

Fundraising complaints procedure

1. A complaint may be raised with any member of staff, verbally or in writing.
2. If the complainant wishes to make a verbal complaint, the following details should be recorded in all instances:
 - The name of the person making the complaint.
 - The complainant's contact details.
 - The date received.
 - The name and position of the person receiving the complaint.
 - A full description of the complaint, which the complainant should be asked to sign off for accuracy (where appropriate).
 - The outcome or response the complainant is seeking, including whether they want a response and, if so, in what form.
 - Any special communication requirements or other needs the complainant might have.
3. All complaints will be reported in the first instance to the relevant fundraising or marketing manager (in their absence this would be dealt with by the director).
4. For all formal complaints, the relevant manager (or commercial director) will nominate:
 - a. A named case handler who will be the complainant's point of contact throughout the complaint
 - b. An investigator

This may be the same person if needed.

5. All complainants must be sent a written acknowledgement from the relevant case handler within three working days of their complaint being received. This letter should include the following:
 - A summary of the complaint
 - The resolution sought
 - An outline of the process that will be followed
 - The name and contact details of the case handler
 - A copy of this policy and procedure
 - Any other pertinent information.
 - An offer of an initial face to face meeting with the case handler at a mutually convenient time with their case handler to discuss their concerns and what outcomes they wish to see. Face to face meetings should be arranged for not more than five working days after receipt of the complaint unless inconvenient to the complainant. Meetings can occur at St Helena or at a reasonable location of the complainant's choosing.
6. Progress investigating a complaint will be reported to the commercial director at regular intervals until the complaint is closed.
7. A full response should be sent to the complainant within 20 working days of receipt of the original complaint (see item 9). If it is not possible to complete the investigation within 20 working days, a letter should be sent to the complainant at or before 17 working days, explaining the reason(s) why and proposing a new deadline. If this deadline also cannot

be met, another letter should be sent by three days before the new deadline proposing a further extension. This process should be repeated until the investigation is complete.

8. The full response will include a summary of the investigation findings. The complainant will be invited to confirm, by writing or by phone, if they are satisfied with the outcome. The deadline for this will be 20 working days, after which, if no response is received, the complaint will be closed. The complainant will also be offered a face to face with their case handler, should they wish it.
9. If the complainant requests a face to face meeting, this will be an opportunity for the case handler to further explain the investigation findings (if necessary) and to explore with the complainant any requests, concerns or objections they might have. Further requests should be treated favourably wherever possible and referred to the commercial director if required (in the event of such a referral, the clock will be stopped). At the conclusion of the meeting, the complainant will be invited to confirm whether or not they are satisfied with the results of the investigation. If they are satisfied, the complaint will be closed. Note that the complainant must be reassured that they do not need to make a decision at this meeting and may take 10 working days to consider their response. If this deadline passes without response, the complaint will be closed.
10. If the complainant is not satisfied with the outcome, they may request that their complaint is reviewed by the finance and operations committee. The complainant should be given the opportunity to speak to the committee or individual trustees if they request. The committee should then make their finding. If the complainant remains unsatisfied, they should be given advice and assistance to refer their complaint to the Fundraising Regulator or Independent Betting Adjudication Service Ltd (where appropriate).
11. If the complaint is referred to Fundraising Regulator or Independent Betting Adjudication Service Ltd, St Helena will cooperate fully with any ensuing investigation and will comply with any requirements that may result.
12. If the complaint was justified, the relevant manager should ensure that an anonymised summary is sent to the appropriate team to ensure lessons are learned and practice is improved/changed. The manager will determine appropriate actions and ensure compliance. Staff members should be supported to reflect on their practice as required.
13. If a complaint merits invoking the disciplinary process against any member of staff, this will be determined by the commercial director in consultation with the manager and in compliance with the Disciplinary Policy. The complainant shall be informed of the disciplinary process and, at the discretion of the manager, its outcome.