

INTERNATIONAL COACH FEDERATION
POLICY & PROCEDURE

Title: Handling Allegations of Unsolicited Commercial Communications

Approved By: ICF Ethics Committee and ICF Board of Directors

Date of current version: January 28, 2001

Revision History:

Next Review: 12/2002

Policy:

It is the policy of the ICF to protect the confidentiality and use of its database of members, conference attendees and other lists involving ICF membership ("ICF contact database") from transmission of Unsolicited Commercial Communications (hereinafter referred to as UCC), also commonly referred to as "spam" or "junk mail" by email, fax, bulk mail or any other electronic or non-electronic means, to the extent possible, by requiring prior approval for transmittal of any electronic or non-electronic communications to membership. This policy recognizes the difficulty in clearly determining whether the complaint of receipt of an unsolicited communication is actually unsolicited material, which has been distributed by utilizing the ICF contact database. It also recognizes the difficulty in causing the cessation of actual UCC, which is often untraceable to the sender.

It is further the policy of the ICF to respond to complaints by ICF members alleging receipt of UCC and/or potentially misleading communications about the ICF (including but not limited to those which give the appearance of ICF endorsement when no prior approval has been given) by any electronic or non-electronic means. All responses will be coordinated and directed by the Ethics Committee, following review of the complaint.

It is intended that a response be sent to the person complaining of receipt of such communications in an effort to explain what the ICF can and cannot do to prevent such practices, and provide suggestions for the complainant to seek further self-help.

It is also intended that a response be sent to alleged UCC sender who appear to have targeted ICF members; alleged UCC senders who are ICF members (regardless of whom they are targeting with their apparent UCC); and any person regardless of membership status, who appears to imply in any communication that the ICF supports and/or sponsors any activity when no prior approval has been obtained. The response to the alleged UCC sender is used to educate that party about ICF policies and to seek a change in behavior. The letter does not assume that there has been a violation of ICF policies or ethical guidelines.

Procedure:

I. Response to Complaints Alleging Receipt of UCC.

- A. ICF will respond to ICF members and others who complain that they have received apparent UCC and/or potentially misleading communications about the ICF or including references to apparent ICF endorsement without prior approval of same.
 - 1. Regarding complaints from the Public: The ICF will respond to any complaints and concerns received from members of the public.
 - 2. Regarding complaints from within the Profession: The ICF will respond to the complaining Coach and encourage them to direct their complaint directly to the alleged UCC sender. If they have no satisfactory response or resolution then the ICF will advise them to be ready to document their attempts to resolve the issue and file a Formal Complaint pursuant to the complaint procedures of the Committee.
- B. Complaints will be forwarded to the ICF Ethics Committee for review. ICF staff will then prepare a written response to the complaining party under the direction of the committee, and based upon “Form Letter to UCC Complainant.” ICF staff will customize the template letter to the circumstances of the complaint by selection from the numbered sections contained within the first paragraph.
- C. The final draft of the customized response letter prepared by ICF staff will be reviewed by the committee. The approved final draft will then be sent to the complaining party under the signature of the ICF Executive Director.
- D. This template letter will be used in concert with the document entitled “Form Letter to Alleged UCC Sender,” unless the concern of alleged UCC arises from within the ICF Board, officers or committee members.

II. Response to Alleged UCC Sender

- A. In response to a member complaint or upon other information received by ICF including a copy of the alleged UCC, ICF will likewise respond to alleged UCC senders who appear to have targeted ICF members; alleged UCC senders who are ICF members (regardless of whom they are targeting with their unsolicited commercial communications); and any person regardless of membership status, who appears to imply in any communication that the ICF supports and/or sponsors their activity. ICF staff will prepare a written response under the direction of the committee, and based upon the template letter entitled “Form Letter to UCC Complainant.”
 - 1. Regarding complaints from the Public: If more than one complaint has been lodged against an alleged UCC sender, then a letter should automatically be sent to the UCC sender. However, if only one complaint has been lodged, then the committee will have the discretion to decide whether a letter should be sent to the alleged UCC sender if they determine the nature of the complaint is serious or significant enough to merit a response.

2. Regarding complaints from within the Profession: If more than one complaint has been lodged against an alleged UCC sender, then a letter should automatically be sent to the UCC sender.
- B. The template letter will be customized by ICF staff to the circumstances in the same manner as that described in part 1. above. The staff member customizing the template will need to make the pronouns consistent with the gender of the alleged UCC sender where it can be determined. Additionally if the alleged UCC sender is a corporation or other legal entity (as opposed to a person) the pronouns will need to be modified.
 - C. The final draft of the customized response letter prepared by ICF staff will be reviewed by the committee. The approved final draft will then be sent to the alleged UCC sender under the signature of the ICF Executive Director.
 - D. Communications with the complainant will be maintained when this template letter is sent to the alleged UCC sender, including but not limited to a carbon or blind carbon copy of the letter to the alleged UCC sender or another form of update to the complainant. Further communications (and courtesy copies to the complainant) will be at the discretion of the committee on a case by case basis in handling the formal complaint process.
- III. Maintenance of Complaint File. A file of all information received or developed in response will be maintained by ICF staff for a period of 5 years. This information shall be cross referenced by categories according to each alleged instance of UCC, the type of complaint, the identity of the complainant and the sender of the communication and the outcome or resolution of the complaint.
- IV. Policy and Procedure Revisions. The Ethics Committee shall have the authority to make rules to implement the UCC policy as passed by the ICF Board of Directors. The Ethics Committee shall not have the authority to make changes to substantive portions of the policy without the consent of the ICF Board of Directors.

Several excellent educational sites relating to UCC can be found on the Internet at:

<http://www.mall-net.com/spamfaq.html>.

<http://mail-abuse.org/manage.html>

<http://spam.abuse.net/>

<http://coverage.cnet.com/Content/Features/Howto/Stop/>

<http://www.earthlink.net/internet/security/spam/prevent.html>

These web sites provide some valuable information concerning internet etiquette that will provide additional discussion and examples beyond the ICF Standards of Ethical Conduct.