17. Principles for Receiving Comments, Suggestions, Concerns and/or Complaints

Policy statement

NTC fosters a culture of inclusion, transparency and openness as this will support demonstrating that it has nothing to hide in terms of its practice. Therefore, NTC is open to feedback from children, as well as their parents, families and carers - including receiving feedback from Directors and staff - as this will assist the organisation in improving how it carries out its activities and delivers its services. NTC - as an organisation which treats all children with dignity and respect - is committed to protect them from harm and will seek to encourage and enable everyone to take an active role in planning and decision-making in all ways that are appropriate to the individual. NTC will seek to achieve this aim through:

1. A commitment to a listening environment within the organisation.
2. The use of a suggestion box to give everyone that engages with the organisation an opportunity to make suggestions about how things could be improved.
3. Maintaining a record of matters, ideas and suggestions that are made by children - as well as their parents, families and carers - and the actions taken.
4. Providing regular feedback on actions taken and developments within NTC.

How NTC will involve parents, families & carers of children & adults

NTC realises that parents, families and carers have a wealth of knowledge about the emotional, physical and cultural needs of their child/family members for whom they care for, or work with. NTC therefore believes that it is important to establish and maintain contact with the parents, families and carers who are involved with the organisation. This will be achieved through encouraging all parents, families and carers to make representations to NTC's management committees and/or their participation in services or activities provided by NTC.

Such involvement will also be an important source of reassurance and support for everyone who has a vested interest in the protection of a child.

How staff contribute to NTC's work with children

As far as NTC staff members are concerned, supervision and support will enable line managers to gain valuable insights provided by staff and to learn lessons to ensure that the organisation is operating effectively.

In addition to the above processes, NTC will seek to encourage feedback via the use of satisfaction surveys that staff, children, adults, parents, families and carers can complete anonymously.

How parents, families & carers can raise concerns or complaints

NTC encourages all parents, families & carers - who have a concern or complaint about some aspect of the organisation - to use NTC's Complaints Procedure. The complaints procedure provides the following:	
Procedure	▪ A fair and clear process to raise concerns or complaints ▪ A named first point of contact, as well as a named alternative - should the first point of contact be unavailable, or is the subject of the complaint ▪ An appeals process in cases where a complaint cannot be resolved at the first stage ▪ Who - within NTC - has the final decision in relation to a concern or complaint ▪ Realistic time limits for each stage of the complaints procedure to ensure matters are dealt with promptly. **NTC's full Complaint Policy and Complaint Procedures are provided in the next section of this Safeguarding Handbook.**

Principles for Receiving Comments, Suggestions, Concerns and/or Complaints continued...

Complaint procedure principles

Principles	
	Everyone involved in a complaint (complainant and the subject/s of the complaint) will be provided with the opportunity to represent their side of the case.
	▪ In the case of a complaint from a child or young person, representation can include input from a parent, family member, carer or an advocate ▪ In the case of a complaint made by a parent, partner, family member, carer or an advocate, representation can include input from a friend or family member.
	Where the complaint is regarding an NTC staff member - or about a family member or carer/advocate acting inappropriately - the person dealing with the complaint will ensure that there is absolute clarity regarding:
	▪ The particular incident of concern and whether there have been any previous incidents ▪ Any remedial action to be taken **e.g.** an apology and any new behaviour expected ▪ What will happen if the agreed arrangements are not adhered to. **NTC's complaint procedure will ensure that records of discussions - and any information shared at each stage of the procedure - will be made clearly, recorded accurately, kept confidentially and stored in a secure location in line with the organisations policies and procedures relating to the Recording, Storing and Sharing of Information.**

Where a complaint is in relation to a particularly serious safeguarding incident e.g. where abuse or exploitation is suspected - then the reporting procedure relating to Responding, Recording & Reporting Allegations of Abuse (as detailed in this Safeguarding Handbook) will take precedence over NTC's Complaints Procedure.

Reviewed & Updated: September 2022

NTC will review this Principles for Receiving Comments, Suggestions, Concerns and/or Complaints and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children; following a safeguarding incident within NTC (or one which directly concerns or affects NTC); and/or following a significant organisational change.

18. Complaints Policy

Policy statement

NTC recognises that everyone who uses our services, activities and/or facilities has the right to a high standard of service and a right to complain if they are not happy with any aspect of what we do. Learning from complaints helps NTC to improve the services that are provided.

The purpose of the Complaints Policy & Procedure is to achieve the following outcomes:	
Purpose	**a.** Help NTC to provide a service of the highest standard to everyone that engages with the organisation. **b.** Help NTC to ensure that everyone that uses (or wishes to use) the organisation's services know that they have a right to complain if they need to. **c.** Help NTC to deal with complaints in a positive way and use them to improve the organisations services. **d.** Set out the issues that could be covered under this procedure. **e.** Set out the steps everyone should take if they wish to make a complaint to NTC. **f.** Set out how NTC will deal with complaints in a fair and consistent way.

Who this Complaints Policy & Procedures applies to

This **Complaints Policy & Procedure** applies to all children, adults, parents and families, as well as carers and advocates. In addition it applies to every person that attends - or wishes to make use of - NTC's facilities and services.

However, this policy and procedure **is not** intended to be used by NTC's staff or volunteers who may be unhappy about their own experience in the workplace. In these circumstances, staff members should use the **Grievance Procedure** (found in section four of the **Employee Handbook**) and volunteers should use the **Complaints Procedure for Volunteers** found in the **Volunteers Handbook**.

The **Complaints Policy & Procedure** are also **not** intended to cover concerns that staff may have about issues of possible malpractice or wrongdoing in the workplace. These concerns should be dealt with under the **Whistle Blowing Policy & Procedure** found in this **Safeguarding Handbook**.

If anyone - whether an NTC staff member, child, adult, parent, family member, carer or advocate - is concerned that a child may be at risk of harm, they should use the relevant procedures contained within this Safeguarding Handbook - rather than this Complaints Policy & Procedure.

How NTC will seek to deal with complaints

- Defining clearly what is mean by a complaint
- Setting out a procedure that can be easily followed and understood
- Making sure that everyone knows about this policy and procedure
- Producing child and adult friendly material explaining this policy and procedure
- Reassuring people that they will not be penalised in any way for using the complaints procedure - and that NTC will respond positively to any complaints made in good faith
- Offering extra support to those who need help to make a complaint
- Taking a staged approach to complaints, that takes account of the level of seriousness and the possibility of resolution at different points
- Investigating each complaint as objectively and fully as reasonably possible
- Keeping the complainant informed during the course of the investigation, as well as about the outcome of their complaint
- Keeping clear records of complaints and of how they are resolved.

Reviewed & Updated: September 2022

NTC will review this Complaints Policy and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children; following a safeguarding incident within NTC (or one which directly concerns or affects NTC); and/or following a significant organisational change.

19. Complaints Procedure

Definition of a complaint

A complaint is a statement from someone that they are not happy about the service provided to them by NTC and that they would like this to be improved. The complaint might be about:	
Definition	**a.** The behaviour of an NTC member of staff member. If this relates to allegations that someone may have harmed a child - or may be at risk of doing so - then the policy relating to **Responding, Recording & Reporting Allegations of Abuse** detailed in this **Safeguarding Handbook** should be used instead. **b.** The behaviour of children or adults in the group - although please note the above point relating to harm. **c.** The level, type of service received, or being refused a service altogether. **d.** The building or facilities. **e.** Written information **e.g.** style or lack of. **f.** Service received over the telephone **e.g.** not being able to get through, or being kept waiting. **g.** A child, adult, parent, family member, carer or advocate feeling that they have been treated unfairly, or in a way that is discriminatory. **h.** A specific activity or outing. **i.** Anything else related to the service provided by NTC.

Informal procedure for making a complaint

Step	Procedure for Making a Complaint: Informal
1.	If possible, the person should discuss the complaint with NTC's **DSO**. If this is not possible - for example, the complainant does not feel comfortable speaking to the **DSO** because the relationship is too difficult - the discussion should be with another member of the NTC safeguarding team.
2.	NTC's **DSO** - or an alternative NTC manager - will, in the first instance, try to resolve the matter informally. This is often possible and can mean that the problem is sorted out simply and more quickly.
3.	If an informal solution has been tried before and has not worked, or if the complainant does not feel that informal discussions are adequate or likely to be effective, stage one of the complaints procedure should be followed.

Stage 1: Formal procedure for making a complaint

Step	Formal Procedure for Making a Complaint: Stage 1
4.	The complainant should put their concerns in writing to NTC's **DSO** or, if the **DSO** is the subject of the complaint, to NTC's **SSM**. If the complainant needs help to do this - and a family member is not able to offer this support - help will be provided by NTC's **DSO**, or, if the **DSO** is the subject of the complaint, by another member of NTC staff identified by the **SSM**.
5.	NTC's **DSO** will acknowledge the complaint **within two working days** by sending a brief letter to: ▪ Thank the complainant for getting in touch & express regret that a complaint has been necessary ▪ Assure them that the matter will be investigated ▪ Set a provisional timescale for the investigation that is achievable, but avoids delay as much as possible ▪ Explain when they will next be in contact ▪ Offer a contact name - usually this will be NTC's **DSO** or the **SSM** - in case the complainant has any questions in the meantime ▪ Make any temporary arrangements that may be necessary pending the outcome of the investigation into the complaint

Complaints Procedure continued...

Step	Formal Procedure for Making a Complaint: Stage 1 continued...
6.	Normally the service to the complainant should continue as normal during the investigation into the complaint. If this is not possible **e.g.** because an individual has had to be excluded from an activity, or because the complainant does not want to use the service at that point, or because it would not be appropriate for the NTC staff member to continue working with the subject of the complaint - then this should be acknowledged and temporary alternative arrangements made, wherever possible.
7.	If the complaint is about a specific NTC member of staff or other child participant, then that person (and the parent/family/carer/advocate where applicable) should be informed **within two working days** - or as soon as possible - that a complaint has been made against them and the nature of the complaint. However, the person should not be informed if doing so would compromise anyone's safety, or a police investigation.
8.	NTC's **DSO** will normally be responsible for investigating a stage one complaint. Therefore, the **DSO** should plan the investigation according to the nature of the complaint, taking into account any witnesses or specialist opinion that should be sought. As a minimum, the complainant (and parent/family/carer/advocate if the complainant is a child) should be interviewed. Any person who might be the subject of the complaint should also be interviewed, provided that doing so would not compromise anyone's safety, or a police investigation.
9.	If the complaint is about a building, facilities or equipment, then this should be examined.
10.	If the complaint is about access to a service, the reasoning behind a decision to offer or not offer a particular service should be examined.
11.	If, at any point during the investigation, it appears that a criminal offence may have been committed, the matter should be reported to the police, and to other statutory agencies and bodies. Discussions should be held with the police about whether the investigation into the complaint can continue alongside their own enquiries.
12.	If it emerges at any point that a child may have been caused significant harm - or may be at risk of significant harm - the appropriate safeguarding procedures detailed in **Safeguarding Handbook** should be instigated **immediately**.
13.	NTC's **DSO** should make notes of the investigation - including notes of any meetings that take place - and should write a report based on their findings. The report should state clearly whether the complaint is upheld or not, and should make recommendations about how the matter can be taken forward. The report should be shared with both the complainant and the **SSM**, other safeguarding personnel as appropriate and any specific member of NTC staff, and/or other person, who may be involved. Any comments that either party may wish to make about the extent to which they accept or reject the findings of the report should be noted.
14.	**Once a way forward has been agreed, this way forward should be reviewed regularly.**

Unhappy with the findings of Stage 1?	Previous complaint resurfaces within 12 months?
If either the complainant (or a person who was the subject of the complaint) is not prepared to accept the findings of the report, they should confirm this in writing. The matter will now become an **appeal** and the procedure for the appeal is as defined by the **Formal Procedure for Making a Complaint: Stage 2**.	Where a complaint - that was previously handled in the preceding 12 months (from the date that the report findings have been communicated) - has resurfaced, then this will be progressed by following the procedure defined by the **Formal Procedure for Making a Complaint: Stage 2**.

Complaints Procedure continued...

Step	Formal Procedure for Making a Complaint: Stage 1 continued...
6.	Normally the service to the complainant should continue as normal during the investigation into the complaint. If this is not possible **e.g.** because an individual has had to be excluded from an activity, or because the complainant does not want to use the service at that point, or because it would not be appropriate for the NTC staff member to continue working with the subject of the complaint - then this should be acknowledged and temporary alternative arrangements made, wherever possible.
7.	If the complaint is about a specific NTC member of staff or other child participant, then that person (and the parent/family/carer/advocate where applicable) should be informed **within two working days** - or as soon as possible - that a complaint has been made against them and the nature of the complaint. However, the person should not be informed if doing so would compromise anyone's safety, or a police investigation.
8.	NTC's **DSO** will normally be responsible for investigating a stage one complaint. Therefore, the **DSO** should plan the investigation according to the nature of the complaint, taking into account any witnesses or specialist opinion that should be sought. As a minimum, the complainant (and parent/family/carer/advocate if the complainant is a child) should be interviewed. Any person who might be the subject of the complaint should also be interviewed, provided that doing so would not compromise anyone's safety, or a police investigation.
9.	If the complaint is about a building, facilities or equipment, then this should be examined.
10.	If the complaint is about access to a service, the reasoning behind a decision to offer or not offer a particular service should be examined.
11.	If, at any point during the investigation, it appears that a criminal offence may have been committed, the matter should be reported to the police, and to other statutory agencies and bodies. Discussions should be held with the police about whether the investigation into the complaint can continue alongside their own enquiries.
12.	If it emerges at any point that a child may have been caused significant harm - or may be at risk of significant harm - the appropriate safeguarding procedures detailed in **Safeguarding Handbook** should be instigated **immediately**.
13.	NTC's **DSO** should make notes of the investigation - including notes of any meetings that take place - and should write a report based on their findings. The report should state clearly whether the complaint is upheld or not, and should make recommendations about how the matter can be taken forward. The report should be shared with both the complainant and the **SSM**, other safeguarding personnel as appropriate and any specific member of NTC staff, and/or other person, who may be involved. Any comments that either party may wish to make about the extent to which they accept or reject the findings of the report should be noted.
14.	**Once a way forward has been agreed, this way forward should be reviewed regularly.**

Unhappy with the findings of Stage 1?	Previous complaint resurfaces within 12 months?
If either the complainant (or a person who was the subject of the complaint) is not prepared to accept the findings of the report, they should confirm this in writing. The matter will now become an **appeal** and the procedure for the appeal is as defined by the **Formal Procedure for Making a Complaint: Stage 2**.	Where a complaint - that was previously handled in the preceding 12 months (from the date that the report findings have been communicated) - has resurfaced, then this will be progressed by following the procedure defined by the **Formal Procedure for Making a Complaint: Stage 2**.

Complaints Procedure continued...

Stage 2: Formal procedure for making a complaint

Step	Formal Procedure for Making a Complaint: Stage 2
A stage two complaint may come about for one of two reasons. It may be a complaint that has escalated from stage one - because the complainant, or a person who was the subject of the complaint, **wishes to appeal** the findings from a stage one investigation. Alternatively, it may relate to matters that were investigated as a **stage one complaint within the previous 12 months and has now resurfaced**.	
15.	Stage two complaints should be investigated either by a manager senior to NTC's **DSO** who was investigating at stage one. Alternatively, it can be investigated by a completely independent person - who is not a staff member or volunteer - and who will be nominated by the **BD** of NTC. Therefore, the investigation will be commissioned by the **BD** and the findings must be reported back to them.
16.	If a complaint is to progress to stage two, the complainant - this could be the original complainant or a person who was the subject of the original complaint - should again indicate in writing that they wish to complain (or complain further) and should state the reason for this.
17.	The written statement should be presented to the **BD**, who should then, **within two working days**, respond in writing to the complainant in the same way as outlined for the stage one procedure. In addition, the **BD** should provide the complainant with the name of the person who will investigate the stage two complaint.
18.	The procedure for the investigation and sharing of the report should be similar to that outlined in the stage one procedure.
19.	Stage two is the **final stage of the complaint's procedure**. If any party wishes to complain further following the completion of stage two, this should be taken up with an external party **e.g.** local councillor, MP or an appropriate statutory authority.

Keeping a record of the complaint

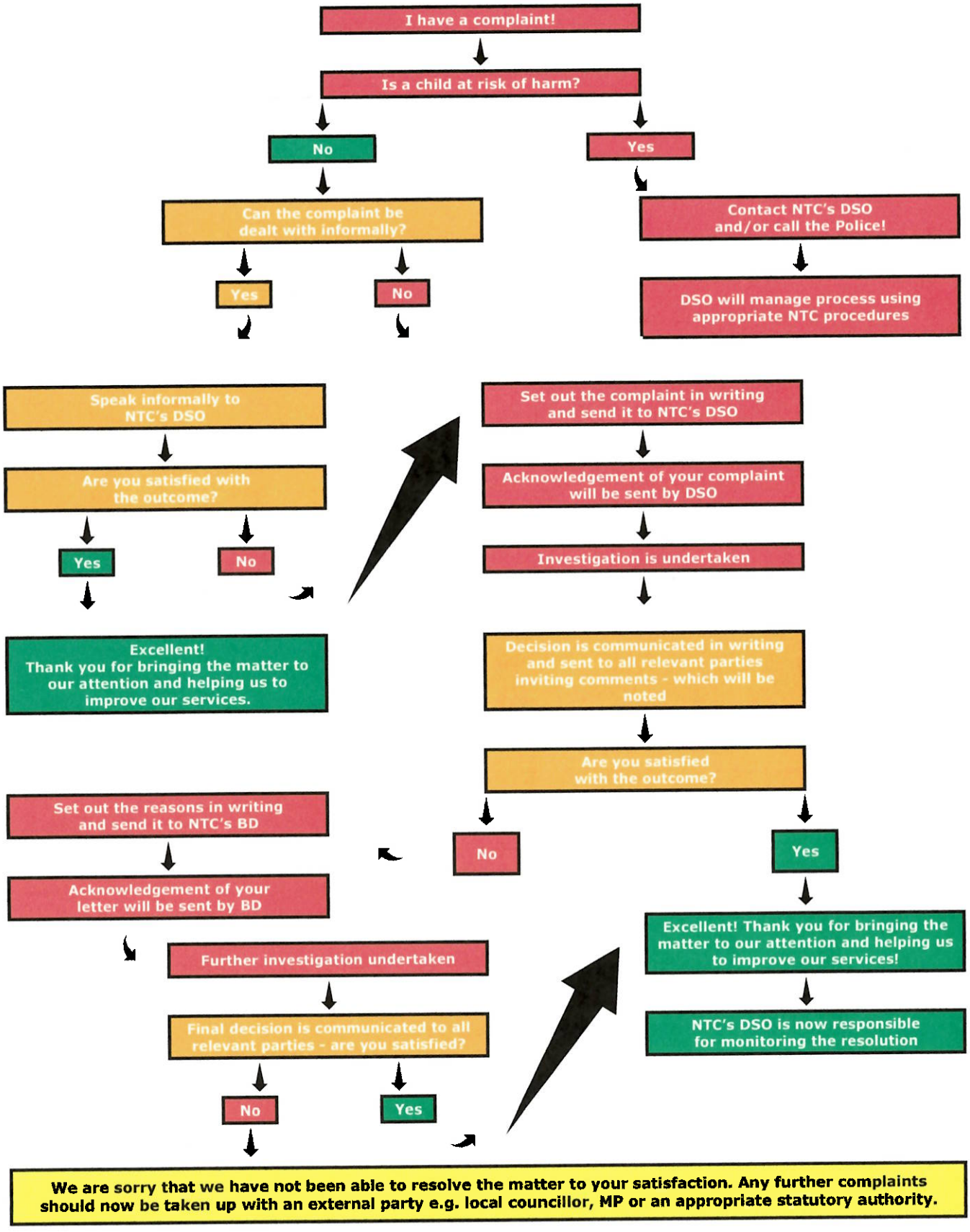
Regardless of whether a complaint is dealt with formally or informally, accurate notes should be made by NTC's **DSO** - or the person conducting the investigation - of each stage of the process, including records of meetings. Anonymous summary notes of any complaint should also be kept on the complaints file with a reference number. This will assist NTC in the process of monitoring and learning from complaints.

Copies of the final report should be given to the person making the complaint and to anyone who may be the subject of the complaint.

If the complaint leads to any disciplinary action or a referral to a statutory authority, copies of the notes made during the investigation and the report of the investigation (together with any notes relating to the outcome) should be kept confidentially on the file of any person who is the subject of the complaint.

All records should be maintained in accordance with the policies and procedures details in the section relating to the Recording, Storing & Sharing of Information within this Safeguarding Handbook.

Reviewed & Updated: September 2022

NTC will review this Complaints Procedure and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children; following a safeguarding incident within NTC (or one which directly concerns or affects NTC); and/or following a significant organisational change.

20. Complaints Procedure Flowchart