links permits any birth parent, prospective adoptive parent or adoptive parent, or adoptee to lodge directly with the signed and dated complaints about any of the services or activities of the agency including its use of supervised providers, including foreign supervised providers, that he or she believes raise an issue of compliance with the Convention, the Inter-country Adoption Act, the Universal

Accreditation Act, or the regulations implementing the Inter-country Adoption Act, the Universal Accreditation Act, and advises such individuals of the additional procedures available to them if they are dissatisfied with the agency's response to their complaint.

Person served should feel free to make recourse to the following procedure for any grievance, complaint or concern that has not been resolved to the complainant's satisfaction.

World Links maintains a written record of each complaint received from birth parent, prospective adoptive parent or adoptive parent, or adoptee and the steps taken to investigate and respond to it and makes this record available to the accrediting entity or the Secretary upon request.

For purposes of clarity "Concern" and "Complaint" shall have separate definitions.

What is a "Concern" or "Complaint"?

A "**Concern**" can be any expression of dissatisfaction by a birth parent, prospective adoptive parent or adoptive parent, adoptee or others. The Concern may be in writing but does not qualify as a complaint under 22 CFR 96.41. A Concern may relate to: (1) quality or standard of service; (2) action or lack of action; (3) untimely or ineffective communication; (4) dissatisfaction with World Links' policies or procedures; or (5) any dissatisfaction with World Links or the adoption process generally. This list is an example and not intended to be exhaustive.

A "**Complaint**" shall be when a birth parent, prospective adoptive parent or adoptive parent, or adoptee, lodges a written, signed and dated complaint about any of the services or activities of World Links (including its use of supervised providers) that the Complainant believes raise an issue of compliance with the Convention, the IAA, UAA or the regulations implementing the UAA or IAA, pursuant to 22 CFR 96.41(b).

PROCEDURE:

1. Anyone, who has received services from, or had contact with World Links, may make a complaint about World Links using this procedure.
2. Any complaint must: (a) be in writing, (b) state with specificity the date and nature of the complaint, including names of persons involved, and (c) be signed and dated by the complainant.
3. World Links encourages all parties to discuss concerns with the supervisor of the staff member involved prior to filing a formal complaint. If such action does not

result in a satisfactory resolution, the individual may submit a complaint in writing to World Links.

4. The CEO, or a designee, will contact the complainant to acknowledge the complaint within 10 business days of receipt of the written complaint and to collect any additional information or documentation needed. However, when a complaint involves time-sensitive matters or allegations of fraud, World Links will provide expedited review of the complaint.
5. The CEO, and possible legal consul, if necessary, will review and investigate the complaint and provide the complainant with a formal response in writing within 30 days of the receipt of a complaint.
6. If the matter is not resolved to the satisfaction of the complainant, the complainant may, within ten business days of receipt of the World Links written response, request an appeal. The request for appeal must be in writing, addressed to the Board of Directors, and must clearly and succinctly state the complainant's objections to the decision or conclusions of the CEO or the Board of Directors.
7. The World Links CEO, along with the Board of Directors, and possible legal consul, if necessary, will review and consider the facts and circumstances of the complaint and will issue a written decision within 30 days of the date of complainant's written notice of appeal.
8. If the complaint concerns or raises an issue of compliance with the Hague Convention or the U.S. implementing statutes and regulations, any person dissatisfied with the resolution of the complaint by World Links may file a complaint with the Complaint Registry maintained by the accreditation authority. Information about submitting a complaint is provided to the clients at the time of signing the services agreement, and the address for submitting written complaints is as follows:

Attn: U.S. Central Authority
U.S. Department of State
Bureau of Consular Affairs
Office of Children's Issues, Adoption Unit
SA-17, Floor 09
Washington, DC 20522-1709

A complaint may also be submitted online by following the directions outlined in:
<https://travel.state.gov/content/travel/en/Intercountry-Adoption/about-adoption-service-providers/hague-complaint-registry.html>

Complainant may also request a hardcopy of the Complaint Form by calling the Department of State at (888) 407-4747.

Individuals are encouraged to use this complaint procedure without fear of retaliation. World Links will take no action to discourage a complaint or to retaliate against any person making a complaint, expressing a grievance, questioning the conduct of, or expressing an opinion about the performance of a World Links and its services and staff.

I/We _____

have received and reviewed the World Links Client Complaint Policy and Procedures this _____ day of _____ 2020.

Signature

Signature