



# **Representations and Complaints Policy and Procedure**

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## **Representations and Complaints Policy and Procedure**

### **1) Introduction and Policy Statement**

The Catholic Children's Society (CCS) is committed to providing the best possible services for children and families. We value all feedback, whether positive or negative, to support our learning and continuous improvement. We will address any concerns raised about our service promptly, and wherever possible resolve issues internally (Stage 1). Once all reasonable efforts have been made to resolve the issue, individuals can request to escalate the complaint if they feel their concerns have not been adequately dealt with. The procedure for doing so is set out below.

Throughout this process all representatives of CCS will adhere to our organisational values and conduct themselves with integrity; we will work constructively to resolve concerns and treat all stakeholders with compassion, kindness and respect.

### **2) Definitions, terms and roles**

**Complaint:** "A complaint is a written or oral expression of dissatisfaction or disquiet in relation to an individual and may arise as a result of an unwelcome or disputed decision, concern about the quality or appropriateness of service, delay in decision making about services or about their delivery or non-delivery" (Children Act 1989 Guidance & Regulations Volume, 3, Chapter 10, 10.5 (b), (c)).

**Complainant:** For the purposes of this policy, the complainant is defined as anyone who has accessed CCS services and notified us that they are unhappy and wish to lodge a complaint.

**CCS Representative:** Any trustee, member of staff or volunteer working/volunteering for CCS.

**Representations and Complaints Officer (RCO):** The designated member of staff at CCS responsible for overseeing our representations and complaints procedures.

**Independent Investigating Officer (IIO):** The independent person appointed to investigate the complaint should it progress to Stage 2.

**Adjudicating Officer (AO):** The senior member of staff at CCS appointed at Stage 2 to communicate the findings of the IIO's investigation to the complainant. The AO also makes the final decision regarding any recommendations made by the Review Panel if the complaint progresses to Stage 3.

**Coram Voice:** An independent charity that provides advocacy services, including supporting and advocating for children's interests.

### **3) Procedures**

Our Representations and Complaints Procedure has three stages:

#### **(i) Stage 1: Initial Resolution**

CCS staff will attempt to work proactively and positively with the complainant to resolve the problem and address their concerns. The expectation is that the majority of complaints should be resolved at Stage 1.

The steps we will follow include:

- Once any complaint is received this must be passed on to the CCS representative's line-manager the same day (for trustees this should be the Chairman). Together they will then agree a suitable response and who will action this. In some cases, it may be more appropriate for the CCS Representations and Complaints Officer (RCO) to take the lead in liaising with the complainant. This will be agreed with the line-manager.
- If necessary, clarification should be sought regarding the precise nature of the complaint and the outcome the complainant is hoping to achieve.
- Where the complainant is a child the RCO should be informed; they will then offer to appoint an advocate from Coram Voice. Alternatively, the child may wish for their parents/carers to advocate on their behalf.
- A response should be made to the complainant within five working days (wherever possible the response should be quicker to help facilitate a prompt resolution).
- The response should acknowledge the concerns raised and how we propose to address these, including the timescale involved. The response can be in writing or verbal.
- We will aim to resolve all complaints within 10 working days. Where key staff are absent, or the case is more complex, then an extension of 10 working days may be granted at the discretion of the RCO. The complainant should be made aware of this if an extension is necessary.
- The final proposed resolution should be put in writing to the complainant and a copy forwarded to the RCO who will update the complaints log.
- If the complainant remains dissatisfied with the outcome and proposed resolution at Stage 1, then they can request that their complaint is dealt with at Stage 2.

#### **(ii) Stage 2: Formal External Investigation**

Once every effort has been made to resolve the issue at Stage 1, the complainant may wish to escalate their complaint to Stage 2 if they remain dissatisfied with our response. In these instances, the steps we will follow include:

- The RCO will appoint an Independent Investigating Officer (IIO) from Coram Voice to conduct a formal investigation into the complaint, including providing an overview of the steps taken during Stage 1.

- The IIO will have 30 working days in which to complete the investigation and provide CCS with a report outlining their findings (in exceptional circumstances, where there are clear and justified reasons, this may be extended by a further 10 working days).
- CCS will appoint an Adjudicating Officer (normally the CEO or a member of the Senior Management Team, but not the RCO) to write to the complainant with the outcomes/findings of the IIO's report.
- Both the IO's report and the adjudication letter will be sent to the complainant within 10 working days of CCS receiving the report.

### **(iii) Stage 3: Review Panel**

If the complainant is unhappy with the outcome of the Stage 2 investigation, they can escalate their complaint to Stage 3. This request must be made within 10 working days of receipt of the adjudication letter, setting out why they feel their complaint has not been adequately dealt with.

The steps we will follow include:

- The RCO will convene a panel within 30 working days to review the IIO's report.
- The panel will consist of three people, two from Coram Voice (one of whom will Chair the panel) plus the AO.
- The IIO will also be required to attend the review panel hearing.
- The complainant may attend the panel and may wish to be supported by a person of their choosing.
- If a member of staff is the subject of the complaint, they may also attend the panel and bring a person of their choosing to support them.
- The complainant may make written or verbal submissions to the panel when invited to do so, as may the member of staff who is the subject of the complaint.
- The outcomes, findings and recommendations of the panel will be sent by the Chair to the AO within 10 working days.
- The AO will then consider the findings, outcomes and recommendations of the panel and respond in writing to the complainant within 10 working days.
- The decision of the AO is final.

## **4) Support for those involved**

The RCO should ensure that complainants are signposted to any support services that may be appropriate, including social services or services offered by other statutory and voluntary agencies.

The RCO should also help any CCS representatives involved in the complain to access suitable support. This could include support via their line-manager, trade union, professional body or via the CCS Employee Assistance Programme.

## 5) Other policies and procedures to consider

There may be cases where other CCS policies and procedures need to be followed either in parallel to, or instead of, our Representations and Complaints Policy and Procedures. These may include, but are not limited to:

- **Safeguarding:** Where any safeguarding concerns are raised CCS representatives should immediately follow the appropriate Safeguarding Policy and Procedures.
- **Grievance:** If a complaint is raised by a CCS employee about CCS then our Grievance Policy and Procedure should be followed.
- **Disciplinary:** Any allegations of gross professional misconduct must be investigated under our separate Disciplinary Policy and Procedure.
- **Whistleblowing:** Any concerns CCS representatives may have relating to misconduct or wrongdoing within the organisation must be raised by following our Whistleblowing Policy and Procedure.

## 6) Record keeping and reporting

The RCO must keep records of all complaints and their outcome. This information will be kept in line with our Privacy Notice and data retention policies. An annual report will be produced by the RCO providing an anonymised summary of any complaints received and actions taken. This will be presented to the CCS board of trustees to ensure effective oversight at governance level.

Where a complaint represents a significant organisational risk, this will be added to the CCS Risk Register and reported to the board of trustees at their next meeting.

*Reviewed November 2023*