

## **1. Introduction**

NAPAC is dedicated to supporting adult survivors of childhood abuse and its long-term traumatic impacts. We are committed to delivering our mission to the best of our ability; however, we realise that sometimes we get things wrong and that not everyone will agree with what we do.

We welcome and value feedback as this enables us to listen, learn, and to improve what we do and how we do it. In short, your compliments, comments and complaints help us improve the direct and indirect support we are able to offer adult survivors of abuse.

## **2. Who this policy is for**

This policy applies to individuals (members of the public) and organisations wishing to comment on, compliment or complain about the performance of services, fundraising activities, the suitability of content and campaigns and the conduct of employees, volunteers, contractors and third parties working with or representing NAPAC.

This policy does **not** apply to complaints made by NAPAC employees, agency workers, interns, secondees, contractors, volunteers, consultants and trustees. In the event that they wish to make a complaint, they should refer to the relevant NAPAC policies – for example, the Grievance Policy, Whistleblowing Policy and the Safeguarding Policy as appropriate.

Those persons to whom this policy does not apply should make their compliments and comments to their line manager or persons to whom they consider their compliments/comments are most relevant.

## **3. Complimenting us**

Compliments are valuable and important to us. Compliments enable us to:

- understand from our supporters and stakeholders what we do well and the positive difference this makes;
- provide positive feedback to our people – whether paid or unpaid;
- influence the continued development of what we do, why and how.

## **4. Commenting on our people or our work**

It is always helpful to hear what people think about us, what we do and how we do it. Comments are welcome because they:

- help to influence the organisational decisions we may make;
- help maintain the standards of our activities;
- raise issues of real importance and can lead to change for the better.

## **5. What we do with compliments and comments**

Wherever we can, we will record and report, internally and externally if required, on compliments and comments we receive. We will endeavour to acknowledge compliments and comments wherever possible but whilst this may not always be practicable, please be assured that they are always appreciated.

## **6. Complaining about our people or our work**

We recognise that there will be times when our trustees, staff and volunteers or third parties working on our behalf make mistakes or get things wrong.

Where this happens and where we receive a complaint, we will always take this seriously, record and report on it internally and externally if required, and deal with it in a timely manner.

We will always take steps to maintain the confidentiality of your personal information. We will only disclose it to people who need to look into your complaint, and, rarely, to others where we are legally permitted to do so.

## **7. Defining a 'complaint'**

We define a complaint as *'a written expression of dissatisfaction (addressed to and received by NAPAC either via email or written letter) about actions taken or a lack of action by NAPAC, or someone acting on behalf of NAPAC'*.

Where it is unclear whether a communication is indeed a complaint, we will endeavour to confirm this with you, in so far as we can.

If the communication or comment is done anonymously, we may not be able to treat it as a complaint under this policy.

The following issues (this is not an exhaustive list) will be treated as complaints as they touch upon NAPAC's purpose and mission:

- poor standards of service including accusations of professional incompetence/misconduct;
- financial losses/waste
- breach of data protection standards
- breach of confidentiality
- criminality within or involving NAPAC
- NAPAC being deliberately used for significant private advantage
- non-compliance with NAPAC's own policies/procedures
- non-compliance with relevant laws and regulations

- inappropriate/improper fundraising methods

Please note: under certain circumstances we may not be able to respond to a complaint, including where:

- you have not identified yourself or provided your contact details – NAPAC cannot deal with anonymous complaints
- your complaint is not about NAPAC
- your expression of the complaint is insufficiently clear
- your complaint has been sent to us and other organisations as part of a bulk mailing or email
- your complaint is only made on social media and upon request details are not sent via email or written letter
- the complaint reiterates the substance of a previous complaint and no new supporting evidence is provided

However, NAPAC will still take the complaints seriously and deal with them appropriately, including contacting you where we are able to, to discuss the matter further.

## 8. Sharing your compliments, comments and complaints with us

Set out below are the details of how and to whom you should submit your feedback:

	<b><i>All compliments, complaints or comments</i></b>
<b>Email</b>	Please email <a href="mailto:info@napac.org.uk">info@napac.org.uk</a>
<b>In writing</b>	Please direct letters to:  Chief Operating Officer NAPAC CAN Mezzanine 7-14 Great Dover Street London SE1 4YR

## 9. Our process for dealing with complaints

Where a complaint has been submitted in accordance with section 8 of this policy, NAPAC will acknowledge your complaint within five working days, explain the process that will be followed and when a decision will be made.

Following a thorough and fair investigation by us to establish the facts surrounding the complaint, we will always attempt to provide a full, written response within 15 working days. There may be occasions where this is not possible, and we will always notify you of this and advise you of the date by which you are likely to receive a response to your complaint against NAPAC.

When notifying you of the outcome of our investigation and any follow up action taken, we will confirm to whom you should submit an appeal in the event that you wish to contest the outcome. An appeal must be submitted in writing within 15 working days from the date of the letter notifying you of the outcome and must satisfy one or more of the criteria in section 10 below

### 10. Appealing our response

Any appeal must be in writing and satisfy one or more of the following criteria:

- you have new, relevant information to present (which you have not previously submitted);
- we have failed to consider adequately or at all information you provided in connection with the complaint;
- the response to your complaint is perverse in that no reasonable person could have reached that conclusion based on the information provided to them.

We will acknowledge receipt of your appeal within five working days.

We will always attempt to provide a full response to your appeal within 15 working days. There may be occasions where this is not possible, and where this is the case, we will always advise you and notify you of a date by when you may receive a response.

Our outcome response, which will always be in writing, is final; there will be no further redress within NAPAC.

#### SUMMARY – COMPLAINTS – QUICK REFERENCE GUIDE:

<b>Complaint</b>	<ul style="list-style-type: none"> <li>• Complaint received in writing via email or letter – acknowledged within five working days by NAPAC</li> <li>• NAPAC aims to respond in full to complaint within 15 working days;</li> <li>• Complainant wishing to appeal (where relevant criteria satisfied) must do so in writing within 15 working days of receiving outcome response from NAPAC</li> </ul>
<b>Appeal</b>	<ul style="list-style-type: none"> <li>• Appeal acknowledged by NAPAC within five working days</li> <li>• NAPAC aims to provide full and final response to appeal within 15 working days of the appeal being received</li> </ul>

### 11. Complaints against the Chief Executive, Founder or a member of the Board of Trustees

Complaints against NAPAC’s Chief Executive, Founder or member of the Board of Trustees will be investigated as outlined below.

	<b><i>Complaint will be investigated</i></b>	<b><i>Appeal will be investigated</i></b>
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	<b>by:</b>	<b>by:</b>
<b>If your complaint relates to NAPAC's Chief Executive, Founder or a trustee</b>	The Chair and Deputy Chair of the NAPAC Board of Trustees	A nominated sub-group of the NAPAC Board of Trustees
<b>If your complaint relates to the Chair of the Board of Trustees</b>	The Deputy Chair and one other nominated trustee	A nominated sub-group of the NAPAC Board of Trustees together with one independent external figure (as chosen by the Board)

## 12. Taking your complaint outside of NAPAC

In the event that you remain dissatisfied with the response you have received, you are entitled to take your concerns to any relevant statutory body, including but not limited to:

The Charity Commission (England & Wales) <https://www.gov.uk/complain-about-charity>

The Scottish Charity Regulator <http://www.oscr.org.uk/charities/raise-a-concern-about-a-charity/complaint-form>

The Fundraising Regulator <http://www.fundraisingregulator.org.uk/make-a-complaint/complaints>

The Advertising Standards Authority <https://www.asa.org.uk>

The Information Commissioner's Office [www.ico.org.uk](http://www.ico.org.uk)

**13. Legal Framework & Guidance** This feedback policy takes into account relevant legal frameworks, including:

- The Fundraising Regulator's Code of Fundraising Practice, Fundraising Promise and Rulebooks for Face-to-Face Fundraising;
- Good Governance: a Code for the Voluntary and Community sector;
- Data Protection Act 2018;
- Charities (Protection and Social Investments) Act 2016.