

## COMPLAINTS POLICY

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## **1. Policy statement**

- 1.1 The National Deaf Children's Society, including its international arm Deaf Child Worldwide is committed to providing an excellent service to its members and other stakeholders, working in an open and accountable way that builds trust and respect.
- 1.2 We view complaints as an opportunity to learn and improve for the future, and will make sure that wherever practicable, complaints are resolved to the satisfaction of all parties involved, and that efforts are made to repair any damage to relationships.
- 1.3 We believe our complaints process should be transparent and accessible to all users and are committed to investigating complaints fairly and in a timely way.

## **2. Scope**

- 2.1 Who can make a complaint under this policy:
  - a. Complaints may come from any person or organisation that has a legitimate interest in the National Deaf Children's Society. For Deaf Child Worldwide, we will support partners to put in place the most appropriate method in order that beneficiaries can raise complaints with us either directly or via the partner.
  - b. We will accept anonymous complaints recognising that complaints may be legitimate and the complainant may have good reasons as to why they do not want to disclose their identity, although following up such complaints will be more difficult and we may be limited in our ability to fully address a complaint as a result.
- 2.2 Key areas of possible complaint may include (but are not limited to):
  - a. Concern from someone we work with about the quality of programme delivery
  - b. Concern from a member of the public or supporter about a particular fundraising approach or campaign
  - c. Concern about the behaviour of staff, volunteers, consultants or partners contracted to deliver on behalf of the National Deaf Children's Society. This could include action taken or conversely, action not taken
  - d. Concern about HR processes and decisions, although separate policies apply for existing staff wishing to raise a concern
  - e. Concern about late payment of invoices

### **3. Definitions**

3.1 A complaint is an expression of dissatisfaction, whether justified or not, about any aspect of work undertaken by the National Deaf Children's Society or Deaf Child Worldwide, or for which we are responsible whether directly or indirectly.

3.2 A complaint is not:

- a. A general query about our work or a request for information
- b. A contractual dispute
- c. A request to amend records e.g. to correct an address, update communication preferences, or cancel a donation\*
- d. A request to unsubscribe from one of our 'services' e.g. a campaign newsletter or email\*

\* unless the request had been made previously and had not been actioned by us to the complainant's satisfaction, or the complainant alleges we did not have permission to contact them

### **4. Principles**

4.1 Accessibility

- a. The National Deaf Children's Society aims to make it as easy as possible for complainants to communicate with us in order to make a complaint and access our complaints policy. A copy of our complaints policy will always be available on our website and copies will also be posted/emailed out on request.
- b. A complaint can be received via any medium, including verbally, by phone, electronically, via video relay service or in writing. This may be directly from the complainant or via a third party. For complaints made by deaf children and young people, or relating to Deaf Child Worldwide, assistance may be needed to do this, and the National Deaf Children's Society (or their partners for Deaf Child Worldwide) should help complainants to present their complaint if required.

4.2 Confidentiality

- a. All complaint information will follow any relevant data protection requirements. Reports on complaints that are shared as part of learning will be anonymised.
- b. Where complaints need to be kept confidential in order to safeguard those making or involved in the complaint, we will only involve third parties in the resolution of

confidential complaints on a case-by-case basis and will notify the complainant. The exception to this may be any complaints involving suspected criminal activities, or those relating to safeguarding children, where we may have a legal duty to share information with the authorities.

- c. Complaints that indicate that a criminal offence has been committed will be referred to the relevant authorities responsible for investigating such matters. Where the complainant is potentially a victim of a crime we encourage them to report it themselves, but where appropriate it could also be done by the National Deaf Children's Society or its partners.

#### 4.3 Transparency and timeliness

- a. The National Deaf Children's Society aims to acknowledge complaints within two working days of receiving them electronically, and within five working days if received via post. We aim to provide a full response to complaints received within five working days. However, there may be complex complaints that require a longer period of investigation or liaising with external suppliers and partners and in these cases we would always aim to provide a full response within twenty five working days. It is important that we are transparent with how we deal with complaints and keep complainants fully apprised of what is happening with their complaint, along with any amended timescales if circumstances dictate a longer period is required.
- b. Where possible it is helpful for complaints to be made as soon as possible after the incident to enable us to investigate fully. Complaints made more than 3 months after an incident may be hard to resolve satisfactorily, but we will always investigate to the best of our ability.

#### 4.4 Right to appeal

- a. Complainants who are unsatisfied with the National Deaf Children's Society response to a complaint have the right to appeal via internal escalation within the charity. If complainants are still unhappy with the response from us they have the right to take their complaint to the relevant external regulating bodies. Nothing in this policy should be understood as taking away the right of any individual, group or organisation to seek redress under any relevant legislation.

#### 4.5 Mutual respect

- a. Everyone who makes a complaint will be treated with courtesy and respect. In return, the National Deaf Children's Society expects people who make a complaint to communicate their concerns fairly and appropriately. Where complainants harass staff, make threats, or behave abusively, we reserve the right to withdraw or modify our adherence to the complaints process.

#### 4.6 Part of a learning process

- a. The National Deaf Children's Society will log and monitor all complaints and results of such complaints as outlined in the complaints definition above. This information will be regularly collated, anonymised and then reviewed by the appropriate senior managers and trustees in order that we learn from our mistakes and ultimately provide a better service for our members and other stakeholders.

### 5. Responsibilities and escalation

5.1 Complainants who are unsatisfied with the National Deaf Children's Society response to that complaint have the right to appeal via internal escalation within the charity. The specific appeal processes are available from us on request, and our responses to complainants also direct them to this information.

If, having escalated the matter, complainants are still unhappy with the response from us they have the right to take their complaint to the relevant external regulating bodies. The primary bodies in the UK are the Charity Commission (England and Wales) <sup>1</sup>, The Charity Commission for Northern Ireland, and the Office of the Scottish Charity Regulator (OSCR) <sup>2</sup>, while specific fundraising complaints are covered by the Fundraising Regulator ([www.fundraisingregulator.org.uk](http://www.fundraisingregulator.org.uk)). Complaints relating to regulated activities which cannot be resolved to the complainant's satisfaction can be raised with OFSTED (email [CIE@ofsted.gov.uk](mailto:CIE@ofsted.gov.uk) or phone 0300 123 4666). In Scotland, any complaints relating to our services providing care of deaf children or young people can also be raised with Social Care and Social Work Improvement Scotland (also known as the Care Inspectorate) at Compass House, 11 Riverside Drive, Dundee, DD1 4NY ([enquiries@sssc.uk.com](mailto:enquiries@sssc.uk.com)).

5.2 Overall responsibility for this policy and its implementation lies with the Board of Trustees and its Executive Directors.

### 6. Implementation

6.1 This policy is implemented through accompanying detailed procedures and guidance, specific to the UK or international context, which contain all necessary information to help staff carry out their responsibilities.

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<sup>1</sup> The Charity Commission will only take action for complaints that sit within their terms of reference, which are outlined at <https://www.gov.uk/government/organisations/charity-commission/about>. Both National Deaf Children's Society and our International arm Deaf Child Worldwide, are regulated by the Charity Commission

<sup>2</sup> The OSCR's guidance can be found at <http://www.oscr.org.uk/charities/raise-a-concern-about-a-charity>

## **7. Related policies and legislation**

7.1 This policy is supported by the additional following policies (depending on the nature of the complaint):

- a. Confidentiality and information sharing when working with families, children and other professionals GuidanceAnti-Corruption Policy
- b. Anti-Bribery Policy
- c. Anti-Money Laundering Policy
- d. Data Protection Policy
- e. Ethical Fundraising Policy
- f. Fundraising and Vulnerable People Policy
- g. Child Protection and Safeguarding Policy.

## **8. Review**

8.1 This policy will be reviewed every three years and additionally if a significant change is made to the laws, regulations, systems, people or processes related to this policy.