

THE WFME PROGRAMME FOR RECOGNITION OF ACCREDITING AGENCIES FOR MEDICAL EDUCATION

Policies and procedures for the recognition of agencies accrediting medical schools

Revised June 2019

Introduction

The World Federation for Medical Education (WFME) was founded in 1972 and is the global organisation concerned with the education and training of medical doctors. WFME was founded on the initiative of the World Health Organization (WHO) and the World Medical Association (WMA).

WFME offers to evaluate agencies that accredit basic medical education. WFME will issue a designation of recognition of the agency if a sufficient level of quality in the accreditation system and procedures is demonstrated.

This document contains the Policies and Procedures used by WFME for the recognition of agencies accrediting medical schools. This document is publically available on the WFME website.

I. Organization of WFME

A. WFME Executive Council

The composition of the WFME Executive Council is set out in the constitution of WFME. The WFME **Executive Council includes:**

- WFME President
- WFME Immediate Past President
- Presidents of the six world-wide Regional Associations for medical education (defined as "members" by the Constitution)
- · Representatives of the founding organisations, the World Health Organization and the World Medical Association ("founding members")
- Three elected members, representatives of the International Federation of Medical Students' Associations, the Junior Doctors Network, and of the Educational Commission for Foreign Medical Graduates ("executive members").

B. WFME Executive Council Recognition Committee

The WFME Executive Council Recognition Committee ("Recognition Committee"), consisting of the President of WFME and six members - one from each region - is otherwise independent from WFME activity, and makes final decisions about the recognition status of accrediting agencies. For the recognition decisions on an accrediting agency, the committee member from the corresponding region participates in the discussion, but does not participate in the vote on recognition. For votes on recognition, a quorum is four members. In the case of a tie, the President of WFME has the casting vote.

New members of the Recognition Committee must complete an induction programme prior to their first meeting. Future members of the committee shall be selected by the standing committee.

C. Administrative Responsibilities

The WFME Secretariat supports the operation of the Recognition Committee and manages the recognition programme. Major responsibilities of the Secretariat include the following:

- Maintenance of records and documents related to the recognition of accrediting agencies
- · Management of the recognition process, including scheduling of site visits, assignment of recognition teams, negotiation with the agency regarding practical arrangements (travel, accommodation, etc.) and production of recognition reports
- · Management of the induction programme for Recognition Committee members and members of recognition teams
- · Preparation and maintenance of documents, guidebooks, and other materials pertinent to the recognition process, including the WFME web site
- Preparation for and support of the Recognition Committee vote.
- Liaison with legal counsel on issues that may arise between regularly scheduled Recognition Committee meetings
- Provision of consultative services regarding the WFME recognition process

II. Policies on the Recognition of Accrediting Agencies

A. Recognition

The Recognition Committee recognises accrediting agencies that have the authority to accredit education programmes and schools that award the qualifying MD degree or its equivalent. The following types of agencies are eligible to apply for WFME recognition; a) a government or intergovernmental entity, or b) an independent professional body that is authorised or recognised by the relevant national or state/provincial government (Ministry of Health or Ministry of Education or both). or the legislator (parliament), or c) an independent professional body that is authorised or recognised by professional or scientific association with appropriate authority.

The entity must have the authority in the country where the medical school is located to accredit education programmes and schools that award the qualifying MD degree or its equivalent.

Recognition of an accrediting agency by the WFME Recognition Committee confers the understanding that an agency has been deemed to be credible in its policies and procedures to assure the quality of medical education in programmes and schools that it accredits.

B. Term of Recognition

Accrediting agencies generally are subject to review on a ten-year cycle. However, the Recognition Committee has the discretion to require that the agency be subject to a full review in less than ten years, if there are questions about the sustainability of the quality of the accreditation process. An accrediting agency, once recognised, remains recognised as a credible accrediting agency until the agency voluntarily terminates its status or the Recognition Committee terminates the agency's recognition through a formal action. Recognition status does not change until a formal action is taken by the Recognition Committee. When recognition is withdrawn, a letter transmitting that decision specifies the date at which recognition ceases. See section III C. for more details on WFME's ongoing monitoring of recognised accrediting agencies.

C. Fees for Recognition Application and Reviews

Until it receives recognition, an agency is responsible for fees for the recognition process and expenses related to the recognition visit. Agencies that are denied recognition status may reapply as described below, must pay a reapplication fee, and are again responsible for expenses related to recognition visits. The timeline of the process and the fees are available on the WFME website and are subject to annual revision.

D. The Recognition Process

Accrediting agencies seeking WFME recognition are requested to contact the WFME Secretariat and inform WFME of their intention to apply. The agency will be asked to complete a preliminary application to prove its eligibility and readiness for the full process.

The WFME Secretariat will make a decision regarding the eligibility of the agency (as defined in Section II A) based on the information provided in the preliminary application.

The Criteria for Recognition, the Application for Recognition, including instructions for completion, and the Recognition Policies and Procedures documents are available on the WFME website.

The evaluation process for eligible accrediting agencies consists of:

- Comprehensive review of the accrediting agency's completed Application for Recognition
- On-site evaluation by the recognition team of a site-visit being conducted by the accrediting agency
- On-site evaluation by the recognition team of a meeting of the decision making body of the agency
- · Review of the report of the recognition team and any other relevant documentation by the Recognition Committee.

The WFME Secretariat in consultation with the agency will select dates for the on-site evaluations that coincide with regularly scheduled meetings of the accrediting agency. It is convenient if the onsite evaluation of a site-visit being conducted by the accrediting agency and the observation and review by the recognition team of a meeting of the decision making body of the agency can be carried out during a single visit of the WFME recognition team.

Approximately eight months prior to the anticipated date for the WFME on-site evaluation of the accrediting agency, the WFME Secretariat will confirm with the chief executive of the accrediting agency that the agency has received and downloaded the Criteria for Recognition, the Application for Recognition, and the Recognition Policies and Procedures. All documents are subject to review and revision.

Approximately two months prior to the anticipated date for the WFME on-site evaluation of the accrediting agency, the WFME Secretariat will provide information to both the agency being reviewed and the recognition team members regarding the agency's recent recognition history (if applicable) and composition of the recognition team. If the chief executive of the agency that is being reviewed has reason to believe that a recognition team member has a conflict of interest, he or she should contact the WFME Secretariat immediately to determine if an alternate member can be appointed. Final decisions about recognition team membership will be made by the WFME President. Once the composition of the recognition team is established, the agency sends a copy of its application and any other relevant materials to the WFME office, including a recent example of an institutional self-study report submitted to the agency.

After the on-site evaluations, recognition team members compile a written report of their findings, based on the Criteria for Recognition. The recognition team documents facts regarding the agency's compliance with each of the Criteria for Recognition. A draft version of the report is sent to the WFME office for a preliminary review to verify that the report is complete and adequately documents the team's factual findings. The draft report is then circulated to the chief executive of the agency under review, who has the opportunity to comment on matters of fact. The agency also receives a letter with suggestions from the recognition team, based on their review of the documents and observations during the site visit. These suggestions are meant as a basis for quality improvement; they are not shared with the Recognition Committee, and are not a part of the report.

After the chief executive of the agency has had the opportunity to correct any factual errors in the draft report, the report is then finalised by the recognition team secretary.

Any time during the process the agency may choose to pause the assessment and defer for up to two years. An interim report will be written by the team, and the process shall restart at the same stage once the agency is ready. If a site visit has already been carried out, the next assessment shall only focus on the areas that were identified as partially compliant or non-compliant. If the assessment is deferred for more than two years, the agency needs to undergo the full Recognition process again.

The Recognition Committee reviews the final report of the recognition team and any other relevant documentation and determines the recognition status of the agency. The Recognition Committee also receives the recommendation of the recognition team about recognition status of the agency. but this recommendation is not binding on the Recognition Committee. Depending on the extent of the agency's compliance with the Criteria for Recognition, the Recognition Committee will take one of the following actions:

- Recognition for a ten-year term with no additional requirements, with status reports every year
- Recognition for a ten-year term with one or more follow-up actions (with written follow-up reports on the follow-up actions required), consultations, and/or limited follow-up reviews, with status reports every year
- Recognition pending the outcome of a follow-up visit or report(s), with status reports every year
- Deny or withdraw recognition

E. Recognition Teams

WFME is responsible for recruitment and training of a suitable group of recognition team members who are knowledgeable about medical education and accreditation. Recognition team members complete an induction course. The recognition team must not include any member with a conflict of interest (as defined in Section IV A). One of the team members is designated as the chair of the team. The team chair functions as the official voice of the team and leads its on-site deliberations. Another member is designated as team secretary, responsible for visit preparations and logistics and the compilation of the recognition report. In most circumstances, recognition teams will consist of three to five members.

The WFME Secretariat maintains a list of qualified potential team members.

F. Recognition Reports

The recognition team's report provides the principal source of information used by the Recognition Committee in making decisions regarding an agency's recognition status. The report includes background information about the agency and a detailed narrative about the agency and its compliance with the Criteria for Recognition.

Unless exceptional circumstances prevail, the draft report should be completed no later than eight weeks after the conclusion of the recognition team site visit. See Section II D for details regarding creation of the recognition report. The Recognition Committee reviews the final report at its next regularly scheduled meeting, provided that its members have had at least two weeks to review the report prior to the meeting.

G. Evaluation of Recognition Process

The WFME staff will send the chief executive of the agency a form to provide feedback on the recognition process in general, to be used internally by WFME to review the recognition process.

III. Conduct of Recognition Committee Meetings

The current recognition status of all accrediting agencies will be posted publicly on the WFME web site and will be updated within 30 days after a decision becomes final. Recognition information made available to the general public includes the current recognition status of an agency but does not include recognition reports, correspondence with an agency regarding its recognition status, or the basis for WFME actions regarding an agency's recognition status.

A. Attendance and Recusals

Recognition Committee members vote remotely using a set protocol. The members are expected to respond to all requests for review of reports, unless exceptional circumstances preclude their doing so. Additional discussions will be held by telephone or internet conference as necessary. Members shall absent themselves from the discussion and voting during consideration of any agency with which there could be an actual or perceived conflict of interest (as defined in Section IV. A.). The member from the corresponding region where the accrediting agency is located participates in the discussion, but is excluded from the vote.

B. Recognition Actions

When considering the recognition status of an accrediting agency, the Recognition Committee may take any of the following actions:

- Recognition for a ten-year term with no additional requirements, with status reports every year
- Recognition for a ten-year term with one or more follow-up actions (with written follow-up reports on the follow-up actions required), consultations, and/or limited follow-up reviews, with status reports every year
- Recognition pending the outcome of a follow-up visit or report(s), with status reports every year
- Deny/withdraw recognition

Denial or withdrawal of recognition are actions subject to appeal. Details of the appeal process are included in Appendix A. Denial or withdrawal is not considered final until either (a) the agency has indicated in writing its acceptance of the action, (b) the time for filing an appeal has lapsed, or (c) the appeal has been concluded and the agency has been notified in writing of the outcome of the appeal.

Withdrawal of recognition may occur when (a) there is documented evidence that an agency exhibits substantial deficiencies in compliance with the Criteria for Recognition, and (b) the deficiencies are sufficiently serious, in WFME's judgment, to raise concern about the credibility of accreditation decisions being made by the agency.

If, as part of the recognition process, an agency knowingly supplies false or misleading information to WFME or its recognition teams, the Recognition Committee will reconsider the agency's recognition status and determine any appropriate follow-up action. Similar action may result if an agency knowingly fails to provide material information to WFME or its recognition teams, makes misleading or incorrect public statements or disclosures regarding its recognition status, or fails to notify interested parties of an adverse recognition action.

C. Follow-up Activities

Any agency that has not demonstrated substantial compliance with all the Criteria for Recognition, or that is engaged in activities or events whose outcome could result in noncompliance, must provide evidence to the Recognition Committee in a timely manner that it has addressed such shortcomings or has made appropriate progress towards resolving them. The Recognition Committee will determine whether such evidence can be provided in a written progress report, or is best documented by on-site verification. The recognition team that carried out the assessment of the agency can be asked to review the report if needed.

If requested by the Recognition Committee, deficiencies in compliance must be corrected promptly. The specified period for achieving full compliance may not exceed eighteen months from the date of final action. Failure to achieve compliance within such time constitutes grounds for denial or withdrawal of recognition unless the period for achieving compliance is extended, at the discretion of the Recognition Committee, for demonstrated good cause. In determining whether good cause exists for an extension, the Recognition Committee may consider a number of factors, including, but not limited to, progress toward achieving full compliance, the complexity of changes that must be made, financial considerations, logistical considerations, and other circumstances internal or external to the agency that might affect the time needed to come into full compliance.

Recognised agencies are monitored by WFME throughout the duration of the recognition term. Recognised agencies are required to complete a Status Report every year, commencing between six to eighteen months after the agency is formally recognised¹. The Status Report requests information on the agency's current activities and any changes in scope, standards, or processes that have taken place over the past year, and an updated list of accredited programmes. The WFME Secretariat reviews completed Status Reports, and in conjunction with the Recognition Committee and/or the recognition team that carried out the assessment of the agency, determine any potential follow up actions or requests for additional documentation.

The accrediting agency must inform WFME of any substantive changes in the scope of activities of the agency, the procedures for accreditation, or standards for accreditation.

D. Reporting of WFME Recognition Actions

Within 30 days of any final Recognition Committee action on the report of a recognition team, the WFME President will send a Decision Letter conveying the WFME action and a copy of the final recognition team report, to the chief executive of the agency. The Decision Letter will include the

¹ The annual report deadline is on 1 March. The first report of an agency will be requested not less than six months, and not more than eighteen months, after the date Recognition Status is granted.

WFME action and conditions, if any were required by the Recognition Committee, and any necessary follow-up. The Decision Letter and final team report are held confidential by WFME, but may be disclosed by the agency at its discretion.

The WFME Secretariat will notify the Secretariat of the World Directory of Medical Schools of all actions taken in a timely manner². For actions subject to appeal (denial of recognition, withdrawal of recognition), notification to the government agency or agencies that authorise or recognise the accrediting agency and the Secretariat of the World Directory of Medical Schools will be made no later than 30 days after the decision is made final.

Recognition decisions will be made public on the WFME website within 30 days after the decision has been made final.

If an agency makes a public disclosure of its recognition status and/or the Recognition Certificate the agency must disclose these accurately and unedited, and provide the contact information of the WFME Secretariat. Any incorrect or misleading statements about recognition actions or recognition status must be corrected or clarified immediately by an official announcement or notification. Failure to make such a timely correction or clarification may result in reconsideration of the agency's recognition status.

² This procedure is set to ease the inclusion of accreditation information in the World Directory of Medical Schools, which is planned in due course.

IV. Other Policies and Procedures

A. Avoidance of Conflicts of Interest

To avoid actual or perceived conflicts of interest, WFME Executive Council Recognition Committee Members, Recognition Team Members, and WFME staff who are involved in WFME recognition activities ("WFME Representatives") must agree in writing to abide by the following polices:

Recognition Team Evaluations and Recognition Decisions. No WFME Representative will participate in a recognition process, or in discussions or voting at WFME meetings, if the accrediting agency being evaluated or discussed is:

- 1. One in which the Representative or an immediate family member (defined as a spouse, life partner, child, parent, or sibling) has been connected as an administrative officer, staff member, employee, or contracted agent within the past three years.
- 2. One in which the Representative or an immediate family member has interviewed for or been in employment within the past two years.
- 3. Part of an organisation where the Representative is employed.
- **4.** Engaged in substantial cooperative or contractual arrangements with the employer of the Representative or an immediate family member.
- 5. One that has engaged the Representative or an immediate family member as a paid consultant within the past five years on matters such as evaluation, organisational structure or design, management, or finances. Provision of short- term services (such as giving guest lectures) is not considered consulting that poses a conflict of interest.
- 6. One in which the Representative or an immediate family member has any financial, political, professional, or other interest that may conflict with the interests of WFME.
- 7. One in which the Representative believes that there may be a conflict due to other circumstances, such as participation in review for other organisations, close personal relationships with individuals at the accrediting agency, etc.
- 8. One in which the accrediting agency has reason to believe, and can document to the satisfaction of the WFME Secretariat, that the participation of the Representative could be unfairly prejudicial.

Consultations: No Representative will act as a paid or unpaid consultant on WFME recognition matters during their service with WFME, and for a period of three years after completion of their service to WFME, to any accrediting agencies subject to WFME recognition.

WFME Discretion: Whenever in these guidelines a term is not expressly defined, the definition of such term and its potential for creating a conflict of interest shall be at the sole discretion of the WFME Secretariat or, upon the Secretariat's determination, at the sole discretion of WFME.

B. Data Collection, Research, and Confidentiality

All WFME recognition decisions will be publicised on the WFME website.

All materials provided by agencies in conjunction with recognition reports, including the comprehensive review and any other relevant documents, will be retained for the most recent recognition cycle. Recognition reports, status reports, records of WFME actions, correspondence with individual agencies, and minutes and agendas of all WFME meetings will be retained indefinitely.

All information compiled in preparation for recognition reports or collected on site, including the contents of the comprehensive review and correspondence regarding the agency's prior recognition history, is held in strict confidence by the WFME Secretariat. All information received by WFME that relates to an agency's recognition status (including recognition reports and status reports) is also treated as confidential data.

WFME staff may conduct research and publish based on confidential information contained in the comprehensive review, recognition reports and status reports. Neither the source documents used for such research nor the results of such research may be shared or made available to other individuals or organisations (including staff of the WFME's sponsoring organisations) unless authorized by WFME.

C. Complaints

WFME will consider complaints about the quality of a recognised accrediting agency, that if substantiated would represent partial or substantial noncompliance with one or more of the Criteria for Recognition. It will not, however, intervene on behalf of a complainant to achieve redress of grievances. Complaints may come from any source. All complaints must be submitted in writing to the WFME office. Anonymous complaints will not be considered.

The WFME Secretariat staff will conduct an initial evaluation of any complaint about agency quality to determine whether it represents potential noncompliance with one or more Criteria for Recognition. If the Secretariat determines that the complaint presents evidence of one or more areas of noncompliance, the agency's leadership will receive a copy of the complaint or comment and will be given an opportunity to respond in writing.

The issue(s) raised in the complaint and the agency's response will be reviewed by an *ad hoc* subcommittee of the Recognition Committee appointed by the Secretariat. Details of these procedures are included in Appendix B.

Complaints about WFME's recognition Policies and Procedures, or operations are reviewed by the Executive Council. Such complaints must be submitted in writing to the WFME office.

D. Procedures for Revising the Criteria for Recognition

Requests for new or revised Criteria for Recognition may arise from any source. Any requests for new criteria or modification of existing criteria should be sent to the WFME Secretariat staff for initial

review. If a proposed criterion or criterion change is deemed to have merit, it is referred to the WFME Executive Council for further action. Any new or revised criteria adopted by WFME will be published on its web site, along with the effective date for the criteria. The latest revision of the Recognition Criteria and the related documents (the Application form and the Recognition Report) were revised in April 2019 and shall be valid until 2023, subject to any essential minor revisions that may arise.

APPENDIX A

Appeal Procedure for Actions Affecting Recognition

Actions of WFME that are Subject to Appeal

The following actions by WFME affecting accreditation are subject to appeal:

- a) Deny recognition
- b) Withdraw recognition

The appeal shall be limited to the time and circumstances that triggered the WFME action (e.g., a site visit, status report, etc.) and shall be based solely on the information contained in the final recognition report. Descriptions of changes made since that time will not be considered.

Notice of WFME Action

Upon finding that an accrediting agency is not in substantial compliance with WFME's published Criteria for Recognition, and imposing an adverse action that is subject to appeal, the WFME President shall promptly notify the agency in writing of the action and of the specific areas of noncompliance that support the imposition of the action. The President shall also inform the agency of its right to appeal.

Notice of Appeal

If it wishes to appeal against WFME's decision, the agency must notify the WFME office within 30 calendar days from the date of receipt of the notice of the WFME action. The agency's Notice of Appeal must be addressed to the WFME President and must contain a concise statement of why the agency believes that WFME's action should be reversed. If no written request for an appeal is received by WFME within 30 days, WFME's initial action shall constitute final action by WFME.

The Appeal Process Hearing before the WFME Appeals Committee

The WFME President shall schedule the appeal hearing for a regularly scheduled WFME Executive Council meeting. The members of the Appeals Committee are the members of the WFME Executive Council. The WFME staff shall notify the agency in writing of the date, time, and place of the hearing. The notice shall be provided at least 45 calendar days prior to the hearing. The notice shall advise the agency that it:

- 1. may send representatives to appear before WFME
- 2. may be represented by legal counsel
- 3. may submit a written response to WFME's cited areas of noncompliance. Such response must be based solely on the information contained in the final recognition report.

The agency's written intent to send representatives to appear before the WFME Appeals Committee, the names of the representatives and, if any, the legal counsel who will attend the hearing, must be received by the WFME staff no later than 21 calendar days before the scheduled date of the hearing.

The WFME President shall send to each member of the Appeals Committee who will participate in the hearing complete copies of all documentation concerning the agency that was available to WFME at the time the action that is the subject of appeal was considered. This documentation shall constitute the Appeal Record.

Conduct of the Hearing before the WFME Appeals Committee

The hearing will be limited to a consideration of the time and circumstances that triggered the initial Recognition Committee decision. Descriptions of changes made since that time will not be considered.

No person shall be present for or participate in a hearing if he or she has a conflict of interest as determined under WFME guidelines on Avoidance of Conflicts of Interest (Section IV. A.).

The hearing shall follow the following general format:

- a) Introductory statement by the President
- b) Oral presentation by the agency (maximum one hour)
- c) Questions by Appeals Committee members and staff
- d) Appeals Committee private session
- e) Additional questions by Appeals Committee members and staff
- f) Closing statement by the agency (maximum 15 minutes)
- g) Adjournment

If the agency, without good cause, fails to appear at the hearing or fails to advise WFME staff in writing more than five calendar days before the scheduled date of the hearing that it will not appear, WFME may elect to notify the agency that no further opportunity for a personal appearance will be provided.

Decision of the Appeals Committee

At the conclusion of the hearing, the Appeals Committee shall meet in executive session to review the proceedings and to reach a decision. The Appeals Committee shall consider the Appeal Record and the information presented during the hearing. The Appeals Committee shall determine whether each of the cited areas of noncompliance with the Criteria for Recognition is supported by substantial credible evidence.

The Appeals Committee shall determine by majority of those members present whether substantial evidence supports the existence of the cited areas of noncompliance, and whether the initial

Recognition Committee action should be affirmed, modified, or reversed. Such determination shall constitute final action by WFME.

The WFME President shall notify the agency in writing of the WFME decision, including the reasons therefore, within 30 calendar days after the hearing.

WFME Review without a Hearing

An agency may inform WFME in writing that it does not wish to appear before the WFME Appeals Committee. In such an event, the Appeals Committee will consider the recognition status of the agency at the next regularly scheduled WFME Executive Council meeting. The Appeals Committee shall rely on the Appeal Record for information, and shall determine by majority of those members present whether to affirm, modify, or reverse its initial action. The WFME President shall notify the agency in writing of WFME's decision, including the reasons, within 30 calendar days after the WFME meeting. The decision of WFME, with or without a hearing, shall constitute final action by WFME.

Responsibility for the Cost of Appeals

The agency appealing against a WFME decision shall be responsible for all costs associated with the appeal, including, but not limited to, costs involved in the development and presentation of its appeal, travel and other expenses of its representatives present at any hearing, and legal expenses.

APPENDIX B

Procedures for Handling Complaints about Agency Quality

Any person concerned about the quality of an accrediting agency recognized by WFME may contact the WFME Secretariat to discuss lodging a complaint. Only complaints that, if substantiated, may constitute noncompliance with the Criteria for Recognition will be investigated. WFME will not intervene on behalf of an individual medical school regarding an accreditation decision.

Submitting a Complaint

Complaints must be made in writing, and may come from any source. Anonymous submissions will not be considered.

The written complaint should contain as much information and detail as possible about the circumstances that form the basis of the complaint. Hearsay cannot be accepted as evidence. If possible, the complainant should cite the relevant Criteria for Recognition relating to the complaint. If the complaint indicates circumstances that, if substantiated, would indicate areas of noncompliance with Criteria for Recognition, the WFME Secretariat will contact the complainant (1) to obtain additional documentation or corroboration, if needed, and (2) to request a signed release form. If the complainant does not comply with either request, the file will be closed and no further action will be taken.

WFME shall attempt to maintain the confidentiality of complainants and any corroborating material; however:

- Any information about an accrediting agency may be released to the leadership of the agency, the WFME Secretariat, members of the Recognition Committee, their respective legal representatives, and other persons required by law or necessity, at the discretion of WFME, to fully investigate the complaint.
- The complainant and any corroborators will be required to sign an authorisation to release the
 written complaint and corroborating materials to the accrediting agency, the WFME Secretariat,
 members of the Recognition Committee, their respective legal representatives, and appropriate
 outside parties.
- The complainant and any corroborators will also be required to authorise the agency to release any information deemed necessary by WFME.

Investigating the Complaint

The WFME Secretariat staff will make an initial determination of whether the complaint contains issues relating to the agency's compliance with the Criteria for Recognition. If the Secretariat determines that the complaint does raise such issues, the Secretariat will contact the leadership of the agency, including the anonymised written complaint and corroborating information, and cite the information that the agency should provide in response. A response from the leadership of the agency will ordinarily be requested within 30 days.

Review of the Complaint

Complaints (including any corroborating materials) will be reviewed by an *ad hoc* subcommittee of the Recognition Committee appointed by the WFME President. The subcommittee will review the

